









Stuart Wallace Director, Financial Services Consulting, Al & Data, EY

Playbook for Effective ESG and

Sustainability Data Management



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Today's panel





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How would you rate the current quality of ESG data available to you today?

- Poor
- Fair
- Good
- Excellent



What best describes you?

- Corporate Sustainability Professional
- Data Management Professional
- Accounting or Audit professional
- IT Professional
- Other



Playbook for Effective ESG and Sustainability Data Management



Click here to learn more and download

This playbook is designed to help companies accelerate the design and execution of a data governance and management strategy for ESG and sustainability data and reporting by leveraging existing tools and known data management capability requirements.





- There is a global shift in the demand for ESG and sustainability data and the way it is used
- Regulations and standards are coming
- Companies currently lack a corporate culture that fosters appreciation for the importance of data management in meeting disclosure requirements and successfully managing sustainability-related issues



Why this playbook?

- The knowledge, processes, and tools for effective data management already exist, they simply need to be brought to ESG and sustainability practices
- Sustainability practitioners need to find a common language to engage with their counterparts in finance, data management, internal controls, and technology
- Time is of the essence



Who is this playbook for?



CSO role

 Equips them to understand the internal control and data management concepts that should be applied to their data requirements



CFO role

 Equips them to understand how application of the DCAM framework complements COSO principles and requirements and supports reliable financial and nonfinancial reporting



CDO role

 Equips them to understand how the COSO internal control framework complements their capabilities to establish proper ESG data governance and management

Poll #3 - #4



Are you familiar with the EDM Council's Data Capabilities Assessment Model (DCAM)?

Are you familiar with the COSO Achieving Effective Internal Control Over Sustainability Reporting (ICSR) framework?

- Not at all familiar
- Somewhat familiar
- Familiar
- Very familiar

- Not at all familiar
- Somewhat familiar
- Familiar
- Very familiar



Our approach

 We mapped the relevant contents of two well-established frameworks in the field of internal controls and data management to identified ESG data challenges, and therefore to each other





 The ESG data challenges and key action items follow the logic of the data management capabilities value chain



Illustration of the data management capabilities value chain and milestones

 Readers less familiar with data management terminology are invited to consult the EDM Council's glossary of terms.



Illustration of mapping in the playbook

The Issue

Effective and appropriate data quality rules are dependent upon both clear definitions and clear ownership.

Key Action Items

Define high-quality and trusted data as the critical objective of an ESG data management program.

- 1. Ensure adequate resourcing for effective data management, recognizing new ESG data requirements.
- 2. Maintain a business glossary that corresponds with the technical concepts in the organization.
- 3. Identify and document ESG data lineage aligned to business process architecture and controls.
- 4. Identify and document the ESG data decisioning traceability including the use of manual and automated models and calculations.

Where to Leverage COSO ICSR

Component Control Environment

Principle 3. Establishes structures, authority, and responsibilities

Principle 5. Enforces accountability

Component Risk Assessment

Principle 6. Specifies suitable objectives

Component Control Activities

Principle 11. Selects and develops general controls over technology

Principle 12. Deploys oversight through policies and procedures

Component Information and Communication

Principle 13. Uses relevant information

Principle 15. Communicates externally

Component Monitoring Activities

Principle 16. Conducts ongoing and/or separate evaluations

Where to Leverage DCAM

Component 3.0 Business & Data Architecture Capability 3.3 Identify the Data

Capability 3.4 Define the Data

Component 7.0 Data Control Environment

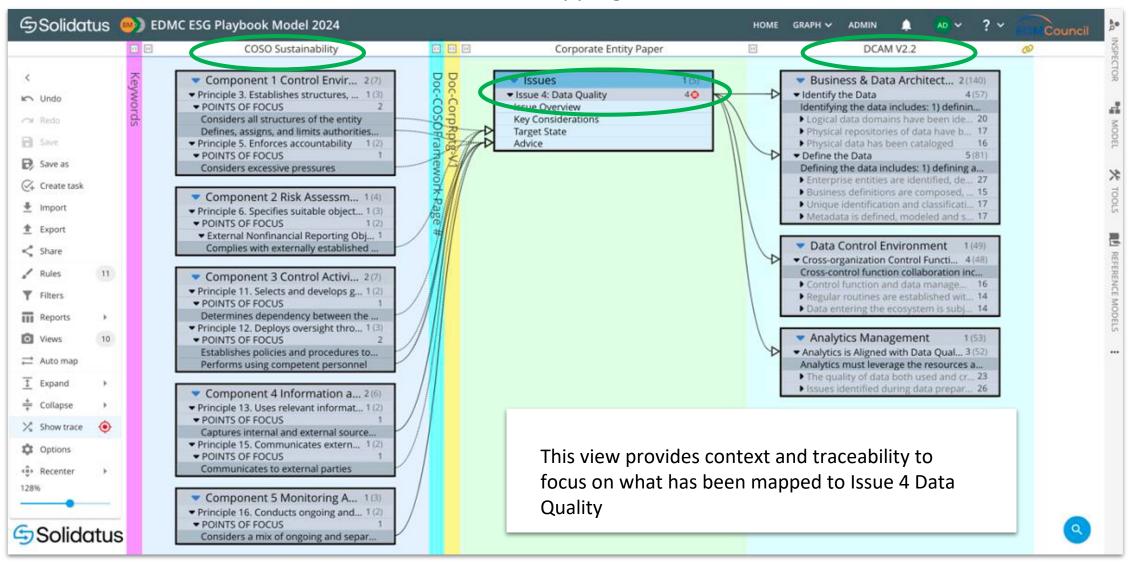
Capability 7.2 Cross-organization Control Function Collaboration

Component 8.0 Analytics Management

Capability 8.4 Analytics is aligned with Data Quality



Illustration of mapping in Solidatus





An example of mapping the contents

3.2 Assigning Accountability

Understand Requirements Identify Internal Data Sources

Conform Data Consolidate Data Report Data

The Issue

Assigning accountability for reporting data at a level that carries executive authority.

Key Action Items

Update board charters, roles, and responsibilities to embed accountability for ESG and sustainability reporting.

 Directly link sustainability responsibility and oversight with explicit titles, functions, and job descriptions at all levels, including clear accountability for disclosures.

Acquire

Data

- 2. Include ESG reporting performance in executive, middle management, and subject matter expert evaluations and compensation.
- Ensure feedback and approval mechanisms or controls are working effectively, change them as needed, and define sign-off on reporting.

Where to Leverage COSO ICSR

Component Control Environment

Principle 2. Exercises board of directors' oversight responsibilities

Principle 3. Establishes structures, authority, and responsibilities

Principle 5. Enforces accountability

Component Risk Assessment

Principle 6. Specifies suitable objectives

Component Control Activities

Principle 10. Selects and develops control activities

Principle 12. Deploys oversight through policies and procedures

Component Information and Communication

Principle 14. Communicates internally

Principle 15. Communicates externally

Where to leverage DCAM

Component 1.0 Data Management Strategy & Business Case

Capability 1.1 The Data Management Strategy (DMS) is Specified and Shared

Component 2.0 Data Management Program & Funding Model

Capability 2.3 The Data Management Organizational Structure is Created and Implemented

Component 5.0 Data Quality Management

Capability 5.1 Data Quality Management (DQM) is Established

Capability 5.3 DQ Issues are Remediated

Component 6.0 Data Governance

Capability 6.1 The Data Governance (DG) Function is Established

Capability 6.4 Govern the Data Structure

Capability 6.5 Govern that the Data is Fit-for-Purpose

Component 7.0 Data Control Environment

Capability 7.2 Cross-organization Control Function Collaboration

Data issue 3.2 Assigning accountability for reporting data at a level that carries executive authority



An organization may be at one of many various stages of their sustainability journey, which directly impacts how to assign accountability for ESG data. For many organizations, ESG is not subject to executive management oversight because reporting remains within a business silo, such as human resources, investor relations, or corporate responsibility. Senior management of such organizations typically perceive ESG issues as non-material, and reporting is seen as a communications exercise.

However, external stakeholders—including investors, customers, communities, and regulators—increasingly expect the board of directors to oversee the integration of ESG considerations into business strategy and monitor performance over time.

Companies with leading sustainability practices have established board-level oversight of ESG risk and opportunities, well-defined governance structures, charters, policies, and processes designed to integrate ESG into strategy, risk management, performance measurement, and reporting.

COSO ICSR guidance

Component Control Environment - Principle 2. Exercises board of directors' oversight responsibilities

The board of directors demonstrates independence from management and exercises oversight of the development and performance of internal control. (ICIF-2013-2)

Oversight by an independent board of directors serves as a check that management is acting in accordance with the organization's sustainable business objectives.

▶ Establishes oversight responsibilities - A board of directors executes its responsibilities over sustainable business management through a system of oversight that facilitates the organization's satisfaction of mandates and expectations. Often, the organization's board of directors establishes structures, such as a designated committee or subcommittee, to oversee the organization's sustainable business activities and reporting. This may necessitate amending existing organizational documents such as the articles of incorporation, bylaws, or charters.

DCAM framework

Capability 2.3 The Data Management Organizational Structure is Created and Implemented

Capability 6.4 Govern the Data Structure

Capability 7.2 Cross-organization Control Function Collaboration

Playbook action items

Update board charters, roles, and responsibilities to embed accountability for ESG and sustainability reporting.

- 1. Directly link sustainability responsibility and oversight with explicit titles, functions, and job descriptions at all levels, including clear accountability for disclosures.
- 2. Include ESG reporting performance in executive, middle management, and subject matter expert evaluations and compensation.
- 3. Ensure feedback and approval mechanisms or controls are working effectively, change them as needed, and define sign-off on reporting.



How to use the playbook

OPTION 1: start with a data challenge



OPTION 2: run down the list of key action items





Key takeaways

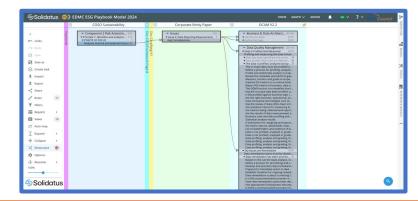
- You need quality ESG and sustainability data to (i) make good management decisions and (ii) produce audit ready, reliable disclosures
- You don't need to reinvent the wheel use tools that already exist and are fit for purpose
- You do not need to do it alone this is a team sport involving finance, internal controls, data and IT. Use this playbook to convene the discussion.

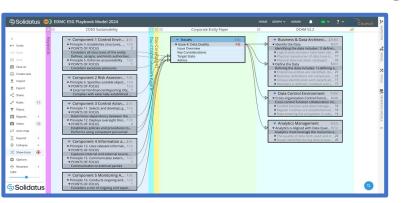
The knowledge and tools to achieve quality ESG data and disclosures already exist within an organization and simply need to be brought to the rapidly emerging sustainability management and reporting practices.



Navigating the Solidatus Map

- The ESG Data Playbook has been mapped in Solidatus and is available to all EDMC members
- Solidatus allows all to navigate mapping and review source text, providing a knowledge base to deepen understanding and explore recommendations
- Map can also be integrated into existing Solidatus estates to support action assignments and tracking
- We will demo ability to review both individual and thematic data challenges

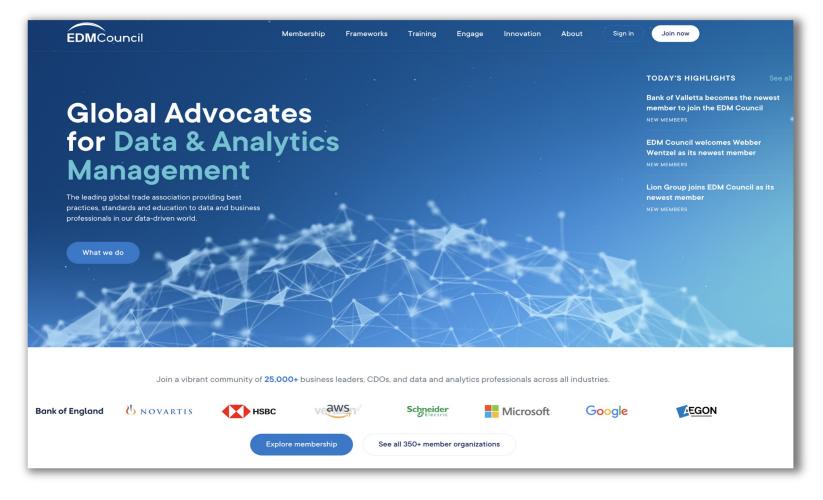




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