
Introducing the Jurisdictional Roadmap Development Tool, Part I

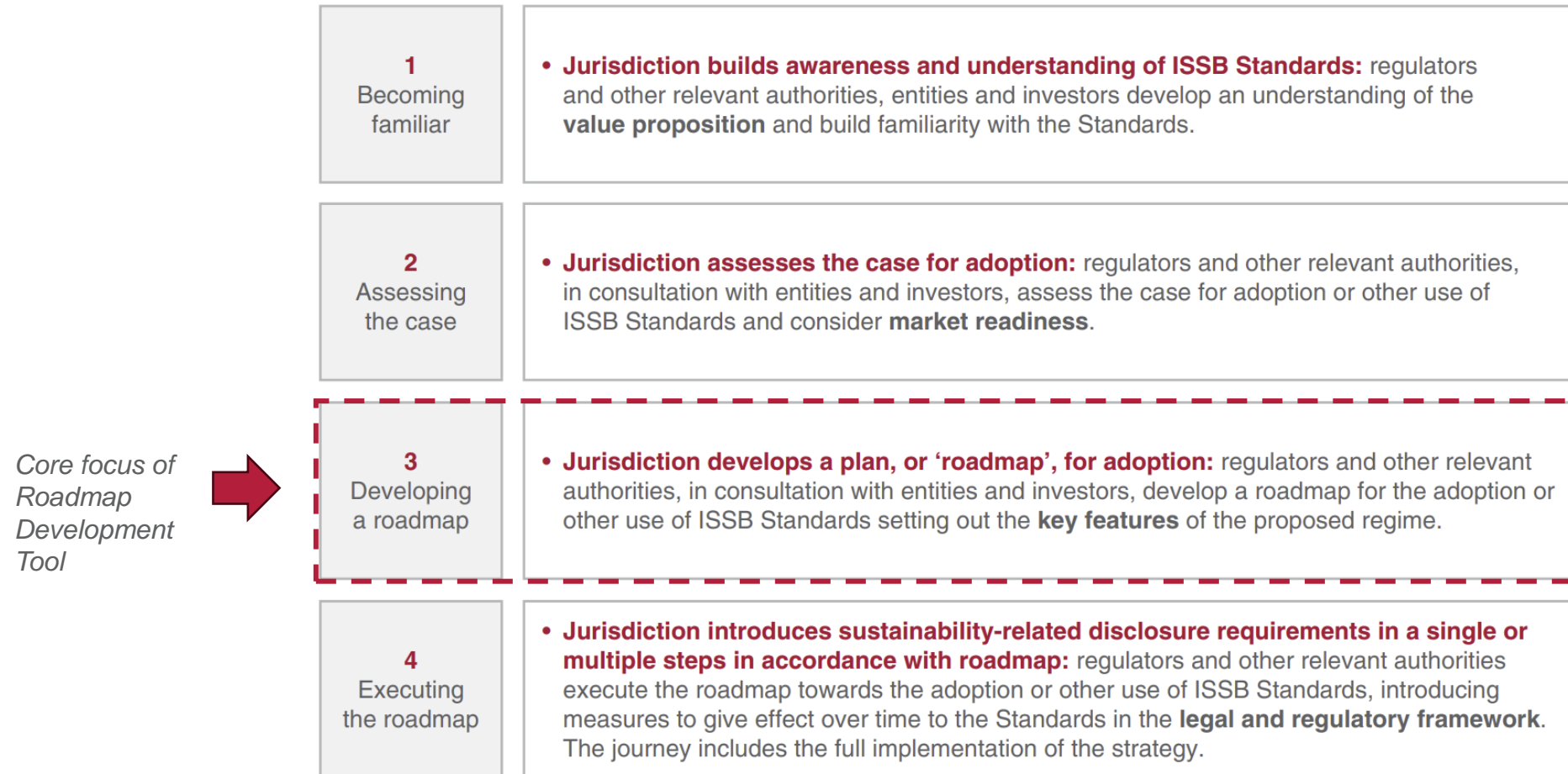
Thursday 8 May 2025

Webinar

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Introduction to the Roadmap Development Tool

Illustrative phases of jurisdictional journey



Why have a roadmap?



Developing and communicating a detailed jurisdictional roadmap can be a valuable step in a jurisdiction's journey:

- set **clear objectives** and identify **crucial milestones** in the process.
- allow a jurisdiction to:
 - **assign responsibilities**
 - **measure progress** towards adoption
 - ensure that all responsible parties are held **accountable** for this progress
 - **identify dependencies** in the sustainability reporting ecosystem, and the **resources and expertise necessary** for successful adoption
- enable entities within the scope of planned requirements to begin to plan and design their implementation programmes

Objectives of the Roadmap Development Tool

The Roadmap Development Tool (RDT) and the Roadmap Templates will support regulators and other relevant authorities as they work through the policy considerations and key steps of:

- Planning and designing their jurisdictional project plan (often referred to as a roadmap) for the adoption or other use of ISSB Standards.
- Assessing:
 - the implications of their decisions and approaches;
 - how well their final jurisdictional approach will achieve their stated policy objectives;
 - how their final jurisdictional approach will be understood by capital market participants and other stakeholders; and
 - how their final jurisdictional approach will be described by the IFRS Foundation in a jurisdictional profile.

Overview of the Roadmap Development Tool

2 core components: Roadmap Tool and Roadmap Templates

Roadmap Tool

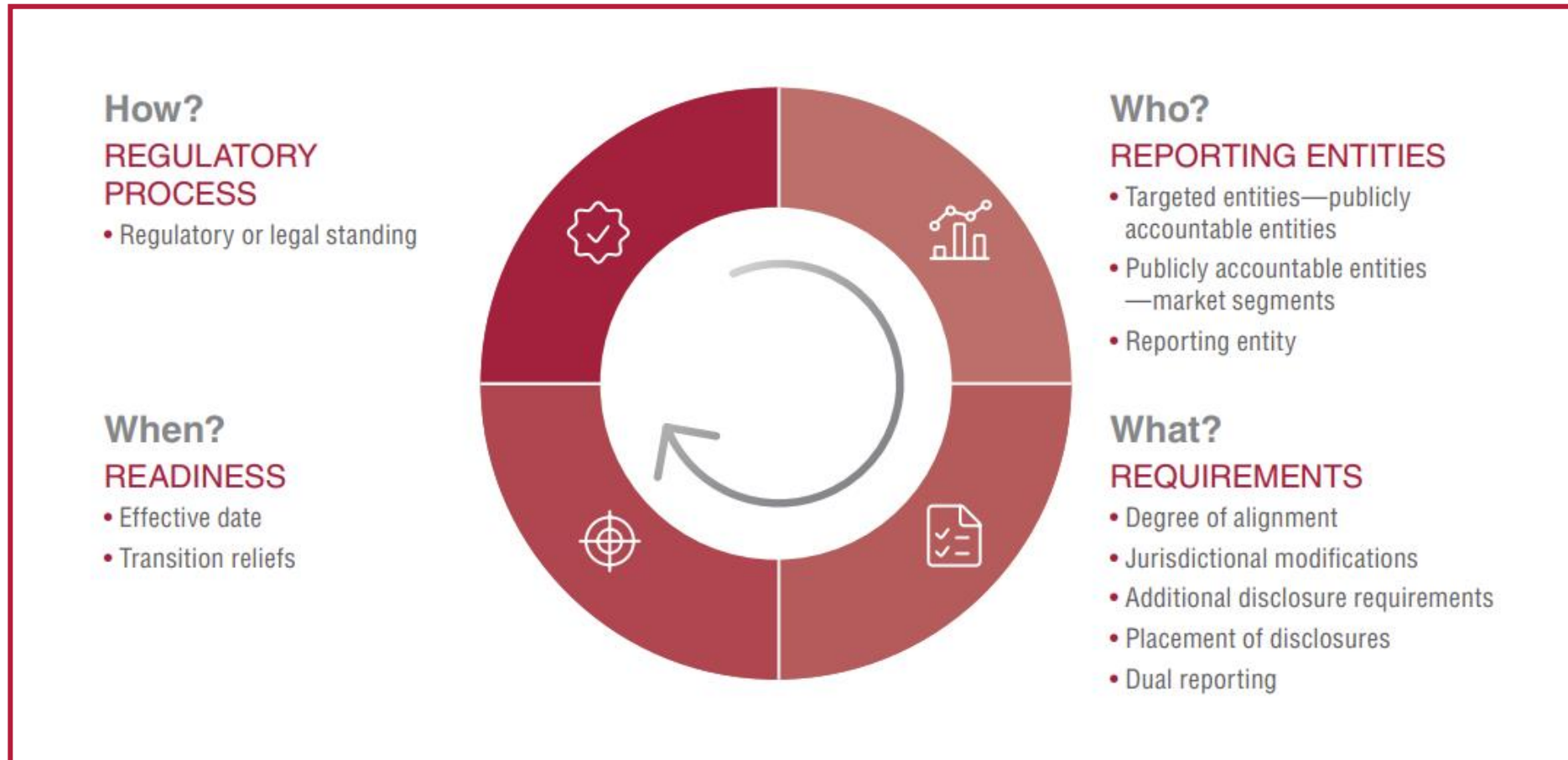
- Tabular form
- 4 decision areas: regulatory process, reporting entities, requirements, readiness
- For each decision area:
 - Overarching guidance
 - Key matters for consideration associated with each 'feature' (including sub-elements of each), and additional guidance notes
 - A 'check-list' of key decisions to be made
 - Spectrum of 'outcomes' that a jurisdiction may draw from each feature, linked to the Roadmap Templates

Roadmap Templates

- Designed to complement the Tool, assisting jurisdictions in understanding the implications of the alternative options for each feature set out in the Tool
- Can be used to inform a description of the jurisdiction's **current status** and **target approach**

Grounded in the **11 features** and **seven descriptions of jurisdictional approaches**

Structure of the Roadmap Tool: 4 decision areas



Illustrative templates: grounded in the 7 jurisdictional approaches*

Committing to adoption or other use of ISSB Standards

Permitting the use of ISSB Standards

Partially incorporating ISSB Standards

Adopting ISSB Standards with extended transition

Adopting ISSB Standards with limited transition

Adopting climate requirements in ISSB Standards

Fully adopting ISSB Standards

**approaches address range of methods contemplated by IOSCO including direct use or development of local standards. Assess alignment with disclosures required by IFRS S1 and IFRS S2*

Illustrative templates: example structure

Navigation:

- **Green:** indicates outcomes for each feature that may, if observed across all features, correspond to an approach of 'fully adopting ISSB Standards'
- **Orange:** indicates outcomes, by feature that may correspond to a description other than 'fully adopting ISSB Standards'. The jurisdictional approach that best describes the jurisdictional strategy will depend on which features have an outcome of orange and the combination.
- **Grey:** indicates outcomes, by feature that do not impact the jurisdictional approach
- **Dashed lines and lighter shades:** indicate there is more than one outcome for a feature that in combination may result in the same description

Regulatory Process

Regulatory or legal standing	No regulatory or legal action taken	Permitted	Required
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Reporting entities

Targeted publicly accountable entities	None	Some	All or most
Publicly accountable entities – market segments	No requirements for listed entities	Some, but not all or most listed entities in the first and second tiers	All or most listed entities
Reporting entity	Not the same reporting entity as for the financial statements	Not specified	Same reporting entity as for the financial statements

Requirements

Degree of alignment	Not aligned to ISSB Standards and requirements not designed to deliver functionally aligned outcomes	Climate-related reporting requirements in ISSB Standards or climate-related reporting requirements designed to deliver functionally aligned outcomes	Full alignment with ISSB Standards or requirements are designed to deliver functionally aligned outcomes
Placement	Outside general purpose financial reports	Not specified	In general purpose financial reports; and disclosed at the same time as the related financial statements
Dual reporting	Required	Permitted	Not required
Jurisdictional modifications	Extensive modifications	Limited modifications	No or not significant modifications
Additional requirements	Volume and presentation of additional disclosures could potentially obscure information required by ISSB Standards	Presentation of additional disclosures does not obscure information required by ISSB Standards	No additional information

Readiness

Effective date	Requirements become effective far into the future	Limited delays	Already effective or effective within a year
Transition reliefs	Additional reliefs and extensions**	Limited extensions*	Transition standard reliefs only
		Long extensions*	

*of transition standard reliefs ** beyond transition standard reliefs

Developing an adoption roadmap: establishing the regulatory process (how?)

Regulatory Process (how?)

1.3—Regulatory process (how?)

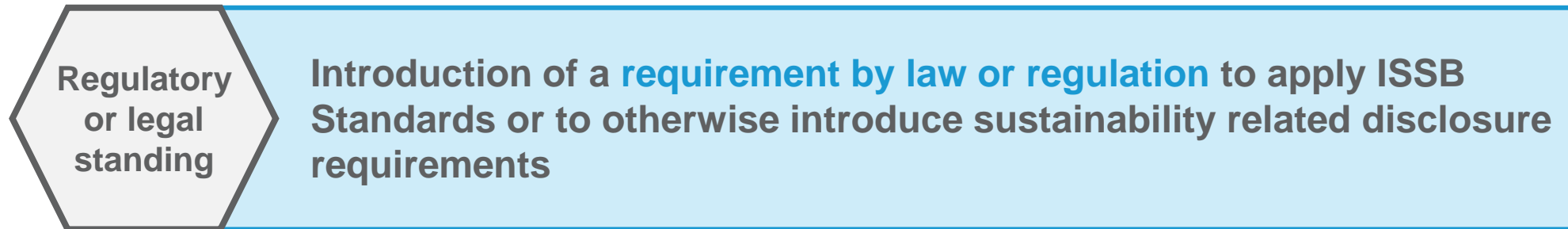
How?

REGULATORY PROCESS

- Regulatory or legal standing



Features of jurisdictional approaches - Regulatory Process (how?)



Regulatory or legal standing

Matters for Consideration:

- Determine whether the jurisdiction will introduce a legislative or regulatory requirement.
- Determine whether the jurisdiction intends to explicitly permit the use of ISSB Standards

Outcomes:

No regulatory or
legal action taken

Permitted

Required

Existing laws and regulations

Matters for Consideration:

- Determine whether other current local laws or regulations focus on sustainability-related disclosures or sustainability reporting.
- Determine the implications of any extraterritorial legal requirements for domestic entities.
- Determine the interaction between different jurisdictional authorities - implications of regional, sectoral or other localised requirements.
- Determine the conflicts or alignment between ISSB Standards and other laws and regulations.

No specific outcomes

Regulatory or Legal Instrument

The regulatory or legal instrument to adopt or otherwise use the ISSB Standards can be introduced by differing institutions:



**Government
legislation**

[The Department of the Treasury, Australia](#)

[Public Oversight, Accounting and Auditing Standards Authority of Türkiye \(KGK\)](#)



**Securities regulator
rules / resolution**

[CVM Brazil](#)



**Central Bank
regulation**

[Bangladesh Bank](#)



**Stock Exchange
rules**

[Singapore Stock Exchange \(SGX\)](#)

[Hong Kong Stock Exchange \(HKEX\)](#)



**National Standard-
Setter**

[Institute of Certified Public Accountants of Kenya](#)

Permitting use of the ISSB Standards

Permitting: The jurisdiction intends to introduce a law, regulation or other regulatory measure to permit the use of ISSB Standards, or a relevant law, regulation or measure permitting ISSB Standards is already in place

Required: The jurisdiction intends to introduce a law or regulation to mandate ISSB Standards, or a relevant law or regulation, requiring ISSB Standards is already in place.

Jurisdictional Examples:



Brazil

Permitting application in 2024 and 2025
Requiring for PAEs from 1 January 2026



Nigeria

Permitting 1 January 2024;
PIE Requiring 1 January 2028;
SME Requiring 1 January 2030



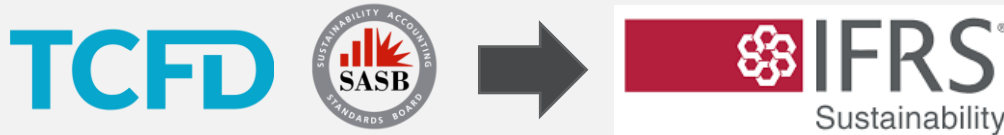
El Salvador

Resolution **permitting** the implementation of ISSB Standards issued in 2024, with effective date 1 January 2025.

Evolution of existing laws and regulations

Jurisdictional Examples:

1. Requirements to apply TCFD / SASB Standards (proposal to update to ISSB Standards)



Chile:

Chile's capital market regulator the Comision para el Mercado Financiero (CMF) mandated the use of TCFD and SASB Standards, via Norm 461, in late 2021. 01 Nov 2024 – CMF has published a [regulation](#) that makes the application of IFRS S1 and IFRS S2 mandatory from 1 January 2026.



UK:

Listed companies and large private companies are subject to TCFD aligned rules, [FCA has encouraged listed companies to start reporting voluntarily under ISSB Standards](#).

2. Amendments to existing ESG listing rules (moving to adoption or other use of ISSB Standards)



Hong Kong SAR:

HKEX published New Climate Requirements that require listed companies in Hong Kong to provide information regarding their climate-related risks.

HKICPA issued [HKFRS Sustainability Disclosure Standards](#) - pending regulatory decision.



Singapore:

SGX RegCo [amended its listing rules](#) to allow for the adoption of ISSB Standards, starting with climate-related disclosures.

Compliance basis: immediately mandatory, or voluntary first

Matters for Consideration:

- Determine the initial and long-term compliance basis for the regulatory regime.

No specific outcomes

Consultation requirements

Matters for Consideration:

- Determine the process for consulting with stakeholders.

No specific outcomes

Consultation requirements

Jurisdictional Examples:

Australia: Release of AASB S1 and AASB S2



Australian Accounting Standards Board released at the end of September AASB S1 and AASB S1 **following public consultation** – see AASB consultation update.

Key decisions **further aligning** Australian Sustainability Reporting Standards with ISSB Standards:

- Voluntary application of IFRS S1
- Climate standard to include **climate-relevant provisions in IFRS S1**, necessary for the climate standard to function as a standalone mandatory standard
- Increased alignment with IFRS S2, including **language and terminology**
- New project to consider **mandatory climate-related industry-based information** (preliminary consultation with stakeholders expected to begin March 2025)

Climate-related financial disclosure legislation requiring disclosures for financial years beginning on or after 1 January 2025.

Japan: Publication of Inaugural Sustainability Disclosure Standards



The Sustainability Standards Board of Japan (SSBJ) published in March 2025 Inaugural Sustainability Disclosure Standards - following a consultation that was initiated in March 2024.

Adoption process

Matters for Consideration:

- Consider the mechanism for adoption of ISSB Standards, both initially and on an ongoing basis.

No specific outcomes

Roles and responsibilities








Matters for Consideration:

- Determine body with the necessary statutory powers to lead.
- Determine authorities needing to act to implement the project.
- Build consensus; mechanisms for coordination and consultation between relevant bodies as well as with wider stakeholders.

No specific outcomes

Roles and responsibilities: the need for a coherent jurisdictional regulatory framework

Jurisdictional Examples:

Adoption readiness model	PAO led	Government-led advisory committee	Capital markets authority led
 <p>Malaysia: Advisory Committee of Sustainability Reporting:</p> <ul style="list-style-type: none"> Securities Commission Malaysia (capital markets authority) Bursa Malaysia (exchange) MASB (standard setter) 	 <p>Kenya: Worked with Readiness Committee that included the Central Bank, Securities Exchanges, Firms</p>	 <p>UK: Department of Business and Trade (DBT) will be consulting on the endorsed standards. FCA and DBT will then consult on requirements to report against those standards for listed companies and other large UK-registered companies, respectively</p>	 <p>Brazil: Coordination between:</p> <ul style="list-style-type: none"> Ministry of Finance – public statement CVM (capital markets authority) – consultation on regulation CBPS (standard setter) – consultation on the standards
 <p>Hong Kong: Cross-Agency Steering Group:</p> <ul style="list-style-type: none"> HKEX (exchange) HKICPA (standard setter) SFC (capital markets authority) HKMA (prudential supervisor) 	 <p>Ghana: Engaged stakeholders one on one without a Committee</p>		
 <p>Nigeria: Adoption Readiness Working Group (regulators, preparers and other market participants, developed roadmap)</p>			

Translation and licensing arrangements

Matters for Consideration:

- Determine whether it will be necessary to translate the ISSB Standards.
- Determine whether reproduction of some or all the ISSB Standards content, or whether use of IFRS or ISSB brand name, will be required.



Decision Points:

- Necessary to translate the ISSB Standards as part of the process?
- Necessary to reproduce all or some of the ISSB Standards content, or to use the IFRS or the ISSB brand name?
- Contacted the IFRS Foundation?
- Timeframes for signing a contract with IFRS Foundation and producing the translation?
- Funds for the translation cost and any licensing fee?
- Time for entities access translations before they start reporting?

No specific outcomes

Translation and licensing arrangements

Jurisdictional Examples:

Adoption by Reference vs Licensing Requirement

Adoption by Reference:

Many jurisdictions adopt by reference, meaning full adoption of **IFRS Sustainability Disclosure Standards as issued by the ISSB** by reference, without any reproduction of content or modifications. For example:



Tanzania



Jordan



Qatar



Mexico



Costa Rica



Nigeria



Ghana



Rwanda

Adoption by Reference vs Licensing Requirement

Translations required for regulatory process:

Certain jurisdictions require the ISSB Standards to be translated as part of their regulatory adoption process.



Türkiye



Brazil



South Korea



Japan



Canada

Q&A

- Do you have any questions regarding the content on regulatory process?
- What insights have you gained from engaging with jurisdictions on regulatory process for the adoption or other use of ISSB Standards?
- Are there any further key considerations that you think deserve prominence?
- Any other points?

Developing an adoption roadmap: defining the reporting entities (who?)

Reporting entities (who?)

1.4—Reporting entities (who?)

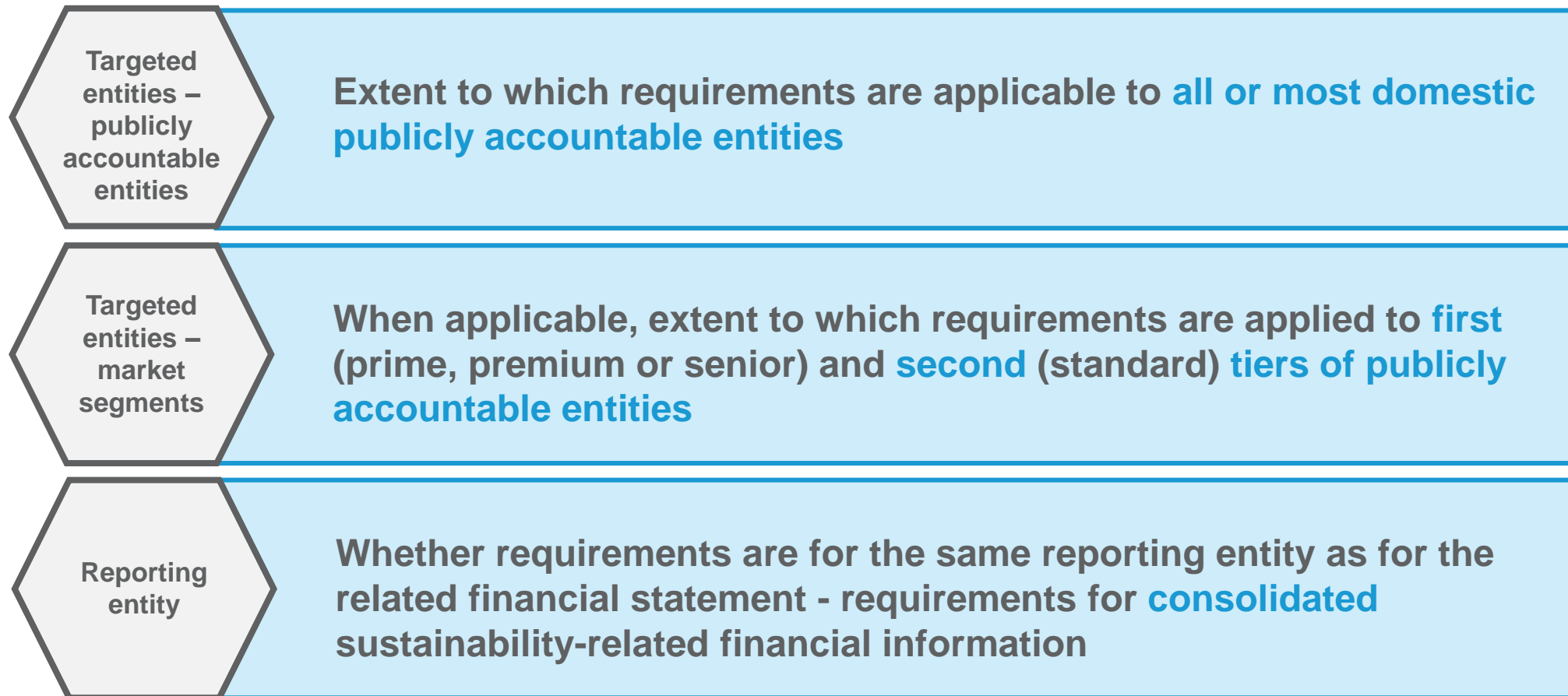


Who?

REPORTING ENTITIES

- Targeted entities—publicly accountable entities
- Publicly accountable entities—market segments
- Reporting entity

Features of jurisdictional approaches – Reporting entities (who?)



Guidance

Policy rationale

Jurisdictional policy rationale integral to deciding entities subject to the requirements

Relevant Entities

IFRS Standards (ISSB Standards and IFRS Accounting Standards) are developed primarily for application by **publicly accountable entities**

Scope

Comprehensive adoption approach would subject **all or most domestic publicly accountable entities** to jurisdictional requirements

Phasing and scaling

Market readiness assessment to determine:

- **scope of entities and pace** for each cohort (if phasing)
- whether **scaling** of requirements is necessary

Connectivity

Jurisdictional requirements should clearly identify the **reporting entity - same as financial statements**

Considerations: Targeted entities – publicly accountable entities

Matters for Consideration:

- Determine if domestic publicly accountable entities are subject to requirements.
- Determine whether requirements introduced for all in-scope entities in a single step, or scaled and phased in over time.
- Determine whether other entities will be subject to any of the requirements.



Decision Points:

- Categories of entities required to apply the requirements?
- All publicly accountable entities subject to the requirements?
- A subset of domestic publicly accountable entities (for example, listed entities only or banks and financial institutions)?
- All publicly accountable entities subject to the requirements at the same time, or reporting phased in for different types of entities at different times?
- Effective date for each category of in-scope publicly accountable entities?
- Requirements for entities without public accountability?
- Requirements for foreign publicly accountable entities?

Outcomes:


None

Some


All or most

Considerations: Targeted entities – publicly accountable entities:

Most PAEs:



Türkiye:

- Initially **PAEs that exceed the threshold values** of at least two of the criteria, namely total assets of 500 million Turkish liras, annual net sales revenue of 1 billion Turkish liras, and a workforce of 250 employees, for two consecutive reporting periods. (**most on Bursa Istanbul + other PAEs**).
- Expected to expand the scope in the future.



Australia

- Requirement introduced for **Group 1-3 of reporting entities** including **most PAEs**

Selected PAEs:


Mexico

- Proposal to adopt IFRS S1 and IFRS S2 (and future ISSB Standards) from FY 2025 for **listed entities but not financial institutions**.


Bangladesh

- Banks and financial institutions only**

2026
Limited disclosures
(with Additional
elements) in annual
report

2027
Full disclosures

June 2024
Limited
intermediate report
to Bangladesh Bank
using template

Dec 2024
Limited supervisory
report to
Bangladesh Bank
using template

2025
Limited disclosures
in annual report

Considerations: Targeted entities – market segments

Matters for Consideration:

- Determine, where applicable, whether all or only specific classes or tiers of listed entities will be subject to the requirements.



Decision Points:

- Will requirements be differentiated according to the class or tier of listed entity?
- Will listed entities in the first and second tiers be subject to the requirements?
- Will the requirements be extended, now or in the future, beyond large, listed entities?

Outcomes:

No requirements for listed entities

Some, but not all or most listed entities in the first and second tiers

All or most

Considerations: Reporting entity

Matters for Consideration:

- Determine whether sustainability-related financial disclosures will be required for the same reporting entity as for the related financial statements.
- Determine whether the requirements will be for consolidated or separate (subsidiary-level) financial statements.



Decision Points:

- Do the requirements specify that the reporting entity for sustainability-related financial disclosures must be the same as for the general purpose financial statements?

Outcomes:

Not the same reporting entity as for the financial statements requirements for listed entities

Not specified

Same reporting entity as for the financial statements



Q&A

- Do you have any questions regarding the content on reporting entities?
- What insights have you gained from engaging with jurisdictions on reporting entities? for the adoption or other use of ISSB Standards?
- Are there any further key considerations that you think deserve prominence?
- Any other points?



Requirements (what?)

1.5—Requirements (what?)

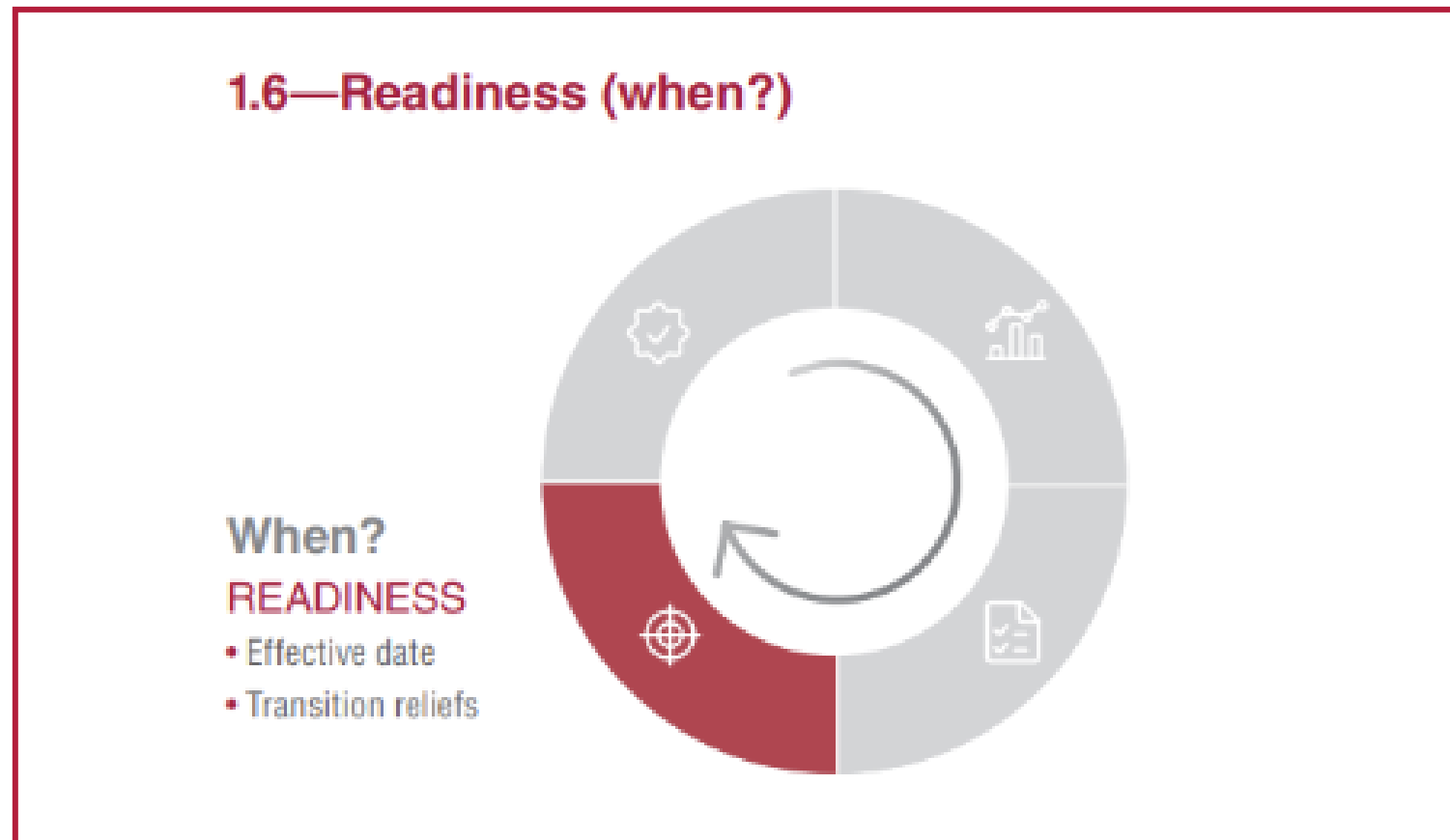


What?

REQUIREMENTS

- Degree of alignment
- Jurisdictional modifications
- Additional disclosure requirements
- Placement of disclosures
- Dual reporting

Readiness (when?)



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Journey towards Adoption of IFRS S1 & S2

- ❖ In 26 December 2023 Bangladesh Bank issues Guideline on Sustainability and Climate-related Financial Disclosure for banks and finance companies adopting IFRS S1 (Sustainability related general disclosure) and S2 (Climate related disclosures)
- ❖ The main objective of this guideline is to help banks and financial institutions integrate sustainability and climate-related considerations into their core governance, strategy, risk management frameworks to identify, assess, and manage environmental, social, and climate-related risks, and seize associated opportunities.
- ❖ Bangladesh is the first country in Asia to receive USD 1.4 billion funds from RSF where climate related financial disclosure following TCFD recommendations was one of the reform measures (RM).

Adoption of IFRS S1 & S2 for Banks and Finance company

Regulatory Process

Regulatory or legal standing

Required

Reporting entities

Targeted publicly accountable entities

All Banks and Finance Companies of Bangladesh

Publicly accountable entities - market segments

All listed and non-listed Banks and finance Companies

Reporting entity

Same reporting entity as for the financial statements

Adoption of IFRS S1 & S2 for Banks and Finance company

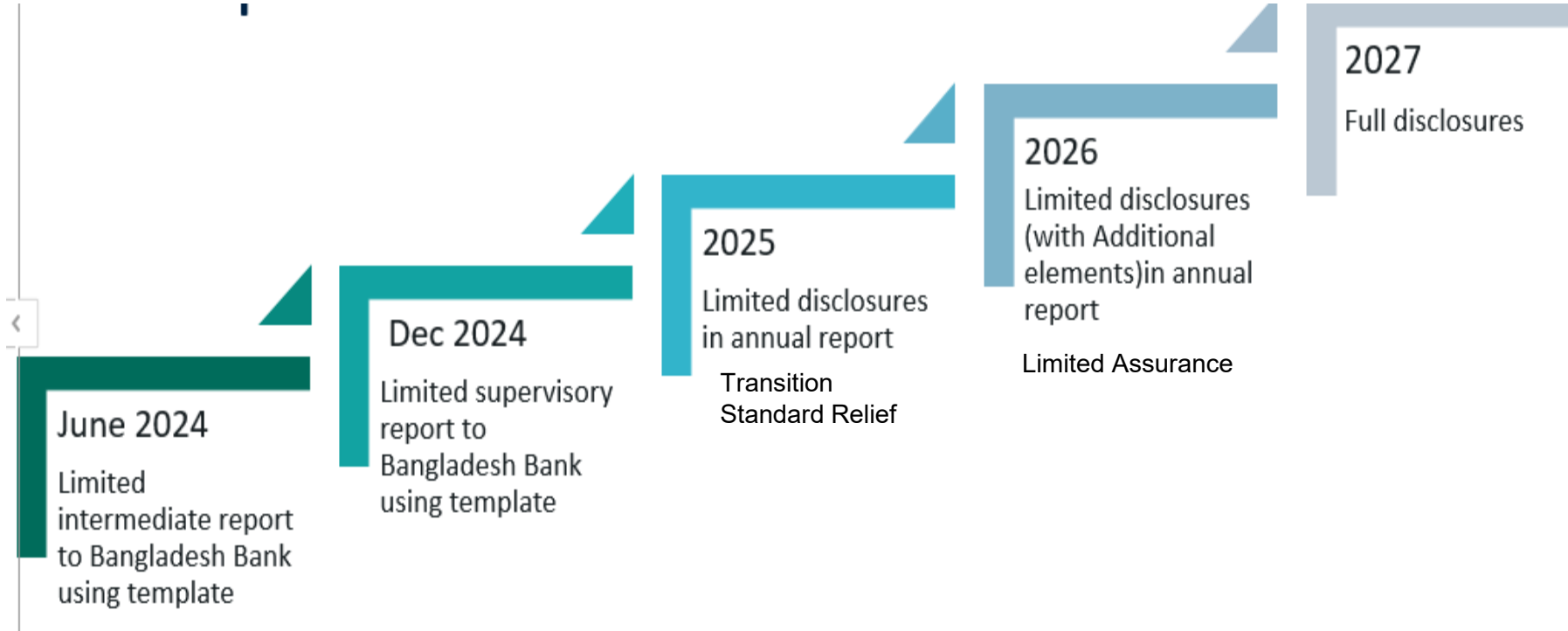
Requirements

Degree of alignment	Full alignment with ISSB Standards
Placement	In general purpose financial reports; and disclosed at the same time as the related financial statements
Dual reporting	Not required (But the impact materiality is ensured by Environmental Social Due Diligence checklist)
Jurisdictional modifications	No or not significant modifications
Additional requirements	No additional information

Readiness

Effective date	Already effective
Transition reliefs	Transition standard reliefs only (GHG protocol and GHG emission is voluntary for the 1st year)

Implementation Pathway



How Bangladesh Bank is assisting the banks and Finance Companies

- Along with IFRS S1 and S2 Bangladesh Bank circulated a reporting template (incorporated all requirements of the standards) through which banks and finance companies have been submitting semiannually to the central bank.
- Bangladesh Bank has signed MoU with an globally renowned international organization to calculate the financed emission of banks and finance companies. The organization has calculated financed emission of 10 banks and finance companies in 2024.

How Bangladesh Bank is assisting the banks and Finance Companies

- Bangladesh Bank bridges the banks and finance companies and the other organization engaged in calculating financed emission to have MoU between banks and finance companies and the organization. For example Partnership for Carbon Accounting Financials (PCAF) signed an MoU with a bank.
- Expert members of my Team of Bangladesh Bank is also assisting banks and finance companies to calculate the financed emission and guiding the banking sector in providing information for the disclosure.

How Bangladesh Bank is assisting the banks and Finance Companies

- Bangladesh Bank is working to finalize a financed emission calculator for the banks and finance committee.
- Bangladesh Bank has prepared a guidance note to assist the banks and finance companies in addressing the information required for the disclosure.
- Bangladesh Bank is searching for every opportunity for the capacity building of the banks and finance companies and the concern officials of central bank.

What about other Companies in Bangladesh other than Banking sector?

- After adopting IFRS S1 and S2, Financial Reporting Council (FRC) of Bangladesh (who are responsible for adopting IFRS standards in Bangladesh) invited Bangladesh Bank for assisting in developing roadmap for other industries. A national committee has been formed and I am a member of that committee. My team members were invited in several meeting of the committee.

Next Step:

- Bangladesh Bank is updating its Environmental and Social Due Diligence check list to fully complied the required impact materiality of European Sustainability Reporting Standard (ESRS), so that both IFRS S1 and S2 and ESRS standard can be ensured for the financial sector.
- Working to improve the data quality of financed emission.