



Malta Stakeholder Engagement Survey  
Have your say

Thank you for your interest in participating in this stakeholder survey. This survey seeks to gauge the current state of awareness of key stakeholders on the requirements of sustainable finance disclosure and reporting, and the challenges and opportunities arising from the implementation of these requirements.

The feedback gathered forms part of the Stakeholder Engagement and Awareness component of a project being undertaken with the European Commission Directorate General for Structural Reform Support (DG Reform), for the benefit of the Malta Financial Services Authority (MFSA). Further information regarding the project can be accessed here:

[https://commission.europa.eu/news/four-financial-supervisor-national-authorities-ready-enhance-supervisory-capacity-field-2023-01-25\\_en](https://commission.europa.eu/news/four-financial-supervisor-national-authorities-ready-enhance-supervisory-capacity-field-2023-01-25_en).

This survey is being carried out on an anonymous basis by Deloitte Malta. No Personal Data will be collected or processed by Deloitte throughout the completion of the survey. The outcomes of this survey shall be used to support the European Commission and the MFSA in better understanding how they can best guide markets in the implementation of various EU Sustainability Disclosures and Reporting requirements. Therefore, we encourage you to respond as openly and honestly as possible such that the necessary support can be provided.

**Survey structure** The survey is structured to delve into key aspects of the European Union Sustainability Disclosures and Reporting (EU SD&R) initiatives. Throughout the survey, the term EU Sustainability Disclosures and Reporting is used to refer to the following main legislative documents:

EU taxonomy Regulation [1] Sustainable Finance Disclosure Regulation (SFDR) [2] Non-Financial Reporting Directive (NFRD) [3] and Corporate Sustainability Reporting Directive (CSRD) [4] EU Benchmarks Regulation [5] Green Bond Standard Regulation [6] Amendments to the Capital Requirements Regulation [7].

Questions are posed across the following main themes:

- Awareness and understanding: What is the current level of awareness and maturity among stakeholders regarding sustainable finance regulatory frameworks and EU SD&R?
- Challenges: What challenges are stakeholders encountering and/or identifying in adapting to sustainable finance practices in the context of the EU SD&R? What obstacles do stakeholders see and/or face in meeting the EU SD&R requirements?
- Opportunities: What opportunities do stakeholders identify in aligning with sustainable finance practices in the context of EU SD&R and how do they plan to leverage them?

The survey primarily consists of open-ended questions, giving you the opportunity to answer freely. These are supplemented with single and multiple-choice questions. Furthermore, in certain questions, you will be asked to assess the statements according to the ranking provided or to determine the degree of conformity with given statements. Completion of the survey is estimated to require approximately 30 – 45 minutes of your time, depending on the type of entity you are representing. Should you encounter any issues with the survey or wish to discuss this topic further, please feel free to reach out on [daherrera@deloitte.com.mt](mailto:daherrera@deloitte.com.mt).

*[1] Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation 2019/2088) and associated delegated acts*

*[2] 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*

*[3] Directive (EU) 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups*

*[4] Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting*

*[5] Regulation (EU) 2019/2089 of the European Parliament and of the Council of 27 November 2019 amending Regulation (EU) 2016/1011 as regards EU Climate Transition Benchmarks, EU Paris-aligned Benchmarks and sustainability-related disclosures for benchmarks*

*[6] Regulation (EU) 2023/2631 of the European Parliament and of the Council of 22 November 2023 on European Green Bonds and optional disclosures for bonds marketed as environmentally sustainable and for sustainability-linked bonds*

*[7] European Commission's proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor & Regulation of the European Parliament and of the Council amending Regulation (EU) No 575/2013 as regards requirements for credit risk, credit valuation adjustment risk, operational risk, market risk and the output floor with respect to Pillar 3 disclosures on ESG risks (Article 449a of Regulation 575/2013) further specified by the Commission Implementing Regulation (EU) 2022/2453 of 30 November 2022 amending the implementing technical standards laid down in Implementing Regulation (EU) 2021/637 as regards the disclosure of environmental, social and governance risks.*

# Part A – Introduction

## Represented stakeholder category:

- |   |   |
|---|---|
| <input type="checkbox"/> AIF managers                   | <input type="checkbox"/> Retirement scheme administrators |
| <input type="checkbox"/> <i>de minimis</i> AIF managers | <input type="checkbox"/> Retirement scheme                |
| <input type="checkbox"/> EUVECA fund managers           | <input type="checkbox"/> Insurance intermediaries         |
| <input type="checkbox"/> Investment firms               | <input type="checkbox"/> Listed entities                  |
| <input type="checkbox"/> UCITS managers                 | <input type="checkbox"/> Public sector organisation       |
| <input type="checkbox"/> Credit institutions            | <input type="checkbox"/> Trade/professional association   |
| <input type="checkbox"/> Insurance undertakings         | <input type="checkbox"/> Other                            |

## Does your organisation currently service any retail clients?

- ☐ Yes ☐ No ☐ N/A

## **(Listed entities only)** Is your organisation the parent company in a capital group?

- ☐ Yes ☐ No

## Does your organisation form part of a larger group?

- ☐ Yes ☐ No

## Is your ultimate parent undertaking based in a third country (i.e. non-EU)?

- ☐ Yes ☐ No

Number of employees at **group level** (if available, please indicate average number of FTEs in last closed financial year):

- |                                |                                   |
|--------------------------------|-----------------------------------|
| <input type="checkbox"/> <10   | <input type="checkbox"/> 100-249  |
| <input type="checkbox"/> 10-25 | <input type="checkbox"/> 250-500  |
| <input type="checkbox"/> 25-50 | <input type="checkbox"/> 501-1000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> >1000    |

Number of employees at **entity level** (if available, please indicate average number of FTEs in last closed financial year):

- |                                |                                   |
|--------------------------------|-----------------------------------|
| <input type="checkbox"/> <10   | <input type="checkbox"/> 100-249  |
| <input type="checkbox"/> 10-25 | <input type="checkbox"/> 250-500  |
| <input type="checkbox"/> 25-50 | <input type="checkbox"/> 501-1000 |
| <input type="checkbox"/> 50-99 | <input type="checkbox"/> >1000    |

What estimated percentage of FTEs are allocated to sustainability disclosures and reporting?

- |                                |                                  |                                  |
|--------------------------------|----------------------------------|----------------------------------|
| <input type="checkbox"/> <1%   | <input type="checkbox"/> 5%-10%  | <input type="checkbox"/> 25%-50% |
| <input type="checkbox"/> 1%-5% | <input type="checkbox"/> 10%-25% | <input type="checkbox"/> >50%    |

Balance sheet in EUR - last closed financial year. In the case of fund managers, please indicate Assets Under Management rather than Balance sheet

- |   |  |
|---|--|
| <input type="checkbox"/> < €100,000               | <input type="checkbox"/> €20,000,000 - €50,000,000     |
| <input type="checkbox"/> €100,000 - €1,000,000    | <input type="checkbox"/> €50,000,000 - €250,000,000    |
| <input type="checkbox"/> €1,000,000 - €5,000,000  | <input type="checkbox"/> €250,000,000 - €1,000,000,000 |
| <input type="checkbox"/> €5,000,000 - €20,000,000 | <input type="checkbox"/> > €1,000,000,000              |

Net turnover in EUR - last closed financial year

- |   |  |
|---|--|
| <input type="checkbox"/> < €100,000               | <input type="checkbox"/> €20,000,000 - €50,000,000     |
| <input type="checkbox"/> €100,000 - €1,000,000    | <input type="checkbox"/> €50,000,000 - €250,000,000    |
| <input type="checkbox"/> €1,000,000 - €5,000,000  | <input type="checkbox"/> €250,000,000 - €1,000,000,000 |
| <input type="checkbox"/> €5,000,000 - €20,000,000 | <input type="checkbox"/> > €1,000,000,000              |

**(Listed entities only)** - Principal activity NACE code

**(Listed entities only)** - Other key activities NACE codes (please indicate up to 5 codes maximum, separated by a comma)

For the last closed financial year, was your organisation required to prepare a Director's report including the information in paragraphs 8-13 of the sixth schedule of the Companies Act? (which transposed the 'NFRD' directive, Article 19a or Article 29a)?

☐ Yes

☐ No

☐ I don't know

For the last closed financial year, did your organisation prepare a Director's report including the information in paragraphs 8-13 of the sixth schedule of the Companies Act? (which transposed the 'NFRD' directive, Article 19a or Article 29a)?

☐ Yes

☐ No

☐ I don't know

Do you expect your organisation to be required to report under CSRD (EU directive 2022/2464 regarding corporate sustainability reporting) in the future?

☐ Yes

☐ No

☐ I don't know yet

Do you (plan to) resort to exemptions from sustainability reporting, due to the fact that the parent undertaking of your undertaking reports at group level?

☐ Yes

☐ No

☐ I don't know yet

For the last closed financial year, was your organisation or the organisations you represent required to prepare taxonomy disclosures (under Article 8 EU regulation 2020/852)?

☐ Yes

☐ No

☐ I don't know

**(Private entities except listed)** - Is your organisation required to prepare Sustainable Finance Disclosure Regulation ('SFDR') disclosures (meaning, under EU regulation 2019/2088)?

☐ Yes

☐ No

☐ I don't know

**(Private entities except listed)** - How does your organisation apply the applicable EU SD&R legislation? Please briefly explain whether you are a financial market participant or financial advisor within the meaning of SFDR, and in general terms, what disclosures your organisation prepares, if any.

☐ At Group level (please explain)

☐ At Entity level (please explain)

☐ Not Applicable (please explain)

**(Private entities except listed)** - For the last closed financial year, was the institution(s) you represent or your (international) capital group required to report under CRR Article 449a (Regulation (EU) No 575/2013, prudential disclosures on ESG risks)?

☐ Yes

☐ No

☐ I don't know

**(Private entities except listed)** - For the last closed financial year, did the institution(s) you represent or your (international) capital group report under CRR Article 449a?

☐ Yes

☐ No

☐ I don't know

What was the level of reporting on prudential disclosures on ESG risks? I.e., was the information disclosed at the highest level of consolidation in the EU (a foreign parent institution reported), or did your bank report on an individual basis?

Does at least one of the following regulations (EU Delegated Acts applicable to investments) apply to your organisation?

- Commission Delegated Directive (EU) 2021/1270 as regards the sustainability risks and sustainability factors to be taken into account for UCITS;
- Commission Delegated Regulation (EU) 2021/1255 as regards the sustainability risks and sustainability factors to be taken into account by Alternative Investment Fund Managers;
- Commission Delegated Directive (EU) 2021/1269 as regards the integration of sustainability factors into the product governance obligations; and
- Commission Delegated Regulation (EU) 2021/1253 as regards the integration of sustainability factors, risks and preferences into certain organisational requirements and operating conditions for investment firms.

☐ Yes

☐ No

☐ I don't know

*(Insurance undertaking / Intermediary)* – Does at least one of the following regulations (EU Delegated Acts relevant for insurance intermediaries and insurance undertakings) apply to your organisation?

- Commission Delegated Regulation (EU) 2021/1257 as regards the integration of sustainability factors, risks and preferences into the product oversight and governance requirements for insurance undertakings and insurance distributors and into the rules on conduct of business and investment advice for insurance-based investment products; and
- Commission Delegated Regulation (EU) 2021/1256 as regards the integration of sustainability risks in the governance of insurance and reinsurance undertakings.

☐ Yes

☐ No

☐ I don't know

Did you have any doubts about the applicability of the particular regulations to your company? Which one? What was not clear (you can briefly refer to articles/requirements)?

To your knowledge, which sustainability disclosures and reporting regulation will be applicable to your organisation in the future?

End of section A



# Section B – Awareness

How many times did your organisation prepare a Director's report required by the Companies Act to this date?

- ☐ 0                      ☐ 1                      ☐ 2                      ☐ 3                      ☐ 4

How many times did your organisation prepare EU taxonomy disclosures to this date?

- ☐ 0                                      ☐ 1                                      ☐ 2                                      ☐ 3

**(Investment firms, credit institutions, and listed entities only)** How many times did your organisation prepare CRR Pillar 3 disclosures on ESG risks to this date?

- ☐ 0                                      ☐ 1                                      ☐ 2                                      ☐ 3

Besides mandatory EU sustainability reporting and disclosures for the last closed financial year, did your organisation also prepare a voluntary non-financial report or disclosures?

- ☐ Yes                                      ☐ No

In the past, for the purposes of either mandatory or voluntary reporting, did you use the following reporting frameworks/guidelines?

- ☐ GRI                                      ☐ TCFD                                      ☐ TNFD                                      ☐ SASB
- ☐ European Commission: Guidelines on non-financial reporting: Supplement on reporting climate-related information (2019).
- ☐ European Commission: Guidelines on non-financial reporting (methodology for reporting non-financial information) (2017).
- ☐ None of the above.

Does your organisation have a non-financial reporting policy in place relating to NFRD or CSRD?

- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting with final responsibility on board-level.
- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting elsewhere in the organisation than on board-level.
- ☐ Yes, a formal policy was implemented as a declarative approach towards non-financial reporting rather than establishment of internal controls, roles and responsibilities.
- ☐ Yes, an informal policy was introduced.
- ☐ No, the organisation does not have a sustainability reporting policy.

Does your organisation have a non-financial reporting policy in place in relation to EU taxonomy?

- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting with final responsibility on board-level.
- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting elsewhere in the organisation than on board-level.
- ☐ Yes, a formal policy was implemented as a declarative approach towards non-financial reporting rather than establishment of internal controls, roles and responsibilities.
- ☐ Yes, an informal policy was introduced.
- ☐ No, the organisation does not have a sustainability reporting policy.

Does your organisation have a non-financial reporting policy in place in relation to SFDR?

- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting with final responsibility on board-level.
- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting elsewhere in the organisation than on board-level.
- ☐ Yes, a formal policy was implemented as a declarative approach towards non-financial reporting rather than establishment of internal controls, roles and responsibilities.
- ☐ Yes, an informal policy was introduced.
- ☐ No, the organisation does not have a sustainability reporting policy.

Does your organisation have a non-financial reporting policy in place in relation to CRR?

- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting with final responsibility on board-level.
- ☐ Yes, a formal policy establishing internal controls was implemented with a system of monitoring ESG data quality and compliance with policies and practices, as well as assigning responsibility for non-financial reporting elsewhere in the organisation than on board-level.
- ☐ Yes, a formal policy was implemented as a declarative approach towards non-financial reporting rather than establishment of internal controls, roles and responsibilities.
- ☐ Yes, an informal policy was introduced.
- ☐ No, the organisation does not have a sustainability reporting policy.

Does your organisation have dedicated ESG data collection tools or do you currently conduct the process "manually" (e.g. manual filing of data templates from the company's reports)?

- ☐ Yes, we have our own (internally developed) ESG data collection technology tool.
  
- ☐ No, we currently conduct ESG data collection manually, but we plan to introduce a dedicated IT tool.
  
- ☐ No, we do not have a dedicated IT tool for ESG data collection, but we have used an IT tool or tools developed externally.
  
- ☐ No, we do not have a dedicated tool for ESG data collection and conduct the process manually.

Regarding the new European Union sustainability disclosure and reporting obligations, does your organisation plan to hire new employees to prepare for the reporting requirements? If yes, can you briefly share what kind of professional background/skillset

- ☐ Yes, in relation to CSRD and the professional background/skillset we look for is:
- ☐ Yes, in relation to EU taxonomy and the professional background/skillset we look for is:
- ☐ Yes, in relation to SFDR and the professional background/skillset we look for is:
- ☐ Yes, in relation to CRR (Pillar 3 with regards to ESG risk) and the professional background/skillset we look for is:
- ☐ Yes, in relation to six delegated acts and the professional background/skillset we look for is:
- ☐ Yes, but not in relation to a specific requirement / we're hiring cross-cutting ESG experts and the professional background/skillset we look for is:
- ☐ No, my organisation does not have such plans at the moment:

Does your organisation currently envisage changing internal processes to comply with EU SD&R? Can you briefly share in what ways?

- ☐ Yes, in relation to CSRD in the following way:
  
  
  
  
  
  
  
  
  
  
- ☐ Yes, in relation to EU taxonomy in the following way:
  
  
  
  
  
  
  
  
  
  
- ☐ Yes, in relation to SFDR in the following way:
  
  
  
  
  
  
  
  
  
  
- ☐ Yes, in relation to CRR (Pillar 3 with regards to ESG risk) in the following way:
  
  
  
  
  
  
  
  
  
  
- ☐ Yes, in relation to six delegated acts in the following way:
  
  
  
  
  
  
  
  
  
  
- ☐ Yes, in relation to many requirements/general ESG reporting needs:
  
  
  
  
  
  
  
  
  
  
- ☐ No, my organisation does not have such plans at the moment:

Did your organisation designate a member of the Board of Directors directly responsible for sustainability disclosure and reporting? If yes, can you provide a short description of how the responsibility was assigned?

☐ Yes, in relation to NFRD/CSRD:

☐ Yes, in relation to EU taxonomy:

☐ Yes, in relation to SFDR:

☐ Yes, in relation to CRR (Pillar 3 with regards to ESG risk):

☐ Yes, in relation to six delegated acts:

☐ Yes, but not in relation to a specific legal requirement/responsibility for ESG reporting in general was assigned:

☐ No, we did not designate such responsibility to a member of the board:

Did your organisation designate a unit in its organisational structure responsible for preparing EU sustainability disclosures and reporting? If yes, please briefly describe where the responsibility for such disclosures and reporting is placed in the structure of the organisation, if not please explain what team or department is in charge in practice.

☐ Yes, in relation to NFRD/CSRD:

☐ Yes, in relation to EU taxonomy:

☐ Yes, in relation to SFDR:

☐ Yes, in relation to CRR (Pillar 3 with regards to ESG risk):

☐ Yes, in relation to six delegated acts (listed in previous questions):

☐ Yes, but not in relation to ESG reporting in general:

☐ No, my organisation does not have such plans at the moment:



Given the dynamically evolving regulatory landscape related to EU SD&R, in your view, does your organisation have the resources to keep up with the current obligations?

- ☐ Yes
- ☐ No (Please elaborate)

Does your organisation use external ESG ratings? Do you verify them / are familiar with the rating methodology?

- ☐ Yes (please elaborate)
- ☐ No (please elaborate)

Does your organisation find any difficulties in understanding the concept of greenwashing and implementing considerations for it in its operations?

- ☐ Yes (please elaborate)
- ☐ No (please elaborate)

From the perspective of your organisation, what is the general assessment of the effort to produce ESG reporting and understanding the requirements stemming from the relevant regulations applicable to your company?

- |                                    |                                  |                                   |
|------------------------------------|----------------------------------|-----------------------------------|
| <input type="checkbox"/> 0-0.5 FTE | <input type="checkbox"/> 1-3 FTE | <input type="checkbox"/> 5-10 FTE |
| <input type="checkbox"/> 0.5-1FTE  | <input type="checkbox"/> 3-5 FTE | <input type="checkbox"/> >10 FTE  |

Is your organisation engaged in any dialogue / consultations with third parties (public or private) in terms of the EU Sustainability Disclosures and Reporting requirements?

- ☐ Yes (please elaborate)
- ☐ No (please elaborate)

Does your organisation use services of law firms/external consultants when preparing sustainability disclosures and/or reports required by relevant legislation?

- ☐ Yes, law firms
- ☐ Yes, consulting firms
- ☐ Yes, other (please elaborate)
- ☐ No, we do not use such services

Does your organisation find any difficulties in understanding the concept of greenwashing and implementing considerations for it in its operations?

- ☐ Yes (please elaborate)
- ☐ No (please elaborate)

**End of section B**

# Section C – Challenges

On a scale from 1-5, how compliant is your organisation with the requirements applicable to it as per NFRD? (1 = non-compliant, 5 = fully compliant)

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

In your view, what is the most challenging aspect of non-financial reporting for your organisation (e.g. in terms of capacity building, aligning or strengthening internal processes)?

☐ Capacity building

☐ Appropriate third-party support

☐ Aligning internal policies and processes

☐ Data quality

☐ Management buy-in

☐ Data availability

☐ Customer buy-in

☐ Other (please elaborate)

In terms of reporting on due diligence processes, non-financial risks, KPIs and outcomes, which sustainability topic requires the most effort to report on?

☐ Human rights

☐ Environment

☐ Corruption, bribery, ethics

☐ Employee and social matters

Rank the following initiatives from most to least supportive for your organisation in the context of EU sustainability disclosures and reporting:

- ☐ Industry-specific trainings conducted by ESG industry experts.
- ☐ Guidance on NFRD and CSRD criteria, to determine whether a company falls under NFRD and CSRD (this could include, for example, guidance on the calculation method of the number of employees during the financial year).
- ☐ Guidance on SFDR criteria, to determine whether a financial product is within scope of Article 8 and/or 9.
- ☐ Industry-specific reporting frameworks.
- ☐ Regulatory guidance on non-financial reporting from the market supervisor.
- ☐ A publication on good practices in the area of non-financial reporting.

On which non-financial reporting aspect would you most appreciate guidance from the market supervisor? (e.g., human rights due diligence, environmental KPIs, corruption policies, PAIs, Good Governance, DNSH...):

**(Listed entities only)** Rank your levels of agreement with the following statements regarding your organisation's preparedness for future reporting in connection with the new CSRD directive:

	1	2	3	4	5
My organisation is ready for the interpretation of CSRD criteria and the reporting scope (who needs to report).					
My organisation is ready for the double materiality analysis.					
My organisation is ready for reporting according to European Sustainability Reporting Standards (ESRS).					
My organisation is ready to report taking into account data from the entire value chain.					
My organisation conducted a gap analysis or implemented a roadmap with measures to be worked through in sequence to report under CSRD.					

**(Listed entities only)** Please explain the main challenges you are encountering in preparation for entry into force of CSRD:

On a scale from 1-5, how compliant is your organisation with the requirements applicable to it as per the EU taxonomy? (1 = non-compliant, 5 = fully compliant)

- ☐ 1                      ☐ 2                      ☐ 3                      ☐ 4                      ☐ 5

What's the most challenging aspect of preparing taxonomy disclosures from the perspective of your organisation?

- |  |   |
|--|---|
| <input type="checkbox"/> Scope of reporting.   | <input type="checkbox"/> Minimum safeguards compliance criteria interpretation. |
| <input type="checkbox"/> Reporting format (correctly filling out the regulatory templates).                      | <input type="checkbox"/> Climate risks assessment interpretation.               |
| <input type="checkbox"/> Financial aspects.  | <input type="checkbox"/> Technical screening criteria interpretation.           |
| <input type="checkbox"/> Internal data availability (e.g. data confirming meeting technical screening criteria). | <input type="checkbox"/> DNSH.  |
| <input type="checkbox"/> External data availability (e.g., data from clients).                                   | <input type="checkbox"/> <i>Other (please elaborate).</i>                       |

Would it be helpful for your organisation if there were additional expectations/points for attention published relating to minimum safeguards disclosures to help market parties prepare for compliance with the new rules?

- ☐ Yes, very helpful                      ☐ Yes, rather helpful                      ☐ No, not needed

From the perspective of your organisation, in which specific aspect of the EU taxonomy you would expect systemic solutions to support your organisation in fulfilling reporting obligations?

On a scale from 1-5, how compliant is your organisation with the requirements applicable to it as per the SFDR? (1 = non-compliant, 5 = fully compliant)

☐ 1

☐ 2

☐ 3

☐ 4

☐ 5

**(Private entities except listed)** In your view, what is the key challenge regarding preparing Sustainable Finance Disclosure Regulation ('SFDR') disclosures from the perspective of your organisation (e.g., in terms of capacity building, and aligning internal processes)?

**(Private entities except listed)** Out of the following guidance, which would be the most needed for your organisation in relation to SFDR?

- ☐ a compendium of non-binding procedures (good practice principles) for supervised entities in the area of sustainability risks in the financial sector.
- ☐ a report on review findings.
- ☐ a sector letter outlining supervisory points of attention.
- ☐ feedback tailored to your company.
- ☐ none of the above.

**(Private entities except listed)** Do you offer financial products mentioned in Article 8 SFDR or Article 9 SFDR (so-called "light green" or "dark green products")?

- ☐ Yes, manufacture product(s) mentioned in Article 8 SFDR.
- ☐ Yes, distribute product(s) mentioned in Article 8 SFDR.
- ☐ Yes, manufacture and distribute product(s) mentioned in Article 8 SFDR.
- ☐ Yes, manufacture product(s) mentioned in Article 9 SFDR.
- ☐ Yes, distribute product(s) mentioned in Article 9 SFDR.
- ☐ Yes, manufacture and distribute product(s) mentioned in Article 9 SFDR.
- ☐ No, my organisation does not offer Article 8 or 9 SFDR products but it does plan to do so within the next 24 months.
- ☐ No, my organisation does not offer Article 8 or 9 SFDR products and it does not plan to do so within the next 24 months.

**(Private entities except listed)** What was the main driver behind the decision whether (or not) to offer Article 8 SFDR products?

**(Private entities except listed)** What was the main driver behind the decision whether (or not) to offer Article 9 SFDR products?

**(Private entities except listed)** Do you need support in understanding the definition of 'sustainable investment' under the Sustainable Finance Disclosure Regulation ('SFDR')?

- ☐ Yes (please elaborate)
- ☐ No (please elaborate)

**(Credit institutions only)** On a scale from 1-5, how compliant is your organisation with the requirements applicable to it as per the EBA Pillar 3 ESG disclosures? (1 = non-compliant, 5 = fully compliant)

1 2 3 4 5

**(Credit institutions only)** What was the key challenge for your organisation (or the organisations you represent) when preparing prudential disclosures on ESG risks under CRR regulation?

**(Credit institutions only)** In regard to the Green Asset Ratio indicator and taxonomy data, rate your institution's preparedness in terms of having a reliable internal method of gathering data and method of calculation: (1 = not prepared, 5 = very prepared)

1 2 3 4 5

**(Credit institutions only)** Did your organisation collect scope 3 emissions and alignment metrics for the purposes of disclosures in 2024, for the year 2023? Did you implement estimation methodologies where necessary? If possible, please elaborate on the challenges associated with.

**(Credit institutions only)** Did your organisation implement methodologies for the identification and reporting of physical risks according to Pillar 3 requirements for 2023? If possible, please elaborate on the challenges associated with the process.

**(Credit institutions only)** Does your organisation collect EPC certificates of collateral and do they cover a significant part of its portfolio? Do you have estimation methodologies for the missing part of the portfolio? If possible, please elaborate on the associated challenges.



**(Credit institutions only)** Rank the following issues from the most to least challenging in the context of ESG Pillar 3 disclosures.

- ☐ Lack of counterparty data.
- ☐ Dynamically evolving regulatory landscape.
- ☐ Varying interpretations of certain taxonomy screening criteria and minimum safeguards.
- ☐ Internal procedures and organisational issues.
- ☐ Difficulties revolving around an adequate ESG risk assessment (methodologies).
- ☐ Lack of regulatory interpretations.
- ☐ Lack of methodologies for physical risk measurement.
- ☐ Lack of data on energy effectiveness of collateral.

**(Insurance intermediary / undertaking only)** On a scale from 1 – 5 (1= non-compliant, 5 = fully compliant), how compliant is your organisation with the requirements applicable to it as per:

	1	2	3	4	5
Commission Delegated Regulation (EU) 2021/1257 as regards the integration of sustainability factors, risks and preferences into the product oversight and governance requirements for insurance undertakings and insurance distributors and into the rules on conduct of business and investment advice for insurance-based investment products; and					
Commission Delegated Regulation (EU) 2021/1256 as regards the integration of sustainability risks in the governance of insurance and reinsurance undertakings					

**(Insurance intermediary / undertaking only)** Based on your organisation's experience, do you find the term 'sustainability-related objectives' in the regulations clear and unambiguous, or are there potential areas of interpretation that could impact the assessment of product compliance?

**(Insurance intermediary / undertaking only)** Would your organisation benefit from any additional guidelines on identifying the target market and the group of compatible customers for insurance products?

**(Insurance intermediary / undertaking only)** Do you need support in implementing sustainability risk management information in your remuneration rules?

**The remaining questions in this section are to be answered by private sector entities excluding credit institutions, insurance intermediary/undertaking, and listed entities**

On a scale of 1 - 5 (1 = non-compliant, 5 = fully compliant), how compliant is your organisation with the requirements applicable to it as per:

	1	2	3	4	5
Commission Delegated Directive (EU) 2021/1270 as regards the sustainability risks and sustainability factors to be taken into account for UCITS.					
Commission Delegated Regulation (EU) 2021/1255 as regards the sustainability risks and sustainability factors to be taken into account by Alternative Investment Fund Managers.					
Commission Delegated Directive (EU) 2021/1269 as regards the integration of sustainability factors into the product governance obligations.					
Commission Delegated Regulation (EU) 2021/1253 as regards the integration of sustainability factors, risks and preferences into certain organisational requirements and operating conditions for investment firms.					

Would your organisation benefit from assistance in effectively implementing sustainability risk considerations, particularly in establishing, implementing, and maintaining decision-making procedures and an organisational structure? Please try to be specific on the manner in which such assistance may be provided.

From your organisation's standpoint, what specific challenges does the integration of sustainability risks pose in its processes, systems, and internal controls?

Do you see difficulties in analysing the coherence of the financial instrument with the needs, objectives, and objectives of the target market, including its possible sustainability objectives?

Do you need support in the creation and implementation of internal regulations specifying the obligation to regularly review the financial instruments you create, with the identification of events affecting the potential risk for a specific financial mark?

Based on your organisation's experience, do you see any difficulties related to establishing, implementing and maintaining appropriate risk management strategies and procedures to ensure that your organisation takes into account sustainability risks?

**End of section C**

## Section D – Opportunities

From the perspective of your organisation, what opportunities do you see in integrating sustainability into corporate reporting? If possible, please be specific.

From the perspective of your organisation, rate these opportunities stemming from credible sustainability reporting and disclosures. (1 = not relevant, 5 = very relevant)

	1	2	3	4	5
Attracting investors					
Attracting new talent					
Increasing consumer demand					
Increasing client trust					
Building a stakeholder communication platform with insights into the long-term value of the business					
Managing long-term risks (e.g. credit, operational)					
Managing short-term risks (i.e., reputational, greenwashing)					
Clarifying strategy position (transition plans)					
Sustainability risk integration					

Does your organisation use the EU taxonomy to plan investments and set transition targets?

- ☐ Yes, we currently use EU taxonomy criteria to scale up environmentally sustainable projects and activities.
- ☐ No, we currently do not use EU taxonomy for further purposes than reporting, but we plan to do so in the future.
- ☐ No, and we currently do not have any plans to do so in the future.

From the perspective of your organisation, which of the following opportunities connected with EU sustainability disclosures and reporting do you consider relevant?

- ☐ Receiving financing of taxonomy-aligned projects.
- ☐ Green bond issuance.
- ☐ Receiving an ESG-rating-linked loan.
- ☐ Receiving a sustainability-linked loan.
- ☐ I don't find any of the above relevant for my organisation.

From the perspective of your organisation, do you envisage any additional opportunities connected with the EU sustainability disclosures and reporting framework/obligations? Please, specify.

What type of engagement do you prefer from the MFSA's side for further market outreach regarding the EY sustainable finance regulatory framework? (e.g., Workshops, Q&A section on website, newsletter, webinar etc.)

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