



ESG DISCLOSURE IN THE EU, SINGAPORE, AND VIETNAM: A COMPARATIVE LEGAL VIEW

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Executive Summary

Moving towards the national Net Zero goal by 2050, **ESG practices and disclosures are receiving increasing attention from diverse stakeholders in Vietnam**. 40% of the surveyed companies considered increased pressure from investors and the government as an ESG commitment motivation (PwC, 2022). With growing commitments and external demands for transparency, they are now finding more pressure, and benefits, in reporting on ESG issues. In this context, it is also necessary for the Vietnamese government to take an active role in promoting sustainable market practices, including ESG and ESG disclosure.

The research provides an overview of regulations and highlights firms' performance in ESG disclosures across the EU – a global sustainable finance leader, Singapore – among the pioneers in the ASEAN, and Vietnam, before proposing policy implications for Vietnam.

From a legal comparative view, the EU and Singapore have more advanced ESG disclosure regulations compared to Vietnam. Thus, exploring the learning experiences of these forerunners can provide legal suggestions for Vietnam. Both the EU and Singapore have published taxonomies, alongside regulations and guidelines for firms and financial institutions, with the EU even extending its impacts to non-EU entities and aligning the interconnected legal base. Meanwhile, Vietnam is in an earlier stage of development, with the prolonged release of the national taxonomy and limited updated documents dedicated to ESG disclosure.

From the practitioner's side in Vietnam, the percentage of firms disclosing among the largest ones is significantly higher than the overall rate. 87% of the top 100 by revenue has sustainability reporting (KPMG, 2021), as opposed to 30% of the overall rate (PwC, 2022). Assurances are also not a common market practice, especially external ones. Vietnamese firms will have to tackle challenges of data complexity, lack of knowledge and resources, lack of policy and guidelines, and navigating through several frameworks and standards.

In terms of policy implications, Vietnam could leverage learning experiences from the global and regional forerunners while considering the local context to promote the national regulatory landscape in ESG disclosure. Notably, the legal framework needs further advancement, especially with the demand for detailed guidelines and a green taxonomy – which can refer to the taxonomies of the EU and Singapore. The government can also explore the options of recommending or prescribing consistent standards, imposing 'carrots and sticks' measures, along with other capacity-building initiatives and grants or subsidies for assurance services. Simultaneously, such policies should be designed with the guiding principle of minimizing bureaucratic burdens.

1. The Necessity of ESG Disclosure for Companies

- **Provide stakeholders with transparency and a more holistic view of companies.** Offer Investors, Financial Institutions, Consumers, and other Stakeholders information to assess companies' operations, position, and impacts during decision-making.
- **Promote market transparency and enhance sustainable financial decisions.** Vietnam needs USD 368b to realize net zero goal, thus needing transparency from enterprises to mobilize financial resources to sustainable destinations.
- **Support companies in access to capital and gaining trust from customers.** 85% of Chief Investment Officers surveyed considered ESG important in their investments ([McKinsey, 2023](#)). Similar concepts may apply to banks' lending and customers' purchasing decisions.
- **Allow companies to ensure compliance and identify risks and opportunities.** ESG practices and reporting allows better risk management and performance improvement.

2. A Global Perspective: ESG Disclosure in Pioneering Countries and Regions

In this paper, we will outline regulatory requirements and highlight disclosure situations in the EU, Singapore, and Vietnam. The EU is a global pioneer in advancing sustainable finance with an interconnected legal framework, while also having significant impacts on both EU and non-EU companies with its vital economic position. Meanwhile, within Southeast Asia, Singapore is among the sustainable finance leaders with several initiatives and developing regulations, thus setting a good example for Vietnam.

2.1. EU

a. EU Regulations & Guidelines

Note: Non-exhaustive

	Sustainable Finance Disclosure Regulation (SFDR)	Corporate Sustainability Reporting Directive (CSRD)	Corporate Sustainability Due Diligence Directive (CSDDD)
Issued	2019	2022	Passed April 2024
Effective	2021	2023 - 2024: large public-interest companies to report - 2025: large non-listed - 2026: smaller organizations	Member states have 2 years to transpose to National legislation upon approval by the Parliament & Council
Aim	Harmonized transparency rules for financial market participants and financial advisers, limit greenwashing	Provide stakeholders a more holistic view of companies' impacts, risks, opportunities; Encourages sustainable business practices	Promote responsible corporate practices; improve human and environmental standards across supply chains
Applies to	Financial market participants, financial advisers	- Listed companies - Large EU companies (2/3 criteria: €25M total assets, net revenue €50+M, 250+ staff) - Non-EU companies (net revenue €150+M in EU market)	Companies with over 1000 employees and global turnover of over €450M

Requirements	Information to be Disclosed - Sustainability Risks affecting investments and their values ('outside-in') - Principle Adverse Impacts (PAIs) of investment decisions ('inside-out') Level of Disclosure - Entity Level Transparency - Financial Product Transparency Where to Disclose - Website - Pre-contractual documents - Periodic reports	ESG Information Disclosure - Double materiality - Impacts of sustainability issues on companies - Broad ESG topics, sector-specific standards Standards: European Sustainability Reporting Standards (ESRS) Setting Targets & Baselines Mandatory Assurance	ESG Due Diligence - Identify, manage & mitigate negative impacts on human rights & the environment - Conduct across the supply chain: existing & new, direct & indirect suppliers Integrate in processes and policy - Grievance mechanism - Climate Transition Plan (CTP) Monitoring & Reporting - Annual risk-based evaluation of effectiveness - Annual reporting in line with CSRD & ESRS
Others	3 Categories of Investment Fund with different Disclosure Requirements - Article 6. Funds with no specific sustainability focus - Article 8. Funds promoting E&S in their investments - Article 9. Funds with Sustainable Investments		Consequences of Violation - Penalties: fine of up to 5% global turnover - Civil liability limited to national rules - Responsibility for negligence

References: [EU \(2023\)](#) - SFDR summary; [EU SFDR Overview](#); [EU SFDR](#); [Synesgy \(2022\)](#); [EU \(n.d.\)](#); [EU \(2019\)](#); [PwC \(2023\)](#); [KPMG \(n.d.\)](#); [EY \(2024\)](#); [PwC \(2023\)](#) - CSRD; [PwC \(2024\)](#) - CSDDD

Other relevant regulations

- **The EU Taxonomy** issued in 2020, with recent updates in 2023, provides an aligned classification system to help agents define "green" economic activities
 - **Benefits:** The EU Taxonomy sets out the basis and metrics to help (i) companies plan and showcase taxonomy-aligned investments; (ii) banks in their lending strategies; (iii) investors align investments and disclose under the SFDR
 - **Regulations:** In 2023, large and listed EU firms started to report in line with the taxonomy's 2 objectives: climate change mitigation and climate change adaptation. Companies subjected to the CSRD will report with reference to the taxonomy.
 - Sets out 6 environmental objectives
 - **Approach:** Technical Screening Criteria (TSC) with metrics for activities; along with 3 other conditions (i) Contribute to at least 1 objective; (ii) Do no significant harm (DNSH) to any other objectives and (iii) comply with minimum safeguards
- **The Carbon Border Adjustment Mechanism (CBAM)** is set to come into effect in 2026, with a transition phase from 2023 – 2025 requiring importer's reports of GHG in imports
 - CBAM puts a price on the embedded emissions (Scope 1 & 2) of imported goods to EU markets, with CBAM certificates to be applied to declare emissions and offset.
 - Regulated sectors: cement, iron and steel, aluminum, fertilizers, electricity and hydrogen



- While the Vietnam economy is not vulnerable to CBAM (estimated **0.1B USD** of GDP reduction in 2030), impacted industry players may face challenges:
 - 4 major sectors: Steel (-0.8% production in 2030), Aluminum (-0.4% production in 2030), Fertiliser, and Cement ([DEPOCEN, 2023](#), view *Table 2.1.1 in Annex*)
 - Risks: (i) export price increase and a corresponding decrease in competitiveness and demand in EU market, (ii) CBAM continued evolution with potential carbon pricing and more expansive sectors covered, especially those under the Emission Trading System (ETS).
- The **Regulation on Deforestation-free Products** came into force in June 2023
 - Requires traders and exporters of certain products to prove their origination does not stem from or contribute to deforestation
 - Regulated products: Commodities including cattle, wood, cocoa, soy, palm oil, coffee, rubber, and some of their derived products, such as leather or chocolate
 - While Vietnamese impacted sectors have low deforestation-linked risks in exports to EU, the Regulation raised the issue of proving traceability and compliance

References: [European Commission \(n.d.\)](#), [VCCI WTO Center \(2023\)](#), [VCCI WTO Center \(2023\)](#); [Taxonomy Uptake - EU: European Commission \(n.d.\) EU Taxonomy Navigator](#)

ESG Disclosure Standards and Guidelines

CSRD requires reporting under the **European Sustainability Reporting Standards (ESRS)** published in 2023. The ESRS referenced from previous common standards such as the ISSB and GRI, thus **aligning with global standards** to avoid confusion for companies while providing a more holistic view of broad ESG topics for investors and other stakeholders.

Reference: [European Commission \(2023\)](#)

b. ESG Disclosure Situation and Practices

Impacted Companies under the enforcement of CSRD and CSDDD

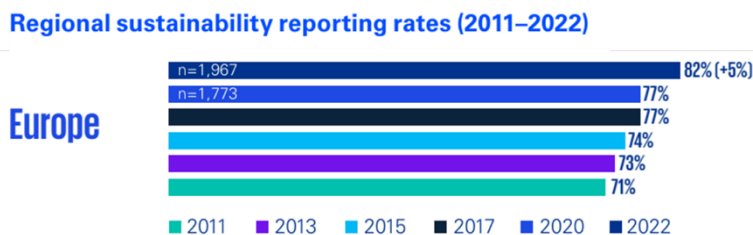
50,000 companies in the EU are to comply with CSRD	10,000 companies outside EU are subjected to CSRD	5,500 companies are to comply with CSDDD
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Reference: [European Parliament \(2022\)](#); [Deloitte \(2024\)](#);

ESG Disclosure Situation of EU Companies

- **50%** EU-domiciled companies (including Norway and Switzerland) scored 75 – 100 under ESG reporting indicator, indicating **readiness for the CSRD** ([Morningstar Sustainalytics, 2023](#), view Figure 2.1-1 in Annex)

- **82% (+5% versus 2020)** of the Top 100 companies by revenue in each EU member, equivalent to **1,612/1,967** companies, have Sustainability Reports (KPMG, 2022)



Source: [KPMG \(2022\)](#)

EU ESG Disclosure Best Practices

Firms can refer to the following practices during their ESG/Sustainability Reporting preparation:

- Set clear goals and define metrics
- Engage stakeholders and conduct materiality assessment. The CSRD will promote the 'double materiality' approach, looking at both inside-out and outside-in impacts
- Integrate ESG into corporate strategy
- Ensure accurate and regular data collecting, reporting, monitoring, and disclosure
- Be transparent, constant, and compliant with regulations and international standards

Reference: [Corp Stage \(2024\)](#), [Neo \(2024\)](#)

2.2. Singapore

a. Regulations & Guidelines

Note: Non-exhaustive

Regulator	Requirements / Proposals / Guidelines
Singapore Stock Exchange (SGX)	<ul style="list-style-type: none"> • Required listed companies to prepare annual sustainability reports since 2016 on a "comply or explain" basis • Issued Sustainability Reporting Guide Practice Note and suggested 27 core ESG metrics • 6 topics of reporting: (i) Material ESG factors, (ii) Climate-related disclosures in line with the TCFD, (iii) Policies, practices and performance, (iv) Targets, (v) Sustainability reporting framework, and (vi) Board statement and associated governance structure for sustainability practices • Announced its approach to mandatory disclosure of firms, with the first industries to publish report in 2024 for FY2023 • Conducted a public consultation in March 2024, planning to prescribe ISSB to move forward with consistency and along with other amendments, including GHG emission reporting

Sustainability Reporting Advisory Committee (SRAC)

proposed mandatory climate reporting roadmap for listed issuers from FY2025 and non-listed large companies from FY2027, with a prescription of **ISSB** standards.

Monetary Authority of Singapore (MAS)

- Requires **ESG Funds** to disclose their Investment Focus, Strategy, Benchmarks, and Risks in [Circular No. CFC 02/2022](#)
- Published Guidelines on Environmental Risk Management for Financial Institutions.
- Released the [Singapore-Asia Taxonomy for Sustainable Finance](#) in late 2023 with thresholds and criteria to determine green and transition activities in 8 sectors, contributing to 5 objectives with climate change mitigation as the focus. The taxonomy also used a traffic light system to distinguish green, amber (transition), and ineligible projects.

Ref: [SGX \(n.d.\)](#), [SGX \(2024\)](#), [ACRA \(2023\)](#), [Circular No. CFC 02/2022](#), [Allen & Gledhill LPP](#), [Singapore-Asia Taxonomy for Sustainable Finance](#)

b. ESG Disclosure Situation & Practices in Singapore

- **100% of the Top 100** companies by revenue in Singapore have sustainability reporting ([KPMG, 2022](#)) - aligns with the result of **100%** of surveyed companies disclosed some ESG information as reported by [IFAC](#) (2021, view Figure 2.2-1 in Annex)
- **85%** reporting rates on stock exchange guidelines among Top 100 companies by revenue in 2022, much higher than the **11%** rate of EU ([KPMG, 2022](#))

3. ESG Disclosure in Vietnam

3.1. Regulations & Guidelines on ESG Disclosure

Note: Non-exhaustive

- [Circular No. 96/2020/TT-BTC](#) issued by the Ministry of Finance in 2020, based on the previous Circular No. 155/2015/TT-BTC, mandates the disclosure of environmental and social impacts of certain companies
 - *Effective:* 2021
 - *Applies to:* Public companies (Article 10), Listed organizations (Article 14), Companies with corporate bonds publicly offered (Article 19.2) or listed (Article 20)
 - *Where to Disclose:* in (i) Annual Report or (ii) a separate ESG/Sustainability Report
 - *Disclosure Requirements:* II.6, Annex IV – ESG report in Annual Report sample:

Information	Details
6.1. Impacts on the environment	Total direct and indirect GHG emission Measures and initiatives to reduce GHG emission
6.2. Management of raw materials	a) Total amount of raw materials used for the manufacture and packaging of the products and services during the year b) The percentage of materials recycled to produce products and services of the organization
6.3. Energy consumption	a) Energy consumption – directly and indirectly b) Energy savings through initiatives of efficiently using energy c) The report on energy saving initiatives and their results
6.4. Water consumption	a) Water supply and the amount of water used b) Percentage and total volume of water recycled and reused
6.5. Compliance with the Law on Environmental Protection	a) Number of times being fined for failing to comply with laws and regulations on environment b) The total amount to be fined for failing to comply with laws and regulations on environment
6.6. Policies related to employees	a) Number of employees, average wages of workers b) Labor policies to ensure health, safety and welfare of workers c) Employee training
6.7. Report on responsibility for local community	The community investments and other community development activities, including financial assistance to community service
6.8. Report on green capital market activities under the guidance of the SSC	

- **Relevant guidelines** have been developed by the SSC in cooperation with the IFC to support Vietnamese companies in their ESG disclosure:
 - [Sustainability Reporting Handbook for Vietnamese Companies](#) (2013)
 - [GHG Emissions Reporting Guidebook](#) (2023)
- The State Bank of Vietnam’s [Dispatch No. 9050/NHNN-TD](#) issued in 2017 requires credit institutions to report quarterly on credit extension to 12 green sectors and on environmental and social risk assessment in credit extension.
- **Green Taxonomy:** Despite the original plan to release in 2022, as well as the draft consulted in the same year, to date, Vietnam has yet to finalize and issue an official green taxonomy. Thus, market agents have not aligned their operations, assessments and reporting to a common taxonomy.

3.2. How are Vietnamese firms disclosing ESG information?



For **Public Listed Companies (PLCs)** in Vietnam, the state of disclosure has been showing more positive signs, yet major limits remain, along with a certain lag behind APAC peers. According to [PwC \(2023\)](#):

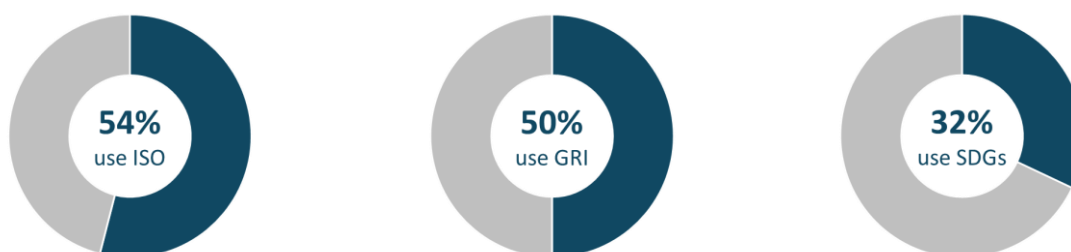
- **Materiality: 76%** of the studied PLCs identify material ESG factors
- **Strategy & Targets: 96%** disclosed sustainability targets, but **only 8%** disclosed net zero targets – among which **none** were based on and verified by SBTi
- **Climate Change & Climate Risks Management:**
 - **78%** identify climate-related risks and opportunities but only **50%** disclose processes for the management of such risks and opportunities
 - **64%** disclose climate scenario analysis, demonstrating a forward-looking view, but **only <7%** disclose scope 1 & 2 GHG emissions
- **Assurance:**
 - Only **18%** disclosed an internal assurance or review for sustainability reporting
 - And a lower figure of **10%** disclosed external assurances, significantly lower than the proportion of **49% in APAC**

Additionally, only **31.9% ESG Data** for Public Companies are publicly available, in which there’s a significant gap between the rate of **54.3% for Governance** data and **21.2% for Environmental** and **10.3% for Social** data.

Source: [FiinGroup \(2022\)](#), view Figure 3.2-1 in Annex

Common Standards In Use

[PwC \(2023\)](#) highlighted **ISO, GRI, and SDGs** as common sustainability reporting standards and frameworks among the *Top 50 PLCs by market capitalization* in Vietnam:



3.3. Challenges

Key Challenges hindering ESG/Sustainability Disclosure and Reporting of Vietnamese Companies are varied:

- **Data Challenge.** ESG data collecting, processing, and reporting can be rather complicated. **71%** of the surveyed companies lack understanding of required data for reporting ([PwC, 2022](#)).
- **Diverse Options of Standards can lead to Confusion and Inconsistency.** No mandatory application of any specific standard offers firms flexibility and authority, yet causing confusion and inconsistency in processes, disclosure practices and quality.
- **Intensive Resources Required.** The process of ESG Disclosure demands various resources, ranging from high financial costs, human capital, to investment of time and productivity. The process also involves tremendous efforts in changing the ESG/Sustainability awareness of staff across all levels.
- **The Need for Further Regulations and Guidelines.** Regulatory transparency and guidelines are needed to nudge ESG disclosure of firms.

3.4. Policy Comparison with EU and Singapore

- **Companies impacted:** Vietnam, EU, and Singapore have all required disclosure for public and listed companies. The EU has taken a further step of developing broader regulatory requirements for financial market players & advisers (SFRD) and expanding impacts to supply chains and some non-EU companies (CSRD, CSDDD, CBAM, EUDR).
- **Standards & Framework Requirement:** While **EU CSRD** mandates applying the **ESRS** which aligned with international standards, and **Singapore** mandated **TCFD** for climate-related disclosure, Vietnam has yet to have similar requirements.
- **Taxonomy:** While EU was the first to publish a green taxonomy, which follows a Technical Screening Criteria approach, and Singapore released its own taxonomy in 2023 to define both green and transition activities, Vietnam has yet to finalize its version despite prolonged delay since 2022.
- **Information Requirement:**
 - **ESG Disclosure of Firms:** The sample in Annex IV attached to Circular No. 96/2020/TT-BTC of Vietnam outlined key E&S topics, yet has not touched upon some mentioned by EU & Singapore namely biodiversity and waste generation.
 - **Assurance:** Vietnam has no compulsory assurance, while EU requires this.
 - **Others:** EU has expanded its scope of impact with SFRD (entity-level and product-level disclosure), CSDDD (due diligence in supply chains), EUDR (deforestation-free origination of products), and CBAM (report on embedded GHG in imported goods).

References: PwC, [SGX \(2023\)](#); View Table 3.4-1 in Annex

3.5. Policy Implications for Vietnam

Regulations and Guidelines

In the policy development process, it is also worth noting that policymakers should design the legal framework while minimizing the bureaucratic burden that may arise to avoid obstacles for practitioners.

- **Accelerate and provide timely update of the development of the green taxonomy.** With its role of providing a common understanding of ‘green’ activities across the market and potential support for more aligned disclosures, Vietnam should accelerate the release of the list and provide updates of progress for market players along the way as well. Not only would this set a basis for banks’ lending strategies and investors’ investment strategies, but it would also help companies devise plans and disclose relevant information in line with the taxonomy.
- **Recommending or prescribing consistent standards to promote consistency throughout the market.** Circular No. 96/2020/TT-BTC of MoF has listed some metrics and encouraged companies to adopt global standards. However, the suggested metrics have not touched upon some important areas, for example biodiversity or waste management. To further promote the adoption and create consistency, the country can provide specific recommendations or prescription of standards to be used. For example, Singapore used TCFD for climate-related disclosures, and proposing to use ISSB; while the EU has developed the ESRS. However, it is worth noting that the application of a common reporting language in Vietnam should be in line with both international standards and suitable for the local context. Flexibility and accessibility, for example, in terms of language or data availability, can also be considered.
- **Develop detailed guidelines, and even a roadmap, to assist firms with their reporting processes.** With the existing guidebook issued by IFC in 2013, the government can review and develop an updated version which suits the new regulatory landscape and sustainability agenda, as well as with the introduction of new reporting frameworks and standards like the IFRS. The guidelines can also support firms in their data mapping and processing, and so on. Simultaneously, considering that ESG disclosure and reporting would require considerable investment and preparation, future regulations and requirements can be informed and implemented with a reasonable period for preparation.
- **Carrots and Sticks / Incentives and Sanctions.** There is limited information on the available or planned measures to incentivize compliance or mitigate non-compliance of companies in ESG disclosure and reporting. This can be further explored in the future development stages of regulations.

Capacity Building

- **Hosting and participating in capacity building events.** Workshops, seminars, roundtable discussions are a few types of events to name that can create chances to foster the exchange and improvement of capacity among stakeholders, and even to gain experiences from international partners as well.
- **Providing technical support.** Explore partnerships with experts and specialized organizations to provide technical support packages for selected companies, for example sector-leading companies or those in hard-to-abate sectors.

Financial Support

- **Develop grant or subsidy schemes for assurance.** External assurances and verification can support the transparency of disclosed information, avoiding misconduct and greenwashing. However, such services may add a cost burden for firms. The government can investigate the option of setting up a grant scheme or providing subsidies for regulated firms to incentivize and better enable them to verify their reporting.

4. EuroCham Policy Dialogue and Advocacy Call to Action

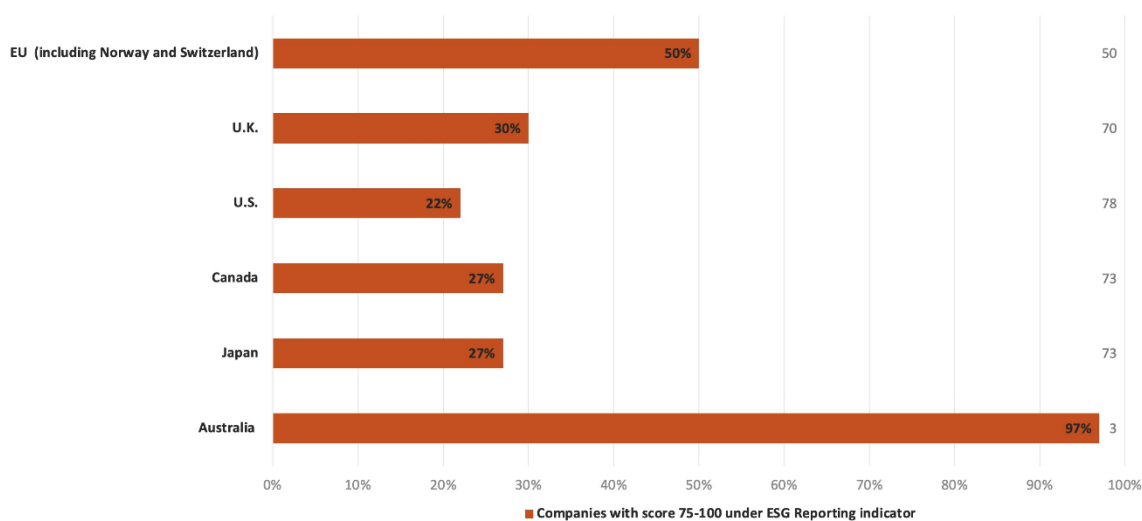
- **Advocacy of the finalization and release of the Green Taxonomy.** Collaborate with other initiatives, promoting progress monitoring and dialogues on taxonomy to help accelerate and refine the process.
- **Advocacy of adoption of recognized frameworks and standards, moving towards their harmonization and consistency.** Provide policy inputs on suggested standards for companies, moving towards harmonization and alignment with international standards, with learning experience from the CSRD/ESRS of EU and TCFD requirements for climate-related disclosure of Singapore.
- **Capacity building and best practices promotion.** Co-host roundtable sessions with relevant government authorities, inviting industry experts to share best practices and legal updates on ESG Disclosure and Reporting. Topics could also cover impacts of EU regulations (CSRD, CSDDD, CBAM, EUDR) on Vietnamese firms for better preparation considering EU is a large trade partner.
- **Advocacy of a grant or subsidy scheme for assurance services.** Support with research, provide policy inputs and attend dialogues on grant or subsidy schemes. These will help enhance trust in companies and market transparency, thus avoiding greenwashing. Moreover, such support can nudge firms and financial institutions to initiate and showcase demonstration transactions that enable the market.

Annex

Table 2.1.1. Estimated economic impacts of CBAM (3/2023 version) in 2030

	Steel	Aluminium	Fertiliser	Cement
Change in production output (%)	-0.8 [-1.7; -0.0]	-0.4 [-0.8; -0.0]	-0.0 [-0.0; -0.0]	-0.1 [-0.2; -0.0]
Change in export value (%)	-3.7 [-5.5; -0.4]	-4.3 [-5.7; -0.7]	-0.0 [-0.0; -0.0]	-0.6 [-0.8; -0.2]
Change in import value (%)	-0.3 [-1.3; +0.8]	-0.1 [-0.7; +0.4]	-0,0 [-0,0; -0,0]	-0.1 [-0.4; -0.0]
Change in emission quantity (mil tCo2)	-1.0 [-2.0; -0.0]	-0.2 [-0.4; -0.0]	-0.0 [-0.0; -0.0]	-0.2 [-0.4; -0.0]

Source: [Chu Hoang Long & Do Nam Thang et al. \(2023\)](#) as cited in [DEPOCEN \(2023\)](#)



Source: Morningstar Sustainalytics. The data for this analysis was retrieved on October 1, 2023, from Sustainalytics Ratings Universe. For informational purposes only.

Figure 2.1.1. Reporting Readiness of Issuers Domiciled in the EU and Selected Non-EU Jurisdictions Likely Affected by CSRD

Source: [Morningstar Sustainalytics \(2023\)](#)

Regional sustainability reporting rates (2011–2022)

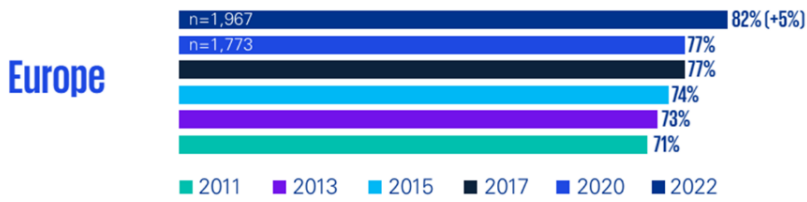


Figure 2.1.2. EU sustainability reporting rates (2011 – 2022)

Source: [KPMG \(2022\)](#)

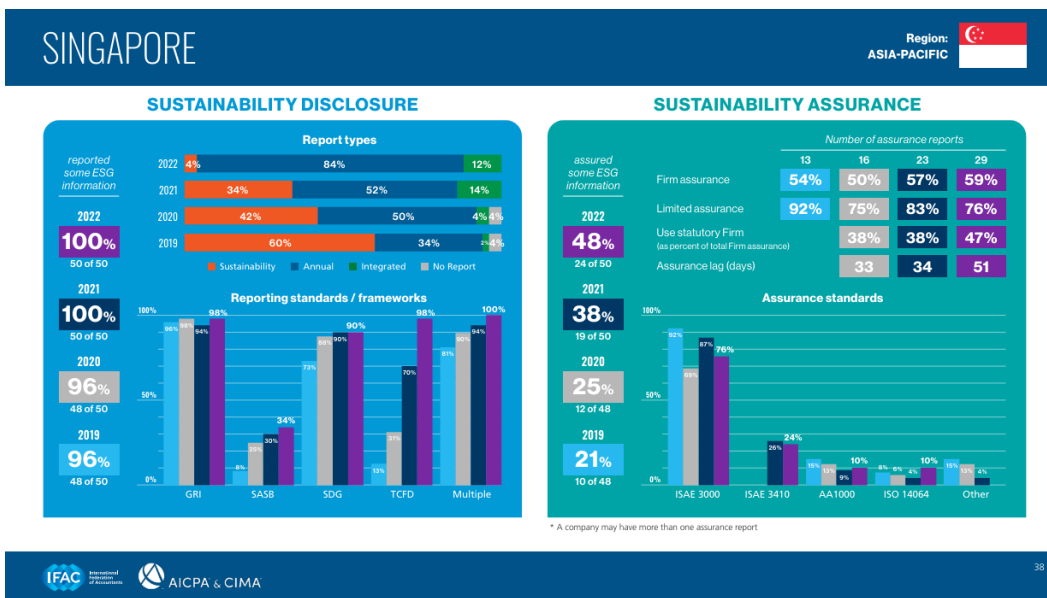
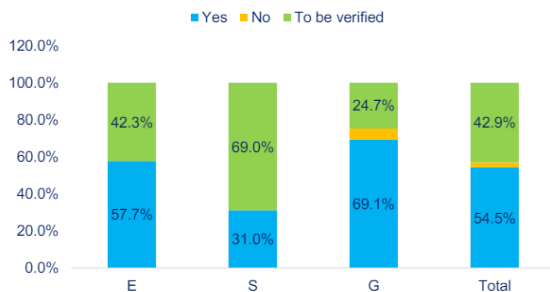


Figure 2.2.1. Sustainability Disclosure and Assurance in Singapore, 2019 - 2022

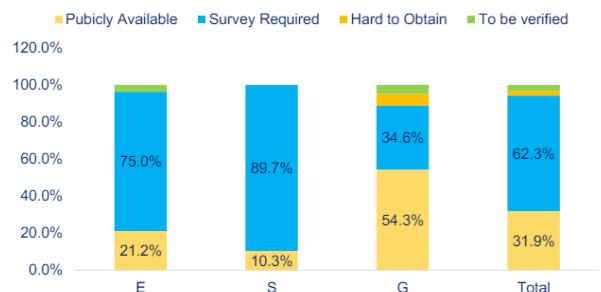
Source: [IFAC, AICPA & CIMA \(2022\)](#)

ESG Data Availability Check (2021)



Source: [FiinGroup](#). Review conducted in Oct 2022

ESG Possible Data Sources (2022)



Source: [FiinGroup](#). Review conducted in Oct 2022

Figure 3.2.1. Preliminary Assessment of ESG Data for Public Companies in Vietnam

Source: [FiinGroup \(2022\)](#)

Table 3.4.1. Policy Comparison: Vietnam in comparison with EU and Singapore

	Vietnam	EU	Singapore
<i>Companies subjected to disclosure requirements</i>	<p>Circular No. 96/2020/TT-BTC (effective)</p> <ul style="list-style-type: none"> - Public, listed companies; - Companies with bonds listed/publicly offered 	<p>CSRD (starting 2024 for public companies)</p> <ul style="list-style-type: none"> - Public companies - Large EU companies - Large non-EU companies <p>SFRD (effective): Financial market players & advisers</p> <p>CSDDD: Companies with 1000+ staff, 450M+ global turnover</p> <p>CBAM (starting 2026), EUDR (18 months after Oct 2023) affecting both EU and non-EU companies</p>	<ul style="list-style-type: none"> - Public and listed companies – comply or explain basis - ESG Funds <p>SGX to mandate disclosure in some industries starting 2024</p> <p>SRAC proposed a roadmap to mandate climate-related disclosure starting 2025 using ISSB</p>
<i>Taxonomy</i>	In development	Issued, CSRD-impacted companies to disclose in line with Taxonomy	Issued Dec 2023, not yet mandatory, intended for voluntary use in the first years
<i>Standards & Framework Requirement</i>	None	CSRD: ESRS which aligned with international standards	TCFD for climate-related information
<i>Information Requirement</i>	<ul style="list-style-type: none"> - E: GHG; Materials; Water; Energy; Compliance - S: Employees; Local community - Green capital market activities 	<p>CSRD covers a wide range of ESG topics:</p> <ul style="list-style-type: none"> - E: Climate change & GHG; Resource use & Circular economy; Biodiversity & ecosystems - S: Social and Human Rights issues <p>SFRD: entity-level and product-level disclosure</p> <p>EUDR: proof of products not coming from/contributing to deforestation</p>	<p>6 topics in annual report: material ESG factors, TCFD climate-related disclosures, targets, etc.</p> <p>SGX recommended 27 core ESG Metrics</p> <ul style="list-style-type: none"> - E: GHG, Energy & Water Consumption, Waste Generation - S: Employee-related - G: Board & Management, Ethical behavior, Certification, Framework alignment, Assurance

Source: Author's comparison and compilation

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