



## What CFOs need to know today

### **Sustainability Reporting Readiness**

Asia Pacific Mandatory Sustainability  
Reporting Series: Paper 1



Sustainability reporting is a policy lever for achieving social, economic and environmental outcomes. The starting point is an increased focus on business impacts, risks and governance.

The reporting regimes draw on established foundations but cover new data, are complex and developing in scope. These are mandatory disclosures that require the same rigour as financial reporting. And they are highly visible. CFOs have a leading role here. Sustainability reporting is more than another regulatory compliance exercise; leaders can use this as a mechanism for positive change, enhancing business decision-making, improving overall performance and beyond.

This three-part series explores the role and practical steps of the CFO in building assurance-ready sustainability reporting and finding opportunities to create business value.

## What is the challenge?

Sustainability reporting is being mandated across Asia Pacific with different requirements and timelines. The majority of countries will have financial and non-financial disclosures in place by 2027 (Figure 1). And for many organisations, they will also need to meet international reporting requirements, such as the European Union's Corporate Sustainability Reporting Directive (CSRD). Most are starting with climate disclosures, but the scope is extending into many other social and environmental domains.

These disclosures are high profile and visible. While the regulations impose accountabilities on company leadership and boards, organisations' sustainability performance is increasingly important for public and investor stakeholders. With 45% reporting that sustainability is a driver of their overall strategy and 85% reporting increases in sustainability investment, organisations also need a clear view of their own impact and performance<sup>i</sup>.

Preparing these disclosures requires the same level of rigour that is applied to the preparation of annual financial statements. As a result, finance functions are taking a leadership role in the reporting process. Deloitte's worldwide ESG reporting benchmark shows a growing number of CFOs are in charge, with 32% of organisations reporting the CFO is the accountable executive, and 16% having joint accountability between the CFO and Chief Sustainability Officer<sup>ii</sup>. Given this, CFOs face the challenge of achieving compliance for a new area with a short time frame, while also navigating complex economic conditions and managing a diverse set of priorities.

Organisations are starting from different points, and most need to improve their sustainability skills and awareness, access to data and associated governance capabilities. For many, this means upfront investment in people, data and systems to build a high quality and repeatable reporting capability. For finance teams, this is familiar territory.

The opportunity and challenge for the CFO is to lead the plan for organisational capability to embed sustainability reporting into business governance – while maintaining a focus on an end goal of value creation.

i. Deloitte, CxO Sustainability Survey, 2024

ii. Deloitte, ESG Reporting Benchmark, 2024








**Figure 1.** Asia Pacific sustainability reporting disclosure timelines

	2023	2024	2025	2026	2027	2028	2029	2030
<b>Australia</b>			The Australian Accounting Standards Board (AASB) Reporting Group 1 Companies	AASB Reporting Group 2 Companies	AASB Reporting Group 3 Companies			
<b>China</b>				Sustainability Reporting Guidelines				ISSB-aligned reporting
<b>Hong Kong</b>				HK Exchange Climate disclosures				
<b>India</b>	Business Responsibility and Sustainability Reporting (BRSR)	BRSR Core Framework						
<b>Japan</b>			Voluntary Sustainability Standards Board of Japan (SSBJ) standards		Mandatory SSBJ standards			
<b>Korea</b>					Financial Services Commission (FSC) standards postponed until after 2026			
<b>New Zealand</b>		Climate Standard 1 (CS1)	Assurance of GHG emissions (CS1)					
<b>Singapore</b>			Climate-related disclosures (CRD) Scope 1 and 2 emissions	CRD Scope 3 GHG emissions				
<b>Taiwan</b>				International Financial Reporting Standards (IFRS) S1 and IFRS S2 Reporting	Phased-in Mandatory Reporting - Future ISSB standards			

 International Sustainability Standards Board (ISSB)/Task Force on Climate-Related Financial Disclosures aligned (TCFD)

 Others

# What are the first questions to ask?

## What applies to your organisation?

Large organisations are likely to be captured by different regimes across countries and standards. CFOs need to understand what is impacting them, when and where. And they need to understand what is common across these regimes to accelerate compliance. Customers and suppliers may be captured by similar requirements, and they will likely need to work together to identify and share sustainability data. Resourcing these interactions requires consideration but presents an opportunity to develop deeper relationships with their sustainability partner ecosystem.

## Who is leading the change?

Clarifying ownership of the sustainability reporting agenda, and who is accountable for delivery, is critical given the deadlines. Leaders involved in achieving compliance will likely have a different understanding of the agenda, and the required effort (Figure 2).

Even when the CFO is not leading, their perspective is critical. Resolving these challenges and developing a regular project rhythm with the right people is key to ensuring that coordinated progress is made and risks to delivery are clear.

## Are the critical stakeholders aligned?

The board, and potentially investors and customers, will be watching closely. Proactively engaging stakeholders, and aligning on ambition, is critical. For some organisations sustainability disclosures will be the first time they communicate climate risks and opportunities in such detail. Considering how to deliver that communication is also important.

Figure 2. Sustainability reporting stakeholders have different needs



For many organisations General Counsel and Chief Risk Officers are also involved, with additional considerations



# Where does the CFO need to focus?

Our work with organisations addressing sustainability reporting challenges around the world tells us there are three common gaps in building an effective reporting function.

- **Securing people resources and capability:** Sixty percent of organisations are unsure of the resource requirement needed to meet their new reporting obligations, and those that do expect resources to double<sup>iii</sup>. This is combined with key skills gaps across data, finance and sustainability experts, and a low level of familiarity with sustainability requirements across the organisation.
- **Evolving governance and controls that are fit for purpose:** Increased transparency and scrutiny of sustainability reporting and performance requires a maturity of controls not previously established. Reporting standards also require evidence that sustainability reporting is embedded into business governance processes and business decision-making.
- **Understanding data requirements and management:** Data availability, consistency, and managing multiple complex data requirements are key challenges for most organisations. This is compounded where organisations need to consolidate new data and information requirements across functions and geographies. They need to be clear on what data they have, what quality, and how it will be used. And they need to assess their technology capability to manage data complexity and automation to deliver efficient and consistent reporting.

The good news is that for many, existing resources, processes and architectures can help meet the new needs – often with targeted uplift across key capability areas. For others, it may be necessary to overcome legacy systems limitations. Smart organisations are using existing finance, risk and strategy capabilities and applying them to the new context.

Some organisations are setting themselves up for transformative leadership by bringing sustainability to the core of their business ambition and strategy; for others achieving compliance is the necessary first step. Today, 32% of global organisations see sustainability reporting as a driver of strategy, while 53% see it primarily as compliance driven<sup>iv</sup>.

The challenge is clear: those who view sustainability merely as a compliance checkbox risk falling behind, while forward-thinking leaders who see this as a strategic imperative can drive long-term value and competitive advantage. The question is not if, but how quickly, businesses can transform to seize this opportunity.

## Client Spotlight

### Combining AI and sustainability expertise to navigate complexity

A global client approached Deloitte as a recognised leader in sustainability, with a clear goal of accelerating their preparedness for mandatory sustainability reporting. To assess their readiness, they first needed to understand the reporting expectations across multiple jurisdictions. By using Deloitte's SustainNext™ tool, a gap assessment of the client's current disclosures was performed against the European Sustainability Reporting Standards (ESRS) and IFRS S1 and IFRS S2. SustainNext™ combines Gen-AI analysis and Deloitte expert assessment to determine existing company disclosures against each reporting requirement. The insights delivered were able to drive the client's reporting readiness roadmap. This included considerations of workstreams across data, technology, process enhancement and controls improvements, financial impact and system improvement.

iii. Deloitte, ESG Reporting Benchmark, 2024

iv. Deloitte, ESG Reporting Benchmark, 2024



# Where are you now, and what do you need to start?

Organisations across Asia Pacific face different requirements and different levels of maturity. The most important first steps for the CFO to take now are to:

- Gain a clear understanding of your current position and the specific material reporting requirements across all relevant regimes and considerations.
- Understand the gaps across data, people and process and what is needed to mature the sustainability reporting capability.
- Look inside the organisation for existing capabilities and processes, and look outside the organisation for emerging leading practice and expert help where needed.
- Plan to go beyond compliance over time and embed reporting into the organisations decision-making and performance rhythm.

The second paper in this series focuses on the essential areas where organisations must focus to evolve their reporting capability.



With increased scrutiny of organisations' sustainability goals on one hand and increased appetite for investment in sustainable business on the other – the need for assurance-ready sustainability reporting is clear.

This requires the same rigour and control demonstrated by effective finance organisations. Laying the right foundations is the crucial first step to unlocking greater business value; by solidifying these basics, organisations not only make compliance more manageable but also pave the way for achieving more ambitious sustainability goals in the long term.



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