

**BAI – Webinar**

# **BAI ESG Template: Art. 8 Taxonomy DA + CSRD/ESRS Reporting for Alternative Investments to NFRD / CSRD investors**

**SPEAKER:**

**LARS BAUSCHUS**, HEAD OF INVESTMENTS BACK OFFICE, LVM VERSICHERUNG  
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- **BAI Working Group on Sustainable Finance & ESG** (permanent working group): preparation of opinions for consultations on all levels (IOSCO, European Union, Germany), dialogue and exchange of information
- **Various Subworking Groups** (SFDR, CSRD, Impact Investing, EET, ...)
- **BAI Best Practices** (PAIs, Impact Investing & Alternative Investments, BAI ESG Template)
- **BAI Webinars on ESG topics**
- **BAI Workshops on ESG topics (next Workshop on 28 November 2024)**
- **BAI member portal with up-to-date information & exchange with members: <https://www.mitglieder.bvai.de>**

The screenshot shows the BAI website interface. At the top, there is a navigation bar with the BAI logo and the text 'REPRESENTING ALTERNATIVE INVESTMENTS'. A search bar is located in the center of the navigation bar. On the right side of the navigation bar, there are icons for a notification bell and a user profile. Below the navigation bar, there is a main content area. On the left side of the main content area, there is a sidebar with various navigation options: 'Beiträge' (26), 'Nachrichten', 'Termine' (1), 'Aufgaben', and 'Dateien'. The main content area features a news article titled 'Neues BAI ESG Template veröffentlicht - Webinar dazu am 14. Oktober 2024 (wie immer kostenfrei)'. The article is authored by Michael Bommer (BAI e.V.) and is categorized under 'Allgemeine Beiträge + 13 weitere Gruppen'. The article text discusses the release of the new BAI ESG Template, its development by Jedor Tokarevich, and the upcoming webinar on October 14, 2024. The article also mentions the Taxonomie-VO-Template and the requirements for the 2024 reporting year. On the right side of the main content area, there is a sidebar with a 'Teams meeting' section, listing a meeting on October 22, 2024, and a workshop on November 28, 2023.

**BAI** REPRESENTING  
ALTERNATIVE  
INVESTMENTS

Startseite Nutzerverzeichnis Gruppenverzeichnis Bedienungsanleitung

Teams meeting

BAI Arbeitskreis Digitalisierung & Alternative Assets  
Di., 22.10.2024, 16:30 - 17:30

BAI Workshop Sustainable Finance & ESG 2024  
Do., 28.11.2024  
Audimax der Frankfurt School of Management and Finance, Frankfurt am Main

**BAI** REPRESENTING  
ALTERNATIVE  
INVESTMENTS

Beiträge 26

Nachrichten

Termine 1

Aufgaben

Dateien

Fachausschuss  
Fonds- und  
Marktregulierung 16

LeerverkaufsVO

MICAR/DLT/DORA/e  
WPG 3

MIFID/MIFIR/EMIR 2

Weiteren beitreten

FACHAUSSCH... 18 +

ASiG/DAC/ATAD/FTT 1

Fachausschuss  
Investmentbesteuerung 9

GewStG 1

InvStG/ESiG 7

USiG

Weiteren beitreten

FACHAUSSCH... 6 +

CRR/CRD/KWG

EbAV/IORP/PFAV

Fachausschuss  
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Solvency  
II/VAG/AnIV 2

Weiteren beitreten

ARBEITSKREIS... 35 +

Arbeitskreis Sustainable Finance & ESG 8

BAI Workshop  
Sustainable Finance & ESG am 20.11.2023  
in Frankfurt 6

CS3D/LkSG 3

CSR 3

EET 2

Impact Investing & Alternative 4

**Michael Bommer (BAI e.V.)**  
Allgemeine Beiträge + 13 weitere Gruppen  
vor 21 Stunden

**Neues BAI ESG Template veröffentlicht - Webinar dazu am 14. Oktober 2024 (wie immer kostenfrei)**

Der BAI hat Ende letzter Woche das neue [BAI ESG Template](#) veröffentlicht (siehe auch Excel-Sheet im Anhang). [Es kann auf der BAI-Website frei heruntergeladen und verwendet werden.](#) Eine Weiterverbreitung ist ausdrücklich erwünscht!

Maßgeblich bei der Entwicklung des BAI ESG Templates beteiligt war Jedor Tokarevich von unserem Mitgliedsunternehmen SOF als Leiter der BAI-EET-Arbeitsgruppe, der das Template im zahlreichen Runden und Stunden zusammen mit über einem Dutzend Versicherungsinvestoren entwickelt und an die Bedürfnisse der Investoren angepasst hat.

Im vergangenen Jahr hatte der BAI das Art. 8 Taxonomie VO-Template, das von alternativen Investment-GPs weit verbreitet genutzt wurde, veröffentlicht, um Taxonomie-Daten an NFRD/Art.-8-Taxonomie-VO-regulierte LPs wie Versicherungen, Pensionsfonds, Vermögensverwalter oder externe AIFMs zu liefern. Die Vorlage wurde auf Basis der Anforderungen von Anhang 10 und Anhang 12 Art. 8 der Taxonomie-VO entwickelt und wurde für die Berichterstattung im Jahr 2023 erstmals verwendet.

**Während die Taxonomie-Anforderungen für das Berichtsjahr 2024 weitgehend unverändert blieben, wurden durch CSRD und ESRS zusätzliche Anforderungen eingeführt. Insbesondere müssen NFRD/CSRD-Investoren nun auch die finanzierten Treibhausgasemissionen (einschließlich Berechnungsmethoden, Datenqualität, Aufteilung nach Sektoren / (PCAF) Anlageklassen, Reduktionsziele bis 2050 sowie vermiedene Emissionen durch erneuerbare Energien) für ihre Fondsinvestitionen offenlegen. Das neue Template widerspiegelt diese neuen Anforderungen.**

In mehreren gezielten Workshops hat der BAI mit einer Expertengruppe, die für die Taxonomie- und CSRD-Offenlegungen in deutschen Versicherungsunternehmen verantwortlich ist, das BAI ESG Template konsultiert und das bestehende Taxonomie-Template um die neuen CSRD / ESRS-Datenpunkte erweitert.

Ein Hinweis: Das Template wurde von und mit Investoren für Investoren und Asset Manager entwickelt. Anregungen und Anmerkungen nehmen wir gerne entgegen, bspw. eine potentielle Ausweitung auf CRR-Investoren.

**Am 14. Oktober 2024 findet dazu noch ein Webinar statt, welches den regulatorischen Hintergrund erläutern, die Anforderungen aus der Perspektive der LPs beleuchten und das neue Template sowie entsprechende Leitlinien vorstellen wird. Speaker werden Jedor**

## BAI ESG Workshop

- 28. November 2024

## BAI Private Debt Symposium

- 6. Februar 2025

**Here you can find all other  
upcoming BAI webinars:**

<https://www.bvai.de/veranstaltungen/bai-webinare>



## Jegor Tokarevich

- CEO of SOF, a London based service provider with focus on risk management und reporting for alternative investment and regulated institutional investors
- Head & initiator of professional development programmms for alternative investments at the University of Oldenburg
- Co-Head of BAI EET Working Suppgroup



## Lars Bauschus

- Head of Investment Back Office at LVM Versicherung Münster
- responsible for investment controlling of alternative investments, investment accounting, regulatory investment reporting and trade settlement

- **Introduction of regulatory requirements (BAI)**
  - **Typical EU LP reporting process for alternative investments**
  - **Article 8 Taxonomy DA Annexes**
  - **CSRD & ESRS**
- **Practical Insights – Insurance LP Perspective (LVM)**
  - Which datapoints are required?
  - What is the reporting timeline?
  - Current experience with auditors
  - What are the consequences of missing / erroneous data?
- **Introduction of the BAI ESG Template 2024 (BAI)**
  - Changes compared to BAI Art. 8 Template 2023
  - New datapoints for ESRS / CSRD / PCAF

## **BAI ESG Template** (Art. 8 Taxonomy DA + **CSRD/ESRS**)

- Taxonomy KPIs (portfolio%, (non)-eligibility, alignment)
- **Financed CO2 Emissions (Scope 1,2,3,12,123),  
Data Quality, Method, Targets, Reductions / Removals**

◀ ***New for 2024!***

15.12.24

15.2.25 31.3.25

31.5.25

## **EET** (Art. 4 SFDR / Principal Adverse Impact KPIs (PAIs))

- Mandatory / Additional PAIs
- PAI Values, PAI Coverage Ratios, PAI Eligibility Ratios
- Other datapoints (e.g. Art. 8 / 9 Annexes, exclusions etc.)

## Annex 10

*(in EUR and %, Revenues and CapEx-based)*

### Portfolio allocation = denominator:

- (Non-)CSRD (non-)financial companies
- Other counterparties (incl. real assets)
- Derivatives
  
- Assets not part of unit-linked portfolio
- Eligible, not aligned assets
- Not eligible

### Taxonomy alignment = numerator

- CSRD (non-)financial companies
- Other counterparties (incl. real assets)
  
- Assets not part of unit-linked portfolio
- Breakdown by 6 environmental objectives

## Annex 12

*(in EUR and %, Revenues and CapEx-based)*

- Nuclear / gas Taxonomy activities – yes / no
  
- Alignment / Eligibility / Non-Eligibility breakdown by:
  - 6 nuclear / gas Taxonomy activities
  - Other non-nuclear / non-gas Taxonomy activities



# Article 8 Taxonomy DA Annexes – Real Life Example

## INVESTMENTS DIRECTED AT FUNDING TAXONOMY-ALIGNED ACTIVITIES

Proportion of the insurance or reinsurance undertaking's investments that are directed at funding, or are associated with, Taxonomy-aligned in relation to total investments

(in EUR million, except percentages)

	Turnover-based		Capital expenditures-based	
	%	Amount	%	Amount
The weighted average value of all the investments of insurance or reinsurance undertakings that are directed at funding, or are associated with Taxonomy-aligned economic activities relative to the value of total assets covered by the KPI, with following weights for investments in undertakings	1.0%	3,818	1.4%	5,629

Source: AXA Website. Annual Financial Report 2023.

[Universal registration document 2023 \(axa-contento-118412.eu\)](https://www.axa.com/content/dam/axa-com/content/2023/04/2023-annual-financial-report-2023-axa-contento-118412.eu)

Amount and proportion (the information is to be presented in monetary amounts and as percentages)

(In Euro million, except percentages)

Row	Economic activities	CCM + CCA		Climate change mitigation (CCM)		Climate change adaptation (CCA)	
		Amount	%	Amount	%	Amount	%
1.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.26 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%	-	0.0%	-	0.0%
2.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.27 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%	-	0.0%	-	0.0%
3.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.28 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	-	0.0%	-	0.0%	-	0.0%
4.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.29 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	25	0.1%	25	0.1%	-	0.0%
5.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.30 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	32	0.1%	32	0.1%	-	0.0%
6.	Taxonomy- eligible but not Taxonomy-aligned economic activity referred to in Section 4.31 of Annexes I and II to Delegated Regulation 2021/2139 in the denominator of the applicable KPI	3	0.0%	3	0.0%	-	0.0%
7.	Other Taxonomy-eligible but not Taxonomy-aligned economic activities not referred to in rows 1 to 6 above in the denominator of the applicable KPI	43,781	99.9%	43,723	99.9%	58	100.0%
8.	<b>Total Taxonomy eligible but not Taxonomy-aligned economic activities in the denominator of the applicable KPI</b>	<b>43,841</b>	<b>100.0%</b>	<b>43,784</b>	<b>100.0%</b>	<b>58</b>	<b>100.0%</b>

## Breakdown of denominator of the KPI

	%	Amount
Derivatives relative to total assets covered by the KPI	-0.4%	-1,652
Exposures to financial and non-financial undertakings not subject to articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI		
For non-financial undertakings	0.0%	65
For financial undertakings	0.0%	68
Exposures to financial and non-financial undertakings from non-EU countries not subject to articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI		
For non-financial undertakings	18.7%	74,322
For financial undertakings	13.5%	53,604
Taxonomy-aligned exposures to financial and non-financial undertakings subject to Articles 19a and 29a of Directive 2013/34/EU over total assets covered by the KPI <sup>(1)</sup>		
For non-financial undertakings	0.8%	3,073
For financial undertakings	0.2%	745
Exposures to other counterparties over total assets covered by the KPI	67.3%	268,276
Insurance or reinsurance undertaking's investments other than investments held in respect of Life insurance contracts where the investment risk is borne by the policy holders, that are directed at funding, or are associated with, Taxonomy-aligned economic activities	1.0%	3,818
All the investments that are funding economic activities that are not Taxonomy-eligible relative to the value of total assets covered by the KPI	87.9%	350,133
All the investments that are funding Taxonomy- eligible economic activities, but not Taxonomy-aligned relative to the value of total assets covered by the KPI	11.2%	44,549

(1) Turnover-based

**CSRD ((2022/2464/EU)**  
**Corporate Sustainability Reporting Directive**

-> Transposition into law in EU Member States: e.g. CSRD-Umsetzungsgesetz in Germany

**ESRS Set 1 ((2023/2772)**  
**European Sustainability Reporting Standards**

**PCAF (December 2022)**  
**GHG Accounting and Reporting Standard for the Financial Industry**  
**from the Partnership for Carbon Accounting Financial - Part A “Financed Emissions”**

# ESRS – Financed CO2 Emissions (ESRS\_E1-6\_AR48)

## Other investments, no further transactions.

67. Business relationships with the investees may give rise to impacts that are connected to the undertaking and that are to be considered in the materiality assessment and reported when material. There are no specific requirements in topical standards on how to measure impacts that are connected to the undertaking through its investments without joint control and/or significant influence, meaning generally below 20%, apart from GHG Scope 3 Category 15 disclosures as explained in paragraph 66.

<b>Investments</b>	All other investments (in the scope of IFRS 9)	Recognised at fair value; dividends in profit or loss; changes in fair value are recognised in profit or loss or in other comprehensive income	No specific indications in ESRS E1 metrics on how to measure impacts connected with the undertaking through its investments (except for category 15 of GHG Protocol)
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Source: EFRAG IG2 VC

	Base year	Compa-rative	N	% N / N-1	2025	2030	(2050)	Annual % target / Base year
<b>Significant scope 3 GHG emissions</b>								
15 Investments								
<b>Total GHG emissions</b>								
Total GHG emissions (location-based) (tCO2eq)								
Total GHG emissions (market-based) (tCO2eq)								

Source: ESRS

# ESRS / PCAF – Financed CO2 Emissions By PCAF Asset Class / Sector (ESRS\_E1-6\_AR48, Table 10.2-8 PCAF)

Table 10.2-8. Example reporting of absolute financed emissions—scope 3, category 15 (investments)

Activity	Total outstanding loan and investments covered (x € 1,000)	Scope 1+ Scope 2 emissions (tCO <sub>2</sub> e)	Scope 3 emissions (tCO <sub>2</sub> e)	Emission intensity (tCO <sub>2</sub> e/€M)	Weighted data quality score (High Quality = 1 Low Quality = 5)
<b>Absolute emissions per asset class (if reporting by asset class)</b>					
Listed Equity & Bonds					
Business Loans					
-Sector 1, e.g., Cement					
-Sector 2, e.g., Cattle					
Project Finance					
Mortgages					
Commercial Real Estate					
Motor Vehicle Loans					
Sovereign Debt					
<b>Total</b>					
<b>Absolute emissions per sector (if reporting by sector)</b>					
Oil & Gas					
Agriculture					
<b>Total</b>					

# ESRS / PCAF – Financed CO2 Emissions – Avoidance / Removals (ESRS\_E1-6\_AR48, Table 10.2-9 PCAF)

Table 10.2-9. Example reporting of financed emission removals and avoided emissions—scope 3, category 15 (investments)

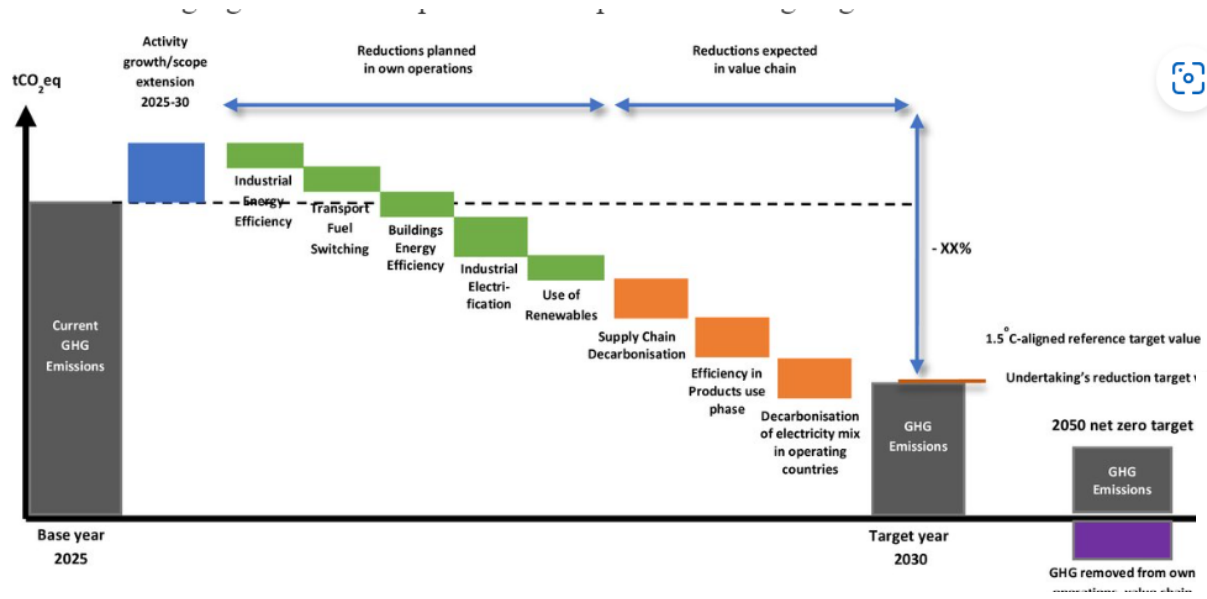
Activity	Total outstanding loan and investments covered (x € 1,000)	Emissions (tCO <sub>2</sub> e)	Emission intensity (tCO <sub>2</sub> e/€M)	Weighted data quality score (High Quality = 1 Low Quality = 5)
<b>Avoided emissions from renewable power projects</b>				
Wind				
Solar				
<b>Total</b>				
<b>Emissions removals from forestry projects</b>				
<b>Carbon credits generated</b>				
<b>Total</b>				
<b>Carbon credits retired</b>				
<b>Total</b>				

## Detailed PCAF Data Quality Tables + Formulas for each of the 7 PCAF Asset Classes

### Summary

- 1 - Verified, reported, calculated based on the GHG Protocol
- 2 - Unverified, reported, calculated based on the GHG Protocol
- 3 - Estimated based on energy consumption or production
- 4 - Estimated based on category average data
- 5 - Estimated based on industry average data

# ESRS – CO2 Targets (ESRS\_E1-6\_AR31)



	Base year (e.g., 2025)	2030 target	2035 target	...	Up to 2050 target
GHG emissions (ktCO2eq)	100	60	40		
Energy efficiency and consumption reduction	-	-10	-4		
Material efficiency and consumption reduction	-	-5	-		
Fuel switching	-	-2	-		
Electrification	-	-	-10		
Use of renewable energy	-	-10	-3		
Phase out, substitution or modification of product	-	-8	-		
Phase out, substitution or modification of process	-	-5	-3		
Other	-	-			

- Introduction of regulatory requirements (BAI)
  - Typical EU LP reporting process for alternative investments
  - Article 8 Taxonomy DA Annexes
  - CSRD & ESRS
- **Practical Insights – Insurance LP Perspective (LVM)**
  - Which datapoints are required?
  - What is the reporting timeline?
  - Current experience with auditors
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- Introduction of the BAI ESG Template 2024 (BAI)
  - Changes compared to BAI Art. 8 Template 2023
  - New datapoints for ESRS / CSRD / PCAF



# Practical Insights from a NFRD/CSRD Insurance Investor

## Alternative Investments at LVM



- LVM Versicherung is a German insurance group active in the areas of non-life-/ life-/ health insurance and financial services.
- LVM's assets under management are around **EUR 24 billion**, of which more than **15% relate to alternative investments**.
- The LVM focus of alternative investments is on single funds and fund of funds in the areas of private equity, infrastructure, real estate and private debt. LVM is currently invested in over **130 different alternative funds**.
- Alternative investments are held in the **direct portfolio of four LVM companies** and managed in-house.

# Practical Insights from a NFRD/CSRD Insurance Investor

## Which datapoints are required?

- The biggest challenge for investors in connection with ESG reporting is the **collection of the necessary ESG data** for different asset classes and the subsequent **aggregation at company level** for various regulatory reporting requirements.
- Data availability for liquid assets is quite good, as many issuers fall within the scope of reporting obligations under SFDR, NFRD or CSRD. This makes it easy for data providers to collect and offer the data. As a result, **ESG data coverage for liquid assets is usually high.**
- The situation is different in the area of illiquid assets such as alternative investments, because they only partially fall within the scope of the ESG disclosure requirements. However, **this fact does not release investors from the obligation to collect and process ESG data for their illiquid assets as well.**
- For this reason, **investors are dependent on the provision of ESG data by alternative funds.**  
Templates such as the **BAI ESG template or the EET are used to standardize** these data deliveries.

# Practical Insights from a NFRD/CSRD Insurance Investor

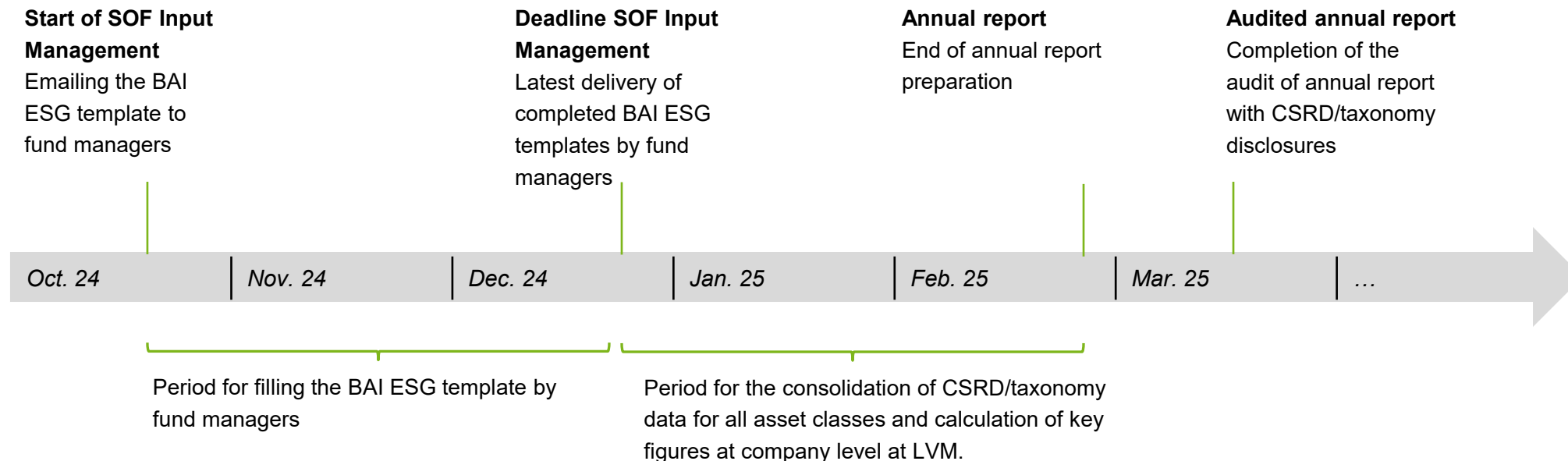
## Which datapoints are required?

- The relevant data points for taxonomy reporting are derived from **Annex X and Annex XII Article 8 Taxonomy Delegated Act**. These mandatory data points are identical for all Annex 10 and Annex 12 publishers and are contained in the **BAI ESG template since last year**.
- The relevant data points for the **new CSRD reporting may differ for different insurance companies**. The individual scope of CSRD reporting depends on a materiality analysis of the respective investment portfolio.
- Currently, the materiality analyses primarily lead to disclosure requirements in the area of **financed GHG emissions**. For this reason, the required data points for financed GHG emissions were **newly included in the BAI ESG template** this year.
- These data points relate primarily to the **absolute GHG emissions (Scope 1,2,3)** for the assets held by the alternative fund together with the associated **eligibility/coverage ratios**. Other data points relate to the **quality of the emissions data supplied (reported or estimated)**. The allocation of the fund to different **asset classes** and information on **avoided emissions** are also requested.

# Practical Insights from a NFRD/CSRD Insurance Investor

## What is the reporting timeline?

- The previous NFRD / taxonomy reporting obligations at company level were carried out in separate sustainability reports, which could also be published after the annual financial reporting.
- With the introduction of the CSRD, companies subject to the **CSRD are obligated to include sustainability reporting in their audited annual reports**. As a result, the timeline for sustainability reporting is much tighter than before.
- The template is filled with the latest available (ESG/financial) data.



# Practical Insights from a NFRD/CSRD Insurance Investor

## Current experience with auditors



- The CSRD introduces an **audit obligation with limited assurance for the sustainability information** contained in the annual report. The previous audits of NFRD disclosures were voluntary.
- The audit of the investment sustainability reporting takes at least as much time as the audit of the financial reporting.
- The **availability of ESG data for illiquid assets was already a focus of the voluntary audits**. Auditors are aware of the limited data availability, but **expect nevertheless reasonable efforts for a high data coverage**.
- LVM has been working with Substance over Form (SOF) as a service provider for the collection of ESG data for alternative investments since April 2023. This input management process has **successfully passed the previous audits of the PAI statements and taxonomy reporting** and is therefore very valuable to us.

# Practical Insights from a NFRD/CSRD Insurance Investor

## What are the consequences of missing / erroneous data?

- Over time, we have seen a **significant improvement in the availability and quality of ESG data for alternative investments.**
- We currently receive **EET and/or the BAI ESG Template from around 50% of our alternative investment funds** and the volume continues to increase.
- The number of completed data fields in the templates is continuously increasing, as is the quality of the data.
- However, there is still a **need for greater data coverage for alternative investments particularly with regard to the CSRD.**
- Missing data must either be **disclosed as a data gap** or, in the case of CSRD, **eliminated by means of estimates.**
- For example, for CSRD disclosure of GHG emissions, **100% data coverage is expected based on either reported or estimated data.** The lack of BAI ESG templates for funds results in very complex estimation procedures for investors and should be avoided.
- Incorrect data can either not be processed further or lead to findings by auditors.

- Introduction of regulatory requirements (BAI)
  - Typical EU LP reporting process for alternative investments
  - Article 8 Taxonomy DA Annexes
  - CSRD & ESRS
- Practical Insights – Insurance LP Perspective (LVM)
  - Which datapoints are required?
  - What is the reporting timeline?
  - Current experience with auditors
  - What are the consequences of missing / erroneous data?
- **Introduction of the BAI ESG Template 2024 (BAI)**
  - **Changes compared to BAI Art. 8 Template 2023**
  - **New datapoints for ESRS / CSRD / PCAF**

- Multiple detailed and fluid discussions with **> 10 ESG experts from CSRD insurers** in Q2-Q3 2024
- Feedback from auditors and consultants from ongoing **CSRD implementation projects**
- Various **uncertainties / room for interpretation** identified  
-> BAI ESG Template reflects the consensus of working group members
- **BAI ESG Template released on 20 September 2024**



# Where to download?


**Location:** [link](#) (no registration required)

-> BAI Website (<https://www.bvai.de/en/>)

-> Regulation

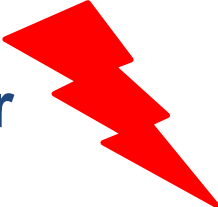
-> Sustainable Finance

-> BAI ESG Template  
(current version)



The screenshot shows the BAI website's 'Sustainable Finance' page. At the top, there is a navigation menu with links for 'About us', 'Members', 'Alternative Investments', 'Regulation', 'Publications', 'Press', and 'Events'. The main content area features a sidebar on the left with a list of categories: 'Funds and Market Regulation (AIFMD/KAGB, MiFID II, ...)', 'Supervisory law for investors (Solvency II/VAG, AnIV, ...)', 'Investment Taxation', 'Sustainable Finance' (highlighted in dark blue), 'Digital Finance', 'Experts' Committees', and 'BAI feedback statements'. The main content area is titled 'Sustainable Finance' and dated '20. September 2024'. It includes a breadcrumb trail: '# > Regulation > Sustainable Finance'. Below the title, there are several tags: 'Sustainable Finance', 'CS3D', 'ESG', 'ESAP', 'EuGB', 'Green Bonds', 'SFDR', 'Taxonomie', and 'CSRD'. The text describes the EU Commission's 'Action Plan on Sustainable Finance' from 2018 and explains the acronym ESG. It also lists three objectives of the Action Plan: 1) re-orientation of private capital flows, 2) fostering of transparency and long-termism, and 3) embedding of sustainability risk into risk management. At the bottom, there is a table of contents with expandable sections: '+ Introduction', '+ Legal basis', '+ Further information', '+ BAI feedback statements', and '+ BAI ESG Template / Best Practices / Contributions' (highlighted in yellow).

Tab	Description
1_Taxonomy+ESRS-Part1	To be provided for regular funds by GPs. Art. 8 Taxonomy DA and ESRS datapoints (part 1).
2_ESRS-Part2	To be provided for regular funds by GPs. ESRS datapoints (part 2).
3_LP Balance Sheet+Master Fund	To be provided for LP balance sheets and master funds where different target funds with different asset classes / strategies are aggregated and the investor uses final values without further processing on their end.

**Relevant for all GPs** 

Only for special cases such as total LP balance sheet calculation

# Level of Reporting

10001	10002	10003	10004	10005	10006	10007	1000000	1000001	1000004	1000006	1000008	1000009	1000012	1000013	1000016	1000017	1000020	1000024	1000026
Dummy RE Fund	InternalID12345	123456ABCDEF12345678	EUR	10000000	12000000	2024-12-31	0	0	1	0.02	0	0	0	0	0	0	0.98	0.08	0.9

One report = one line per fund / per share class, if available (similar to EET, VAG)

NOT intended for reporting of data on the portfolio company level (like TPT, CRR)

# Structure of Fields + Changes compared to BAI Template 2023

BAI ESG Template Tab	Field IDs	Background	# of Fields	Compared to BAI Art. 8 Template 2023
<b>1_Taxonomy+ ESRS-Part1</b>	10001-10007	General Fund Data	7	<ul style="list-style-type: none"> <li>• Ids changed</li> <li>• 1 new field</li> </ul>
	1000000-1000085	Annex 10 Art. 8 Taxonomy DA	48	<ul style="list-style-type: none"> <li>• Removed value fields</li> <li>• Minor changes field names</li> </ul>
	1200000-1220165	Annex 12 Art. 8 Taxonomy DA	170	
	2000000-2000016	ESRS_E1-6_AR48	17	<b>NEW</b>
<b>2_ESRS-Part2</b>	2100001-2100007	ESRS_E1-6_AR48, Table 10.2-8 PCAF	7	
	2100008-2100047	ESRS_E1-6_AR48, Table 10.2-9 PCAF	40	
	2100048-2100057	ESRS_E1-6_AR31	10	
<b>Total</b>			<b>299</b>	<b>-127 fields (previously 426)</b>

# Illustrative Simplified Examples Taxonomy Fields

## 0% Taxonomy Alignment

Field ID	Field Description	RE / Renewables SPV Fund	PE / PD Fund
10002	Fund / Share Class ID	InternalID12345	LU123456789
10003	Fund LEI	L47NHHI0Z9X22DV46U42	
1000000, 1000001	% T-aligned – <u>revenues, capex</u>	0	0
1000006	% derivatives	0.02	0.02
1000008	% non-CSRD undertaking, non-financial	0	0.9
1000009	% non-CSRD undertaking, financial	0	0
1000012	% non-CSRD undertaking, non-EU, non-financial	0	0.7
1000013	% non-CSRD undertaking, non-EU, financial	0	0
1000016	% CSRD undertaking, financial	0	0
1000017	% CSRD undertaking, non-financial	0	0
1000020	% other counterparties (incl. real assets)	0.98	0.08
1000024	% not T-eligible - <u>revenues</u>	0.08	0.08
1000026	% T-eligible, not T-aligned - <u>revenues</u>	0.9	0
1000083	% not T-eligible - <u>capex</u>	0.08	0.08
1000085	% T-eligible, not T-aligned - <u>capex</u>	0.9	0
1200000-05, 1220000-05	6 gas & nuclear Taxonomy activities - <u>revenues, capex</u>	N	N

# Illustrative Simplified Examples Taxonomy Fields

## ESRS Fields Part 1 – Private Equity Fund

Field ID	Field Description	Value	Interpretation
2000000	Method for calculating GHG emissions	<b>L</b>	Location-based method
2000001	Eligibility ratio	<b>0.9</b>	<u>90 EUR portfolio companies (PC)</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2000002	GHG emissions (Scope 1) - all asset classes	<b>100</b>	Covered assets financed 100tCO <sub>2</sub> e
2000003	Coverage ratio GHG emissions (Scope 1) - all asset classes	<b>0.2</b>	<u>20 EUR portfolio companies with available GHG</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2000004	Data quality GHG emissions (Scope 1) - all asset classes	<b>0</b>	All values estimated and not reported by PC
...	...	...	
2000014	GHG emissions (Scope 123) - all asset classes	<b>350</b>	...
2000015	Coverage ratio GHG emissions (Scope 123) - all asset classes	<b>0.1</b>	...
2000016	Data quality GHG emissions (Scope 123) - all asset classes	<b>0</b>	...

# Illustrative Simplified Examples Taxonomy Fields

## ESRS Fields Part 2 – Private Equity Fund

Field ID	Field Description	Value	Interpretation
2100001	% listed equity and corporate bonds	0	n/a
2100002	% business loans and unlisted equity	0.9	<u>90 EUR portfolio companies</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100003	% project finance	0	n/a
2100004	% commercial real estate	0	n/a
2100005	% mortgages	0	n/a
2100006	% motor vehicle loans	0	n/a
2100007	% sovereign debt	0	n/a

⇒ Only one asset class relevant for a PE strategy with unlisted equity only

⇒ Sum is 90% < 100% because of non-eligible assets (8% cash and 2% derivatives)

# Illustrative Simplified Examples Taxonomy Fields

## ESRS Fields Part 2 – Private Equity Fund

Field ID	Field Description	Value	Interpretation
2100008	Avoided GHG emissions - bioenergy		n/a because no avoidance from bioenergy
2100009	Coverage ratio of avoided GHG emissions - bioenergy	<b>0</b>	<u>0 EUR portfolio companies with available bioenergy avoidance</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100010	Eligibility ratio of avoided GHG emissions - bioenergy	<b>0</b>	<u>0 EUR portfolio companies producing bioenergy</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100011	Data quality of avoided GHG emissions - bioenergy		n/a because no avoidance from bioenergy
...	...	...	...
2100036	Emissions removals from forestry		n/a because no forestry
2100037	Coverage ratio of emissions removals from forestry	<b>0</b>	<u>0 EUR portfolio companies with available forestry removals</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100038	Eligibility ratio of emissions removals from forestry	<b>0</b>	<u>0 EUR forestry projects</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100039	Data quality of emissions removals from forestry		n/a because no forestry



# Illustrative Simplified Examples Taxonomy Fields

## ESRS Fields Part 2 – Private Equity Fund

Field ID	Field Description	Value	Interpretation
2100040	Carbon credits (CC) generated		n/a because asset is not renewables or forest
2100041	Coverage ratio of CC generated	<b>0</b>	<u>0 EUR portfolio companies with available generated CC</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100042	Eligibility ratio of CC generated	<b>0</b>	<u>0 EUR portfolio companies eligible for generating CC</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100043	Data quality of CC generated		n/a because asset is not renewables or forest
2100044	CC retired	<b>0</b>	Sum of retired CC
2100045	Coverage ratio of CC retired	<b>0.5</b>	<u>50 EUR portfolio companies with available retired CC</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100046	Eligibility ratio of CC retired	<b>0.9</b>	<u>90 EUR portfolio companies eligible for retiring CC</u> 100 EUR GAV = 90 EUR PC + 8 EUR cash + 2 EUR derivatives
2100047	Data quality of CC retired	<b>0</b>	All values estimated and not reported by PC

# Illustrative Simplified Examples Taxonomy Fields

## ESRS Fields Part 2 – Private Equity Fund

Field ID	Field Description	Value	Interpretation
2100048	GHG emissions (Scope 123) – ‘2030 target		n/a for all fields because the PE fund doesn't have such targets in the prospectus
2100049	GHG emissions (Scope 123) – 2035 target		
2100050	GHG emissions (Scope 123) – 2040 target		
2100051	GHG emissions (Scope 123) – 2045 target		
2100052	GHG emissions (Scope 123) – 2050 target		
2100053	GHG reductions - 2030 target		
2100054	GHG reductions - 2035 target		
2100055	GHG reductions - 2040 target		
2100056	GHG reductions - 2045 target		
2100057	GHG reductions - 2050 target		