

## CRITERIA FOR THE BELGIAN AWARDS FOR SUSTAINABILITY REPORTS 2026

### CSRD ORGANISATIONS

#### 1. Introduction

The [Corporate Sustainability Reporting Directive](#) (“CSRD”) was transposed into [Belgian legislation on 2 December 2024 \(the “CSRD Law”\)](#). The CSRD Law applies to all Public Interest Entities<sup>1</sup> (PIEs) with more than 500 employees, including EU PIEs (meaning companies whose securities are admitted to trading on a regulated market within the European Economic Area), on a stand-alone or consolidated basis, and this already as from 2024 (with reporting in 2025) (wave 1 companies).

In February 2026, the [Directive “Omnibus I”](#) has been published in the JOUE. It focuses amongst others on changing the thresholds for companies in scope of the CSRD. The Directive Omnibus I foresees two thresholds, (i) average number of employees of 1,000, and (ii) annual net turnover of € 450 million. If a company exceeds these two thresholds, it will be in scope of the CSRD. The Directive Omnibus I enters into force 20 days after its publication, being 16 March 2026. Member States have until 19 March 2027 to implement the changes to the CSRD directive. The Belgian government will be working on the transposition during 2026, but the exact timing is currently unknown. This timing will determine the effective date of application in Belgium (normally sustainability statements relating to the year 2027) and whether early adoption will be possible (meaning as from calendar year 2026). This means that the effective application of the new thresholds will not be possible until 2027 (reporting in 2028), unless early adoption is decided for 2026 (reporting in 2027).

Therefore, the CSRD Law for the moment (until the transposition of the changes to the thresholds in Belgium is enacted) still applies to all PIEs<sup>1</sup> with more than 500 employees, including EU PIEs, on a stand-alone or consolidated basis.

According to the CSRD Law, the following companies were supposed to apply the CSRD as from 2025 (reporting 2026) (wave 2 companies): all large companies, being companies that exceed more than two of the following criteria either on a stand-alone or on a consolidated basis:

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

However, as a result of the transposition of the Stop-the-clock directive into Belgian legislation in December 2025, the effective implementation of the CSRD by all large companies in scope of the CSRD Law, except for the PIEs with more than 500 employees, has been postponed for

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<sup>1</sup> According to the Belgian Code of Companies and Associations, the companies which must be considered as public interest entities are:

- companies whose securities are admitted to trading on a regulated market within the European Economic Area;
- credit institutions;
- insurance and reinsurance undertakings;
- securities settlement institutions as well as organizations assimilated to settlement institutions.

2 years, so meaning reporting for the first time over 2027 (instead of 2025) as first year of implementation.

The criteria developed below were updated following feedback gathered during the 2025 jury process. These are meant as guidance to be applied by the members of the Jury of the Belgian Awards for Sustainability (BAS) for the 2026 edition, scoring the sustainability statements of the **companies in scope of the CSRD in 2025, reporting in 2026 (wave 1 companies)**. We note that these sustainability statements, prepared in accordance with the [European Sustainability Reporting Standards \(ESRSs\)](#) are integrated in entities' annual reports and accompanied by a limited assurance statement of an auditor registered with the Belgian Institute of Statutory Auditors (**IBR-IRE**).

The criteria have been developed to demonstrate the added value of the BAS for participating entities. The criteria focus on impact, and performance (metrics and targets), and are based on the overall objective of stimulating best practices in an open and transparent reporting of an entity's material impacts, risks, and opportunities (IROs). The reporting (as part of the sustainability statements) remains the basis for scoring, but entities can distinguish themselves by going over and above the minimum and putting relevance, truly embedding sustainability into their strategy and business model, 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 approximately 5-8 sustainability statements/annual reports which will be subject to scoring by the members of the Jury. These members of the Jury, including the President, are all independent from the IBR/IRE/profession.

For the specific criteria relating to the large non-**CSRD** organisations, we refer to our separate document called "**Criteria for the BAS 2026 large non- CSRD organisations**".

## **2. Eligibility of the reports**

- All sustainability statements of Belgian EU-PIEs which are in mandatory scope of the CSRD Law.

## **3. Criteria**

The criteria developed are based on the following elements and weights, whereby we have considered that the sustainability statements have been audited (scope: limited assurance) from a compliance perspective with the CSRD Law:

- Performance in the quantitative data provided either as mandatory disclosure as per the ESRSs, voluntary disclosures as per the ESRSs, or entity-specific disclosures in case entities could not relate their material IROs to a sector-agnostic ESRS:  
**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 are implemented;**
- Other aspects/considerations of the sustainability statements reported:  
**50% of the points awarded by the Jury.**

For information purposes, we note that the double materiality process and the EU Taxonomy are not separately considered as elements for scoring as these are covered as specific elements in the assurance conclusion which accompanies the sustainability statements. We believe the guidance given with respect to the qualitative considerations, provides sufficient flexibility for jury members to comment on elements directly or indirectly related to these two specific aspects.

### **a. Performance of the quantitative data (50% of the points to be awarded)**

Focus is on metrics for the ESRs (mandatory or voluntary quantitative datapoints/disclosures) or entity-specific disclosures/metrics, where the performance and/or trend has improved. Inclusion of historical information about achieved milestones (including interim-milestones) between the base year and the reporting period, could be deemed as relevant to evaluate the consistency of the metrics included in the KPI's in the sustainability statements.

#### **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 topics with regards to the ESRs?
  - Does the company disclose whether the targets set are science-based, based on conclusive scientific evidence or aligned with globally recognized frameworks or with national, EU or international policy goals (e.g. SBTi, Science-Based Targets Initiative for Nature (SBTN), Kunming-Montreal Global Biodiversity Framework (GBF), UN Sustainable Development Goals (UN SDG's))?
  - Can the target set be considered as being sufficiently ambitious, considering industry/sector benchmarks, reporting peers and national, EU or international policy goals?
  - Does the company disclose the period to which the target applies and, if applicable, any milestones or interim targets?
  - in case that the company has not set targets, does the company disclose whether and how it nevertheless tracks the effectiveness of its actions to address material IRO's and measures the progress in achieving its policy objectives?
- **Progress reporting:**
  - Has the company defined a suitable, objective as well as specific, measurable, achievable, relevant and time-bound (SMART) metrics regarding its IRO's identified to track its performance?
  - Does the company report its progress towards the adopted targets (including intermediate milestones/targets set) and against its baseline over time?
  - 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 company towards achieving the target, as well as disclosing the challenges faced, both negative and positive evolutions regarding metrics, and remediation actions taken.
  - Does the company provide meaningful analysis year-over-year?

- 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?

### **Specific guidance on entity-specific topics and metrics**

We understand that it is sometimes difficult to know whether a topic is entity-specific or falls under a topical standard such as “energy.” To avoid inconsistencies in the scoring process, the following guidance needs to be followed by all pre-screeners and external jury members: Based on the decision by the reporting entity:

- If the entity-specific topic appears in a topical standard chapter (E1-E5, etc), it should be scored under that standard;
- If it is presented in a separate “entity-specific” section, it should be assessed in our quantitative performance as a separate line item “entity-specific” with a weight of 10%, whereby, as indicated above, the excel will automatically change the weights of the other standards in scope of the respective sustainability statements, so as to always get to a total of 100%.

As an exception to the above general rule, if a company has identified any of the following topics as material (and linked to a material IRO), these should always be considered and scored as entity-specific, even if the company would have presented these in a specific topical standard:

- Cyber security;
- Artificial Intelligence.

Conversely, if a company has identified any of the following topics as material (and linked to a material IRO), these should always be considered as part of a topical standard, even if the company would have presented these in a separate “entity specific” section of the sustainability statements:

- Product quality and safety aspects, which should be scored as part of S4;
- Customer satisfaction survey results, which should be scored as part of S4.

### **b. Other aspects/considerations of the sustainability statements reported (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 IRO’s is important. It also includes a clearly understandable narrative covering the process to identify and define the stakeholders involved, to ensure their

involvement during the double materiality assessment, and how their feedback has been considered in determining the material IROs.

**iii. Due diligence procedures (20% weight)**

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

**iv. Embedding sustainability into the strategy (20% weight)**

Did the entity specify how their material ESG topics are embedded in their strategy and business model? Can a reader understand how sustainability is genuinely embedded in strategic thinking and execution?

**v. Readability considerations (20% weight)**

- The sustainability statements include a clear narrative that allows to understand the perimeter of the sustainability statements;
- Evaluation of the level of cohesiveness of the information (for example between the sustainability statements and the financial statements). If there is high degree of connectivity, that is considered positive in the evaluation of the Jury members;
- 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. Sustainability statements that are complex should get a negative rating for this aspect:
- Appreciation of the structure of the sustainability statements 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 statements and if this is proportionate to the size of the undertaking/ its activity? If so, it should impact the below score ranges positively;
- Do the sustainability statements contain disclosure requirements that are allowed to be omitted as subject to the "phased-in Disclosure Requirements" in accordance with appendix C of ESRS 1? 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 statements contain positive and negative aspects of the organization'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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**Appendix 1: weighting of the quantitative performance per ESRS for sectors**

ESRS	Default	Food and Beverage	Chemicals, Pharmaceuticals & Adv Materials	Energy & Utilities (& renewables)	Banks, Insurance, Asset Man	Transport, Logistics & Mobility
E1	15	15	15	20	15	20
E2	10	5	15	10	5	10
E3	5	10	5	5	3	5
E4	10	12	5	10	5	5
E5	10	8	10	5	5	10
S1	15	15	15	15	15	15
S2	10	10	10	10	15	10
S3	5	5	5	10	7	5
S4	10	10	10	5	10	10
G1	10	10	10	10	20	10
Total (%)	100	100	100	100	100	100