

# Global Mandatory Disclosure Landscape

	SEC Proposed Climate Disclosure Rule	California Disclosure Laws	EU CSRD
Scope of Coverage	<p>SEC registrants (mostly companies with U.S. public equity listings, including foreign private issuers)</p> <p>~8,000 companies</p>	<p>Public &amp; private companies (including LLCs and partnerships) organized in the United States and "doing business in California"</p> <p><b>SB 261:</b> &gt;\$500 million revenue (~10,000 companies)</p> <p><b>SB 253:</b> &gt;\$1 billion revenue (~5,000 companies)</p>	<p>1) Companies listed on EU-regulated markets; 2) large EU companies, both listed and unlisted, including large subsidiaries of non-EU companies; 3) SMEs listed in the EU; 4) non-EU parent companies with more than €150 million in annual EU revenue</p> <p>~50,000 EU companies and ~10,000 non-EU companies (1/3 of those U.S. co.'s)</p>
Information Required	<p>Climate-related risks, primarily through the lens of traditional financial materiality</p> <p>Scope 1-2 emissions; Scope 3 if material or if the company has set a target</p>	<p><b>SB 261:</b> Biennial preparation and publication of a TCFD-aligned risk report</p> <p><b>SB 253:</b> Annual Scope 1-3 emissions data</p> <p>Emissions data required regardless of materiality determination</p>	<p>Broad range of sustainability topics—not just climate, but also environment, social, and governance. Unique double materiality threshold</p> <p>Emissions reporting subject to (double) materiality determination</p>
Status	<p>Pending finalization and adoption</p>	<p>Signed by Governor Newsom; pending regulatory implementation</p>	<p>Implementation ongoing; first round of companies will report on 2024 data</p>
Key Questions	<p>Some key issues in question (e.g., Scope 3, financial statement footnotes); political landscape; litigation anticipated</p>	<p>CARB budget and implementation details; scope of anticipated follow-up legislation</p>	<p>Multinational companies must determine reporting entities; double materiality assessments must begin; some ESRS topical standards may present challenges</p>