



Scaling the Standard 2026

Insights from CDP's 2025
IFRS S2-aligned disclosures

Harmonization has never been more important; jurisdictions that account for approximately 60% of global GDP have already decided to use or are taking steps to introduce ISSB Standards in their legal or regulatory frameworks.

In 2024, CDP aligned its corporate questionnaire with the ISSB's IFRS S2 Standard as its foundational baseline for climate disclosure, enabling companies worth nearly two-thirds of global market capitalization to disclose IFRS S2-aligned data in a structured and transparent way. CDP is the largest single source of consistent, globally comparable IFRS S2-aligned climate data for investors and decision-makers.

Corporate climate disclosure in the European Union is mandated under the Corporate Sustainability Reporting Directive (CSRD), and companies must report using the European Sustainability Reporting Standards (ESRS). As part of the EU Omnibus simplification of the EU Sustainability requirements, EFRAG, the EU's standards body, published revised and simplified ESRS and technical advice for the European

Commission in December 2025. The EC is in the process of considering the incorporation of the technical advice and revising the ESRS.

This Europe (EU + EFTA) snapshot provides insight into the extent of disclosure against IFRS S2-aligned data points in CDP's question bank, indicating where companies are advancing and where disclosure gaps remain.

Extent of disclosure against IFRS S2-aligned questions through CDP in Europe (EU + EFTA)

Analysis is based on a subset of 2,401 corporate disclosures from 2025



The majority of companies are responding to climate governance-related questions, with 88% disclosing against all aligned questions on the governance processes they use to manage their climate-related risks and opportunities. Risk management disclosures are also strong, with 86% disclosing against all aligned questions, a 29% increase on the previous year.

While gaps remain in the extent of responses against other IFRS S2 components, improvements can still be seen. Climate-related metrics, the component with the lowest levels of complete response in 2025, saw 35% of companies disclosing against all aligned questions – a 7% increase from last year.

Climate governance

88% disclosing against all aligned questions

Risk management

86% disclosing against all aligned questions

Climate-related metrics

35% disclosing against all aligned questions



Disclosure against IFRS S2 requirements - by core content area

Core content area	Sub-elements	0-49%	50-79%	80-89%	90-99%	100%
Governance (88% fully complete)	Governance	1%	2%	1%	8%	88%
Strategy (34% fully complete)	Climate-related risks and opportunities and financial performance	2%	4%	4%	20%	69%
	Business model, strategy and decision making	3%	7%	10%	23%	57%
	Climate resilience	42%	1%	0%	2%	55%
Risk management (86% fully complete)	Risk management	7%	1%	2%	4%	86%
Metrics and targets (33% fully complete)	Climate-related metrics	6%	15%	12%	32%	35%
	Climate-related targets	2%	6%	10%	11%	72%

How policymakers can collaborate with CDP

As more jurisdictions prepare to introduce ISSB-aligned disclosure requirements, CDP is uniquely positioned to support governments and policymakers with data and insights to assess market readiness, inform regulatory frameworks and identify opportunities for capital allocation.

CDP also provides a globally accessible platform for disclosure of IFRS S2-aligned information and a means to track its uptake across the economy.

CDP has a proven track record in scaling the adoption of disclosure frameworks and standards. For example, our 2018 questionnaire alignment was a driver behind the mainstreaming of TCFD-aligned reporting globally, which subsequently informed the growth of mandatory sustainability reporting.

How to engage with CDP to align with ISSB

Together with the disclosed dataset, the questionnaire provides an effective tool to support companies on their path to IFRS S2 disclosure. By disclosing through CDP between June and October 2026, companies will be able to share environmental data aligned with IFRS S2 – as well as other important standards and frameworks – with stakeholders and the wider global market.

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