

CRITERIA FOR THE BELGIAN AWARDS FOR SUSTAINABILITY REPORTS 2025

NON CSRD ORGANISATIONS

1. Introduction

The Corporate Sustainability Reporting Directive (“CSRD”) has been transposed into Belgian legislation on 2 December 2024 (the “CSRD Law”). The CSRD Law applies to all large companies as from 2025 (reporting in 2026). It also applies to all EU-PIE entities with more than 500 employees on a consolidated basis, and this already as from 2024 (reporting in 2025).

As result, for purposes of determining the criteria to be applied by the members of the Jury of the Belgian Awards for Sustainability (“BAS”) for the 2025 edition, we have made a distinction between the criteria to be applied by the Jury for the entities in scope of the CSRD in 2024 (reporting in 2025), which we refer to as “the CSRD organisations”, and the criteria to be applied by the Jury for all other organisations publishing sustainability information over 2024 (or over 2023, provided that it has been published in 2024 or) in 2025. The latter organisations are referred to as the non-CSRD organisations. For the criteria relating to the CSRD organisations, we refer to our separate document called “Criteria for the BAS 2025-CSRD organisations”.

This document is focused on the criteria to be applied by the Jury for the sustainability information/reports of the non-CSRD organisations.

2. Categories of organisations in scope of the Non-CSRD BAS

a. **Large organisations** exceeding two of the three following criteria:

- Net turnover: € 50 million;
- Balance sheet total: € 25 million; and
- 250 employees (FTE).

This category also includes listed organisations together with public-interest entities not subject to the CSRD in 2024.

b. **Small and medium-sized enterprises (“SMEs”)**: all organisations between 50 and 250 employees, not considered as large organisations

c. **Other organisations**:

- Small-sized companies: companies smaller than 50 employees;
- Non-Governmental Organisations (“NGOs”), not-for-profit organisations (“ASBLs”/“VZW’s”), international not-for-profit organisations (“AISBLs”/“IVZW’s”) or foundations, which are based in Belgium and operate in or outside the Belgian territory;
- Educational institutions, federations, public sector, etc.

3. Reporting standards

The organisations in scope can prepare sustainability reports on a voluntary basis, using the [European Sustainability Reporting Standards \(“ESRSs”\)](#) or other various internationally recognised frameworks or standards for the preparation of such reports, such as those developed by the Global Reporting Initiative (“GRI”), the Sustainability Accounting Standards

Board (“SASB”), the UN Global compact (Sustainable Development Goals, or SDGs”) or the Task Force on Climate related Financial Disclosures (“TCFD”).

The criteria to be used by the Jury as guidance, further in this document have been developed to demonstrate the added value of the BAS for participating entities. The criteria focus on impact and performance but still based on the overall objective of stimulating best practices in an open and transparent reporting of an entity’s so -called material impacts, risks, and opportunities (“IRO’s”). The sustainability reporting therefore remains the basis for the scoring, but entities can distinguish themselves by going over and above the minimum expectations (by reference of the reporting standard used) and putting relevance and decision-usefulness for the stakeholders first. As such, the recognition of such transparency will be an added value for participating entities and will drive change and innovation in future reporting practices.

Finally, we note that all reports submitted to the Jury will have been subject to a pre-screening performed by members of the IBR/IRE (based on using the below criteria). This will result in a short-list of between 3 and 5 sustainability reports (per category) which will be subject to scoring by the members of the Jury. These members of the Jury, including the President, will all be independent from the IBR/IRE/profession.

4. Eligibility of the reports

- Every organisation that issues a sustainability report on its **activities in Belgium and beyond** – regardless of the size of the organisation or its industry – can participate in the BAS;
- The report has to **communicate on the activities of a Belgian legal entity** or on the Belgian activities of a foreign entity;
- The report on the Belgian activities of a foreign entity must set clear sustainability objectives and provide sufficient information on the basis of certain selected criteria (targets, results etc.) for Belgium;
- The organisation has to disclose on its **environmental, social and governance activities and performance** (“ESG”);
- The 2025 edition promotes sustainability reports relating to the year 2024 or - when not available - the most recent sustainability report (for a year prior to 2024) provided that it has been published in 2024 or 2025 and has not been submitted for previous editions of these BAS.

5. Criteria

The criteria developed are based on the following elements and weights:

- Performance as expressed through the quantitative data provided: **50% of points to be awarded during the pre-screening process by the members of the of the IBR/IRE whereby conflict of interest safeguards will be implemented;**
- Other aspects of the sustainability reports: **50% of the points awarded by the Jury.**

b. Performance of the quantitative data (50% of the points to be awarded)

Focus is on metrics, where the performance and/or trend has improved. Inclusion of historical information about achieved milestones between any base year and the reporting period, could be deemed as relevant to evaluate the consistency of the metrics included in the KPI's.

Suggested criteria and principles to use in terms of assessing performance:

- Target setting:
 - Has the company set a measurable time-bound outcome-oriented target to meet its policy's objectives for all material sustainability matters?
 - Does the company disclose whether the targets set are aligned with globally recognized frameworks or with national, EU or international policy goals?
 - Can the target set be considered as being sufficiently ambitious, considering industry/sector benchmarks, reporting peers and national, EU or international policy goals?
- Progress reporting:
 - Has the company defined a suitable, objective as well as specific, measurable, achievable, relevant and time-bound ("SMART") metrics to track its performance?
 - Does the company transparently disclose if the company's performance is on track to meet the milestones and targets set, and whether the progress is in line with what had been initially planned? This includes disclosing an analysis of trends or significant changes in the performance of the entity towards achieving the target, as well as disclosing the challenges faced, both negative and positive evolutions, and remediation actions taken to enable the company to meet the targets set.
 - Does the company disclose its performance compared to industry/sector benchmarks, peers and/or national, EU or international policy goals, including the disclosure of an objective and balanced assessment/evaluation of its performance compared to these benchmarks.

c. Other aspects/considerations of the sustainability reports (50% of the points to be awarded)

i. Value chain considerations (20% weight)

The level of explicit disclosures on the level of value chain information and how it was embedded in the material IRO's.

ii. Stakeholder considerations (20% weight)

The level of explicit disclosure in regards of stakeholder involvement in the determination of the material topics is important. It also includes a clearly understandable narrative covering the process to identify and define the stakeholders involved.

iii. Due diligence procedures (10% weight)

Did the organisation specifically disclose their due diligence procedures? Evaluate the maturity level of the due diligence process.

iv. Readability considerations (50% weight)

- The sustainability report includes a clear narrative that allows to understand the perimeter of the sustainability statements;
- Evaluation of the level of cohesiveness of the information;
- If there is a clear link between the material IRO's and the strategy and business model and how the sustainability matters are integrated with the strategy and business model, this should be positively rated;
- Readability and accessibility through the wording used: understandable by a reasonable and informed reader. If so, it should impact the below score ranges positively. A sustainability report that is complex should get a negative rating for this aspect;
- Appreciation of the structure of the sustainability report and the overall presentation. If structure is deemed clear for the reader, it should impact the below score ranges positively;
- Evaluation of the length of the sustainability report and if this is proportionate to the size of the undertaking/ its activity? If so, it should impact the below score ranges positively;
- If the information is given for the undertaking compares also with industry and peers, and if the sustainability report contains positive and negative aspects of the organisation's performance and if, according to the Jury members, smart KPI's and objectives / targets have been set, this should positively reflect on the score ranges below.

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