

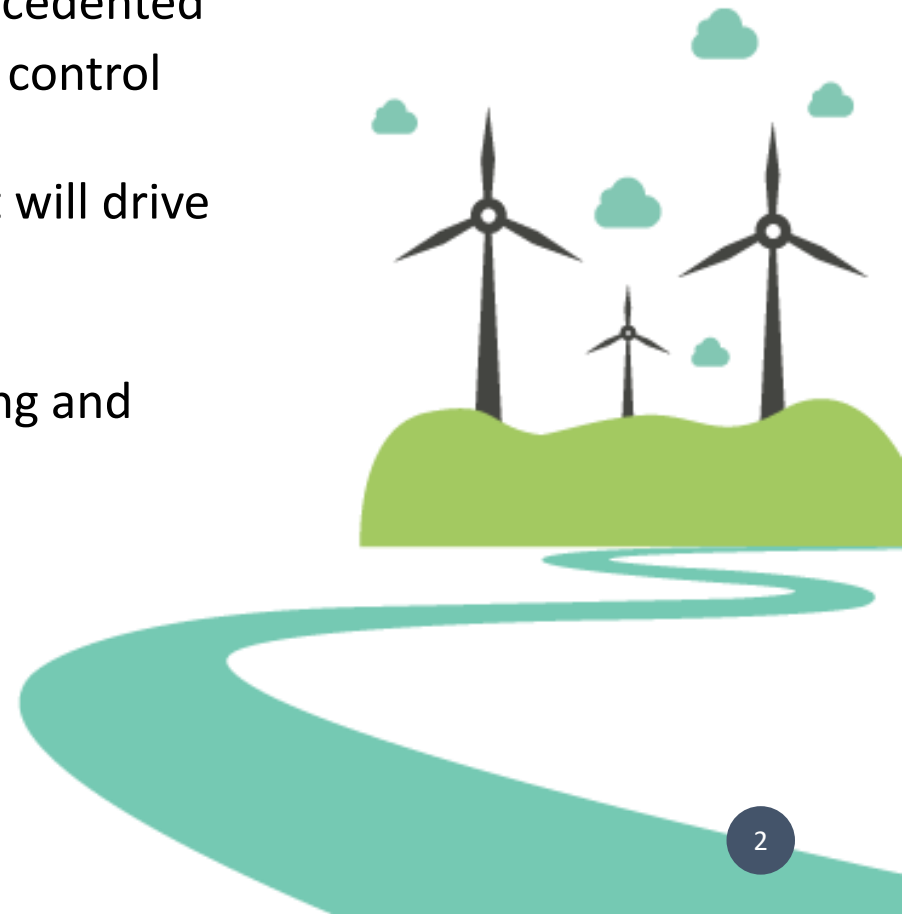


REGULATORY HORIZON FOR HOTELS & APART HOTELS

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The Big Picture

- ESG regulation is developing at pace globally
- The EU is blazing a trail: SFDR, Taxonomy, CSRD, CS3D
- The ambition and scope of this regulation is unprecedented
- A paradigm shift in approach - the "command and control model" does not work for ESG
- If you give the market the information, the market will drive change
- BUT, with ambition comes complexity
- Businesses need to be proactive in horizon scanning and planning for the changes to come



The EU / UK picture




Regulation	Which in effect will:	And the UK intends to:
Sustainable Finance Disclosure Regulation	Requires investment firms to disclose to investors just how sustainable their funds are	Consulting on its Sustainable Disclosure Regulations
Taxonomy	Define what is, and is not, sustainable for every type of business activity	Adopt its own version of taxonomy (highly ambitious)
Corporate Social Reporting Directive	Reform existing corporate reporting rules, so that report on a range of company's impacts on ESG issues, as well as impact of ESG issues on company's financial risk ('double materiality') including their Net Zero plan	Rely on TCFD / other existing reporting obligations (such as Modern Slavery regime)
Corporate Sustainability Due Diligence Directive	Require larger organisations to identify and mitigate ESG impacts across their value chain	No current equivalent proposals (although does have obligations in certain areas, e.g. illegal deforestation, anti-bribery)

ESG timeline for hospitality








Full timeline

Use the menu at the top of the page to filter the timeline to UK only or EU only

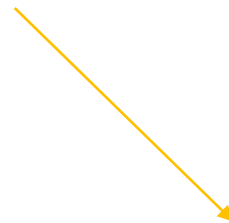
The  icon beneath the flag indicates that the entry is for information purposes only








Selecting the theme buttons below will eliminate the theme from the timeline



-  Sustainable Finance
-  Energy and emissions
-  Tax
-  Environment and Resources
-  Human Rights
-  Diversity & Inclusion
-  Built environment


Clicking on these buttons will make the relevant timeline entries disappear



-  Sustainable Finance
-  Energy and emissions
-  Tax
-  Environment and Resources
-  Human Rights
-  Diversity & Inclusion
-  Built environment


The timeline before clicking the 'Energy & Emissions' tab

 **SECR reporting required for financial years ending on or after 31 Dec 2020**
31/03/2021
 Streamlined Energy and Carbon Reporting ("SECR") – latest year-end date for in scope entities to include SECR reporting in annual reports.
 NOTE: Consideration may need to be given

 **SFDR – majority of disclosure obligations apply to in-scope entities**
10/03/2021
 Disclosure Regulation (EU) 2019/2088 – key applicable dates for sustainability-related disclosures in the financial sector ("SFDR"): The majority of the disclosure obligations apply: sustainability-related disclosures on the website for in-scope entities and in relevant pre-contractual information for products in market (additional disclosure requirements for larger in-scope participants required from 30 June 2021). Obligations depend on classification, ranging from Article 6 products (no obligations, any product which is not in Articles 8 or 9); Article 8 products (promote environmental and/or social characteristics); Article 8+ (commit to some sustainable investments) and Article 9 (exclusively sustainable investments).
 In scope organisations: Banks, investment firms, asset managers, insurers

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The timeline after clicking the 'Energy & Emissions' tab

 **New Off-Payroll Working Rules in force**
06/04/2021
 New off-payroll working rules came into force following delays due to the Covid-19 pandemic.
 In scope organisations: All public sector entities; large and medium-sized businesses

 **UK premium-listed companies subject to TCFD disclosure requirements**
01/01/2021
 TCFD – climate-related disclosure requirements apply to commercial companies with a UK premium listing for accounting periods beginning on or after 01/01/2021: see our briefing [Consultation on mandatory climate change reporting: the building of a new sustainable financial system](#)
 In scope organisations: UK premium-listed companies

The timeline is both forward and backward looking, beginning on 01/01/2021 and going through to 2030 and beyond.

 **Energy Performance of Buildings Directive to require new hotels to be zero emission**
2030
 EU Commission's proposed revisions to the Energy Performance of Buildings Directive (EPBD) intend to require all new hotels to be zero-emission as of 2030.
 In scope organisations: All business organisations developing in the EU

