

## Mapping of SFDR Requirements to Exposure Draft Provisions

During the development of the Exposure Draft of the CFA Institute ESG Disclosure Standards for Investment Products (the “Standards”), there were several points at which it was useful to map the requirements of the “Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector” (“SFDR”) and the “JC 2021 03 Final Report on draft Regulatory Technical Standards” issued by the Joint Committee of the European Supervisory Authorities on 2 February 2021 (“draft RTS”) to the proposed provisions in the Exposure Draft.

This mapping was performed by CFA Institute staff. CFA Institute has chosen to provide this mapping to readers of the Exposure Draft solely as a resource to inform their comment letters on the Exposure Draft. It is not intended to be used for any other purpose.

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The disclosure requirements and recommendations presented in the Exposure Draft are based primarily on the proposals presented in the Consultation Paper released in August 2020, comment letters submitted in response to the Consultation Paper, and input from the ESG Technical Committee. SFDR and the draft RTS requirements were carefully considered during the development of the Exposure Draft, but the presence or absence of a requirement in SFDR or the draft RTS did not determine whether or not to include an identical or similar requirement in the draft Standards. The Exposure Draft expresses an independent view of the ESG-related disclosures that investment managers should make with respect to their investment products.

The Standards' draft provisions require the disclosure of a substantial portion of the information that is required to be disclosed by SFDR and the draft RTS. This should not be surprising. Many of the requirements in SFDR and the draft RTS are appropriate for voluntary, global standards. It should also not be surprising that SFDR and the draft RTS require disclosure of information that the draft Standards do not, and vice versa. It is by no means a trivial task to select the subset of information about an investment product's strategy that should be disclosed to investors. The universe of information is large and complex, and reasonable people will select reasonable, but different, sets of information. It is often impossible to fully reconcile these differences of opinion, but it is possible to achieve a general consensus on the information that is needed by most investors most of the time. To aid readers' responses to the Exposure Draft, this document attempts to make clear the similarities and differences between SFDR and the Exposure Draft, specifically in terms of the information required to be disclosed.

#### Information required to be disclosed by SFDR and not required to be disclosed by the draft Standards

As explained in the Exposure Draft, an intentional decision was made to focus the scope of the Standards solely on information related to an investment product's strategy. There is a need in the marketplace to more clearly distinguish between product-level information and manager-level information and to more clearly distinguish between process-related information (i.e., intent or design) and outcome-related information (i.e., performance or outcome measured over a period of time). As a result of this decision, the entity-level disclosures required by Articles 3, 4, and 5 of SFDR are not required by the draft Standards. Furthermore, periodic reporting required by Article 11 of SFDR is not required by the draft Standards.

With respect to Articles 6-10 of SFDR, readers of this document will see that the Exposure Draft contains provisions that relate to most, but not all, of the articles of SFDR and the draft RTS. Additionally, even when the Exposure Draft has one or more provisions related to an article of SFDR or the draft RTS, those provisions sometimes do not require as much information to be disclosed as SFDR or the draft RTS requires. In these cases, it is usually because the Exposure Draft has, for the most part, intentionally avoided provisions that would:

- likely produce lengthy and complex disclosures for topics that are likely of lesser importance to the Standards' intended users,
- require investment managers to make ex-ante forecasts,
- require the disclosure of the absence of any ESG-related feature,
- require certain types of investment products to disclose significantly more information than others, or

- require disclosure of information that is generic to all investment products and that is not particularly relevant to ESG information or ESG issues, which is the focus of the Standards.

#### Information required to be disclosed by the draft Standards and not required to be disclosed by SFDR

The mapping in this document was created specifically to evaluate how the requirements of SFDR and the draft RTS are addressed in the draft Standards. It is not intended to work in the other direction. Still, readers of this document might be particularly interested in the draft provisions that might require disclosure of information beyond what is required by SFDR and the draft RTS. Readers should note that disclosures required by the draft Standards and not required by SFDR and the draft RTS may still be required by some other law or regulation.

The following draft provisions require disclosure of information that SFDR and the draft RTS may not:

- 2.A.7 (summary description of the policies and procedures for notifying investors when material changes are made to the ESG-related features of the investment product)
- 2.A.8 (listing of material changes to the ESG-related features of the investment product since the investment product's inception date)
- 3.A.2 (description of the relationship between objectives)
- 6.A.2 (rationale for exclusions)
- 6.A.3 (circumstances in which exclusion criteria are not applied)
- 7.A.2 (description of the research and analysis undertaken to determine the ESG information that is financially material to the investment product's investments)
- 7.A.3 (circumstances in which financially material ESG information is not used in financial analysis and valuation of the investment product's investments)
- 8.A.2 (rationale for portfolio-level criteria)
- 9.A.5 (risks to the achievement of the impact objective)
- 10.A.1 (summary description of the investment manager's or investment product's stewardship policies that are relevant to ESG issues, if any)
- 10.A.3 (a description of the processes, systems, and measures used to undertake and manage the investment product's stewardship activities)
- 10.A.4 (a list of the ESG issues, if any, that are typically considered when undertaking stewardship activities and the rationale for doing so)

EU SFDR Requirements	Provision #	Notes
<b>Article 3: Transparency of sustainability risk policies</b>		
1. Financial market participants shall publish on their websites information about their policies on the integration of sustainability risks in their investment decision-making process.	Not required	The scope of the Standards are investment product disclosures. The Exposure Draft does not contain entity-level disclosure requirements.
<b>Article 4: Transparency of adverse sustainability impacts at entity level</b>		
1. Financial market participants shall publish and maintain on their websites: (a) where they consider principal adverse impacts of investment decisions on sustainability factors, a statement on due diligence policies with respect to those impacts, taking due account of their size, the nature and scale of their activities and the types of financial products they make available; or (b) where they do not consider adverse impacts of investment decisions on sustainability factors, clear reasons for why they do not do so, including, where relevant, information as to whether and when they intend to consider such adverse impacts.	Not required	The scope of the Standards are investment product disclosures. The Exposure Draft does not contain entity-level disclosure requirements.
<b>Article 5: Transparency of remuneration policies in relation to the integration of sustainability risks</b>		
1. Financial market participants and financial advisers shall include in their remuneration policies information on how those policies are consistent with the integration of sustainability risks, and shall publish that information on their websites.	Not required	The scope of the Standards are investment product disclosures. The Exposure Draft does not contain entity-level disclosure requirements.
<b>Article 6: Transparency of the integration of sustainability risks</b>		
1. Financial market participants shall include descriptions of the following in pre-contractual disclosures:		
(a) the manner in which sustainability risks are integrated into their investment decisions; and	7.A.4	Draft Provision 7.A.4 essentially asks for the same information. The draft provisions in Section 7 refer to "financial analysis and valuation" but it should not be assumed the draft provisions apply only to security selection decisions. Financial analysis can, and should, support all investment decisions including, for example, the weight of a holding in a portfolio.

<b>EU SFDR Requirements</b>	<b>Provision #</b>	<b>Notes</b>
(b) the results of the assessment of the likely impacts of sustainability risks on the returns of the financial products they make available.	7.A.1	Draft Provision 7.A.1 provides the opportunity for an investment manager to explain the reason for using ESG information in financial analysis and valuation - e.g., to reduce risk or identify mispriced investments. Draft Provision 7.A.1 does not require an investment manager to make ex-ante forecasts about how the use of ESG information might affect future returns.
Where financial market participants deem sustainability risks not to be relevant, the descriptions referred to in the first subparagraph shall include a clear and concise explanation of the reasons therefor.	Not required	The Exposure Draft does not presume that all investment products should take sustainability risks into account, and therefore, it does not have a provision that requires an explanation for why an investment product does not take sustainability risks into account.
<b>Article 7: Transparency of adverse sustainability impacts at financial product level</b>		
1. By 30 December 2022, for each financial product where a financial market participant applies point (a) of Article 4 (1) or Article 4(3) or (4), the disclosures referred to in Article 6(3) shall include the following:		
(a) a clear and reasoned explanation of whether, and, if so, how a financial product considers principal adverse impacts on sustainability factors;	6.A.1 6.A.2 6.A.3 6.A.4 8.A.1 8.A.2 9.A.3 9.A.4 10.A.4	There are four ways in which investment products typically consider principal adverse impacts on sustainability factors - through exclusions (i.e., investment-level criteria), portfolio-level criteria, direct management (usually relevant only for direct investments), and stewardship activities. If an investment product considers principal adverse impacts on sustainability factors, this will trigger one or more of the draft provisions listed.
(b) a statement that information on principal adverse impacts on sustainability factors is available in the information to be disclosed pursuant to Article 11(2).	Not required	The scope of the Standards are disclosures related to an investment product's strategy. The Exposure Draft does not contain requirements for periodic reporting and, therefore, it does not require a reference to periodic reporting.
<b>Article 8: Transparency of the promotion of environmental or social characteristics in pre-contractual disclosures</b>		

EU SFDR Requirements	Provision #	Notes
1. Where a financial product promotes, among other characteristics, environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made follow good governance practices, the information to be disclosed pursuant to Article 6(1) and (3) shall include the following:		Certain provisions in the Exposure Draft are triggered by the presence of mechanisms within the investment product strategy that are designed produce portfolio-level ESG characteristics. It logically follows that any investment product that truthfully promotes environmental or social characteristics must have at least one such mechanism. The provisions in the Exposure Draft are triggered regardless of whether or not the companies in which the investments are made follow good governance practices.
(a) information on how those characteristics are met;	6.A.1 6.A.3 6.A.4 8.A.1 10.A.4	There are three ways that investment products typically build a portfolio with certain ESG characteristics - through exclusions (i.e., investment-level criteria), portfolio-level criteria, and stewardship activities. If an investment manager intends to create certain ESG characteristics at the portfolio-level, the underlying mechanism for doing so would trigger one or more of the draft provisions listed.
(b) if an index has been designated as a reference benchmark, information on whether and how this index is consistent with those characteristics.	4.A.1 4.A.2	The Exposure Draft requires disclosure of the investment product's benchmark (draft Provision 4.A.1) However, it does not require an investment manager to explain whether or how the benchmark index is consistent with the portfolio-level ESG characteristics of the investment product. Because this explanation could be lengthy and complicated and because different investors may be interested in different aspects of such a comparison, the Exposure Draft instead requires investment managers to provide information about where the index methodology can be found (draft Provision 4.A.2) so that investors can do the comparison themselves.
2. Financial market participants shall include in the information to be disclosed pursuant to Article 6(1) and (3) an indication of where the methodology used for the calculation of the index referred to in paragraph 1 of this Article is to be found.	4.A.2	Draft Provision 4.A.2 asks for the same information.

EU SFDR Requirements	Provision #	Notes
Final Report on Draft RTS, Article 13 (detailed further by Articles 14 - 19)		
1. Financial market participants shall present the information disclosed in accordance with Article 8(1) and (2) of Regulation (EU) 2019/2088 and this Section in an annex to the document referred to in Article 6(3) of Regulation (EU) 2019/2088 in accordance with the template set out in Annex II. They shall include a prominent statement in the main body of the document referred to in Article 6(3) of that Regulation that information related to environmental or social characteristics is available in that annex.		
2. Financial market participants shall include a statement at the beginning of the annex referred to in paragraph 1 to explain:		
(a) whether the financial product intends to make any sustainable investments;	3.A.1	If making sustainable investments is an objective of the investment product, this must be disclosed under draft Provision 3.A.1.
(b) that the financial product promotes environmental or social characteristics, but does not have as its objective a sustainable investment; and	3.A.1	The Exposure Draft requires the disclosure of all of an investment product's objectives. The Exposure Draft does not require disclosure of the absence of any objective. An investment product can have an objective to invest in, or construct, a portfolio that has certain ESG characteristics. But even if this is not an explicit objective, the Exposure Draft still requires the disclosure of information related to the mechanisms that would create such characteristics. See Note on Article 8.1 (a).
(c) whether an index has been designated as a reference benchmark for the purpose of attaining environmental or social characteristics promoted by the financial product.	4.A.3	The Exposure Draft requires disclosure of any external reference points, which may be an index or some other point of reference such as a carbon reduction curve, that are used as a comparison point for any aspect, characteristic, or metric other than return and risk.

EU SFDR Requirements	Provision #	Notes
3. Financial market participants shall present the information referred to in paragraph 1 in summary format in the order and made up of the following sections titled:		The Exposure Draft does not require disclosures to be presented in a specific format or order. The Exposure Draft seeks input on whether users would like the Standards to contain a recommended format or template for compliant presentations.
(a) 'What environmental and/or social characteristics are promoted by this financial product?';	6.A.1 8.A.1	The ESG characteristics of an investment product are expected to be made evident through the information required by draft Provisions 6.A.1 and 8.A.1.
(b) 'What investment strategy does this financial product follow?';	6.A.1 6.A.3 6.A.4 8.A.1 10.A.4	The overarching purpose of the Standards is to explain how and why ESG information is used or ESG issues are addressed in an investment product's strategy. Therefore, many provisions pertain to an investment product's strategy. For investment products that have portfolio-level ESG characteristics, the most relevant provisions are listed at left.
(c) 'What is the asset allocation planned for this financial product?';	2.A.5	The Exposure Draft requires disclosure of the asset classes in which the product invests, but does not require all the detailed information required by Article 16 in the draft RTS (e.g., a narrative description of investments, how sustainable investments contribute to the sustainable objective, use of derivatives, minimum allocation to sustainable investments, purpose of non-sustainable investments, how adverse indicators are taken into account, and whether particular standards are taken into account.)



EU SFDR Requirements	Provision #	Notes
(d) 'Does this financial product take into account principal adverse impacts on sustainability factors?';	6.A.1 6.A.2 6.A.3 6.A.4 8.A.1 8.A.2 9.A.3 9.A.4 10.A.4	See Notes on Article 7.1 (a).
(e) 'Can I find more product specific information online?'; and	8.B.1	The Exposure Draft does not require specific information to be posted on an investment manager's website. However, the Exposure Draft contains a recommendation to provide information about how an investor can obtain the latest report that shows the ESG characteristics of the investment product.
(f) where an index is designated as a reference benchmark for the purpose of attaining the environmental or social characteristics promoted by the financial product, 'Is a specific index designated as a reference benchmark to determine whether this financial product is aligned with the environmental and/or social characteristics that it promotes?'	4.A.3	The Exposure Draft requires disclosure of any external reference points, which may be an index or some other point of reference such as a carbon reduction curve, that are used as a comparison point for any aspect, characteristic, or metric other than return and risk. The Exposure Draft does not, however, require the detailed information specified in Article 19 of the draft RTS.
<b>Article 9: Transparency of sustainable investments in pre-contractual disclosures</b>		
1.Where a financial product has sustainable investment as its objective and an index has been designated as a reference benchmark, the information to be disclosed pursuant to Article 6(1) and (3) shall be accompanied by the following:		If an investment product has "sustainable investment" as an objective, this must be disclosed under draft Provision 3.A.1.
(a) information on how the designated index is aligned with that objective;	4.A.1	The Exposure Draft requires disclosure of an investment product's benchmark. However, it does not require an investment manager to explain whether or how the benchmark index is consistent with the sustainable investment objective.

<b>EU SFDR Requirements</b>	<b>Provision #</b>	<b>Notes</b>
(b) an explanation as to why and how the designated index aligned with that objective differs from a broad market index.	Not required	The Exposure Draft does not require an explanation for how the chosen benchmark differs from a broad market index.
2. Where a financial product has sustainable investment as its objective and no index has been designated as a reference benchmark, the information to be disclosed pursuant to Article 6(1) and (3) shall include an explanation on how that objective is to be attained.	6.A.1 8.A.1	Regardless of whether an investment product does or does not use an index as a benchmark, the Exposure Draft equires disclosure of how the investment product's objectives are to be achieved. When "sustainable investments" are an objective, the information required by draft Provisions 6.A.1 and 8.A.1 are expected to explain how such investments are selected.
3. Where a financial product has a reduction in carbon emissions as its objective, the information to be disclosed pursuant to Article 6(1) and (3) shall include the objective of low carbon emission exposure in view of achieving the long- term global warming objectives of the Paris Agreement.	3.A.1 3.B.1	If an investment product has "carbon emission reduction" as an objective, this must be disclosed under draft Provision 3.A.1. The Exposure Draft does not require that such an objective be stated in context of the objectives of the Paris Agreement. However, the Exposure Draft contains a recommendation that the compliant presentation provide information about policy objectives and development goals, if such were relevant in the establishment of an impact objective.
4. Financial market participants shall include in the information to be disclosed pursuant to Article 6(1) and (3) an indication of where the methodology used for the calculation of the indices referred to in paragraph 1 of this Article and the benchmarks referred to in the second subparagraph of paragraph 3 of this Article are to be found.	4.A.2	The Exposure Draft requires investment managers to provide instructions for how an investor can obtain detailed information about the index methodology. It is expected the index methodology would explain if the index is a Climate Transition Benchmark or a Paris Aligned Benchmark.
Final Report on Draft RTS, Article 20 (detailed further by Articles 21 - 27)		

EU SFDR Requirements	Provision #	Notes
<p>1. Financial market participants shall present the information disclosed in accordance with Article 9(1) to (4) of Regulation (EU) 2019/2088 and this Section in an annex to the document referred to in Article 6(3) of Regulation (EU) 2019/2088 in accordance with the template set out in Annex III. They shall include a prominent statement in the main body of the document referred to in Article 6(3) of that Regulation that information related to sustainable investment is available in that annex.</p>		
<p>2. Financial market participants shall include a statement at the beginning of the annex referred to in paragraph 1 that the financial product has a sustainable investment objective and on whether an index has been designated as a reference benchmark in accordance with Article 9(1) of Regulation (EU) 2019/2088 or a reference benchmark has been designated in accordance with Article 9(3) of that Regulation.</p>	<p>3.A.1 4.A.1</p>	<p>The Exposure Draft requires disclosure of all of an investment product's objectives under draft Provision 3.A.1. The Exposure Draft require disclosure of the benchmark but do not require disclosure of whether or not the benchmark is a Climate Transition Benchmark or a Paris Aligned Benchmark.</p>
<p>3. Financial market participants shall present the information referred to in paragraph 1 in summary format in the order and made up of the following sections titled:</p>		
<p>(a) 'What is the sustainable investment objective of this financial product?';</p>	<p>3.A.1 9.A.3</p>	<p>The Exposure Draft requires disclosure of all of an investment product's objectives under draft Provision 3.A.1. When an objective qualifies as an impact objective, an investment manager must describe the intended outcome in measurable or observable terms (draft Provision 3.A.1) and disclose how the impact is assessed (draft Provision 9.A.3).</p>

<b>EU SFDR Requirements</b>	<b>Provision #</b>	<b>Notes</b>
(b) 'What investment strategy does this financial product follow?';	6.A.1 8.A.1 9.A.1 9.A.2 9.A.3 9.A.4 9.A.5	The overarching purpose of the Standards is to explain how and why ESG information is used or ESG issues are addressed in an investment product's strategy. Therefore, many provisions pertain to an investment product's strategy. If the sustainable investment objective is only to invest in certain types of investments, the criteria for "sustainable investments" would be disclosed under draft Provisions 6.A.1 and 8.A.1. If the investment product has an impact objective, as defined by the Exposure Draft, the investment manager must also disclose the process to achieve the impact objective under the draft provisions of Section 9.
(c) 'What is the asset allocation planned for this financial product?';	2.A.5	The Exposure Draft requires disclosure of the asset classes in which the product invests, but does not require all the detailed information required by Article 23 in the draft RTS (e.g., a narrative description of investments, how sustainable investments contribute to the sustainable objective, use of derivatives, minimum allocation to sustainable investments, purpose of non-sustainable investments, how adverse indicators are taken into account, and whether particular standards are taken into account.)
(d) 'Does this financial product take into account principal adverse impacts on sustainability factors?';	6.A.1 6.A.2 6.A.3 6.A.4 8.A.1 8.A.2 9.A.3 9.A.4 10.A.4	See Notes on Article 7.1 (a).

<b>EU SFDR Requirements</b>	<b>Provision #</b>	<b>Notes</b>
(e) 'Can I find more product specific information online?';	8.B.1 9.B.1	The Exposure Draft does not require specific information to be posted on an investment manager's website. The Exposure Draft does contain a recommendation to provide information about how an investor can obtain the latest report that shows the ESG characteristics of the investment product and the latest report on progress toward the impact objective.
(f) for a financial product referred to in Article 9(1) of Regulation (EU) 2019/2088, 'Is a specific index designated as a reference benchmark to meet the sustainable investment objective?'; and	4.A.3	The Exposure Draft requires disclosure of any external reference points, which may be an index or some other point of reference such as a carbon reduction curve, that are used as a comparison point for any aspect, characteristic, or metric other than return and risk. The Exposure Draft does not, however, require the detailed information specified in Article 26 of the draft RTS.
(g) for a financial product referred to in Article 9(3) of Regulation (EU) 2019/2088, 'Does the financial product have the objective of a reduction in carbon emissions?'	3.A.1	The Exposure Draft requires disclosure of all of an investment product's objectives under draft Provision 3.A.1.
<b>Article 10: Transparency of the promotion of environmental or social characteristics and of sustainable investments on websites</b>		
1. Financial market participants shall publish and maintain on their websites the following information for each financial product referred to in Article 8(1) and Article 9(1), (2) and (3):		The Exposure Draft contains a single set of disclosure requirements for a compliant presentation. Different information need not be presented on a website and in a compliant presentation.
(a) a description of the environmental or social characteristics or the sustainable investment objective;	3.A.1 6.A.1 8.A.1	The ESG characteristics of an investment product are expected to be made evident through the information required by draft Provisions 6.A.1 and 8.A.1. The Exposure Draft requires disclosure of all of an investment product's objectives under draft Provision 3.A.1.

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(b) information on the methodologies used to assess, measure and monitor the environmental or social characteristics or the impact of the sustainable investments selected for the financial product, including its data sources, screening criteria for the underlying assets and the relevant sustainability indicators used to measure the environmental or social characteristics or the overall sustainable impact of the financial product;	4.A.3 5.A.1 5.A.2 6.A.1 8.A.1 9.A.3	Draft Provision 4.A.3 requires disclosure of any external reference points, which may be an index or some other point of reference such as a carbon reduction curve, that are used as a comparison point for any aspect, characteristic, or metric other than return and risk. Draft Provision 5.A.1 requires disclosure of the sources and types of ESG information used. Draft Provision 5.A.2 requires disclosure of the steps taken to evaluate the reliability of the ESG information used. Draft Provision 6.A.1 requires disclosure of investment-level ESG exclusion criteria. Draft Provision 8.A.1 requires disclosure of portfolio-level ESG criteria. Draft Provision 9.A.3 requires disclosure of the methodology used to assess environmental and social impacts.
(c) the information referred to in Articles 8 and 9;	See earlier analysis	See analysis above for Articles 8 and 9.
(d) the information referred to in Article 11.	Not required	See analysis below for Article 11.
Final Report on Draft RTS, Article 32 and 45 (detailed further by Articles 33 - 44 and 46-57)		
For financial products referred to in Article 8(1) of Regulation (EU) 2019/2088, financial market participants shall publish the information referred to in Article 10(1) of that Regulation and Articles 33 to 44 in the order and made up of the following sections titled:		The Exposure Draft does not require disclosures to presented in a specific format or order. The Exposure Draft seeks input on whether users would like the Standards to contain a recommended format or template for compliant presentations. Information required by Article 10 that is also required by Article 8 and 9 is not repeated here. Only the incremental requirements of Article 10 are listed below.
Articles 33 and 46 (Summaries)	Not required	The Exposure Draft does not require a summary of the information in a compliant presentation, nor is a summary prohibited.

<b>EU SFDR Requirements</b>	<b>Provision #</b>	<b>Notes</b>
Articles 38 and 51 (Monitoring of Environmental or Social Characteristics / Sustainable Investment Objective)	8.B.1 9.B.1	The Exposure Draft does not require disclosure of monitoring procedures but it does recommend information be provided as to how investors can obtain periodic reports that may be helpful to assess an investment manager's monitoring and reporting of ESG characteristics, if any, and progress toward impact objectives, if any.
Articles 40 and 53 (Data Sources)	5.A.1 5.A.2	The Exposure Draft requires disclosure of sources and types of data and steps taken to ensure data quality. They do not require disclosure of all the points in Articles 40 and 53 of the draft RTS.
Articles 41 and 54 (Limitations to Methodologies)	Not required	The Exposure Draft does not require disclosure of limitations to methodologies.
Article 42 and 55 (Due Diligence)	7.A.2	The Exposure Draft does not require a full description the due diligence process undertaken for investments, but it does require a description of the research and analysis undertaken to determine the materiality of ESG information, when such information is used.
Articles 43 and 56 (Engagement Policies)	10.A.1 10.A.2	The Exposure Draft requires a summary of the stewardship policies related to environmental and social issues and information about how an investor can obtain a complete and current copy of all stewardship policies.
<b>Article 11: Transparency of the promotion of environmental or social characteristics and of sustainable investments in periodic reports</b>		
1. Where financial market participants make available a financial product as referred to in Article 8(1) or in Article 9(1), (2) or (3), they shall include a description of the following in periodic reports:	Not required	The scope of the Standards are investment product disclosures. The Exposure Draft does not contain requirements for periodic reports.
(a) for a financial product as referred to in Article 8(1), the extent to which environmental or social characteristics are met;		
(b) for a financial product as referred to in Article 9(1), (2) or (3):		

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(i) the overall sustainability-related impact of the financial product by means of relevant sustainability indicators; or  
(ii) where an index has been designated as a reference benchmark, a comparison between the overall sustainability-related impact of the financial product with the impacts of the designated index and of a broad market index through sustainability indicators.

**Article 12: Review of disclosures**

1. Financial market participants shall ensure that any information published in accordance with Article 3, 5 or 10 is kept up to date. Where a financial market participant amends such information, a clear explanation of such amendment shall be published on the same website.

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1.A.10

The Exposure Draft requires compliant presentations to be kept up to date and material errors to be corrected.

1.A.15

**Article 13 Marketing communications**

1. Without prejudice to stricter sectoral legislation, in particular Directives 2009/65/EC, 2014/65/EU and (EU) 2016/97 and Regulation (EU) No 1286/2014, financial market participants and financial advisers shall ensure that their marketing communications do not contradict the information disclosed pursuant to this Regulation.

1.A.6

The Exposure Draft prohibits information to be presented in a compliant presentation that contradicts information contained in the documents that govern the investment product or information contained in disclosures or filings required by law or regulation.