

# Mapping International Sustainability Rules

A Guide to Material Requirements for Compliance

As investors and issuers increasingly consider the risks, opportunities and impacts of environmental, social and governance factors on investments and business decisions, regulators also took notice. The proliferation of climate, ESG and sustainability-focused reporting standards and regulations has been welcomed by some financial market participants and challenged by others.

For the companies and investors to which these measures apply, compliance means understanding the rules, gathering the relevant information and disclosing it to the appropriate regulatory body. Review the map to see the focus areas for select sustainability regulations across regions. For additional details please visit our **Regulations Hub**.

**Americas**

**SEC Climate Rule | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	✗	✗	only disclosure	✗

**CSSB – ISSB Adoption | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	only disclosure	✓	only disclosure	✗

**European Union**

**EU Taxonomy | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✗	✗	✓	✓	✗

**SFDR | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✗	✓	✓	✗	✗

**CSDDD | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✗	✓	✗	✗	✓	✗

**CRD VI/CRR | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✓	✗	✗	✓	✓

**CSRD | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	✗	✗	only disclosure	✗

**ESMA | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✗	✗	✓	✗	✗	✗

**United Kingdom**

**UK SDR | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✗	✓	✓	✗	✓

**Singapore**

**Circular No. CFC 02/2022 | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✗	✓	✗	✗	✗

**APAC/ASEAN/Australia**

**Australian Accounting Standards Board Australian Sustainability Reporting Standards | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	✗	✓	✗	✗

**Circular to Licensed Corporations - Management and Disclosure of Climate-Related Risks by Fund Managers | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✓	✗	✗	✗	only disclosure

**ACRA/SCX REGCO ISSB Adoption | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	✗	✗	only disclosure	✗

**Guidelines For Environmental Risk Management For Asset Managers, Banks And Insurers (Respectively) | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✓	✗	✗	✗	Asset Managers only

**International\***

**TCFD | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	only disclosure	✗	✗	only disclosure	✗

**IFRS ISSB S1, IFRS ISSB S2 | Focus Areas:**

Disclosures	Risk Management	Naming/Marketing	Labels	Transition Plan	Stewardship
✓	✓	✗	✗	only disclosure	✗

\*Countries that have or are expected to adopt ISSB: Australia, Bangladesh, Brazil, Canada, Costa Rica, Hong Kong, India, Japan, Korea, Malaysia, Nigeria, Phillipines, Singapore, Sri Lanka, Taiwan, Turkey, UK.

## Focus Areas for Compliance

### Disclosures

The regulation/framework places an emphasis on reporting and disclosing key performance indicators and qualitative information to relevant stakeholders.

### Risk Management

The regulation/framework was developed to mitigate sustainability or climate risks at the product and/or company level.

### Naming/Marketing

Parts of the regulation/framework focus explicitly on how in scope products are named and marketed to consumers to prevent misrepresentation of financial products, or misleading claims (i.e., greenwashing). Instruments must meet minimum criteria for the use of sustainability-related terms in their names.

### Labels

By meeting certain criteria within the regulations, financial instruments/products are allowed to use specific labels to signal to the market their compliance/alignment with said regulation.

### Transition Plan

As part of regulatory compliance, entities that fall within a regulation's scope must execute a climate transition plan (i.e., a plan to ensure their products/financial instruments contribute to the transition to a net zero economy within a certain timeframe).

### Stewardship

Parts of the regulations/framework require in scope entities to have an investor stewardship strategy (i.e., engagement with companies, exercising of voting rights, monitoring of proxy advisors, etc.) that is compatible with their sustainability product offerings and sustainability objectives.