

Harnessing Technology to **Simplify ESG Reporting Challenges**





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Executive Summary

The ESG agenda is now mainstream and stakeholders' demand for ESG information is putting pressure on companies to provide transparent, credible, and reliable disclosures. A host of ESG regulations have evolved in recent years and these regulations are expected to increase. The EU leads in this space and other regions are soon catching up.

The importance of ESG reporting is underscored by the rise in ESG report publication among major companies. For instance, over 90% of S&P 500 Index companies now publish ESG reports, a significant increase from just 20% in 2011, according to the Governance & Accountability Institute.

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Regulations and frameworks range from investor-centric, aiding investors in assessing ESG risks for sustainable investments, to industry-led ones that focus on collaborative industry efforts in scrutinizing ESG performance, particularly in supply chains.

Yet, the multiple frameworks pose challenges for companies to standardize ESG disclosures. Although efforts have been made to harmonize these frameworks with the establishment of ISSB, companies will still have to continue to report on multiple frameworks at least for the near future. Companies also struggle with the challenges of managing vast complex data with under-invested capabilities and often, through excel spreadsheets.

Companies tend to view ESG reporting as a tactical task rather than a strategic activity. Complexities compound when extending the ESG reporting requirements for supply chains. Technology is not fully leveraged to drive ESG reporting. These challenges result in low quality data disclosures which do not actively support decision making for the companies and their stakeholders.

A strategic approach can transform ESG reporting into a value-generating process, and at the heart of this transformation lies technology capabilities. Companies should invest in an intelligent ESG solution that can manage the complexities of reporting processes and make it more dynamic, utilize analytics to derive actionable insights and collaborate with various internal and external stakeholders. This can support companies in real-time decision making and meet the evolving stakeholder needs. Companies need to evaluate specific capabilities of the ESG solution to support their goals but also that can provide a flexible and scalable architecture. SaaS platforms also have the advantage of low-cost rapid deployment that can be scaled with minimal investment. With increasing compliance requirements, companies can ill afford to not invest in ESG reporting solutions.



Pressure is mounting on companies to disclose ESG information.

Corporate ESG[Environmental, Social and Governance] reporting has seen a significant increase with multiple stakeholders demanding data and accountability. Among the key groups are regulators with an increasing number of ESG-related compliance requirements. Investors are looking for reliable ESG data to apply ESG investing criteria to their portfolios. Millennial and Gen Z consumers in particular want to associate with brands that demonstrate credible sustainability action. Communication on ESG performance is key to establishing this trust.

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ESG policy interventions have been introduced worldwide since 2011 and 647% increase in ESG regulations since turn of the millennium

Source: ESG Book

46%

consumers expect brands to take the lead on creating sustainable change

Source: Nielsen

US\$ 18.4 trillion

ESG policy interventions have been introduced worldwide since 2011 and 647% increase in ESG regulations since turn of the millennium

Source: PWC and Bloomberg

Increasing ESG disclosures make the ESG reporting landscape complex.

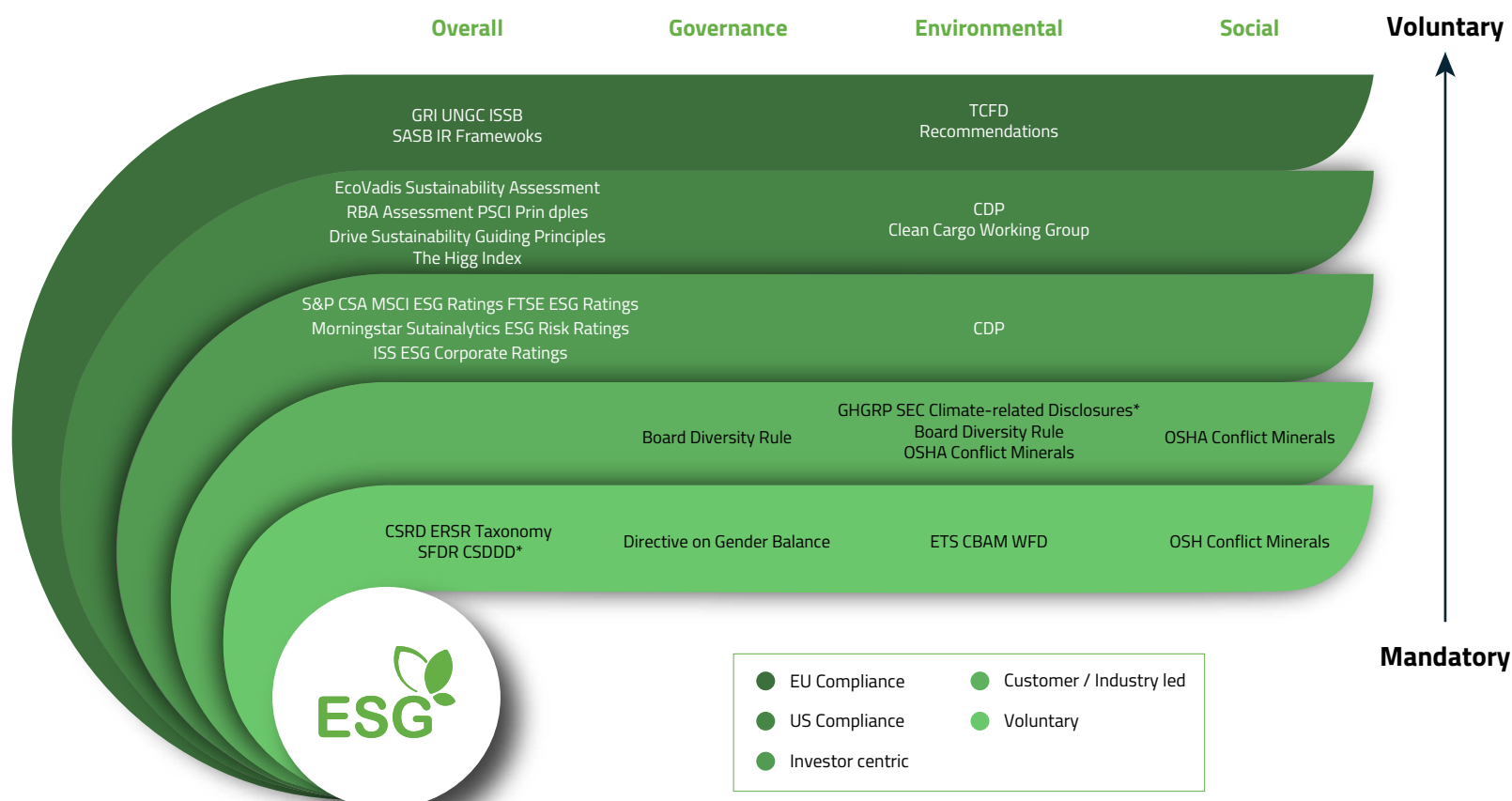
Regulators across the globe are focusing on ESG regulations to address key environmental, social, and governance issues, aiming to promote sustainable corporate behavior and enable transparency to hold companies accountable. While the EU is leading in ESG regulations, other regions are catching up and these regulations are expected to increase in coming years.

Beyond regulators, investors demand ESG information to assess their portfolio risk and make ESG investing decisions. They use various ESG rating services, and each rating agency has their own methodology. Companies also use ESG rating platforms to assess their supply chain risks and collaborate with suppliers for ESG performance improvements. There are also voluntary frameworks that companies use to disclose ESG information.

ESG or sustainability reporting has significantly increased in the last few years. As per global research [Source: KPMG Report], 79% of the top 100 companies across 58 countries report on ESG and the reporting rate is 96% for the top 250 global companies. Similarly, 20,000 companies have disclosed environmental data in 2022 through the CDP platform.

Navigating this multitude of ESG reporting requirements and frameworks is complex, and often frustrates the companies. Some of these frameworks cover wide-ranging ESG topics while others focus on specific ESG topics such as climate.

Overview of the complex EU and US ESG reporting landscape



Key ESG Compliance Directives - EU

The EU has adopted many directives on ESG topics and related disclosures. The directives provide for the EU-wide frameworks and would require member states to adopt national legislations to meet the directives' requirements.

Corporate Sustainability Reporting Directive (CSRD)

CSRD requires all large companies and all listed companies (except listed micro-enterprises) to disclose information on what they see as the risks and opportunities arising from social and environmental issues, and on the impact of their activities on people and the environment. CSRD replaces the existing Non-Financial Reporting Directive (NFRD) and expands the scope to a broader set of large companies as well as listed SMEs. The reporting must be in accordance with European Sustainability Reporting Standards. The rules will apply for the reporting period 2024, and NFRD will continue to be in force until companies have to apply CSRD rules.

European Sustainability Reporting Standards (ESRS)

ESRS provide detailed standards for compliance with CSRD. Currently, there are 12 cross-cutting draft standards released. These spread across general requirements and general disclosures and topical standards on Environment, Social and Governance topics.

The Taxonomy Regulation

The Taxonomy Regulation establishes an EU-wide common definition of economic activities that can be considered environmentally sustainable. It sets 4 criteria to assess whether an economic activity is environmentally sustainable. Financial and Non-financial undertakings have disclosure requirements under this regulation.

Sustainable Finance Disclosure Regulation (SFDR)

SFDR has implemented harmonized transparency rules for Financial Market Participants and Financial Advisors on how they integrate ESG factors into their investment decisions and financial advice and on their overall and product-related sustainability ambition. Disclosures under this regulation are at both entity and product level.

Directive on improving the gender balance among directors of listed companies and related measures

All listed companies, by 30 June 2026, must reach the directive's gender balance on boards objectives of:

- Members of the underrepresented sex hold at least 40% of non-executive director positions
- Members of the underrepresented sex hold at least 33% of all director positions, including both executive and non-executive directors

Listed companies are required to annually disclose the gender representation on their boards, distinguishing between executive and non-executive directors.

Emissions Trading Scheme (ETS) Directive

This directive establishes a system for greenhouse gas (GHG) emission allowance trading within the EU to reduce GHG emissions in the most cost-effective manner. The scheme covers GHG emissions of power stations, energy-intensive heavy industry (e.g. oil refineries, steelworks, and producers of iron, aluminium, cement, paper, and glass), and civil aviation. Qualifying entities in these sectors are required to measure and report GHG emissions.

Carbon Border Adjustment Mechanism (CBAM)

CBAM addresses the embedded carbon emissions during the production of carbon-intensive goods entering the EU. Importers of certain carbon-intensive products will have to disclose the embedded carbon emissions of their imports and pay a price for such emissions through CBAM certificates.

Waste Framework Directive (WFD)

WFD prescribes measures for waste management and reducing overall impacts of resource use to transition to a circular economy. The waste hierarchy is established through 5 stages, and Extended Producer Responsibility (EPR) principles are laid down. Under this directive, entities producing, processing, and transporting hazardous waste must report such waste details to competent authorities. This may be extended to non-hazardous waste as well.

Occupational Safety & Health (OSH) Framework Directive

The OSH Framework Directive contains principles concerning the prevention of risks, the protection of safety and health, the assessment of risks, the elimination of risks and accident factors, and the informing, consultation, balanced participation and training of workers and their representatives. Based on this Framework Directive a series of individual directives were adopted. Employers are required to record, maintain and report occupational accidents data to responsible authorities.

Conflict Minerals Regulation

The regulation aims to stem the trade of four minerals (tin, tantalum, tungsten and gold) which sometimes finance armed conflict or are mined using forced labor. EU companies importing such minerals have to conduct detailed supply chain due diligence to establish if the sources finance armed conflict or use forced labor and make annual disclosures on such due diligence and risk mitigation measures.

Corporate Sustainability Due Diligence

The EU has adopted a proposal for a Directive on Corporate Sustainability Due Diligence. The proposal aims to establish responsibilities for companies for identifying, preventing, mitigating, and accounting for negative human rights and environmental impacts in the company's operations, subsidiaries, and value chains.

The EU member states such as France, Germany and Norway have implemented national legislations for corporate due diligence and countries like Austria and the Netherlands are in the process of adopting and implementing similar legislations.





Key ESG Compliance Directives – US

Greenhouse Gas Reporting Program (GHGRP)

The GHGRP requires reporting of GHG data and other relevant information from large GHG emission sources, fuel and industrial gas suppliers, and CO₂ injection sites in the United States. Approximately 8,000 facilities are required to report their emissions annually, and the reported data is made publicly available.

SEC Proposed Climate-Related Disclosures

The US Securities and Exchange Commission (SEC) has proposed rules² that require companies to include certain climate-related disclosures in their registration statements and periodic reports. If adopted, companies would be required to include governance, risk management, impact and transition activities related to climate change, and GHG emissions data and related targets in their financial statements.

SEC guidance on board diversity disclosures

The US SEC has issued clarifications on board diversity disclosures. Companies need to disclose any self-identified diversity characteristics of board members and how such diversity characteristics were considered in the selection criteria of board members. The SEC further

approved NASDAQ new listing rules that further require all NASDAQ-listed companies to have at least two diverse directors (including at least one woman and at least one member of an underrepresented community) or the company will have to explain why it has failed to do so.

Occupational Safety and Health Administration (OSHA) Regulations

OSHA regulations prescribe detailed requirements for different industries on occupational safety and health procedures. Employers are required to maintain detailed records and report any work-related fatality or serious injury to OSHA authorities.

SEC rules on disclosing the use of conflict minerals

The US SEC requires certain companies to disclose their use of conflict minerals (tantalum, tin, gold or tungsten). Companies must disclose if such minerals originate in the Democratic Republic of Congo (DRC) region and undertake detailed due diligence, chain of custody review, and private sector audit. Due diligence details along with risk mitigation measures taken must be disclosed to the SEC and publicly on the company's website.

Key Investor-centric ESG frameworks

CDP

CDP is a global environmental disclosure system supporting thousands of companies, cities, states, and regions to measure and manage climate change, water security and deforestation risks. CDP requests these annual disclosures from companies on behalf of their investors or customers. Based on the disclosures made, companies are scored from A to D-. In 2023, CDP information request on behalf of investors were sent to more than 15,000 companies. Additionally, customers can request environmental disclosures from their supply chain partners through CDP platform.

S&P Corporate Sustainability Assessment

The S&P Global Corporate Sustainability Assessment (CSA) is an annual evaluation of companies' sustainability practices. It covers over 10,000 companies from around the world.

MSCI ESG Ratings

MSCI ESG Ratings measures a company's management of financially relevant ESG risks and opportunities using rules-based methodology to identify industry leaders and laggards (AAA to CCC) according to their exposure to ESG risks and how well they manage those risks relative to peers. The ratings methodology uses publicly available information to rate the companies.

FTSE ESG Ratings

FTSE Russell's ESG Scores are comprised of an overall Rating that breaks down into underlying ESG Pillar and Theme Exposures and Scores. The Pillars and Themes are built on over 300 individual indicator assessments that are applied to each company's unique circumstances.

Morningstar Sustainalytics ESG Risk Ratings

Sustainalytics ESG Risk Ratings provides company-level ESG risk by measuring the size of an organization's unmanaged ESG risk. This is measured by a unique set of material ESG issues and considers issues which have a potentially substantial impact on the company's economic value. The rating scale ranges from 'negligible' to 'severe'.

ISS ESG Corporate Ratings

ISS ESG Corporate Ratings assess companies on their sustainability performance and the companies are rated from D- to A+ on an absolute best-in-class basis.



Key Customer/Industry led ESG frameworks

EcoVadis Sustainability Assessments

EcoVadis sustainability assessment methodology focuses on evaluating how well a company has integrated the principles of sustainability into their business management system. It is generally used by companies who want their trading partners to report on sustainability.

Drive Sustainability Guiding Principles

Drive Sustainability, an automotive industry coalition, has a set of common guidelines- Global Automotive Sustainability Guiding Principles (Guiding Principles) - outlining expectations for suppliers on key responsibility issues including human rights, environment, working conditions, business ethics, health and safety and responsible supply chain management. The members use a common Sustainability Assessment Questionnaire (SAQ) to assess sustainability performance of the automotive suppliers.

Responsible Business Alliance (RBA) Assessment

RBA is an industry coalition comprised of electronics, retail, auto and toy companies. RBA members commit and are held accountable to a common Code of Conduct and utilize a range of RBA training and assessment tools to support continuous improvement in the social, environmental and ethical responsibility of their supply chains.

Pharmaceutical Supply Chain Initiative (PSCI) Principles

PSCI is a coalition of pharma companies and aims to bring together members to define, establish, and promote responsible supply chain practices, human rights, environmental sustainability, and responsible business. PSCI Principles for Responsible Supply Chain Management articulate responsible business practices expectations on ethics, labor, health & safety, environment, and management systems.

The Higg Index

The Higg Index is a suite of tools for the standardized measurement of value chain sustainability for apparel and footwear industry. It was developed by Sustainable Apparel Coalition (SAC), a coalition of multiple stakeholders of the apparel and footwear industry.



Key voluntary ESG frameworks

GRI

GRI Standards are the most widely used sustainability reporting standards. They consist of modular interconnected reporting standards across three series.

- Universal Standards are applicable to all companies and spread across Foundation, General Disclosures and Material Topics standards.
- Sector Standards provide sector specific material topics and related disclosure requirements. Currently 3 sector standards are available and GRI intends to cover 40 sectors in future under their Sector Program.
- Topic Standards contain disclosure requirements for each sustainability topic. These 32 topic standards cover environmental, social and governance aspects.

UNGC

United Nations Global Compact (UNGC) is a call to companies to align strategies and operations with universal sustainability principles. UNGC's 10 principles cover human rights, labour, environment, and anti-corruption. Participants of the UNGC forum are required to publicly disclose the progress on UNGC principles through annual 'Communication on Progress'. More than 18,000 companies globally participate in the UNGC forum.

ISSB

International Sustainability Standards Board (ISSB) was formed by IFRS to develop high-quality, comprehensive global baseline of sustainability disclosures focused on the needs of investors and the financial markets. The ISSB builds on the work of market-led investor-focused reporting initiatives, including the Climate Disclosure

Standards Board (CDSB), the Task Force for Climate-related Financial Disclosures (TCFD), the Value Reporting Foundation's Integrated Reporting (IR) Framework and industry-based SASB Standards, as well as the World Economic Forum's Stakeholder Capitalism Metrics. It has assumed the responsibility of CDSB, SASB and IR framework and currently has issued 2 standards.

■ SASB

SASB Standards help companies disclose relevant sustainability information to their investors. Available for 77 industries, the SASB Standards identify the sustainability-related risks and opportunities most likely to affect an entity's cash flows, access to finance and cost of capital over the short, medium or long term and the disclosure topics and metrics that are most likely to be useful to investors.

■ Integrated Reporting (IR) Framework

IR Framework establishes framework for communication on how an organization's strategy, governance, performance and prospects, in the context of its external environment, lead to the creation, preservation or erosion of value over the short, medium and long term.

TCFD Recommendations

The Task Force on Climate-related Financial Disclosure (TCFD) released climate-related financial disclosure recommendations designed to help companies provide better information to support informed capital allocation. The disclosure recommendations are structured around four thematic areas that represent core elements of how companies operate: governance, strategy, risk management, and metrics and targets.

Companies struggle to manage ESG data for credible reporting.

Reporting on the plethora of ever increasing ESG requirements can be overwhelming. Companies face multiple challenges in this journey to measure and report credible ESG data.

Key challenges for ESG reporting

Defining the ESG metrics

The reporting frameworks landscape is vast and complex. These frameworks are not harmonized and the reporting metrics for similar topics might be different under various frameworks. Climate-related disclosures are one of the key requirements under multiple frameworks, but the reporting metrics differ in requirements and representation. Defining the right ESG metrics could be challenging.

Data challenges

Data is perhaps the biggest challenge for ESG reporting. Some of the key challenges include:

- Not all ESG metrics might be captured, and data measurement needs more effort. This could mean engaging frontline staff to measure and monitor additional metrics.
- Multiple frameworks offer differing methodologies, setting the right data methodologies is complex.
- Data sources are spread across the organization, both structured and unstructured. Data collection is a tedious task.
- Reliance on external data sources like emission factors can impact the quality of the data.
- Managing data from value chain partners like suppliers is very complex. It impacts the completeness, quality, and reliability of ESG data being reported.
- Data is mostly managed through excel spreadsheets which leads to time-consuming, resource intensive exercise with often low-quality results.
- Focus is largely placed on reporting and enough attention is not paid to analyze ESG data for decision making.

Low technology enablement

Many companies still rely on excel spreadsheets to manage ESG data. Companies generally make low investments in ESG reporting solutions with incorrect assumption that multiple data points are being captured in other company ERPs or systems, and all that is required is to collate the data. This leaves the corporate sustainability teams or teams in charge of reporting to manage ESG data manually, which is a tedious task and not the best use of resources. The low-quality data also does not meaningfully support decision making.

Evolving ESG requirements

With ESG gaining prominence, the requirements and demands of stakeholders for ESG data are evolving at a very fast pace. Companies will not be able to keep up with this pace of development with a static approach of year-end reporting exercise. ESG data is evolving to be more dynamic and needs higher analytical enablement to make real-time decisions. There is also increased pressure from stakeholders to improve the credibility and reliability of ESG data through external assurance and validation. This requires companies to produce auditable and verifiable ESG data.

Complexities in interconnected value chain ESG data

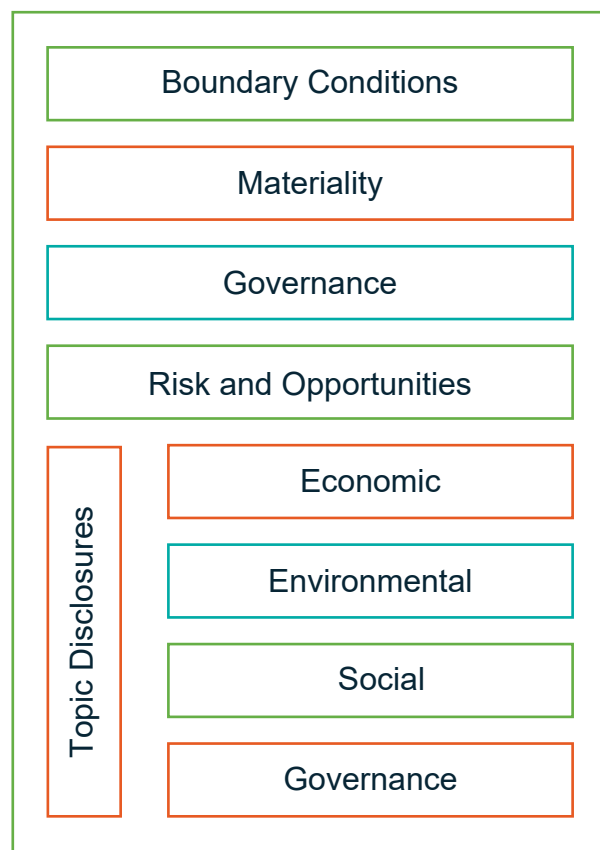
Reporting on ESG impacts in the value chain is a complex topic, especially with supply chains having thousands of suppliers spread across multiple geographies. Value chain partners might lack the capabilities to monitor and report on ESG.



Underlying performance metrics across frameworks can be interconnected.

Each of the ESG framework attempts to address the information needs of specific stakeholders. Some frameworks compete with other frameworks, while some complement. ESG frameworks require companies to track and report hundreds of performance metrics. With varying methodologies across the frameworks, the reporting requirements appear to be divergent. There is a need to simplify and harmonize these requirements, and the creation of ISSB at COP26 is seen as a step in this direction.

Analyzing these requirements and mapping them against underlying ESG principles or aspects can help companies better structure the data management. The reporting requirements can broadly be bucketed into below segments.



Boundary conditions

Organizations can have complex operating structures with varying degrees of control and influence over operations and entities across value chain. Setting the right boundary conditions to truly reflect the ESG impact is critical and often challenging. The reporting frameworks continue to evolve to push companies to take accountability for the value chain impact and set boundary conditions for reporting accordingly.

Materiality

Materiality principles guide companies to identify what ESG topics are relevant, where in the value chain they have maximum impact and prioritize the resources to manage ESG impacts and report them. Materiality can be considered as financial materiality and impact materiality. Financial materiality places the focus on the material impact of an ESG topic on the financial performance of the company. Some frameworks with investor focus tend to consider financial materiality to inform investors on how a company's financial performance is impacted by ESG risks such as climate change. The impact

materiality considers the impact of company's operations and decisions on society and environment. The combinatory approach of financial and impact materiality is referred as 'double materiality' approach. Many reporting frameworks such as GRI, SASB, ESRS refer to this approach. Stakeholder engagement is an important process for identifying material issues and companies might also be required to report on such process and outcomes.

Governance

The governance framework for ESG agenda is expected to consist of Board or Executive level engagement and oversight. Many reporting frameworks consider this as important measure and require companies to report on how boards are engaged on these topics, what level of oversight boards have, do board members have required competency on ESG and how executive compensation is tied to ESG outcomes.

Risks and Opportunities

Risk management processes should consider ESG risks over short, medium, and long term. Disclosure requirements include the process to identify ESG risks, impact for such risks and risk mitigation strategies. ESG topics can also unlock value for companies. Companies are expected to disclose how such opportunities are considered as part of the company's strategy. ESG targets and performance against the targets are also covered by the requirements. Climate-related disclosures have specific emphasis on risks and opportunity management, and detailed disclosure requirements include the climate risks and related impacts, targets, strategies for low-carbon transition and investments needed.

Topic Disclosures

Reporting on ESG specific topic areas are covered under topic disclosures. Typical ESG topic areas can be categorized into 4 areas.

Economic

- Economic metrics include direct and indirect economic value generated for the company and its stakeholders. These provide a reference for overall ESG performance in relation to financial performance.

Environmental

- Environmental disclosures include metrics on materials use, energy, emissions, water, waste, and biodiversity. Reporting frameworks on climate-related disclosures focus on GHG emissions (Scope 1, 2 & 3). Environmental assessments of the supply chain and related metrics are also covered. Metrics representation might vary based on the reporting framework, but underlying parameters can be consistent.

Social

- Social disclosures include metrics on workforce diversity and welfare, health & safety, collective bargaining, non-discrimination, human rights, community impacts, consumer rights and marketing. Some frameworks have specific disclosure requirements on social assessments in the value chains, especially on human rights, and related outcomes.

Governance

- Governance disclosures include metrics on board diversity, executive compensation, business ethics, taxation and internal controls and policies. A few of these disclosures may also be covered in the ESG governance related disclosures mentioned under 'Governance' earlier.

The above categorization can be a starting point to identify the data needs and structure the data better. This helps in reducing duplication of data management for similar reporting metrics while laying the foundation for required analytics. Some of reporting requirements may vary beyond just representation, based on the reporting framework but a solid ESG data foundation help can support in expanding the data management structure to meet all requirements.

A structured strategic approach with flexible and scalable technology foundation can help solve ESG reporting challenges.

Companies should transform their ESG reporting journey from being tactical task to a strategic activity to manage the varied requirements and more importantly derive value.

Key steps in transforming ESG reporting to more strategic agenda:

- Comprehensively map the ESG requirements across compliance, stakeholder led or focused, and voluntary frameworks.
- Define appropriate ESG metrics and align those with the company's ESG strategic priorities.
- Define the methodologies for ESG measurement.
- Map the data sources – internal and external, structured and unstructured.
- Create a stakeholder map for ESG reporting and build capabilities of such stakeholders to support the ESG reporting.
- Invest in technology capabilities to drive the ESG reporting.
- Build capabilities in the value chain, especially the supply chain to enable ESG information flow.
- Automate ESG data collection and enable advanced analytics of ESG data to support real-time decision making.
- Report and seek stakeholder feedback to improve ESG reporting.
- Continuously monitor ESG developments to adjust reporting processes.
- Adopt collaborative initiatives with industry associations to standardize methodologies.



The role of an intelligent technology platform to support ESG management cannot be understated. Even though data remains one of the biggest challenges, a research report reveals that only 9% of companies are using digital solution for ESG data collection, analysis, and reporting. This highlights one of the key reasons that companies struggle to manage ESG data.

The business case for an intelligent ESG technology platform is clear. ESG platform should help companies:

- Manage compliance and voluntary reporting requirements
- Significantly reduce time and efforts for ESG reporting
- Improve data quality and reliability
- Strategically manage ESG journey
- Use ESG data for real-time decision making
- Keep abreast of ESG developments

Companies should assess ESG solutions for the capabilities below.

- Comprehensive coverage of ESG topics with extensive ESG metrics library
- Exhaustive mapping of various reporting requirements across regions
- Intelligent workflow management
- Seamlessly connect to multiple internal and external data sources
- Integration capabilities with other ERPs
- Advanced capabilities to leverage AI for analytics
- Data visualization and actionable insights
- SaaS capabilities with flexible and scalable architecture for low-cost rapid deployment
- Collaborative platform for value chain partners to easily connect and report
- Learning academy to create awareness and educate stakeholders

Conclusion

ESG reporting landscape is evolving at a very fast pace and the requirements are only going to increase. Stakeholders are demanding more transparent, credible, and reliable ESG disclosures. The evolution of multiple ESG frameworks reflects this demand and regulations are quickly catching up to create more consistent and comparable reporting regimes. While there is some effort made to harmonize multiple standards, in the near future companies will have to continue to report on multiple frameworks to meet stakeholder needs.

Companies often struggle to manage ESG reporting. Lack of consistent and harmonized standards is a key impediment, which is not within the control of the company. Companies should support collaborative approaches to enable the creation of more consistent standards. However, companies face bigger challenges to manage the vast quantum of ESG data. Data collection is mostly reliant on spreadsheets, and this leads to unproductive resource use. Data quality and reliability is low, and the complexities compound when data has to be managed from value chain partners such as suppliers.

As the reporting requirements increasingly become compliance driven, companies cannot afford to under invest in ESG reporting capabilities and must go beyond viewing this as tactical task. The role of technology is very critical to manage ESG across complex value chains. An intelligent ESG platform can support companies to reduce time and effort, drive more value through analytics and insights, and easily scale reporting efforts across the value chain through seamless ecosystem integration. SaaS platforms in particular can offer these solutions through flexible and scalable architecture, making the deployment rapid and low-cost.

