Presentation of the case study on the first-time application of EU taxonomy at EnBW >

Workshop on EU Green Taxonomy in the energy and building sectors Dr. Lothar Rieth (Head of Sustainability)
EnBW Energie Baden-Württemberg AG
Thursday, September 30, 2021



Deloitte.



Agenda

Conclusion



Overview requirements

EnBW-Approach for early application of EU taxonomy requirements

Project Phase Part 1: Assessment of the environmental sustainability of activities

Project Phase Part 2: Transfer of sustainability assessment into financial indicators

Timeline: Further Developments of Non-Financial Reporting

risk management and reporting





Outlook: Further Developments of Non-Financial Reporting



Reporting Requirements under EU taxonomy



2021/2022

	Group (M. EUR)	Thereof "environmentally sustainable"	
		(M. EUR)	(%)
Revenue			
Capex			
Opex			

Revision of the Non-Financial Reporting Directive





2023

- Mandatory reporting in the management report
- Adjusted definition of materiality
- More risks subject to mandatory reporting
- Audit obligation in terms of content

Development of non-financial reporting standards



Measuring Stakeholder Capitalism
Towards Common Metres and
Consolint Reporting of Sustanable
Value Creation







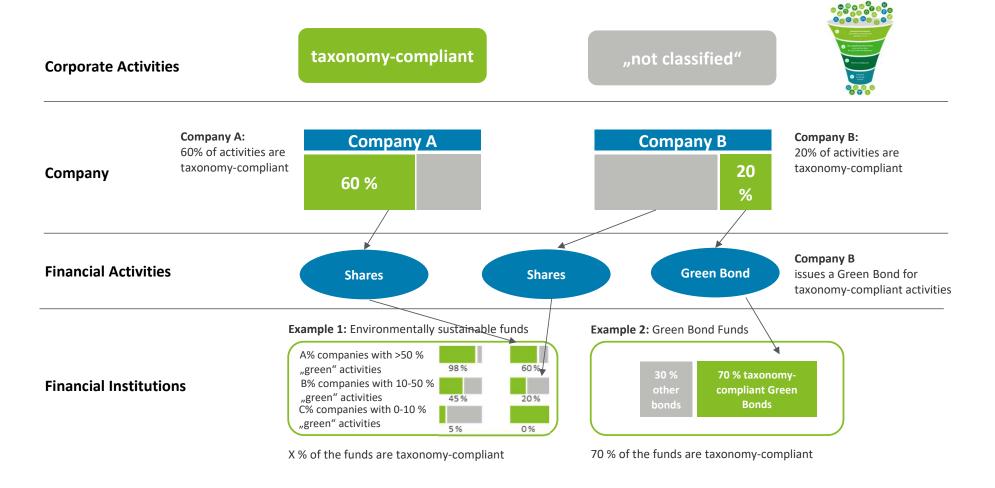




- Reorganization of the non-financial standard setting
- Specification of concrete KPIs
- Disclosure of raw data

Overview: taxonomy reporting requirements



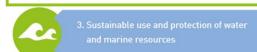


EU taxonomy requirements and effects on EnBW's corporate reporting



Six environmental objectives of the taxonomy regulation







Adoption EU taxonomy regulation (18.06.2020)

- Mandatory disclosure of "environmentally sustainable" revenues, capex and opex under the NFR.
- "Environmentally sustainable" activities (contributing substantially) to the achievement of one of the six EU environmental targets.

Delegated act with technical screening criteria for

EU environmental targets 1 & 2:

- 1. Climate change mitigation
- 2. Climate change adaptation

Published: June 4, 2021

Delegated act specifying the

new reporting requirements

Delegated act with technical screening criteria for

EU environmental targets 3 to 6:

(see graphic)

Announced: 31.12.2021

EnBW

- > The reporting obligation has direct effect; transposition into German law is not required.
- Requirement: Identification of "environmentally sustainable" business activities.
- Corresponding data collection to ensure proper reporting.

To be disclosed for FY 2021:

- Revenues, capex and opex associated with EnBWactivities that contribute substantially to the achievement of objectives 1 & 2 and do not significantly affect the achievement of the other environmental and social objectives.
- Analysis of the relevant project activities initially based on the consultation draft for the criteria

Specification of Reporting Requirement

Published: July 6, 2021

- Among other things, for the derivation of revenue. capex and opex, their tabulation and any further explanations required.
- Orientation to the corresponding draft.

To be disclosed for FY 2022:

- Reporting requirement identical for FY 2021 with expansion to targets 1 through 6.
- Analysis of EnBW business activities also with regard to taxonomy conformity for environmental goals 3 to 6.

EnBW background for implementation of the EU taxonomy Regulation for the reporting year 2020



The announcement of the EU Green Deal has given a further push to the overall topic of **Sustainable Finance** and the work of the **Technical Expert Group on Sustainable Finance (TEG)**. EnBW was involved in the work of the TEG through its **CFO, Thomas Kusterer**.

With its **strategy EnBW 2025** and its **climate neutrality approach**, EnBW supports the goal of reducing **net emissions of greenhouse gases to zero** in the **European Union** by 2050 and thus becoming **climate neutral**.

EnBW is committed to transparent, integrated and efficient reporting. We have therefore voluntarily decided to implement the EU taxonomy at an early stage in order to help shape this process.

EnBW has been issuing green bonds since 2018. With these, we are raising the financial resources required for the sustainable transformation on the capital market envisaged in the corporate strategy. The planned EU Green Bond Standard (GBS) will provide further impetus here.

In our view, it is crucial for the successful implementation of the taxonomy that attention is paid to what is technically possible and economically feasible for decarbonization today when defining the specific criteria and thresholds.

For the 2020 financial year, EnBW has voluntarily included information on taxonomy-compliant revenue, capex, opex and Adj. EBITDA in the IAR*.



Share of "environmentally sustainable" business activities of the EnBW Group for the year 2020



Initial Situation:

- > EU taxonomy as a central component of the EU Financing Sustainable Growth Action Plan
- > Uncertainty among companies and investors regarding applicability
- > EnBW was represented by CFO Thomas Kusterer in the EU Technical Expert Group on Sustainable Finance and wanted to contribute to its finalization by piloting the EU Sustainable Finance taxonomy.

Project Approach:

- > Establish a common understanding of the taxonomy criteria and reporting requirements.
- > Assessing taxonomy compliance and obtaining evidence
- > Requirements list for system-side provision of information
- > Derivation of "environmentally sustainable" revenues, capex, opex and Adj. EBITDA

Project Results:

- > Reporting of "environmentally sustainable" revenues, capex, opex and Adj. EBITDA from activities of the segments Renewables and Grids in the IAR 2020.
- > Establishment of Reasonable Assurance Readiness: the disclosures were audited as part of the statutory audit of the financial statements
- > Joint detailed case study on the EU Sustainable Finance taxonomy: application, experiences and recommendations.

^{*} see Integrated Annual Report 2020: https://www.enbw.com/integrierter-geschaeftsbericht-2020/

Preliminary work in EnBW's Integrated Reporting as an important starting point for the application of the EU taxonomy

thinking

Report 2014

Stakeholder focus and

13 Top-KPIs and their

targets for 2020

AMBITION

growing need for integrated

2013

EnBW Deloitte.

2012

First combined report:

Financial and sustainability reporting merged with due regard to the requirements of the Global Reporting Initiative (GRI) and the German Sustainability Code (GSC).

- Communication sustainable corporate strategy with focus on climate neutrality
- Inclusion initial content for EU taxonomy*

2019

Pursuing of targets for year 2020 and communication of targets 2025

2018/2019

- Further development of EnBW's strategy
- Governance-consolidation: Anchoring sustainability in investment processes. further development of materiality analysis, reporting on green bonds

2014

First integrated report based on the recommendations of the IIRC Integrated Annual Report 2017

2015

Complete examination of resources within the business model: finances, relationships, employees, environment, infrastructure, expertise.

2016

- Presentation of interdependencies
- Inclusion new non-financial KPIs and harmonization of nonfinancial and financial performance indicators

2017

ENBW

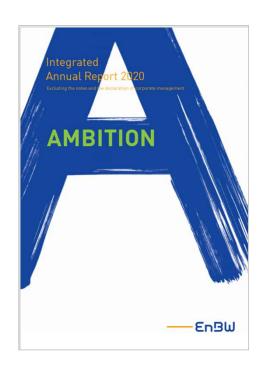
- Reporting based on CSR-RUG (esp. nonfinancial statement)
- First presentation of climate-related risks based on the recommendations of the TCFD
- Presentation of the robustness of the business model
- * Based on the taxonomy Regulation (version June 18, 2020) and test criteria (draft delegated

legal act, version November 20, 2020).

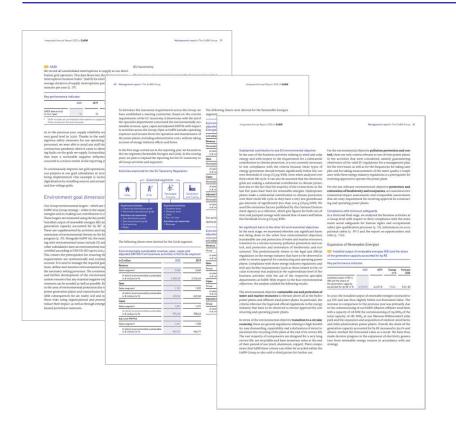
In the Integrated Annual Report 2020, EnBW has included EU taxonomy disclosures in the management report for the first time



IAR 2020



Corporate situation of the EnBW Group p. 79-81



Stand Alone Bericht



The project focused on two sub-aspects: in phase 1, the technical sustainability assessment of the activities, and in phase 2, the conversion into financial indicators.









Assessment of the environmental sustainability of activities



PROJECT PHASE 2

Transfer of the sustainability assessment into financial indicators

Proportion of "environmentally sustainable" activities			
Revenue	X %		
Capex	Y %		
Opex	Z %		

The determination of the "environmental sustainability" of the activities was made taking into account the available EU documents



Significant contribution to climate mitigation

Substantial Contribution

- > Significant contribution primarily to EU environmental goal 1: "Climate mitigation", contribution to goal 2: "climate change adaptation" less relevant for EnBW for selected activities.
- > In principle, consideration at **plant level**; if SC is not to be checked (e.g. for wind energy), at activity level possible
- No significant impairment of the other environmental objectives

 DNSH
- > No significant (!) impairment of the five other EU environmental objectives: Often, in the highly regulated energy sector, required regulatory approvals for construction/operation will be sufficient evidence for the assumption that there is no significant risk of impairment
- > Consideration basically possible at activity level

Minimum safeguards for occupational safety and human rights

Minimum Safeguards

- > Due to trends towards supply chain laws and stronger emphasis on human and labor rights in the EU CSR Directive (under revision), consider to what extent these developments should already be anticipated in the taxonomy implementation
- > Consideration basically possible at group level

The project was set up in the summer of 2020 and implemented in collaboration with various departments and external support



A. Project set-up

- > EnBW Executive Board member as "project sponsor"
- > EnBW Steering Committee: Controlling, Sustainability, Accounting
- > Project plan and project organization
- > Uniform understanding of taxonomy criteria and reporting requirements

B. Analysis of EnBW-business activities

- > Identification of taxonomy-relevant activities
- > Assessment of taxonomy conformity and obtaining of evidence
- > Requirement list for system-side provision of information

C. Analysis of systems and processes

> Inventory of systems and processes for data collection, gap analysis.

D. Implementation and finalization

- > Design and implementation of adjustments to systems and processes
- > Test and trial phase
- > Technical concept for auditors
- > Summary of assumptions, evidence and proofs



Assessment example "significant contribution to climate change mitigation" in energy production (see draft TEG recommendation/delegated act - chapter 4)

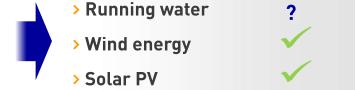


Threshold in energy generation for significant contribution to climate change mitigation*

> 100 g CO2 e/kWh

determined on the basis of a life cycle analysis according to recognized standards

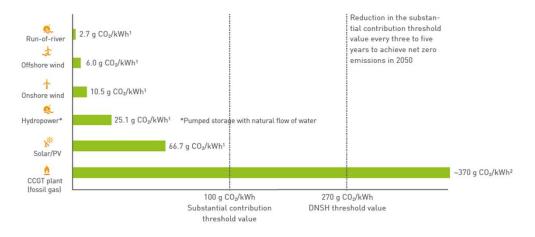
Evaluation of individual types of energy production



Analysis of life cycle emissions with UBA standard values

> Running water
since energy generation in
hydropower plants naturally
causes no or hardly any CO2
emissions.

Life cycle emissions by generation method



¹ Life cycle emissions according to the German Federal Environment Agency.

² Life cycle emissions based on a life cycle analysis by EnBW and the Forschungsstelle für Energiewirtschaft (FfE).

Taxonomy compliance assessment process



- Example: Construction and operation of wind power plants:
- **Substantial Contribution**: Taxonomy criterion for electricity generation in general: max. 100g CO2e/kWh
 - 1. 4.3 Construction and operation of wind power plants: significant contribution to climate protection is assumed.
- Do no <u>significant</u> harm:
 - Adaptation to climate change: physical climate risk assessment
 - 3. Water quality: compliance with EU law (only to be checked for offshore wind; may be assumed in principle according to TEG report)

Coding required?

- 4. Circular economy: design and construction to ensure: long durability, refurbishment and recycling ("high durability, easy dismantling, refurbishment and recycling)
- 5. Pollution reduction: n/a
- Biodiversity / ecosystems: compliance with EU law (environmental impact assessment according to EU-RiLi 2011/92/EU; for sites close to biodiversity sensitive areas: Assessment of compliance with Birds Directive (2009/147/EC) and Habitats Directive (92/43/EEC).
- **Minimum Safeguards**: Rather minimum criteria for protection of workers and human rights
- Derivation :
 - Revenue: Individually attributable?
 - Capex: Can be allocated individually?
 - Opex: Usually most difficult to allocate clearly.
 - Disclosure of assumptions, interpretations, exercise of judgment

Definition Revenue, Opex und Capex



Revenue

- > External revenue of the EnBW Group in accordance with IFRS
- > Generally: Determination of values in accordance with the framework on which the financial statements are based (IFRS/HGB)

Capex

> Gross capital expenditure on tangible and intangible fixed asset

Opex

- > Operating expenses from operation and maintenance, including plant administration costs, excluding energy-related effects and allocations
- > No consideration of depreciation





Determination of financial indicators - consideration of common controlling and accounting approaches lead to meaningful key indicators





- > 2020: External revenues of the sub-segments can be clearly derived from EnBW segment reporting Internal revenues, e.g. grid fees of the distribution grid compared to own sales are not reported as revenues
- > For EnBW (with own trading department-> fluctuations), **revenue is not a relevant control KPI**; for producing/service-providing companies, revenue can serve as a control parameter.
- Adj. EBITDA
 (How green is EnBW at present?)
- > Adj. EBITDA better indicator than revenue for current "ecologically sustainable" EnBW orientation (TOP KPI); globally accepted by groups, analysts, rating agencies, etc.



- > 2020: Gross investments in tangible and intangible assets as well as additions to financial assets (investments). E.g. an offshore wind farm in the construction phase is accounted for as a minority interest and financed 100% by equity, inflow of EnBW equity is capex.
- > For EnBW, Capex is a suitable indicator for investments in the future.



- > In principle, companies have little interest in as much opex as possible; moreover, no information is available on the interpretation, so that neither the purpose nor the goal of an opex presentation becomes apparent.
- > If the focus is on the future viability of companies, then (from EnBW's point of view) opex can at best refer to non-capitalized R&D expenditures, but this only makes sense for personnel-intensive companies*.

^{*} For capital-intensive or asset-intensive companies, the disclosure of opex is not expedient, which is why an option (see TEG recommendation) is preferred. For these companies, opex is rarely relevant for management purposes.

Project phase 2: Determination of financial indicators and presentation in the Integrated Annual Report 2020 in relation to the Group and the segments



Environmentally sustainable shares of revenue, opex and capex and additionally adjusted EBITDA in relation to total Group activities:

"Environmentally sustainable" revenue, opex, capex and adjusted EBITDA of the EnBW Group

in € million	2020	2019
Revenue		
Group	19,694	19,436
of which "environmentally sustainable" in € million / in %	3.513/18	3.007/15
0pex		
Group	3,417	3,234
of which "environ <mark>men</mark> tally sustainable" in € <mark>milli</mark> on / in %	874/26	788/24
Capex		
Group	2,526	3,168
of which "environmentally sustainable" in € million / in %	1.521/60	2.093/66
Adjusted EBITDA		
Group	2,781	2,433
of which "environmentally sustainable" in € million / in %	1.811/65	1.436/59

Source: EnBW Integrated Annual Report 2020, p. 80

https://www.enbw.com/media/bericht/bericht-2020/downloads/integrierter-geschaeftsbericht-2020.pdf

- > A total of **three tables** showing the shares of environmentally sustainable sales, opex and capex related to
 - > the Group as a whole
 - the Grids segment and
 - > the Renewable Energies Segment.

in € million	2020	"Environmentally sustainable" re			
Revenue		adjusted EBITDA from business activities in the Grids segment			
Renewable Energies segment	1,044	in € million	2020	2019	
of which "environmentally		Revenue	_		
sustainable" in € million / in %	1.007/96	Grids segment	3,658	3,460	
Opex		of which "environmentally		name any ma	
Renewable Energies segment	193	sustainable" in € million / in %	2.506/69	2.376/69	
of which "environmentally		<u>Opex</u>		50 97343	
sustainable" in € million / in %	181/94	Grids segment	1,122	1,039	
Capex		of which "environmentally sustainable" in € million / in %	692/62	623/60	
Renewable Energies segment	597	— Capex	072702	023700	
of which "environmentally sustainable" in € million / in %	547/92	Grids segment	1,407	1,231	
Adjusted EBITDA		of which "environmentally sustainable" in € million / in %	975/69	778/63	
Renewable Energies segment	836	Adjusted EBITDA	_		
of which "environmentally sustainable" in € million / in %	824/99	Grids segment	1,347	1,355	
Sastanasta S Inition / In 19	3247 117	of which "environmentally sustainable" in € million / in %	987/73	960/71	

EnBW - EU taxonomy-compliant key indicators





Determination of financial indicators - consideration of common controlling and accounting approaches lead to meaningful key indicators

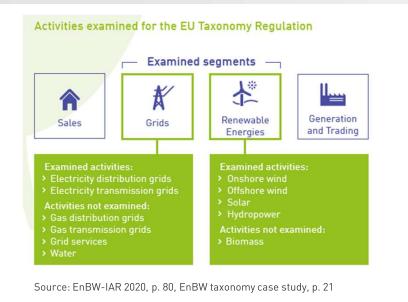


General preliminary remark

Use of IFRS-HGB figures: Determination of taxonomy key indicators according to the framework applied in the financial statements "The three indicators are to be determined and published according to the framework applied in the financial statements: If the financial statements are prepared in accordance with IFRS, "environmentally sustainable" revenues, capex and opex are also to be determined in accordance with IFRS. If the financial statements are prepared in accordance with national law (in Germany: HGB), the three indicators are to be determined in accordance with these requirements"

1st Project Phase (2020) - focus on fully "environmentally sustainable" activities of the "RE" and "Grids" segments.

2nd Project Phase (2021) - expansion to all other segments (incl. those that are not fully "environmentally sustainable")



- > EnBW's 2020 reporting comprises four **segments**. For the calculation of the EU taxonomy-compliant key indicators, only the Grids and Renewable Energy segments were addressed.
- > In these segments, only individual **subsegments** were considered, e.g. electricity distribution networks. These subsegments could be fully classified as "environmentally sustainable".
- > As EnBW therefore did not prepare accounts at **activity level**, it was possible to dispense with appropriate codes in this project phase.
- > For EnBW reporting in 2021, all segments and sub-segments will be included and therefore - very likely - coding will be required

Determination of financial indicators - consideration of common controlling and accounting approaches lead to meaningful key indicators



Basically positive assessment

- > Financial Statements = IFRS → Taxonomy KPIs = IFRS Financial statements = HGB → Taxonomy KPIs = HGB
- > Capex: gross calculation (without revaluations, depreciation).
- Capex: The ESMA consultation paper only provided for share deals, the draft of Art. 8 DA correctly includes asset deals and share deals.
- Specification of a standardized table enables comparability and efficient information transfer.
- > The following recommendations are in line with EnBW's approach and appear appropriate: additional information on determination of criteria fulfillment, assumptions, changes, avoidance of double counting, previous year's figures.

To be reconsidered, clarification desired

- > Reporting at activity level:
 - > Difficult to determine clearly
 - > EVU: 26 x 3 x 6 x 6 = 2.808 disclosures
 - > Better reduced meaningful disclosures: Reporting at segment level (IFRS 8)
- > **Disclosure requirement** exists for opex / capex even if an activity does not / will not lead to significant "environmentally sustainable" external sales.
- Capex: In order to be classified as "green" capex, there must be a decided plan according to which the investments must lead to "green" revenues within five years. The forwardlooking capex disclosures required in the draft are too detailed.
- There are requirements to code revenues, capex and before all opex: this should be allowed, analogously including overhead costs in cost of sales

Conclusion / Lessons Learned*



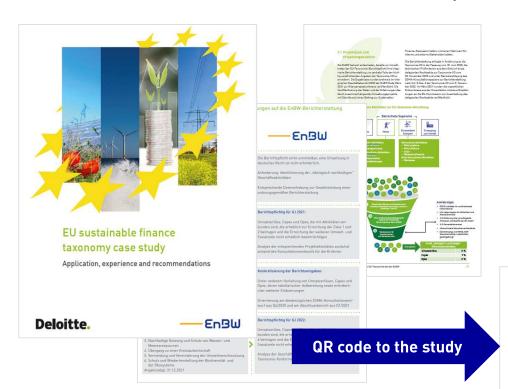
- Proper implementation requires **sufficient time** and the involvement of internal experts beyond the **sustainability department**. In particular, the department responsible for the internal recording of revenues, capex and opex (usually **controlling or accounting**) should be involved.
- Until now, (commercial) **non-financial reporting has often stood alongside financial reporting** (in the management report and financial statements). The taxonomy reporting requirements make it mandatory to **link it to the financial statements**.
- Companies should examine whether further **financially related key indicators** that increase the informative value of the taxonomy reporting should be published. This could, for example, be a **steering-relevant key indicator** for the respective company, such as Adjusted EBITDA at EnBW.
 - The taxonomy requirements enable the **financial indicators presented to be compared over time**, and comparative analyses are also possible between companies in different industries. However, one challenge for corporate practice at present is that **criteria** for the majority of activities are **not available for all industries**.

^{*} For further insights from the application, see case study from p. 29ff.

Case Study EnBW and Contact



For more information, see EU sustainable finance taxonomy case study.



Alternative: <u>Case Study EU-Sustainable-Finance-taxonomy</u> (available in German and English)



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