

# **CDP TECHNICAL NOTE ON BUSINESS RESPONSIBILITY AND SUSTAINABILITY REPORT (BRSR)**

Alignment of CDP questionnaire with the BRSR  
Framework





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# FOREWORD



**Prarthana Borah**  
Director, CDP India



Policy and Regulation in India are progressively embracing a greater role in making businesses responsible for sustainability and social responsibility to balance resource

consumption and meet the nation's Paris-aligned climate commitments. The sustainability reporting mandated by the Security Exchange Board of India's Business Responsibility and Sustainability Reporting (BRSR) for the top 1,000 listed companies is a clear demonstration that ESG reporting is on the market regulator's priority agenda.

At CDP, we run an environmental disclosure system for companies, working on behalf of 590 investors with \$110 trillion in assets. Our CDP India Disclosure Report, 2021 shows that Indian companies have identified climate change-related risks of around US\$100 billion (₹7,13,800 crores) within the next five years. US\$65 billion (₹4,63,800 crores) is the reported financial impact of climate-induced risks in direct operations by Indian companies. In terms of risk types, current regulation was deemed to be most relevant and included in 97% of the organizations' climate-related risk assessments.

The business risks sought by BRSR are broader in scope than at CDP where our focus is on the "E" -climate, forest, and water-related risks while

BRSR seeks information on "S" and "G". The proposed BRSR format emphasizes quantifiable metrics, which allows for easy measurement and comparability across companies, sectors, and periods. Further, the disclosures on climate- and social-related issues are significantly enhanced and made more granular.

We at CDP see immense potential in aligning with SEBI's notification of BRSR. This publication is a mapping exercise that involved assessing the alignment of the BRSR with the 3 CDP thematic questionnaires namely- Climate Change, Water Security, and Forests. Alignment of our questionnaires with the BRSR will reduce the reporting burden for the Indian companies. Our alignment with international frameworks including the TCFD and Sustainable Development Goals (SDGs) brings in the comprehensive environmental reporting for use by India-focussed investors, companies, and regulators. Companies responding to us can answer the Essential Indicator questions, mandatory of the BRSR, and attempt the optional Leadership questions thus leading by example and setting the blueprint for environmental action in line with a climate-resilient future. As BRSR comes into the effect we at CDP are excited about this as an opportunity to drive business to climate action in India. CDP India will be happy to facilitate our disclosing companies to report under BRSR.

*Sincerely*

**Prarthana Borah**, Director India, CDP



# RATIONALE

This document showcases the alignment between CDP's questionnaires and the environment-based questions presented in the Business Responsibility and Sustainability Report (BRSR) framework. By understanding the commonalities that exist between the two, Indian companies that report to CDP will be better positioned to disclose their sustainability information to the Securities and Exchange Board of India's (SEBI's) BRSR which will become mandatory from the 2022-23 financial year. Corporates should observe that CDP responders would particularly benefit from answering certain principles of 'section C' in the BRSR namely - Principle 2 and Principle 6, which are predominantly focused on the environment. The scope of CDP questionnaires ensures that each aspect of the most pressing global environmental issues like climate change, forests and water security are comprehensively covered, and provides businesses with a pathway to progress to higher levels of environmental stewardship. In addition, other benefits of disclosing to CDP include: boosting investor confidence, identifying environmental risks and opportunities and gaining a competitive edge over non-responders.







# CONTEXT

## Growing importance of Environment Social Governance (ESG) disclosures

Over the last decade, there has been a growing recognition that all businesses face risks from the impacts of climate change. These may be physical risks, or may also be liability risks, which may arise from who will be held responsible for any disaster from the environment. ESG (used interchangeably with sustainability in this document) disclosures have a key role to play for us to transition to a low-carbon economy.

They help investors make informed decisions by identifying companies prone to risks and those underperforming on different environmental metrics, vis-à-vis those adopting the best practices in corporate sustainability. They help companies minimize value chain risks by tracking the performance of partners. They help regulators and policymakers make informed decisions on the trajectory of these interventions. In addition, they enable corporates to stay ahead of ever-tightening regulation and enhance brand reputation.

It is therefore not surprising to see a growing focus of companies on ESG performance and ratings in tandem with investors' growing reliance on them<sup>1</sup>. In India, ESG funds have outperformed conventional funds even though they account for only 0.6% of total equity assets under management<sup>2</sup>. That the MSCI

<sup>1</sup> <https://insights.diligent.com/esg/disclosures/#:~:text=The%20term%20refers%20to%20the,to%20sustainability%20or%20ESG%20failings.>

<sup>2</sup> <https://economictimes.indiatimes.com/markets/stocks/news/pandemic-resilience-gives-esg-investing-a-boost-in-india/articleshow/77589163.cms>

ESG Index has consistently outperformed the MSCI Index for several years is evidence that companies that score high on ESG metrics have outperformed others. The prominence of issues like energy efficiency measures and carbon emissions mitigation as factors considered by asset managers for making investment decisions has grown substantially.

In 2020, CDP disclosers identified climate opportunities worth INR 2,787 billion; with resource efficiency, use of low carbon energy and development of low-emissions goods and services being the most crucial verticals companies are acting upon.

Over the last two years, regulators and policymakers globally have signalled a strong commitment to implementing or strengthening mandatory disclosure requirements with different legal approaches depending on the legal construct of the economies.

The developed markets, particularly Europe, are well ahead in terms of acceptance and implementation of mandatory ESG disclosure requirements that are based on the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD) and other regulatory pillars such as the EU taxonomy and Sustainable Finance Discloser Regulation (SFDR).

The emerging markets are determined to ramp up their efforts in improving ESG standards. The focus on ESG issues is indeed critical for the emerging markets as they need to keep the current investors (who are increasingly committing to sustainability goals) and to access new foreign capital, particularly from the growing pool of sustainable funds and assets (\$35.3 trillion of the total AUM of \$98.4 trillion in five major markets were sustainable investments in 2020, translating to about 40% of total assets being sustainable).

## India's climate ambition and the role of the private sector

According to the United Nations, today's annual global emissions are approximately 52 billion tonnes (excluding land use changes) of CO<sub>2</sub> equivalents, with India contributing close to 3.5 billion tonnes or around 7%. However even at an average GDP growth rate of just 5% from 2020- 2050, India will more than quadruple its GDP in the next 30 years. Thus, even if India reduces its carbon intensity by 50% from 2005 levels, we will be emitting about 14 billion tonnes annually.

There is also no denying the fact that without requisite business action, India and the world will not be able to achieve the ambition of keeping temperature rise below 1.5°C, since the more we delay action, the steeper and more difficult the emission cuts become.

It is imperative that corporates collectively accelerate the adoption of renewables and energy-efficiency measures, while shifting away from fossil-fuels as soon as possible; since it's evident that even limited economic activities will not bring about the desired levels of emission reduction.

## Global sustainability reporting frameworks – an overview

The sustainability reporting landscape has become increasingly crowded in recent years, with the emergence of a multitude of reporting standards and frameworks to cater to the needs of multiple users – stakeholder groups – who have different thematic interests, levels of commitment and sustainability goals.

- ▼ **GRI:** This provides sustainability standards pertaining to economic, environmental and social topics affecting a company's stakeholders
- ▼ **Value Reporting Foundation (VRF):** VRF combines three frameworks: a) Integrated Thinking Principles, which guide board and management planning and decision making; b) Integrated Reporting Framework, which provides principles-based, multi-capital guidance for comprehensive corporate reporting; and c) the Sustainability Accounting Standards Board (SASB) Standards, which are a powerful tool to notify disclosure to investors and guide investor decision-making when embedded in investment tools and processes. The Foundation provides the latest market infrastructure to assess, develop, manage and communicate strategy to create long-term value and drive improved performance.
- ▼ **CDP:** The global voluntary disclosure system, which leverages the authority of a network of investors, purchasers and governments and subnational governments, to measure and manage impacts on climate, forests and water through granular/sector-specific questionnaires.
- ▼ **The Task Force on Climate-Related Financial Disclosures (TCFD):** Created by the Financial Stability Board (FSB), the TCFD framework is organized around four core pillars: governance, strategy, risk management, and metrics and targets (science-based).

There has been a growing momentum to produce a harmonized global framework for sustainability-related financial reporting standards in recent months. The most promising development is the International Sustainability Standards Board (ISSB) under

the International Financial Reporting Standards Foundation (IFRSF), which was launched at COP26 in November 2021. Building on existing frameworks, the ISSB will be tasked with developing a global baseline of investor-focussed sustainability standards to improve the global consistency, comparability and reliability of sustainability reporting based on existing standards and frameworks. Two prototype standards have been launched already – the draft standards will be launched for public consultation mid-2022.

## Landscape of sustainability reporting in India

Given India's sheer size, demographics and pandemic recovery, sustainable development is central to achieving its growth objectives. Policymakers and regulators in India are progressively embracing greater roles in making business enterprises responsible and accountable for sustainability and social responsibility to balance the upsurge in resource consumption and to meet the nation's Paris-aligned climate commitments. Furthermore, the Reserve Bank of India's (RBI's) membership of the Central Banks and Supervisors Network for Greening the Financial System (NGFS) is an important step to support the low-carbon transition, with access to international best practices for environment and climate risk assessment and management in the financial sector<sup>3</sup>. The sustainability reporting mandated by SEBI in the form of BRSR for the top 1,000 listed companies by market capitalization is a clear demonstration that ESG reporting is on the market regulator's priority agenda.

The current landscape of environmental reporting and disclosure in India is growing but

still at the early stages. There were 67 investor-driven Indian companies – worth over US\$697 billion market cap – that reported to CDP in 2020. Around 45 companies have adopted the Integrated Reporting framework and more than 80 companies are using the GRI format for their sustainability reporting. The National Stock Exchange of India conducted a study on the data compiled of the 100 listed companies from the Business Responsibility Report (BRR) in FY 2016-17. 50% developed Sustainability Reporting; 22 published Integrated Reporting; 90% identified environmental risks<sup>4</sup>; 33% identified climate change as a risk to business; 42% took carbon reduction targets; 11% have committed to SBTs and 6% adopted the TCFD framework. 42 Indian companies have adopted the TCFD framework, according to their own sources, 19 of which also report to CDP. It can be inferred that the penetration of climate risks and target setting to mitigate the same is limited amongst Indian companies but has gained momentum in the last five years.

## Key barriers to ESG reporting

While it is an encouraging sign that India Inc. is reporting to these globally reputed environmental frameworks, as it demonstrates their serious commitment towards climate action, the existence of a myriad of such guidelines leads to confusion and uncertainty among corporates and increases their reporting 'burden'. While business leaders worldwide are increasingly facing pressure from stakeholders to disclose on ESG matters and rethink their strategies from an ESG lens, they are often left wondering which ESG framework to adopt since it is not feasible to use all. While businesses desire or are forced to communicate their ESG performance, it is not without challenges, both for the reporting entities as well as for the key

users of ESG data. The primary barriers faced by reporting entities are highlighted below.

- ▼ **Resource constraints:** The ESG/sustainability department is often focused on regulatory and compliance filings and has limited resources to report on multiple frameworks. Stricter timelines are also one of the biggest challenges in reporting. Furthermore, not all ESG issues are equally significant or relevant, in other words material, for an organization.
- ▼ **Burden of multiple reporting:** Lack of consistency across multiple reporting frameworks about what ESG information is required by regulators, stock exchanges and other stakeholders, is a challenge.
- ▼ **Complex reporting frameworks:** Given the complexities of ESG issues, the reporting frameworks, guidelines and mechanisms tend to be tedious and cumbersome and can create confusion.
- ▼ **Apprehensions about data misuse:** Companies are also hesitant to disclose data as they are apprehensive about data being misinterpreted thereby subjecting companies to reputational or regulatory risks.
- ▼ **Knowledge and skill gaps:** Knowledge gaps between regulators and industry about the data and disclosure requirement possesses significant challenges in reporting the right data. Further skills gaps in what is required to create a comprehensive sustainability report and what is already available at the company and the willingness to commit to the task, create a barrier in producing reliable ESG data.
- ▼ **Lack of understanding of wider benefits of ESG reporting:** Many companies are unaware of the business benefits of greater disclosures and hence look at reporting as an unnecessary task.

3 (RBI, 2021). [https://m.rbi.org.in/scripts/BS\\_ViewBulletin.aspx?Id=20563](https://m.rbi.org.in/scripts/BS_ViewBulletin.aspx?Id=20563)

4 [https://www1.nseindia.com/content/equities/bbr\\_2017\\_18.pdf](https://www1.nseindia.com/content/equities/bbr_2017_18.pdf)



# HOW IS THE BRSR / CDP ALIGNMENT USEFUL?

Over the last decade, there has been a growing recognition that all businesses face risks from the environment. These may be physical risks, or liability risks, which may arise from being held responsible for an environmental disaster. The focus on adopting sustainability principles in businesses' actions has also increased since the adoption of the 2030 Agenda for Sustainable Development, and the Nationally Determined Contributions (NDCs) commitments in the Paris Agreement.

In India, ESG investments have outperformed conventional funds. ESG funds account for only 0.6% of total equity assets under management<sup>5</sup>. There is evidence to suggest that companies that score high on ESG metrics have outperformed those that don't. The prominence of issues like energy efficiency measures and carbon emissions mitigation as factors considered by asset managers for making investment decisions has grown substantially.

Among mutual fund managers in India, the risk profile of a company (26.9%) and legal disputes (19.4%) are the two most prominent factors considered while making investment decisions. Private equity managers in India, on the other hand, consider capital gains generated (26.75%) as the most important factor in investment decisions, followed by risk profile of the company (20%).

<sup>5</sup> <https://economictimes.indiatimes.com/markets/stocks/news/pandemic-resilience-gives-esg-investing-a-boost-in-india/articleshow/77589163.cms>

## The business responsibility and sustainability formats

Given the increased global and national focus of investors and other stakeholders seeking businesses to be responsible and sustainable towards the environment and society, SEBI introduced BRSR – Business Responsibility and Sustainability Reporting. The BRSR seeks disclosures from listed entities on their performance against the nine principles of the 'National Guidelines for Responsible Business Conduct' (NGRBC). The BRSR is mandatory for top 1000 listed companies from financial year 2022-23. The BRSR is intended towards having quantitative and standardized disclosures on ESG parameters to enable comparability across companies, sectors and time.

SEBI has recognised inter-operability with international frameworks. Therefore, the listed entities already preparing and disclosing sustainability reports based on internationally accepted reporting frameworks (such as GRI, SASB, CDP, TCFD or Integrated Reporting) may cross-reference the disclosures made under such framework to the disclosures sought under the BRSR.

At the outset, the Committee recommends that the format be called 'Business Responsibility and Sustainability Report (BRSR)' instead of Business Responsibility Report. The BRSR has three sections and the purpose and structure of each of these three sections is given below.

### SECTION A:

**General disclosures:** The objective of this section is to obtain basic information about the company – size, location, products, number of employees, corporate social responsibility (CSR) activities, etc. The proposed formats include additional disclosures on material issues that pose

environmental and social risks, the associated financial impact and the actions taken to mitigate them.

### SECTION B:

**Management and process:** In this section, the company is required to disclose information on policies and processes relating to the NGRBC Principles concerning leadership, governance, and stakeholder engagement. Wherever relevant, companies have been asked to provide links to their websites where these policies are available. The purpose of this section is to understand whether the company has the building blocks in place that will enable and ensure responsible business conduct. It reflects the belief that policies and processes are foundational in nature to ensuing action.

### SECTION C:

**Principle-wise performance:** Responses to Section C indicate how a company is performing in respect of each Principle and Core Element of the NGRBCs. This section requires companies to demonstrate their intent and commitment to responsible business conduct through actions and outcomes. The questions in this section have been divided into two categories:

- **Essential:** Those that are mandatory for all companies. These are referred to as E1, E2 in the latter sections of the document.
- **Leadership:** Those that are voluntary and which provide an opportunity for companies to present their impacts and outcomes. It is expected that in the next cycle of review, questions from the Leadership category would be moved to the Essential category and so companies should see this as a pathway to transitioning to a more comprehensive disclosure regime. These are referred to as L1 and L2 in the latter sections of the document.

The National Guidelines for Responsible Business Conduct (NGRBC) is comprised of nine principles, namely:

- ▶ **Principle 1:** Businesses should conduct and govern themselves with integrity, and in a manner that is Ethical, Transparent and Accountable.
- ▶ **Principle 2:** Businesses should provide goods and services in a manner that is sustainable and safe.
- ▶ **Principle 3:** Businesses should respect and promote the well-being of all employees, including those in their value chains.
- ▶ **Principle 4:** Businesses should respect the interests of and be responsive to all its stakeholders.
- ▶ **Principle 5:** Businesses should respect and promote human rights.
- ▶ **Principle 6:** Businesses should respect and make efforts to protect and restore the environment.
- ▶ **Principle 7:** Businesses, when engaging in influencing public and regulatory policy, should do so in a manner that is responsible and transparent.
- ▶ **Principle 8:** Businesses should promote inclusive growth and equitable development.
- ▶ **Principle 9:** Businesses should engage with and provide value to their consumers in a responsible manner.

## About CDP's disclosure platform and scale

CDP runs the world's environmental disclosure system for companies, working with over 590 investors with \$110 trillion in assets. CDP pioneered using capital markets and corporate procurement to motivate companies to disclose their environmental impacts, and to reduce greenhouse gas emissions, safeguard water resources and protect forests. Fully TCFD-aligned, CDP holds the largest environmental database in the world, and CDP scores are widely used to drive investment and procurement decisions towards a zero-carbon, sustainable and resilient economy.

Over 14,000 organizations around the world disclosed data through CDP in 2021, including more than 13,000 companies, worth over 64% of global market capitalization, and over 1,000 cities, states and regions, representing a combined population of over 2.6 billion. Investors worth US\$17 trillion are working with us to urge companies responsible for causing 25% of global emissions to take science-based climate action.

Latest data reported to CDP India shows Indian companies reporting to CDP have identified climate change-related risks of around US\$100 billion (₹7,13,800 crores) within the next five years. US\$65 billion (₹4,63,800 crores) is the reported financial impact of climate-induced risks in direct operations by Indian companies. In terms of risk types, current regulation was deemed to be most relevant and always included in 97% of the organizations' climate-related risk assessments. This was followed by emerging regulation and technology. Companies have also identified climate-related risks across their value chain, with direct operations being the most severely affected and exposed to acute physical risks. Companies find their 'downstream' value chain most affected by market risks, followed by acute physical risks.

## How is the BRSR and CDP alignment useful?

India will have to explore pathways that are competitive, environmentally sustainable and highly resilient in dealing with big shocks such as global financial crisis and the COVID-19 pandemic.

To get to this green frontier, India will have to drive a massive investment boom, create millions of high-quality jobs and drive sustainable prosperity, all this while ensuring a higher climate ambition, preferably net-zero; and dedicated action to achieve the same.

In this context, CDP sees huge potential in aligning with SEBI's notification of BRSR; and synergies between the two can support the mission in the following ways.

- ▶ **Reduce the reporting burden:** 67 BSE 200-listed Indian companies reported to CDP in 2020, increasing to 89 in 2021 and only an upward trajectory is expected in the years to come. Alignment of the CDP questionnaires on climate change, forests and water with the BRSR will reduce the reporting burden for the Indian companies.

- ▶ **Alignment with global frameworks:** CDP is aligned with international frameworks including the TCFD and Sustainable Development Goals (SDGs); and thus, brings in the comprehensive environmental reporting for use by India-focussed investors, companies, and regulators.

- ▶ **Comprehensive:** The depth of the CDP questionnaire ensures that companies are not only able to answer the Essential Indicator questions (mandatory) in Section C of the BRSR, but also equips them to attempt the Leadership questions (optional) in principles 2 and 6, which gives businesses the opportunity to lead by example and set the blueprint for environmental action in line with a climate-resilient future.

- ▶ **From disclosure to action:** CDP functions on investor-driven data management systems and thus brings in data analysis frameworks useful for investor decision-making.

- ▶ **Consistency:** Reporting consistent environmental information on both platforms would not only lead to greater transparency but also increase the credibility of the organisation as well as improve its visibility in the market.







## CDP'S ALIGNMENT WITH INTERNATIONAL FRAMEWORKS

CDP is fully aligned with relevant international frameworks.

### TCFD:

CDP's disclosure platform provides the mechanism for reporting in line with the TCFD recommendations. By translating the TCFD recommendations and pillars into actual disclosure questions and a standardized annual format, CDP provides investors and disclosers with a unique platform where the TCFD Framework can be brought into real-world practice. Companies that disclose through CDP are doing so in line with the TCFD recommendations, in a comparable and consistent way that is relevant and accessible to the global economy. As a result, CDP has the largest TCFD-aligned environmental database in the world, and CDP scores are widely used to

drive investment and procurement decisions towards a zero-carbon, sustainable and resilient economy.

### GRI:

GRI and CDP continue to work together to align best practice and avoid duplication of disclosure efforts to ease the reporting burden for the thousands of companies that report to CDP's questionnaires and supply chain programs and the GRI Sustainability Reporting Standards (GRI Standards). The last linkage document was issued in 2017. In 2020, the two organizations received a grant to explore further structural and operational alignment. The outcome was that both organizations agreed to keep working in cooperation where relevant, especially regarding the work on topical standards.

### SDGs:

CDP conducted a mapping exercise of the SDG indicators against its disclosure data to assess business contribution and progress towards the SDGs, understand gaps and inform policy action.

As CDP's data collection currently focuses primarily on environmental sustainability, this was restricted to the 66 indicators corresponding to the six environmental goals.

The mapping methodology consisted of linking each individual data point from the four CDP questionnaires (climate change; forests; water security; and Cities, States and Regions (CStaR)) to the most appropriate SDG indicator. Direct links to the CDP questionnaire were found with six SDGs, i.e:

Goal 6 – Clean Water and Sanitation; Goal 7: Affordable and Clean energy; Goal 11: Sustainable cities and communities; Goal 12: Sustainable Consumption and Production; Goal 13: Climate Action; and Goal 15: Life on Land.

### IFRSF:

The complexity surrounding sustainability disclosure has made it difficult to develop the comprehensive solution for corporate reporting that is urgently needed.

In response to this, five framework- and standard-setting institutions of international significance, CDP, the Climate Disclosure Standards Board (CDSB), the Global Reporting Initiative (GRI), the International Integrated Reporting Council (IIRC) and the Sustainability Accounting Standards Board (SASB); have co-published a shared vision of the elements necessary for more comprehensive corporate reporting and a joint statement of intent to drive towards this goal. The institutions seek to achieve this goal by working together and by each committing to engage with key actors, including IOSCO and the IFRS, the European Commission, and the World Economic Forum's International Business Council.

The formation of a new International Sustainability Standards Board (ISSB) to develop – in the public interest – a comprehensive global baseline of high-quality sustainability disclosure standards to meet investors' information needs.

We look forward to informing and supporting the ISSB process with our global market-led environmental disclosure system, expertise and data.

CDP is committed to driving the rollout of both global and jurisdictional-level standards, including those being developed by the ISSB, EFRAG in the EU and other markets.





# UNDERSTANDING THE LINKAGES BETWEEN CDP AND BRSR

There are three thematic questionnaires for companies that CDP requests data on. These themes include: climate change (Referred as CC in later texts), forests and water.

The BRSR questions have been categorised under the following sub-heads based on their linkages with the CDP questions.

CATEGORY 1: Full overlap	This category will include questions from BRSR that are fully covered by one or many questions in the CDP questionnaires on climate, forests and water.
CATEGORY 2: Partial overlap (Issue based)	In this category, questions in the BRSR whereby some components asked are covered by CDP but it may require additional information are labelled; and vice versa, where for a particular theme, more details of questions are asked by CDP.
CATEGORY 3: Partial overlap (climate-based)	Category 3 covers those BRSR questions that ask about general aspects; and CDP has a climate perspective of the same question.
CATEGORY 4: Non-related questions	Those questions that show no overlap between the BRSR and CDP questionnaire will be labelled here.

The summary of the linkages can be seen in the below table. Overall, 65 out of 140 BRSR Questions have some kind of overlap with the CDP questionnaire. The division is as follows:

- Full overlaps: Nine questions, all from Principle 6 on Restoring Environment, can be fully answered using the CDP questionnaire. Of these, five get answered from the CDP CC questionnaire, one from forests and three from the water questionnaire.
- Partial Overlaps (Issue based): 32 BRSR questions can be partially answered using the CDP questionnaire, where there may be additional information required by the company but substantial issues are covered by the identified CDP questions. Out of these 32 questions, 26 have answers contributed

from the CC thematic questionnaire, 24 from forests and 21 from the water questionnaire.

- Partial Overlaps (climate based): There are 24 BRSR questions where the CDP questionnaire can provide answers from the environmental lens (climate change/forests/ water), but these questions may require other aspects beyond environment which is outside the scope of CDP questionnaires.  
  
Out of these 24 questions, the CDP CC questionnaire will contribute 21 questions, the forests 21 questions and water 19 such questions.
- Non-related questions: There are 75 questions in BRSR that are not related to any CDP questionnaire.



Below is a summary of the number of BRSR questions that are covered for each category using the CDP questionnaire:

BRSR Section	CDP Climate Q			CDP Climate Q			CDP Climate Q			Total Linkages
CATEGORIES	C1	C2	C3	C1	C2	C3	C1	C2	C3	
Section A: General Detail (24 Questions)		15	2		15	2		15	2	17 out of 24 Qs
Section B: Governance & Mng (12 Questions)			12			12			12	12 out of 12 Qs
Section C – Principles										
P1: Ethics, Transparency & Accountability (E – 7, L – 2)			2			2			2	2 out of 9 Qs
P2: Sustainable Provision of Goods (E – 4, L – 5)		4	1		3				1	7 out of 9 Qs
P3: Well-Being of Employees (E – 15, L – 6)			1			1			1	1 out of 21 Qs
P4: Respect Interest of all stakeholders (E – 2, L – 3)		1			1	1		1		2 out of 5 Qs
P5: Respect Human Rights (E – 10, L – 5)										0 out of 15 Qs
P6: Protect and Restore Env. (E – 12, L – 9)	5	6		1	5		3	5		19 out of 21 Qs
P7: Influencing Public Policy (E – 2, L – 1)			2			1			1	2 out of 3 Qs
P8: Inclusive Growth (E – 4, L – 6)						2				2 out of 10 Qs
P9: Engage with consumers (E – 6, L – 5)			1							1 out of 11 Qs
TOTAL	5	26	21	1	24	21	3	21	19	65 OUT OF 140 Qs

Following is the summary of connections between BRSR and CDP questionnaires.:

related risks and opportunities and the types of risks considered.

## Section A: General details

CDP questionnaires, as well as BRSR, ask briefly about operations, business divisions, activities and any other relevant information that tells investors more about the enterprise; by reporting and financial year respectively; geographical location and reporting boundary. CDP also includes information on the currency used by the company to disclose financial details; which is not relevant and therefore not asked in the case of BRSR.

The business risks sought by BRSR are generally broader in scope than CDP as the latter mainly focuses on environmental issues like climate, forest and water-related risks while the former in addition also seeks information on social and other sustainability issues. The CDP questionnaire (C2.2, C2.2a, C2.2g, W3.3, W3.3a, W3.3b) asks in detail about processes for identifying, assessing and responding to climate-

The questionnaires also ask companies that do not undertake risk assessments for reasons as to why they do not do so. The BRSR questionnaire (A24) asks for commodity risk or opportunity to business pertaining to environmental and social matters. It further asks for a rationale of identification and approach to mitigation. The environmental risks and opportunities asked in the BRSR question can be fully answered by the CDP questions. Both CDP questionnaire (C2.3, C2.3a, C2.4, C2.4a, F-MM10.2, F-CO10.2, F-MMF-MM11.3, F-CO11.3.10.2a, F-CO10.2a, F-MM10.2b, F-CO10.2b, F-MM10.2c, F-CO10.2c, W3.3c, W3.3d, W3.3e F3.1, F3.1a, F3.1b, F3.1c, W4.1, W4.1a, W4.1b, W4.1c, F3.2, F3.2a, F3.2b, W4.2, W4.2a) and BRSR questions (A24) highlight the financial implication of the risks and opportunities. The CDP questionnaire requests details of risks identified with the potential to have a substantive financial or strategic impact on your business. CDP questionnaires additionally ask the companies to define short-, medium- and long-term horizons.

BRSR Section	CDP overlapping questions
Section A: General details	
A 1–13: Details: Contacts, Shared capital, Reporting Boundary	(C0.2/F.02/W.02) State the start- and end-date of the year for which you are reporting data.  (C0.5/F.05/F.05a/W.05/ W.06/F-MM0.6/F-CO0.6/ F-MM0.7/F-CO0.7) Select the option that describes the reporting boundary for which climate-related impacts on your business are being reported. Note that this option should align with your chosen approach for consolidating your GHG inventory. Any operations within the reporting boundary that are excluded in the disclosure.
A 14–15 Products/services: Business activities and products/ services with description and turnover	(C0.1/F01/W0.1) Give a general description and introduction to your organization.  (W-CH0.1a/ W-EU0.1a/ W-EU0.1b/ W-FB0.1a/ W-MM0.1a/ W-OG0.1a) Which activities in the chemical sector/Electric utilities/ electricity generation/ food-beverage-tobacco/metals and mining/ oil and gas sector does your organization engage in?



A 23–24 Transparency and Disclosure compliance; Overview of entity’s material responsible business conduct issues: pertaining to env and social matters that presents risk or opportunity to your business, rationale for identifying the same. Material issue/risk/rationale for risk-opportunity/approach to mitigate	(C2.1/ C2.1a/C2.1b/ W3.3/ W3.3a/W3.3b) Process for identifying, assessing, and responding to climate-related risks and opportunities? Define short-, medium- and long-term time horizons. Define substantive financial or strategic impact on your business.
	(C2.2/ C2.2a/C2.2g/ F-MM10.2/F-CO10.2/F-MMF-MM11.3/F-CO11.3/10.2a/F-CO10.2a/F-MM10.2b/F-CO10.2b/F-MM10.2c/F-CO10.2c/ W3.3c/ W3.3d/W3.3e) Process(es) for identifying, assessing and responding to climate/water/biodiversity-related risks and opportunities. - Value chain stages covered, risk management process, frequency of assessment. Risk types covered. If not, why?
	(C2.3/ C2.3a/ C2.3b/ F3.1/ F3.1a/ F3.1b/ F3.1c/ W4.1/ W4.1a/ W4.1b/ W4.1c) Any inherent climate-related risks with the potential to have a substantive financial or strategic impact on your business. Provide details of risks identified. If not considered, why?
	(C2.4/ C2.4a/ C2.4b/F3.2/F3.2a/F3.2b/W4.2/W4.2a) Have you identified any climate-related opportunities with the potential to have a substantive financial or strategic impact on your business? Provide details. If not, why?
	(C3.1/ C3.3/ C3.4/ C3.4a/ C3.5) Have climate-related risks and opportunities influenced organization’s strategy & financial planning? Describe. If not influenced, why?



Section B: Governance and Management

CDP and BRSR substantively overlap in the case of corporate governance on ESG-related matters. Both questionnaires ask the role of the Director/ Board of Directors in overseeing

climate risks (in the case of CDP)/ ESG challenges (in the case of BRSR). Seniority of the person handling ESG-related issues is also considered in both questionnaires. Performance incentives to management and leadership to achieve their climate-based targets need to be provided in the CDP questionnaire. The CDP questionnaire additionally asks for details on board-level oversight such as frequency of meeting; as well an explanation if no board level oversight is established in the organisation.

CDP further investigates whether companies have integrated climate-related risks and opportunities into their business strategy and whether they have a low-carbon transition plan in place what is on the agenda at Annual General Meetings (C3.1, C3.1a). CDP asks the company if they use scenario analysis for climate modelling to account for a range of possible future outcomes when considering sustainability risks and opportunities (C3.2). The BRSR does not explicitly ask this, but more broadly wants to know if the enterprise has policies in place for making efforts to protect and restore the environment (B1a) as well as asking the enterprise to state commitments, targets and goals and the timeline for completion (B5).

Section B: Governance and management

B 1–6. Policy and Management Process: - whether covers all 9 principles of NGRBCs - approved by Board - Translated policy into procedures - extended to your value chain partners - Any international codes/standards adopted	(C3.1b) Does your organization intend to publish a low-carbon transition plan in the next two years?
	(C3.2/ C3.2a/C3.2b) Does your organization use climate-related scenario analysis to inform its strategy? Provide details. If not, why? (C12.1d) Give details of your climate-related engagement strategy with other partners in the value chain.  (F4.5/ F4.5a/ F4.5b) Does your organization have a policy that includes forests-related issues? Scope and content of policy Any commodity specific sustainability policy(ies)?  (F-MM12.4/F-CO12.4/ F-MM12.4a/F-CO12.4a) Does your organization have a policy that includes biodiversity-related issues?  (W6.1/W6.1a/W1.4c) Do you have a water policy? Select the options that best describe the scope and content of your Organization’s rationale and strategy for prioritizing engagements with customers.
C 7–12. Governance and leadership oversight: - Statement by director responsible for BRSR highlighting challenges, targets, achievements - Highest authority responsible for implementation and oversight of BRSR.	(C1.1/ C1.1a/ C1.1b/ C1.1c/ F4.1/ F4.1a/ F4.1b/F4.1c/W6.2/ W6.2a/ W6.2b/W6.2c) Board-level oversight of climate-related/Forest-related issues. Identify positions. Provide details. If not, why?  (C1.2/ C1.2a/F4.2/ F-MM12.1/F-CO12.1/ F-MM12.1a/F-CO12.1a/ F-MM12.1b/F-CO12.1b/ F-MM12.2/F-CO12.2/W6.3) Highest management-level position(s) with responsibility for climate-related issues. Where in the organizational structure and what are their associated responsibilities?  (C3.1a) Is your organization’s low-carbon transition plan a scheduled resolution item at Annual General Meetings (AGMs)?

Section C: Principles

PRINCIPLE 1: ETHICS, TRANSPARENCY AND ACCOUNTABILITY

Question E2 of the BRSR question asks to elaborate fines/penalties/ punishments/ awards/fees in proceedings with regulators and enforcement agencies/judicial institutions, with details. There are questions in CDP’s forests and water security questionnaires asking similar details: if the organization has been subjected to any fines, enforcement, orders or other penalties for violation of water- or biodiversity-related regulations. This lies in Category 3 (blue) as it covers the fines/penalties etc related to the themes of water and biodiversity.

Further, L1 of the BRSR question asks for awareness programmes conducted for value chain partners on any of the principles. Both CDP and BRSR lay emphasis on value chain and stakeholder engagement.

While the CDP questionnaire (C12.1/C12.1e/ W1.4/W1.4b) asks if the company engages with its suppliers, customers and other partners in the value chain on climate change, BRSR (C.1.L.1) requests for information on awareness programmes conducted for value chain partners on any of the nine NGRBC principles.

In this case, awareness on Principle 6 can be said as covered by the answers listed the above-mentioned CDP questions.



P1: Ethics, transparency and accountability	
E2: Fines/Penalties/ Punishments/ award/fees in proceedings with regulators and enforcement agencies/judicial institutions - details	(F-MM9.6/F-CO9.6/ F-MM9.6a/F-CO9.6a /W2.2 /W2.2a /W2/2b) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for violation of biodiversity-related regulation? Provide details.
L1: Awareness programmes conducted for value chain partners on any of the Principles	(C12.1/C12.1e) Do you engage with your value chain on climate-related issues? If not, why? (W1.4/W1.4b) Do you engage with your value chain on water-related issues? Provide details.

PRINCIPLE 2: PROVIDE GOODS AND SERVICES IN A MANNER THAT IS SUSTAINABLE AND SAFE

BRSR question E1 in Principle 2 requests details on the share of research and development (R&D) and capital expenditures investments out of the total budget made in technological innovation for improving environmental outcomes for the current and previous financial year. It also seeks seeking information on the action plans for improvement. Similar information is sought by CDP questions C3.4, C4.2b and W7.2 on the climate-related targets and methods used to drive investments in emissions reduction activities. One of the options under investments is R&D Expenditure. Hence this question is under Category 3 (Blue category) where it covers the answers from the environmental point of view but not social.

The remaining questions under Principle 2 are in category 2 (yellow) because they partially cover the information requested by BRSR. In the case of E2, procedures on sustainable sourcing are requested by BRSR. The forests questionnaire (F1.5b) requests information on jurisdiction of origin of production volume. E3 of the BRSR requests information on the process to safely reclaim products for reusing, recycling for plastics and e-waste. Companies can choose 'Waste reduction and material circularity' under C4.3b of the CDP questionnaire. This option is for circular economy and waste reduction initiatives (e.g. reuse, recycling, remanufacturing, product/service design to reduce waste etc.) and under column 2 (Initiative type) select the

following options: Product/component/material reuse, and Product/ component/material recycling, and the response is relevant to the said BRSR question.

The first leadership question under Principle 2 particularly asks for Life Cycle Assessment while CDP enquires about the low carbon aspect of products in C4.5 and C4.5a, which is one aspect of the lifecycle assessment. The forests questionnaire (F6.1, F6.2) further asks on sustainable production and consumption of the commodities and traceability systems in place to monitor origin of your disclosed commodities which are all aspects of the LCA. The L2 Question further asks if there are social/environmental concerns from the LCA conducted. The CDP forests questionnaire asks companies to highlight commodities where disclosures are not processes and palm oil is considered as a high environmental risk commodity, any production and consumption of biofuel by the organisation is tracked.

L3 and L4 questions of the BRSR request information on % recycled/reused input to total material and; reclaimed products, packaging materials for each category. C4.2b of the CDP CC questionnaire asks a similar question. Under Metric in C4.2b, on selecting Waste Management, one gets the following options to input data on: percentage of total waste generated that is recycled; metric tons of waste recycled; metric tons of waste reused; and metric tons of waste generated; which are in alignment to the information required by L3 and L5.

P2: Provide goods and services in a manner that is sustainable and safe	
E1: % of R&D and Capex investments in specific tech to improve env & social impacts of product and processes to total R&D and capex investments	(C3.4) Describe where and how climate-related risks and opportunities have influenced your financial planning. C4.2b: Provide details of any other climate-related targets, including methane reduction targets. C4.3c: What methods do you use to drive investment in emissions reduction activities?  (W7.2) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?
E2: Procedures for sustainable sourcing? If yes, what % inputs sourced sustainably?	(F1.5b) For your disclosed commodity(ies), indicate the percentage of the production/consumption volume sourced by national and/or sub-national jurisdiction of origin.
E3: Process to safely reclaim products for reusing, recycling for Plastics, e-waste	C4.3b: Provide details on the initiatives implemented in the reporting year in the table below. Under column 1 (Initiative category), companies can choose 'Waste reduction and material circularity'. This is option is for circular economy and waste reduction initiatives (e.g. reuse, recycling, remanufacturing, product/service design to reduce waste etc.) and under column 2 (Initiative type) select the following options: Product/component/material; reuse; andProduct/component/material recycling.
L1: Life Cycle Perspective / Assessments (LCA) for products and services	(C4.5) Do you classify any of your existing goods and/or services as low-carbon products or do they enable a third party to avoid GHG emissions?  (C4.5a) Provide details of your products and/or services that you classify as low-carbon products or that enable a third party to avoid GHG emissions.  (F6.1/ F6.1a/F6.1b) Did you have any timebound and quantifiable targets for increasing sustainable production and/or consumption of your disclosed commodity(ies) that were active during the reporting year? Provide details. If not, why?  (F6.2/ F6.2a/ F6.2b) Do you have traceability system(s) in place to track and monitor the origin of your disclosed commodity(ies)? Provide details. If not, why?
L2: If there are any significant social or environmental concerns and/ or risks arising from production or disposal of your products / services, as identified in the Life Cycle Perspective / Assessments (LCA) or through any other means	(F0.4) Select the forest risk commodities that you are, or are not, disclosing on (including any that are sources for your processed ingredients or manufactured goods); and for each select the stages of the supply chain that best represent your organization's area of operation. (F1.5e) How does your organisation produce or consume biofuel derived from palm oil?
L3: % of recycled/reused input to total material	C4.2b: Provide details of any other climate-related targets, including methane reduction targets.  Under Metric column 6 of the table, on selecting Waste Management, one gets the following options to input data on: Percentage of total waste generated that is recycled, metric tons of waste recycled, metric tons of waste reused, and metric tons of waste generated.
L5: Reclaimed products, packaging materials for each category	C4.2b: Provide details of any other climate-related targets, including methane reduction targets.

PRINCIPLE 3: BUSINESSES TO RESPECT AND PROMOTE WELL-BEING OF EMPLOYEES

Only one question overlaps in the case of Principle 3 of BRSR under Category 3, where

details of performance review of employees and workers are asked under BRSR (E9). Details of incentives for management and C-suite employees for management of climate – forest- and water-related issues - are requested in the CDP questionnaires on climate, forest and water.



**PRINCIPLE 4: BUSINESSES TO RESPECT INTERESTS OF AND RESPONSIVE TO ALL ITS STAKEHOLDERS**

Question E1 under Principle 4 comes under Category 2 (yellow) and asks about the process of identifying key stakeholder groups. The CDP questionnaire does not ask for the process but asks for details on engagement with value chain members (C12.1/C12.1a), which stakeholders are considered in risk assessments (F2.1c/

W3.3c) and whether the organisation is working with small holder farmers (F6.7). Therefore this covers the BRSR question only partially.

The L3 question under BRSR Principle 4 asks for details of instances of engagement to address concerns of vulnerable groups. The CDP forests questionnaire (F4.6b) asks for details of public commitments and description of coverage and action where marginalised and vulnerable groups are one component of the same.

P3: Businesses to respect and promote well-being of employees	
E9: Details of performance and career development reviews of employees and workers	(C1.3/C1.3a) Incentives for management of climate-related issues, including the attainment of targets? Provide details.  (F4.3/ F4.3a/ F-MM12.3/F-CO12.3/ F-MM12.3a/F-CO12.3a/ W6.4/ W6.4a) Provide incentives to C-suite employees or board members for the management of forests/bio-diversity/water-related issues? Provide details.
P4: Businesses to respect interests of and responsive to all its stakeholders	
E1: Process of identifying key stakeholder groups	(C12.1/C12.1a) Do you engage with your value chain on climate-related issues? Provide details.  (F2.1c/ W3.3c) Which of the stakeholders are considered in your organization's forests-related/water-related risk assessments?  (F6.7) Are you working with smallholders to support good agricultural practices and reduce deforestation and/or conversion of natural ecosystems?
L3: Provide details of instances of engagement with, and actions taken to, address the concerns of vulnerable/ marginalized stakeholder groups.	(F4.6b) Provide details on your public commitment(s), including the description of specific criteria, coverage, and actions.

**PRINCIPLE 6: PROTECT AND MAKE EFFORTS TO PROTECT AND RESTORE THE ENVIRONMENT**

Principle 6 of BRSR, focused on environmental protection and restoration, is most widely covered by the CDP questionnaire.

There are nine questions under this principle that can be fully answered by the CDP questionnaires.

- E1 asks for details of energy consumption – electricity, fuel and energy intensity - which

is asked in C8.2a, C8.2c, C8.2d and C8.2e of the CDP climate change questionnaire. Additionally, CDP’s questionnaire asks for % of total operation spend on energy and the applications of your organization’s consumption of fuel that are additionally relevant to E1.

- E3 asks for details of water withdrawals and water consumption. The water security questionnaire fully covers this under W1.2h. It additionally asks production weight/ volume for the top five products as well as water intensity in the sectors of chemical

sector, electricity generation activities, agriculture commodities that you produce/ source, metals and mining activities, oil & gas sector. In addition, the CDP questionnaire asks to describe the approach for setting and monitoring water-related targets, water discharge data by destination.

- E6 asks for details of Scope 1 and Scope 2 of greenhouse gas (GHG) emissions and their intensities. The CDP questionnaire asks for details on base year, base year emissions, gross emissions and the reporting boundary of Scope 1 and Scope 2 emissions. It further asks for a breakdown of Scope 1 and Scope 2 emissions on GHG type, country/region type, classified by business division, facility and activity. It further asks the companies to comment on the change of emissions from the previous year and indicate the verification/assurance status that applies to the reported emissions. The CDP questionnaire also tracks the current emissions of the company with the targets set by the company in the previous year and reflect on the achievement. The CDP questionnaire also looks for details of net-zero targets and the name of the standard, protocol, methodology used to collect data and calculate emissions.

- E7 asks whether there are any projects related to reducing GHG emissions, CDP questionnaire also asks whether the company has emission reduction initiatives, the phase in which such initiative is and details of the same in C4.3a.
- L1 asks for a breakdown of total energy consumers from renewable energy (RE) and non-RE sources which is covered in the CDP CC question of C8.2a. L2 asks for details of water discharged by destination and treatment level, which is covered under the water security questionnaire (W1.2i, W1.2j). L3 also asks about water withdrawal-related data based on area, nature of operations, by

source and destination. The water security questionnaire covers this through the cluster of questions – on volume of water withdrawn, discharged and consumed based on operational area (W1.2b); water withdrawn from water stress area (W.12d); water discharge by destination (W1.2i) and the highest level to which the company treats the discharge within direct operations (W1.2j).

- L4 asks for details of Scope 3 Emissions and intensity that are fully covered under the CDP CC questionnaire (C6.5 and C10.c).
- L5 of the BRSR question asks for details of impact on biodiversity and prevention. The forests questionnaire covers this in detail. It asks if the organization experienced forest related detrimental impacts, whether their own projects caused any, any impacts that got mitigated through a project and details of conservation action. It also asks for any public commitments made by the organization to reduce or remove deforestation and degradation.

There are 10 questions in BRSR Principle 6 that come under Category 2 (yellow) and are partially covered by CDP questionnaires:

- E2 asks for sites identified as designated consumers under the Perform Achieve and Trade (PAT) scheme. The PAT scheme is India’s policy. The CDP questionnaire asks for carbon pricing systems in operation and whether the organization has purchased any project-based carbon credits – both of which follow in the same theme as that of PAT. CDP also asks if the organization uses an internal price of carbon and to provide relevant details for the same.
- E8 and E9 of the BRSR asks for waste management details and waste management practices adopted by your establishment. The climate change, forests and water securities questionnaires also ask



for similar targets and details. Under climate, question C4.2b, a company can select ‘waste management’ in column 6 ‘Metric (target numerator if reporting an intensity target)’ and further select the following: metric tons of waste diverted from landfill.

- E10 asks for environmental clearances around ecologically sensitive areas that have been taken by the company. The CDP questionnaire does not ask for environmental clearances but asks for details on mining projects and land located under legally protected area, and detail on any such projects. It also asks for water withdrawn from areas in water stress regions and to provide for proportions.
- E11 asks for details of Environmental Impact Assessments (EIAs) of projects undertaken. The CDP forests questionnaire asks whether biodiversity impacts and risks of mining projects were assessed before the project development stage. It also asks for details on the procedures in identifying and assessing biodiversity-related impacts and risks. A similar question is asked on water-related detrimental impacts faced by the organization. The water security questionnaire also asks for the number of active and tailing dams, and any procedures to mitigate tailing dam-related risks.
- E12 asks for compliance with environmental laws in India. The forests and water security questionnaire asks if the organization

follows the compliance with no deforestation commitments and forest regulations and mandatory standards.

- L6 asks for initiatives to improve resource efficiency, impacts due to emissions and effluence discharged. CDP’s climate change and forests questionnaires ask for opportunities and projects focused on mitigating climate impacts and ecosystem restoration.
- L7 asks whether an organization has business continuity and a disaster management plan. The forests and water security questionnaires ask whether forest- and water—related issues are integrated in the main business plan of the organization.
- L8 asks the organization to disclose any significant adverse impact to the environment arising from value chain; any mitigation measure that is taken. L9 further asks the percentage of value chain partners that were assessed for environmental impacts. The climate change and water security questionnaires ask similar questions on engagement strategy with value chain on climate- and water-related issues, and the rationale and strategy for prioritizing engagement with these value chain members. While the percentage is not explicitly asked as in L9 of the BRSR question in Principle 6, the CDP climate change questionnaire asks for details on climate-related supplier engagement strategy.

P6: Respect and make efforts to protect and restore the environment

E1: Details of energy consumption- electricity, fuel, energy intensity

- (C8.2a) Report your organization’s energy consumption totals (excluding feedstocks) in MWh.
- C8.2c) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.
- (C8.2d) Provide details on the electricity, heat, steam, and cooling your organization has generated and consumed in the reporting year.

P6: Respect and make efforts to protect and restore the environment

	<p>(C8.2e) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero-emission factor in the market-based Scope 2 figure reported in C6.3.</p> <p><b>Additional related information:</b></p> <p>(C8.1) What percentage of your total operational spend in the reporting year was on energy?</p> <p>(C8.2) Select which energy-related activities your organization has undertaken.</p> <p>(C8.2b) Select the applications of your organization's consumption of fuel.</p>
E2: Sites identified as designated consumers (DCs) under the PAT scheme	<p>(C11.1/C11.1a/C11.b/C11.c/C11.d) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap &amp; Trade or Carbon Tax)?</p> <p>Select the price regulation that impacts the operations. Provide details of the regulations and taxations you are regulated by. Your strategy to comply with the system.</p> <p>(C11.2/C11.2a) Has your organization originated or purchased any project-based carbon credits within the reporting period? Provide details.</p> <p>(C11.3/ C11.3a) Does your organization use an internal price on carbon? Provide details.</p>
E3: Details on water withdrawal by source, total withdrawal, total volume of water consumption, water intensity per rupee of turnover, water intensity	<p>(W1.2h) Provide total water withdrawal data by source.</p> <p>(W-CH1.3a/WEU1.3a, W-FB1.3a-WF.B1.3b, W-MM1.3a, W-OG1.3a) For your top five products by production weight/volume, provide the following water intensity information associated with your activities in the chemical sector, electricity generation activities, agriculture commodities that you produce/ source, metals and mining activities, oil &amp; gas sector.</p> <p><b>Additional related information:</b></p> <p>(W8.1) Describe your approach to setting and monitoring water-related targets and/or goals.</p> <p>(W1.2i) Provide total water discharge data by destination.</p> <p>(W-CH1.3/ W-EU1.3/ W-FB1.3) Do you calculate water intensity for your activities in the chemical sector/electricity generation?</p>
E6: Details of GHG emissions – S1 & 2 intensity	<p>(C5.1) Provide your base year and base year emissions (Scopes 1 and 2).</p> <p>(C6.1, C6.2) What were your organization's gross global Scope 1 emissions in metric tons CO2e? Organization's approach to reporting Scope 2 emissions.</p> <p>(C6.3) What were your organization's gross global Scope 2 emissions in metric tons CO2e?</p> <p>(C6.4) Are there any sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?</p> <p>(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure.</p> <p>(C6.10) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.</p>



P6: Respect and make efforts to protect and restore the environment

	<p>(C7.1) Does your organization break down its Scope 1 emissions by greenhouse gas type?</p> <p>(C7.5) Break down your total gross global Scope 2 emissions by country/ region.</p> <p>(C7.6) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.</p> <p>(C7.6a, C7.6b, C7.6c) Break down your total gross global Scope 2 emissions by business division, facility and activity.</p> <p>(C7.1a, C7.2) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP); by country/region.</p> <p>(C7.3) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.</p> <p>(C7.3a, C7.3b, C7.3c) Break down your total gross global Scope 1 emissions by business division/ facility/ activity</p> <p>(C7.9) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?</p> <p>(C7.9a) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.</p> <p>(C7.9b) Are your emissions performance calculations in C7.9 and C7.9a based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?</p> <p>(C10.1) Indicate the verification/assurance status that applies to your reported emissions.</p> <p><i>Additional related information:</i></p> <p>(C4.1c) Explain why you did not have an emissions target, and forecast how your emissions will change over the next five years.</p> <p>(C4.1/C4.1a/C4.1b) Did you have an emissions target that was active in the reporting year? Provide details of your absolute emissions and your emission intensity targets and progress made.</p> <p>(C4.2/ C4.2a/C4.2b) Did you have any other climate-related targets that were active in the reporting year? Provide details.</p> <p>(C4.2c) Provide details of your net-zero target(s).</p> <p>(C5.2/ C5.2a) Select the name of the standard, protocol or methodology you have used to collect activity data and calculate emissions.</p>
E7: Project related to reducing GHG emissions	<p>(C4.3, C4.3a, C4.3b, C4.3d) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases. Identify total initiatives at each stage. Provide details. If not, why?</p>
E8: Waste management details- plastic, e-waste, bio medical waste, C&D waste, battery waste, other hazardous	<p>(C4.2b) Provide details of any other climate-related targets. Companies can input the data in the table by first selecting 'waste management' in column 5, 'Target type category', and then choosing 'metric tons of waste generated' under column 6 'Metric (target numerator if reporting an intensity target)'. Companies can then choose 'metric ton of waste' under column 7 'Target denominator (intensity targets only)'.</p>
E9: Describe waste management practices adopted by your establishment	<p>(C4.2b): Provide details of any other climate-related targets, including methane reduction targets.</p>

P6: Respect and make efforts to protect and restore the environment

E10: Environmental clearances in and around ecologically sensitive areas	<p>(F-MM9.1/F-CO9.1) Provide details on the mining projects covered by this disclosure, by specifying your project(s) type, location and mining method(s) used.</p> <p>(F-MM9.2/F-CO9.2/ F-MM9.2a/F-CO9.2a) Can you disclose the mining project area and the area of land disturbed for each of your mining projects? Provide details.</p> <p>(F-MM9.3/F-CO9.3/ F-MM9.3a/F-CO9.3a) Are any of your mining projects located in or near legally protected and internationally recognized areas? Provide details.</p> <p>(F6.11a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).</p> <p>(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.</p> <p>(W-FB1.2e/ W-FB1.2f/ W-FB1.2g) For each commodity reported in question W-FB1.1a, do you know the proportion that is produced/sourced from areas with water stress?</p>
E11: Details of environmental impact assessments of the projects undertaken by entity based on applicable laws	<p>(F-MM10.1/F-CO10.1) Have biodiversity impacts and risks of your mining projects been assessed before the project development stage?</p> <p>(F-MM10.1a/F-CO10.1a) Select the options that best describe your procedures for identifying and assessing biodiversity-related impacts and risks.</p> <p>(W2.1/W2.1a) Has your organization experienced any detrimental water-related impacts? Describe and the total financial impact.</p> <p>(W-MM3.2/ W-MM3.2a/ W-MM3.2b/ W-MM3.2c) By river basin, what number of active and inactive tailings dams are there under you? Do you evaluate according to the consequences of their failure to human health and ecosystems? Provide details. What procedures are in place to mitigate tailing dam related risks?</p>
E12: Compliance with environmental laws in India; such as the Water Act, Air, Act, Environment protection act	<p>(F6.4) For your disclosed commodity(ies), do you have a system to control, monitor, or verify compliance with no conversion and/or no deforestation commitments?</p> <p>(F6.6)/F6.6a For your disclosed commodity(ies), indicate if you assess your own compliance and/or the compliance of your suppliers with forest regulations and/or mandatory standards.</p> <p>(W2.1a) Describe the water-related detrimental impacts experienced by your organization, your response, and the total financial impact.</p>
L1: Breakup of total energy consumers from RE and non-RE sources	<p>(C8.2a) Report your organization's energy consumption totals (excluding feedstocks) in MWh.</p>
L2: Water discharged by destination and treatment level - Surface, ground, sea water, sent to third parties, others	<p>(W1.2i) Provide total water discharge data by destination.</p> <p>(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.</p>
L3: Water withdrawal, consumption and discharge in water stress areas - Area, nature of operation, water withdrawal. Water withdrawal by source. Water discharged by destination.	<p>(W1.2b) What are the total volumes of water withdrawn, discharged and consumed across all your operations, and how do these volumes compare to the previous reporting year?</p> <p>(W1.2d) Indicate whether water is withdrawn from areas with water stress and provide the proportion.</p> <p>(W1.2i) Provide total water discharge data by destination.</p> <p>(W1.2j) Within your direct operations, indicate the highest level(s) to which you treat your discharge.</p>



P6: Respect and make efforts to protect and restore the environment

L4: Details of Scope 3 emissions and intensity	(C6.5) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.  (C10.1c) Provide further details of the verification/assurance undertaken for your Scope 3 emissions and attach the relevant statements.
L5: Provide details of significant direct & indirect impact on biodiversity and prevention and remediation activities.	(F1.6, F1.6a) Has your organization experienced any detrimental forests-related impacts? Describe the impact and your response, and total financial impact.  (F-MM11.1/F-CO11.1/ F-MM11.1a/F-CO11.1a/ F-MM14.3/F-CO14.3/ F-MM14.3a/F-CO14.3a) Have any of your projects caused, or have the potential to cause, significant adverse impact(s) on biodiversity? Your organisation's response to mitigate such adverse impacts (Mining Sector).  (F-MM14.4/F-CO14.4/ F-MM14.4a/ F-CO14.4a/ F-MM14.5/F-CO14.5) Have significant impacts on biodiversity been mitigated through restoration? Provide details on restoration. Any residual impacts compensated through biodiversity offsets.  (F-MM14.6/F-CO14.6/ F-MM14.6a/F-MCO14.6a) Is your organization implementing or supporting additional conservation actions? Provide details.  (F6.11a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify outcomes.  (F4.6, F4.6b) Has your organization made a public commitment to reduce or remove deforestation and/or forest degradation from its direct operations and/or supply chain? Provide details.
L6: Specific initiatives to improve resource efficiency, reduce impact due to emissions, effluent discharge / waste generated	(C2.4a) Provide details of opportunities identified with the potential to have a substantive financial or strategic impact on your business.  (F6.11) Is your organization supporting or implementing project(s) focused on ecosystem restoration and protection?  (F6.11a) Provide details on your project(s), including the extent, duration, and monitoring frequency. Please specify any measured outcome(s).
L7: Does the entity have a business continuity and disaster management plan?	(F5.1/ F-MM10.3/F-CO10.3) Are forests/biodiversity-related issues integrated into any aspects of your long-term strategic business plan, and if so, how?  (F-MM10.3a/F-CO10.3a/ F-MM13.1/F-CO13.1/ F-MM14.1/F-CO14.1/ F-MM14.1a/F-CO14.1a/ F-MM14.2/F-CO14.2) Describe your criteria for defining which sites are required to produce biodiversity action plans. How are they integrated in financial planning? Any measurable and time-bound targets. Provide details.  (W7.1) Are water-related issues integrated into any aspects of your long-term strategic business plan, and if so how?
L8: Disclose any significant adverse impact to the environment, arising from the value chain of the entity. What mitigation or adaptation measures have been taken.	(C12.1/ C12.1a/ C12.d/C12.e/W1.4/W1.4a/W1.4b/W1.4d) Do you engage with your value chain on climate-related issues and water related issues? Provide details of climate engagement strategy or water-related supplier engagement strategy. If not, why?  (W1.4c) What is your organization's rationale and strategy for prioritizing engagements with customers or other partners in its value chain?
L9: Percentage of 1value chain partners that were assessed for environmental impacts.	(C12.1a) Provide details of your climate-related supplier engagement strategy.

PRINCIPLE 7: BUSINESS INFLUENCING POLICY IN RESPONSIBLE AND TRANSPARENT MANNER

Two BRSR questions under Principle 7 come under Category 3 (Blue). E1 asks for affiliations with trade and industry chambers and their name. The CDP climate change questionnaire (C12.3b/C12.3c) asks if the organization is on the board of any trade association and whether they provide funding beyond membership. Further, CDP also asks under the forests questionnaire, whether they collaborate with any NGO to implement biodiversity-related goals.

The L1 question asks further details of public policy positions advocated by the entity. The CDP questionnaire also covers this aspect from the environmental lens – climate change, forests and water security. The CDP questionnaire asks whether the organisation engages to influence public policy, on what issues and what processes do they follow.

PRINCIPLE 8: BUSINESSES SHOULD PROMOTE INCLUSIVE GROWTH AND EQUITABLE DEVELOPMENT

The two questions – E2 and E4 in Principle 8 – are classified under Category 3 (Blue). E2 asks for information on projects where ongoing rehab and resettlement is being undertaken. The forests questionnaire asks for closure plans of mining projects and details on area rehabilitated for each mining project. This can also include post-mining land use. Since this aspect is covered only from the mining front, it is in category 3. E4 asks for the percentage input of material directly sourced from Micro, Small and Medium Enterprises (MSMEs)/small producers. CDP's forests questionnaire asks if there are artisanal and small-scale mining operations active in their project areas and thus covers this question only from the mining point of view.

PRINCIPLE 9: BUSINESSES PROVIDE VALUE TO THEIR CONSUMERS IN RESPONSIBLE MANNER

The L2 question under Principle 9 asks for steps taken to inform and educate consumers about safe and responsible usage of products and services. The CDP climate change questionnaire asks for a customer engagement strategy related to climate in C12.1b. Therefore, this question is covered under category 3 (blue).





P7: Business influencing policy in responsible and transparent manner

E1: Affiliations with trade and industry chambers – Name	(C12.3b/C12.3c) Are you on the board of any trade associations or do you provide funding beyond membership? Provide details. (F-MM15.3/F-CO15.3/ F-MM15.3a/F-CO15.3a) Do you collaborate or engage in partnerships with non-governmental organizations to promote the implementation of your biodiversity-related goals and commitments? Provide details.
L1: Details of public policy positions advocated by the entity	(C12.3/C12.3a/C12.3f/C12.3g) Do you engage in activities that could either directly or indirectly influence public policy on climate-related issues through any of the following? On what issues have you been engaging directly with policy makers? What processes do you follow? If not, why?  (F6.10/ F-MM15.1/F-CO15.1/ F-MM15.2/F-CO15.2/ F-MM15.2a/F-CO15.2a/ F-MM15.5/F-CO15.5/ F-MM15.5a/F-CO15.5a) Do you participate in external activities and/or initiatives to promote the implementation of your forests-related policies and commitments? Participate and endorse global initiatives? Do you engage with other stakeholders to further the implementation of your policies concerning biodiversity?  (W6.5/W6.5a) Do you engage in activities that could either directly or indirectly influence public policy on water through any of the following? Describe the process.

P8: Businesses should promote inclusive growth & equitable development

E2: Information on project(s) for which ongoing Rehabilitation and Resettlement (R&R) is being undertaken by your entity	(F-MM14.7/F-CO14.7/ F-MM14.7a/F-CO14.7a) Do your mining projects have closure plans in place? Provide details on mines with closure plans. (F-MM14.8/F-CO14.8/F-MM14.8a/F-CO14.8a) Area for each of the mining projects. Provide details on the area rehabilitated (total/reporting year) for each of your mining projects, including post-mining land use.
E4: Percentage of input material (inputs to total inputs by value) sourced from suppliers - directly sourced from MSMEs/small producers; sources locally within district	(F-MM9.4/F-CO9.4/ F-MM9.4a/F-CO9.4a/ F-MM15.4/F-CO15.4/ F-MM15.4a/F-CO15.4a) Are there artisanal and small-scale mining (ASM) operations active in your mining project areas or in their area of influence? Provide details. Do you engage with them in mining concessions? Describe your engagement approach.

P9: Businesses provide value to their consumers in responsible manner

L2: Steps taken to inform and educate consumers about safe and responsible usage of products and/or services.	(C12.1b) Give details of your climate-related engagement strategy with your customers.
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Genesis of BRSR

The Ministry of Corporate Affairs, Government of India, released the National Voluntary Guidelines on Social, Environmental and Economic Responsibilities of Business (NVGs), in 2011. It provided guidance to businesses on what constitutes responsible business conduct. In order to align the NVGs with the emerging global concerns, the Sustainable Development Goals (SDGs), and the United Nations Guiding Principles on Business & Human Rights (UNGPs), the process of revising the NVGs began in 2018.

In 2012, the Securities and Exchange Board of India (SEBI) mandated the top 100 listed companies by market capitalisation to file Business Responsibility Reports (SEBI-BRRs/ BRR) through the Listing Agreement. These disclosures were intended to enable businesses to engage more meaningfully with their stakeholders, encourage them to go beyond regulatory financial compliance and report on their social and environmental impacts. The requirement for filing BRRs was extended to the top 500 listed companies by market capitalisation from the financial year 2015-16.

After numerous stakeholder consultations, the requirements were revised and released as the National Guidelines for Responsible Business Conduct (NGRBC) in 2019. The NGRBC has been

designed to assist businesses to embrace the principle of responsible conduct going beyond the requirements of regulatory compliance. The disclosure mechanism emanating from the NVGs, namely, the Business Responsibility Report (BRR), needed to be modified to reflect the NGRBC and encourage companies to take on leadership roles in practices and disclosures.

Expectations from BRSR

The proposed BRSR format is a notable departure from the existing format for business responsibility reporting. The BRSR lays considerable emphasis on quantifiable metrics, which allows for easy measurement and comparability across companies, sectors, and time periods. Further, the disclosures on climate- and social- (employees, consumers and communities) related issues of the entity are significantly enhanced and made more granular as compared to the disclosures under BRR.

It is hoped that as non-financial/sustainability disclosures grow in prominence, this information will be used by banks, credit rating agencies, and other financial institutions, along with financial information to assess the credibility of a company/business. It is also important that steps be taken to ensure that businesses be supported through capacity building and training to adopt these formats for making disclosures.<sup>6</sup>

6 [https://www.mca.gov.in/Ministry/pdf/BRR\\_11082020.pdf](https://www.mca.gov.in/Ministry/pdf/BRR_11082020.pdf)



## ABOUT CDP

CDP is a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts by running a global environmental disclosure system. Each year CDP supports thousands of companies, cities, states and regions to measure and manage their risks and opportunities on climate change, water security and deforestation. We do so at the request of their investors, purchasers and city stakeholders.

Over the last two decades we have created a system that has resulted in unparalleled engagement on environmental issues worldwide. In 2020, Over 9,600 companies reported through CDP on climate change, water security and forests, and, over 800 cities and more than 120 states and regions disclosed their environmental impacts through CDP.

## CDP India

CDP began working in India in 2008 and was formally registered in 2012, working on disclosure and driving climate action. It serves as a source of knowledge for hundreds of Indian corporations, from those that are just beginning on the road to corporate environmental disclosure, through to those looking to improve sustainability and make commitments to reduce environmental impact.

It is the only NGO to be named in India's INDC submission to the UNFCCC owing to its corporate environmental data repository and tracking of emissions and mitigation data from the Indian Industry. CDP India also actively participated in Government of India's Ministry of Environment, Forests & Climate Change (MoEFCC) work on future carbon market mechanisms. In addition to our work on disclosure, CDP India is actively engaged in other initiatives including Internal Carbon Pricing (ICP), Science-based targets (SBT) and RE100.





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