Summary of Differences between IFRS Sustainability Disclosure Standards and Exposure Draft Sustainability Disclosure Standards (DE SPK)

The objective of this document is to identify the differences between IFRS Sustainability Disclosure Standards and the DE SPK. It should be noted that this document was prepared by the Technical Team of the DSK IAI for the convenience of the readers of the DE SPK and was not discussed nor approved by the DSK IAI.

No.	Requirement in IFRS Sustainability Disclosure Standards	Proposals in DE SPK
1.	IFRS S1 paragraph 61 61 .... It might be known by or included in reports with various names, such as 'management report', 'management's discussion and analysis', 'operating and financial review', 'integrated report' or 'strategic report'.	DE PSPK 1 paragraph 61 61. .... It might be known by or included in reports with various names, such as 'management report', 'management's discussion and analysis', 'operating and financial review', 'integrated report' or 'strategic report'. In Indonesia, general purpose financial reports are generally known as annual reports. For the complete definition of general purpose financial reports, please refer to Appendix A.
2.	IFRS S1 paragraph 64 64 An entity shall report its sustainability-related financial disclosures at the same time as its related financial statements. The entity's sustainability-related financial disclosures shall cover the same reporting period as the related financial statements.	DE PSPK 1 paragraph 64 and 64a 64. An entity shall report its sustainability-related financial disclosures at the same time as its related financial statements. The entity's sustainability-related financial disclosures shall cover the same reporting period as the related financial statements. 64a. Reporting "at the same time" must be carried out no later than when the entity's annual report is published in accordance with the applicable legal requirements.
3.	IFRS S1 paragraph E1 E1 An entity shall apply this Standard for annual reporting periods beginning on or after 1 January 2024. Earlier application is permitted. If an entity applies this Standard earlier, it shall disclose that fact and apply IFRS S2	DE PSPK 1 paragraph E01 E01. An entity shall apply this Standard for annual reporting periods beginning on or after 1 January ~~2024~~2027. Earlier application is permitted. If an entity applies this Standard earlier, it shall disclose that

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	Climate-related Disclosures at the same time.	fact and apply IFRS S2 Climate-related Disclosures at the same time.
4.	IFRS S1 paragraph E4 E4 In the first annual reporting period in which an entity applies this Standard, the entity is permitted to report its sustainability-related financial disclosures after it publishes its related financial statements. In applying this transition relief, an entity shall report its sustainability-related financial disclosures: ...	DE PSPK 1 paragraph E04 E04. Deleted
5.	IFRS S1 paragraph E5 In the first annual reporting period in which an entity applies this Standard, the entity is permitted to disclose information on only climate-related risks and opportunities (in accordance with IFRS S2) and consequently apply the requirements in this Standard only insofar as they relate to the disclosure of information on climate-related risks and opportunities. If an entity uses this transition relief, it shall disclose that fact.	DE PSPK 1 paragraph E05 In the first ~~annual reporting period~~ three years in which an entity applies this Standard, the entity is permitted to disclose information on only climate-related risks and opportunities (in accordance with IFRS S2) and consequently apply the requirements in this Standard only insofar as they relate to the disclosure of information on climate-related risks and opportunities. Nevertheless, entities are still encouraged to disclose other sustainability-related risks and opportunities as outlined in this Standard. If an entity uses this transition relief, it shall disclose that fact.
6.	IFRS S1 paragraph E6 If an entity uses the transition relief in paragraph E5: a. ... b. in the second annual reporting period in which the entity applies this Standard, it is not required to disclose comparative information about its sustainability-related risks and opportunities, other than	DE PSPK 1 paragraph E06 If an entity uses the transition relief in paragraph E05: a. ... b. in the ~~second~~ annual reporting period in which the entity ~~applies this Standard~~ discloses its sustainability-related risks and opportunities other than climate for the first time, it is not required to disclose

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	its climate-related risks and opportunities.	comparative information about its sustainability-related risks and opportunities, other than its climate-related risks and opportunities.
7.	IFRS S2 paragraph B62(a)(i) B62 An entity that participates in commercial banking activities shall disclose: a. its absolute gross financed emissions, disaggregated by Scope 1, Scope 2 and Scope 3 greenhouse gas emissions for each industry by asset class. When disaggregating by: i. industry—the entity shall use the Global Industry Classification Standard (GICS) 6-digit industry-level code for classifying counterparties, reflecting the latest version of the classification system available at the reporting date.	DE PSPK 2 paragraph B62(a)(i) B62 An entity that participates in commercial banking activities shall disclose: a. its absolute gross financed emissions, disaggregated by Scope 1, Scope 2 and Scope 3 greenhouse gas emissions for each industry by asset class. When disaggregating by: i. industry—the entity shall use the ~~Global Industry Classification Standard (GICS) 6-digit industry-level code~~ industry classification established by the regulator for classifying counterparties, reflecting the latest version of the classification system available at the reporting date.
8.	IFRS S2 paragraph B63(a)(i) B62 An entity that participates in insurance industries shall disclose: b. its absolute gross financed emissions, disaggregated by Scope 1, Scope 2 and Scope 3 greenhouse gas emissions for each industry by asset class. When disaggregating by: i. industry—the entity shall use the Global Industry Classification Standard (GICS) 6-digit industry-level code for	DE PSPK 2 paragraph B63(a)(i) B62 An entity that participates in insurance industries shall disclose: b. its absolute gross financed emissions, disaggregated by Scope 1, Scope 2 and Scope 3 greenhouse gas emissions for each industry by asset class. When disaggregating by: i. industry—the entity shall use the ~~Global Industry Classification Standard (GICS) 6-digit~~

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	classifying counterparties, reflecting the latest version of the classification system available at the reporting date.	~~industry-level code~~ industry classification established by the regulator for classifying counterparties, reflecting the latest version of the classification system available at the reporting date.
9.	IFRS S2 paragraph C1 C1 An entity shall apply this Standard for annual reporting periods beginning on or after 1 January 2024. Earlier application is permitted. If an entity applies this Standard earlier, it shall disclose that fact and apply IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information at the same time.	DE PSPK 2 paragraph C01 C01 An entity shall apply this Standard for annual reporting periods beginning on or after 1 January ~~2024~~ 2027. Earlier application is permitted. If an entity applies this Standard earlier, it shall disclose that fact and apply IFRS S1 General Requirements for Disclosure of Sustainability-related Financial Information at the same time.
10.	IFRS S2 paragraph C4 In the first annual reporting period in which an entity applies this Standard, the entity is permitted to use one or both of these reliefs: (a) if, in the annual reporting period immediately preceding the date of initial application of this Standard, the entity used a method for measuring its greenhouse gas emissions other than the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004), the entity is permitted to continue using that other method; and (b) an entity is not required to disclose its Scope 3 greenhouse gas emissions (see paragraph 29(a)) which includes, if the entity participates in asset	IFRS S2 paragraph C4 In the first ~~annual reporting period~~ three years in which an entity applies this Standard, the entity is permitted to use one or both of these reliefs: (a) if, in the annual reporting period immediately preceding the date of initial application of this Standard, the entity used a method for measuring its greenhouse gas emissions other than the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (2004), the entity is permitted to continue using that other method; and (b) an entity is not required to disclose its Scope 3 greenhouse gas emissions (see paragraph 29(a)) which includes, if the entity participates in asset

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	management, commercial banking or insurance activities, the additional information about its financed emissions (see paragraph 29(a)(vi)(2) and paragraphs B58–B63).	management, commercial banking or insurance activities, the additional information about its financed emissions (see paragraph 29(a)(vi)(2) and paragraphs B58–B63).

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