

Dear CDSB,

Please find attached several comments from PwC Poland on CDSB Framework (edition 2.0) consultation draft as it applies to disclosure on environmental information by organizations in mainstream reports.

We agree that there is a need for a Framework that focuses on information presented in mainstream reports and encourage organizations to disclose non-financial information within their mainstream reporting. There is also an important need we observe in the EU, to support the process of implementation of the Directive of the European Parliament and of the Council amending Council Directives 78/660/EEC and 83/349/EEC as regards disclosure of non-financial and diversity information by certain large companies and groups (the Directive is expected to be adopted by Council in the upcoming weeks). We perceive CDSB Framework as a great opportunity to support the process and to provide guidelines that can lead the companies to the fulfilment of requirements and at the same time keep their reporting consistent and comparable with the disclosures provided in the other parts of the world. Nevertheless, certain issues are not clear to us and we are happy to share a few overall comments to the presented draft:

- 1) So far, the proposed Framework appears to be a combination of and a guide to other existing frameworks and methodologies. It is not clear what is the value added by the framework and why should companies use this Framework instead of looking directly into others guidelines (GRI, CDP, etc.).
- 2) What is the value added of the Framework in relation to countries, that have their own regulations in this field (i.e. EU directive, Australia, France, Sweden) and what are the benefits that should motivate companies to use CDSB Framework, while having their own guidelines already available (and sometimes legally binding) on national level.
- 3) As stated in the Framework text "comparability of environmental information provided under the Framework between enterprises and sectors may be limited, pending development of disclosure approaches and practices". Did you consider any type of incentives to increase comparability over time? Does the framework provide any opportunity to gather certain types of information in one place? What is the concept of supporting "development of disclosure approaches" so as it results in increased comparability (as an example – use of CDP by Bloomberg)?

Thank you for the opportunity to share our views.

Kind regards,

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