



Response from the Danish Government to the public consultation on non-binding guidelines for reporting of non-financial information by companies

Denmark appreciates the opportunity to provide input to guidelines for reporting of non-financial information by companies. Denmark has invited Danish stakeholders to provide input to the consultation process and the response from the Danish Government includes the received comments.

Denmark recognises the directive 2014/95/EU amending directive 2013/34/EU as regards disclosure of non-financial information as an important tool for companies, investors, shareholders and other stakeholders to gain a fair and just understanding of the state of the company. Denmark has been among the first European countries to implement the directive into national law.

Denmark supports guidelines for reporting of non-financial information which can contribute to increased transparency on the impact of companies on the surrounding environment.

1. From a Danish point of view it is important that the guidelines assist companies in operationalising key concepts in the directive such as “business model” and “due diligence”. Therefore the guidelines should include examples and best practise on non-financial reporting which inspire and improve CSR-reporting. Furthermore, the guidelines could include a list of possible KPI’s and stakeholders.
2. The guidelines, however, should avoid increasing administrative burdens for companies. This can be achieved by underlining the considerable flexibility in the directive which allows companies to report in a way which is relevant and meaningful to them.
3. There is a need for more alignment in the field of CSR. Therefore, the guidelines should not be a new and additional framework, but

MINISTRY OF BUSINESS AND GROWTH

Slotsholmsgade 10-12
DK-1216 Copenhagen K

Tel. +45 33 92 33 50
Fax +45 33 12 37 78
CVR no. 10 09 24 85
evm@evm.dk
www.evm.dk

build on the existing frameworks of especially UNGP, UNGC, the OECD Guidelines for multinational enterprises and ISO26000.

Denmark looks forward to participate in further discussions on the upcoming guidelines. Please find enclosed Danish Guidelines on CSR-reporting published March 2016.