

Sustainability in the EU

Global implications of the Corporate Sustainability Reporting Directive

Updated May 2026



Omnibus changes enacted into EU law, significantly reducing the number of companies in scope.

Source and applicability

- The [Accounting Directive \(AD\)](#), as amended by the [Corporate Sustainability Reporting Directive \(CSRD\)](#), applies to certain EU companies and certain non-EU parents, including US companies.
- The Accounting Directive and CSRD have been amended by the [Stop-the-clock Directive](#) and [Content Directive](#). A 'Quick fix' [Delegated Act](#) introduced as part of the [Omnibus package](#) also affects CSRD reporting requirements.

CSRD to apply to only the largest companies

The CSRD marked a significant expansion of EU sustainability reporting requirements but also raised concerns around complexity and disproportionate burden. In response, the European Commission (EC) introduced an Omnibus package of proposals in February 2025; and with key legislative components now finalized, the landscape of CSRD reporting has been substantially streamlined – giving companies sufficient clarity to confidently move forward with their CSRD reporting strategies.

The Omnibus package introduced pivotal changes, most notably the significant recalibration of CSRD scoping thresholds, which now capture only the largest EU-based companies and non-EU parents with a meaningful EU footprint.

Number of companies in scope	Significant reduction of in-scope companies
	<ul style="list-style-type: none"> • EU company scoping threshold raised to include only companies with > 1,000 employees and > €450M revenue. • Non-EU parent scoping threshold raised to > €450M revenue generated in the EU and at least one EU subsidiary or branch with > €200M revenue. • Listed small and medium-sized enterprises (SMEs) and financial holdings companies excluded from scope.

This Hot Topic discusses the CSRD as amended. Throughout this Hot Topic, we also highlight key changes from the CSRD as originally adopted, in January 2023, in boxes. For up-to-date news on the status of ongoing EU sustainability reporting developments, including ESRs and EU Taxonomy simplification efforts, visit our webpage, [Sustainability reporting in the EU](#).

1. Background

In February 2025, the EC introduced an Omnibus package of proposals designed to streamline and reduce the burden of EU sustainability reporting and due diligence requirements. The package included significant amendments to the CSRD, aiming to simplify its framework while upholding the European Green Deal's overarching objectives.

This comprehensive initiative comprised several key legislative documents that amend the CSRD.

- **Stop-the-clock Directive:** Enacted into EU law in April 2025, this directive postpones effective application dates of the CSRD by two years for certain companies. Member States were required to transpose it into national law by December 31, 2025.
- **Content Directive:** Enacted into EU law in March 2026, this directive aims to reduce reporting burdens primarily by limiting the CSRD scope to the largest companies. Member States are required to transpose it into national law by March 19, 2027.
- **'Quick fix' Delegated Act:** Adopted into EU law in November 2025, this act extends the transitional relief measures in European Sustainability Reporting Standards (ESRS) to companies already reporting under the CSRD, to ensure they do not need to report additional information in FY25 and FY26 as compared to FY24.

The CSRD mandates sustainability reporting based on 'full ESRS'. The currently effective standards were drafted by the European Financial Reporting Advisory Group (EFRAG) and adopted into EU law in December 2023. The CSRD also requires inclusion of EU Taxonomy disclosures in the sustainability reporting. The Omnibus package encompasses efforts to streamline and significantly reduce ESRS disclosure requirements (read our [guide](#)) and to simplify the EU Taxonomy (see [below](#)).

The Omnibus package also amends the Corporate Sustainability Due Diligence Directive (CSDDD), which is discussed in our CSDDD Hot Topic linked on our webpage, [Sustainability reporting in the EU](#).

2. Scoping requirements

The CSRD includes different scoping requirements for EU-based versus non-EU parent companies – referred to in this Hot Topic as 'general' vs 'non-EU parent' scoping, respectively. The general scoping depends on size, whereas the non-EU parent scoping is based on a combination of physical presence in the EU and net turnover (revenue) generated in the EU. The interplay of these requirements, alongside various reporting exemptions, contributes to the complexity of the scoping analysis.

The CSRD applies to EU companies or groups (i.e. a company and all its subsidiaries, on a consolidated level) and non-EU parent groups that meet the following criteria.

General scoping: EU companies (or groups) that had, on their balance sheet date:

- > 1,000 average employees during the fiscal year; and
- > €450M revenue.

This general scoping applies to all EU-based companies, irrespective of their ownership or domicile.

CSRD requirements before Omnibus

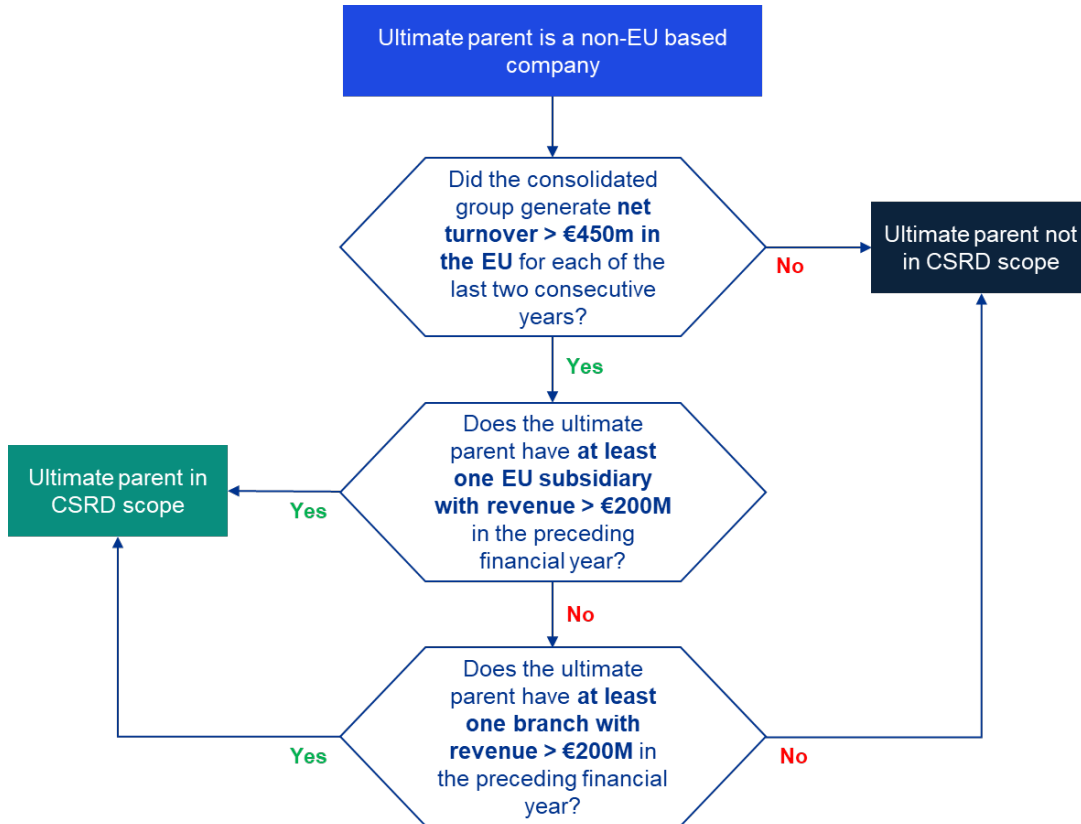
The CSRD as originally adopted applied broadly to all large companies as defined under the Accounting Directive as well as most listed companies in the EU, including listed small and medium-sized enterprises (SMEs), and non-EU companies with listed securities on an EU-regulated market. The AD defines a 'large company' as meeting at least two of the following criteria for two consecutive years: > 250 employees; > €50M revenue; > €25M total assets.

While the Content Directive does not change the above definition of a 'large company', it moves away from using this definition for CSRD scoping. Instead, scoping is limited solely to EU-based companies and prior classifications such as 'large' or 'listed SMEs' no longer determine general scoping. The significant increase in employee and revenue thresholds further narrows the general scoping.

Non-EU parent scoping: Irrespective of the **general scoping** described above, global group-level sustainability reporting is required if an ultimate non-EU parent company has:

- > €450M revenue generated in the EU for each of the last two consecutive financial years; and
- at least:
 - one EU subsidiary with > €200M revenue in the preceding financial year, on its balance sheet date; or
 - one EU branch with > €200M revenue in the preceding financial year.

The following decision tree summarizes application of the non-EU parent scoping.



CSRD requirements before Omnibus

The CSRD as originally adopted applied to ultimate non-EU parent companies with > €150M revenue generated in the EU for each of the last two consecutive financial years and which had at least one in-scope EU subsidiary or an EU branch with > €40M revenue in the preceding financial year.

The Content Directive substantially increases the revenue thresholds for both the ultimate non-EU parent and its EU subsidiary/branch, thereby reducing the number of non-EU entities in the scope of the CSRD's reporting obligations.

2.1. Financial holding company scope exclusion

The CSRD excludes certain EU and non-EU financial holding companies from consolidated CSRD reporting requirements. This applies only to companies that meet the definition of a financial holding company, defined as a company whose sole objective is acquiring and managing holdings in other companies for profit, without direct or indirect involvement in the management of those companies, while retaining their rights as shareholders. These rights include exercising voting rights at general shareholder meetings to oversee and protect their investments.

This scope exclusion is limited to companies with diverse holdings, meaning the business models and operations of their underlying investments are independent of one another. Therefore, this excludes closely interconnected subsidiaries.

This scope exclusion does not override any reporting obligations that may apply to subsidiaries that meet the scoping criteria above.

CSRD requirements before Omnibus

This scope exclusion was not included in the CSRD as originally adopted.



This exclusion is intended for holding companies that are not directly or indirectly involved in the management of their subsidiaries. While many holding company structures may not possess extensive resources or employees, they are often designed to enable the ultimate parent to manage subsidiaries indirectly through them.

3. Effective dates

The CSRD's phased-in effective dates have been significantly revised by the [Stop-the-clock Directive](#) and [Content Directive](#). For continuity and reader familiarity, the outline below presents the CSRD's amended effective dates in the CSRD's original phases, referred to as 'Waves'.

	FY25 Report in FY26	FY26 Report in FY27	FY27 Report in FY28	FY28 Report in FY29
Wave 1 ¹ . Large ² PIEs ³ (> 500 employees) and large companies listed on an EU-regulated market (> 500 employees)				
Wave 2 . Other companies in scope of general scoping which were not captured in Wave 1				
Wave 3 ⁴ . SMEs, except micro companies, listed on an EU-regulated market				
Wave 4 . Companies in scope of non-EU parent scoping				

Notes:

- Wave 1 includes large public interest entities with more than 500 employees that began applying full ESRS for financial years starting on or after January 1, 2024 (reporting in 2025) based on the

CSRD as originally adopted. This also applies to large non-EU companies with securities listed on an EU-regulated market that have more than 500 employees.

Because there are companies in Wave 1 that no longer meet the [general scoping](#) – i.e. large public interest entities with > 500 but ≤ 1,000 employees; or > €50M but ≤ €450M revenue – the [Content Directive](#) permits Member States, during [transposition](#), to exempt these companies from having to comply going forward.

1. The AD defines a large company as meeting at least two of the following criteria for two consecutive years: > 250 employees; > €50M revenue; > €25M total assets.
 2. Public Interest Entities (PIEs) include companies whose transferrable securities are admitted to trading on regulated markets governed by the law of a Member State of the EU (companies with listed securities in the EU), banks, insurance companies or other companies designated by Member States as PIEs.
 3. The CSRD as originally adopted included an effective date for certain SMEs listed on an EU-regulated market. Wave 3 companies are no longer in scope.
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CSRD requirements before Omnibus

Before the [Stop-the-clock Directive](#), Wave 2 and Wave 3 companies were required to report applying full ESRS from financial years starting on or after 1 January 2025 (reporting in 2026) and on or after 1 January 2026 (reporting in 2027) respectively, with an option to opt out of sustainability reporting for up to two years only for Wave 3 companies.

3.1. Transposition

Transposition refers to the process by which EU Member States integrate EU directives into their national law. Unlike regulations which are directly applicable, directives necessitate national legislation to become effective. Each directive specifies a deadline for transposition. During transposition, Member States can make revisions that go above and beyond the directive as drawn up – e.g. expanding the scope.

This process holds particular relevance for the CSRD, which mandated transposition into national law by a specified date. It is equally critical for the Omnibus package, as many of its amendments to the CSRD are delivered through additional directives that also require national transposition.

The following table shows the timeline for transposition of these relevant directives.

	Date of adoption into EU law	Deadline for transposition
CSRD, as originally adopted	January 5, 2023	July 6, 2024
Stop-the-clock Directive	April 14, 2025	December 31, 2025
Content Directive	December 16, 2025	March 19, 2027

Despite a transposition deadline, some Member States did not complete the transposition of the original CSRD in time. This has resulted in further diversity in reporting requirements across the EU. The [Stop-the-clock directive](#) addressed this issue by recalibrating the [effective dates](#).

4. Reporting requirements

The following table summarizes the reporting requirements for companies subject to the CSRD; see separate discussion on [reporting exemptions](#). When assessing the reporting requirements, it is important to involve legal counsel, where appropriate.

Company type	Report level	Report framework	Report location	Report filer
Companies that meet general scoping	Legal entity (or consolidated ¹ for parents of groups)	Full ESRS	Management report ²	Company subject to the CSRD
Ultimate non-EU parent companies that meet non-EU parent scoping	Global group level	NESRS ³ or full ESRS	Provided for by each Member State – e.g. Impact Report	In-scope subsidiary ⁴ or branch

Notes:

1. Consolidated sustainability reporting includes the reporting company and all of its subsidiaries, regardless of size and location.
2. The AD introduced the requirement for certain EU companies to prepare a management report. This report is sometimes analogized to the MD&A section of annual reports filed with the SEC.
3. The focus of the forthcoming standards for non-EU parents (referred to as 'NESRS') is expected to be information about sustainability-related impact reporting only.
4. Any subsidiary of a non-EU parent company that meets the [general scoping](#) is nonetheless in the scope of the related disclosures that apply to EU-based companies.

4.1. Value chain cap

The CSRD mandates reporting on both a company's own operations and its value chain. To alleviate the trickle-down burden on out-of-scope companies, the [Content Directive](#) introduces a 'value-chain cap'. This cap gives companies within the value chain of a CSRD-in-scope company the right to limit the sustainability information they provide to what would be required under a voluntary reporting standard for SMEs (VSME).

CSRD-in-scope companies can rely on a self-declaration from their value chain partners to determine the applicability of this cap. While there is no general requirement for in-scope companies to verify such self-declared information, they cannot rely on it if they know, or could reasonably be expected to know, that the declaration is incorrect.

Key limitations of the value chain cap include the following.

- It does not prohibit voluntary sharing of sustainability information, such as data commonly exchanged within specific sectors.
- It applies exclusively to sustainability information gathered for the purpose of CSRD reporting.

The value-chain cap, designed for out-of-scope companies, does not apply to non-EU subsidiaries of in-scope EU parents. These subsidiaries are generally considered part of the parent's consolidated operations for reporting purposes.

CSRD requirements before Omnibus

This cap was not included in the CSRD as originally adopted, which could have resulted in smaller companies facing extensive information requests from CSRD-in-scope companies.

4.2. Consideration for mergers and acquisitions

Newly acquired or merged subsidiaries are permitted to be excluded from a parent company's consolidated sustainability reporting for the financial year in which they are acquired or merged. The parent's subsequent financial years consolidated sustainability reporting will have to include the newly acquired or merged subsidiaries. Similarly, subsidiaries that are divested during the financial year may also be excluded from the consolidated sustainability report.

For any excluded subsidiary, the parent company discloses significant events that occurred during the financial year that affect the group's sustainability-related impacts, risks or opportunities.

CSRD requirements before Omnibus

The CSRD as originally adopted offered no such provisions for excluding newly acquired, merged, or divested subsidiaries from consolidated sustainability reporting.

4.3. EU Taxonomy

Companies that meet the [general scoping](#) are required to disclose additional information referred to in [Article 8 of Regulation \(EU\) 2020/852](#) (EU Taxonomy) such as KPIs on net turnover and capital expenditure.

While the EU Taxonomy reporting requirements are not detailed in this Hot Topic, the Omnibus package included significant amendments to the EU Taxonomy through a delegated act. The revisions introduce a materiality threshold, modify the 'Do No Significant Harm' criteria on pollution and update reporting templates. These amendments apply for 2025 reporting periods, with an option to delay their application until the 2026 reporting period.

The EC is evaluating additional revisions, including a comprehensive review of the technical screening criteria. The objective of these ongoing efforts is to simplify the criteria, enhance their usability and achieve closer alignment with other EU legislation. For the latest developments and more insights, visit our article, [New amendments proposed to EU Taxonomy](#).

4.4. Equivalency

The EC has the power to designate equivalency status to jurisdictions requiring sustainability reporting. Equivalency is not granted to a voluntary sustainability reporting framework – e.g. Global Reporting Initiative standards.

Although the EC has not yet determined what would be considered an equivalent sustainability reporting framework, it will use the following criteria:

- whether the other framework requires companies to disclose information on environmental, social and governance matters; and
- whether the other framework requires companies to disclose information necessary to understand the company's impacts on sustainability matters, and how sustainability matters affect the company's development, performance and position (so-called double materiality).

4.5. Electronic reporting format

Companies that publish their sustainability reporting in a management report are required to:

- prepare the management report in accordance with the electronic reporting format specified by the European Single Electronic Format (ESEF) Regulation (i.e. XHTML); and
- mark up their sustainability reporting, including EU Taxonomy disclosures, in accordance with a specific digital taxonomy to be adopted by the EC (by amending the ESEF Regulation).

Until the EC officially adopts these rules, companies are not obligated to apply digital tagging to their sustainability reporting.

The report for an ultimate non-EU parent company that meets the [non-EU parent scoping](#) needs to be published in a data extractable format with the relevant accompanying metadata – e.g. name of submitting company, year and month of submission. However, there are no other specific format requirements for group-level reporting prepared in accordance with NESRS.

4.6. Assurance

Limited assurance over the compliance of sustainability reporting – under both the [general scoping](#) and [non-EU parent scoping](#) – is required. The scope of assurance conclusion is required to address the following aspects of the sustainability reporting for [general scoping](#):

- presentation in accordance with the CSRD and ESRS;
- the company’s process to identify the information reported in accordance with the ESRS – i.e. the double materiality assessment process;
- the requirement to mark up the sustainability reporting in accordance with the electronic reporting format; and
- whether it meets the EU Taxonomy reporting requirements.

CSRD requirements before Omnibus

Before the [Content Directive](#), the EC was required to consider moving to reasonable assurance.

In November 2024, the International Auditing and Assurance Standards Board (IAASB) formally approved and [issued](#) International Standard on Sustainability Assurance (ISSA) 5000, *General Requirements for Sustainability Assurance Engagements*. ISSA 5000 addresses both limited and reasonable assurance. Although it is based on principles from existing IAASB standards and guidance, it expands on these to facilitate consistency and quality by more explicitly addressing the expectations in performing sustainability assurance engagements.

The CSRD does not currently mandate which assurance standards should be used by an assurance practitioner to perform the engagement. It requires the EC to adopt limited assurance standards by July 2027. The EU has indicated its intention to use ISSA 5000 as a foundational basis for developing these standards. The technical advice associated with these standards is expected to be presented to the EC, by September 30, 2026. Pending the EC’s adoption of an assurance standard, Member States may adopt ISSA 5000 or national assurance standards or pronouncements, and their effective dates may vary based on Member State requirements.

CSRD requirements before Omnibus

Before the [Content Directive](#), the EC was required to adopt limited assurance standards by October 2026.



US accountants performing assurance engagements are required to comply with the attestation standards of the American Institute of Certified Public Accountants, although they may additionally follow other standards, such as ISSA 5000.

5. Reporting exemptions

There are two reporting exemptions available under the CSRD. For each exemption option, the following table provides a roadmap to the reporting requirements for the subsidiary (that meets the [general scoping](#)) and the ultimate non-EU parent (that meets the [non-EU parent scoping](#)). These exemptions are discussed further in the following the table.

		In-scope subsidiary reporting requirement	In-scope ultimate non-EU parent reporting requirement
Option 1	Group exemption	None, subject to conditions of group exemption criteria	Voluntary consolidated reporting in accordance with full ESRS; or group-level reporting in accordance with NESRS if group exemption is applied at a lower parent level – e.g. EU holding company level
Option 2	Ultimate non-EU parent exemption	Artificially consolidated reporting, subject to conditions, until 2030, then Option 1 or standalone reporting	Group-level reporting in accordance with NESRS

If neither of the above exemptions are applied, ultimate non-EU parent group-level reporting in accordance with the NESRS is required to be prepared, and each in-scope subsidiary is required to prepare standalone and/or consolidated reporting in accordance with the full ESRS.

5.1. Option 1 – Group exemption

If an EU parent makes available sustainability reporting (in accordance with full ESRS) that includes the entire group, all in-scope subsidiaries are exempt from preparing their own sustainability reporting. This exemption applies to all in-scope subsidiaries, including those that are PIEs with securities listed on EU regulated markets.



Based on the EC's CSRD FAQs, it appears that for non-EU parent reporting to exempt EU subsidiaries, the non-EU parent will need to make available group-level sustainability reporting prepared under full ESRS. It appears that such reporting may be published in a separate document – i.e. outside of a management report.

Group exemption criteria

To qualify for the group exemption, an exempted EU subsidiary must include the following information in its management report:

- that it is exempt from sustainability reporting requirements;
- the name and registered office of its parent that reports the exempting consolidated sustainability reporting; and
- a link to the website with the exempting consolidated management report (or consolidated sustainability report) and related assurance opinion.

Additionally, if a subsidiary's sustainability impacts, risks and opportunities are significantly different from those of the parent, the consolidated sustainability reporting must contain sufficient detail to provide an adequate understanding of both the group and the subsidiary.

EU Taxonomy disclosures, covering the activities carried out by the exempted subsidiary, are included in the management report of the exempted subsidiary or in the consolidated sustainability reporting of the non-EU parent.

As part of the [transposition](#) process, Member States may set additional criteria for application of the group exemption for the subsidiaries within that jurisdiction.

CSRD requirements before Omnibus

Under the CSRD as originally adopted, the group exemption was not available to subsidiaries classified as large PIEs with securities listed on EU-regulated markets.

5.2 Option 2 – Ultimate non-EU parent exemption

To qualify for the ultimate non-EU parent exemption, a non-EU parent must have multiple subsidiaries in the EU that meet the [general scoping](#).

This exemption allows for the preparation of consolidated sustainability reporting (commonly referred to as ‘artificial consolidation’) that includes only those subsidiaries (including holding companies) that fall under the general scoping.

This report needs to:

- follow the [reporting requirements](#) specific to the [general scoping](#);
- include all of the subsidiaries (both EU- and non-EU based) that fall under the [general scoping](#) on a consolidated basis; and
- be prepared by one of the EU subsidiaries that generated the greatest revenue (consolidated where applicable) in the EU in at least one of the preceding five financial years.

Based on the EC’s CSRD FAQs, it appears that this exemption is available for financial years ending on or before January 6, 2030.

Provided the [group exemption criteria](#) are met, subsidiaries included in such reporting are exempted from their own sustainability reporting requirements.

6. Non-EU company impact

Non-EU companies could be affected by the CSRD in two ways.

6.1. As a subsidiary

A non-EU subsidiary might be required to deliver sustainability information to its parent (either EU- or non-EU based) for CSRD reporting. We recommend coordinating closely with your parent company so it is clear whether you need to provide sustainability data and, if so, when that data is needed.

6.2. As an ultimate parent

An ultimate non-EU-parent might have EU-based subsidiaries that are subject to the CSRD. Additionally, an ultimate non-EU parent might be subject to global group-level reporting if it meets the [non-EU parent scoping](#).

Your EU subsidiaries need to know if, and when, they will be subject to the CSRD. Keep in mind which exemptions apply, and at which level, to help subsidiaries reduce the reporting burden. If your EU subsidiaries are subject to the CSRD, consider the best way of providing adequate resources and proper governance structures for the subsidiaries to report.

You may consider voluntarily publishing full ESRS reporting for the entire group to exempt EU subsidiaries subject to the CSRD. This would exempt your EU subsidiaries from filing a report (if the

group exemption criteria are met) but would require any non-EU subsidiaries to provide sustainability data. These trade-offs require careful consideration.

7. Next steps for companies



Most US and non-EU companies operating in the EU had already started on their sustainability reporting journey when the Omnibus package was introduced. While it simplified some aspects, changes to scoping and reporting requirements combined with delayed transposition in some Member States continues to add complexity.

7.1 Current CSRD reporters

Companies currently reporting under the CSRD should consider the following:

- **Exemption for out-of-scope entities:** Member States can now exempt companies that are currently reporting from their 2025 and 2026 reporting obligations if they no longer meet the [general scoping](#). Affected companies should monitor local transposition to determine if this option is exercised in their relevant jurisdictions.
- **Ongoing Omnibus developments:** Closely monitor further developments from the Omnibus package, particularly regarding ESRS simplification and any additional changes to EU Taxonomy reporting requirements.
- **Transposition:** For companies incorporated in, or with subsidiaries in, Member States where the CSRD has not yet been transposed, closely monitor forthcoming national transposition developments.

7.2 Future CSRD reporters

If your company, or any of your subsidiaries, still fall into scope of the CSRD, consider refining your CSRD reporting strategy and its alignment with your broader sustainability strategy. Consider the following no-regrets moves.

- **Reevaluate scoping:** Assess your company's and its subsidiaries' status against the amended CSRD thresholds, including applicability of the new [financial holding company](#) exclusion. Be mindful of potential variations in Member State transposition for the financial holding company definition.
- **Prioritize strategic efforts:** Focus on CSRD implementation efforts that serve broader purposes, such as supporting cost savings, meeting external stakeholder demands or fulfilling requirements of other regulations, such as California's GHG emissions reporting law (SB-253). Read more about the California climate laws on our webpage, [All about California's climate laws](#).
- **Assess voluntary reporting:** Evaluate continued voluntary reporting expectations from investors and stakeholders. Align methodologies with ESRS or other relevant frameworks and enhance processes and controls for data quality.
- **Monitor regulatory updates:** Stay informed on future milestones, such as the release of limited assurance standards and the adoption of NESRS, as well as the Member State transposition of the CSRD and the [Content Directive](#).

7.3 Companies no longer in scope

While Omnibus changes may have placed your company outside the scope of the CSRD, consider your potential role within the value chains of companies that remain in scope.

- **Value chain assessment:** Evaluate your supply chain to identify partners that are in the scope of the CSRD and familiarize yourself with the new [value chain cap](#), which may limit the information you will need to provide. This understanding will be important for managing future information requests.
- **Consider voluntary VSME reporting:** Consider reporting in line with the forthcoming VSME once it is adopted. Applying this standard could streamline your ability to provide necessary sustainability data to your in-scope value chain partners, potentially reducing ad hoc requests.

KPMG resources

For further guidance and up-to-date information on sustainability reporting, we recommend the following KPMG resources as a starting point.

- **EU Sustainability Reporting:** Visit our webpage, [Sustainability Reporting in the EU](#), for the latest CSRD and other EU sustainability reporting developments.
- **ESRS Amendments:** Access our [guide](#) for insights into the proposed ESRS amendments.
- **ESRS Reporting Challenges:** Learn about the practical challenges faced by first-time ESRS reporters [here](#).
- **US Company Perspectives:** For other relevant sustainability reporting news, explore our full collection of resources tailored for US companies at kpmg.com/us/sustainabilityreporting.

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