

OPEN FOR COMMENTS
UNTIL 8 APRIL 2024

Draft Article 8 XBRL Taxonomy

FEBRUARY 2024

EXPLANATORY NOTE AND
BASIS FOR CONCLUSIONS



EFRAG

sustainability reporting

Disclaimer

The Draft Article 8 XBRL Taxonomy is published by EFRAG for comment only and is accompanied by this Explanatory Note and Basis for Conclusions. EFRAG assumes no responsibility or liability whatsoever for the content or any consequences or damages direct, indirect or incidental arising from following the advice or guidance contained in this document. Information contained in this publication does not constitute advice and should not be substituted for the services of an appropriately qualified professional.

How to provide feedback on the Draft XBRL Article 8 Consultation Document

Comments need to be received by 8 April 2024 by completing the questionnaire available [here](#). To see a PDF of the survey, click [here](#). All comments will be on the public record and posted on our website at www.efrag.org unless the respondent requests confidentiality.

Role and responsibility of EFRAG for Article 8 disclosures

EFRAG doesn't have any responsibility for the structure and content of the Article 8 disclosure requirements as, in contrast with the CSRD, it has not been requested to provide any technical advice regarding this regulation. In this context, EFRAG serves merely as a digital and technical support to the EC, transposing the Article 8 disclosure requirements into a machine-readable format.

About EFRAG

EFRAG's mission is to serve the European public interest in both financial and sustainability reporting by developing and promoting European views in the field of corporate reporting. EFRAG builds on and contributes to the progress in corporate reporting. In its sustainability reporting activities, EFRAG provides technical advice to the European Commission in the form of draft European Sustainability Reporting Standards (ESRS) elaborated under a robust due process and supports the effective implementation of ESRS. EFRAG seeks input from all stakeholders and obtains evidence about specific European circumstances throughout the standard setting process. Its legitimacy is built on excellence, transparency, governance, due process, public accountability and thought leadership. This enables EFRAG to speak convincingly, clearly, and consistently, and be recognised as the European voice in corporate reporting and a contributor to global progress in corporate reporting.



EFRAG is funded by the European Union through the Single Market Programme in which the EEA-EFTA countries (Norway, Iceland and Liechtenstein), as well as Kosovo participate. Any views and opinions expressed are however those of the author(s) only and do not necessarily reflect those of the European Union, the European Commission or of countries that participate in the Single Market Programme. Neither the European Union, the European Commission nor countries participating in the Single market Programme can be held responsible for them. © 2024 EFRAG All rights reserved.

Reproduction and use rights are strictly limited. For further details please contact efragsecretariat@efrag.org

Contents

1. Introduction	4
2. Objective of the Draft Article 8 XBRL taxonomy released by EFRAG for consultation	5
2.1. Legal background	5
2.2. Description of the Draft Article 8 XBRL taxonomy	7
2.2.1. Disclosures Delegated Act	7
2.2.2. Structure of the Disclosures Delegated Act.....	8
2.3. Glossary and defined terms.....	8
3. Methodology and architecture of the Draft Article 8 XBRL Taxonomy.....	10
Appendix: Digitising disclosures using the Article 8 XBRL Taxonomy	11
A1. Illustration of tagging application instructions	11
Use case 1: Dimensional structures	15
Use case 2: Tagging of Specific types of elements.....	17
Use case 3: restatements and corrections	22
Additional guidance on tagging	23

1. Introduction

1. EFRAG has been tasked by the European Commission (EC) to develop the digital taxonomy ('XBRL taxonomy' or 'Article 8 XBRL taxonomy' in this document) for Article 8 disclosures¹). The European Securities and Market Authority (ESMA) will define the tagging rules to be applied for the sustainability reporting, including the Article 8 disclosures. Such tagging rules will finally be adopted by the EC by way of a delegated act (DA) amending Commission Delegated Regulation (EU) 2019/815 on the European Single Electronic Format (hereafter '**ESEF** Regulation').
2. EFRAG has also been tasked to develop the digital taxonomy for the European Sustainability Reporting Standards (ESRS). The release of the Draft ESRS Set 1 XBRL Taxonomy is provided on the EFRAG webpage together with a separate consultation questionnaire and accompanying documents.
3. This document accompanies the release of the Article 8 XBRL Taxonomy for consultation. It illustrates the basis for conclusions, the methodology applied and technical options exercised in the preparation of the XBRL taxonomy. It also includes illustrations of the resulting reporting in machine-readable format to support the implementation of the Draft Article 8 XBRL Taxonomy and obtain more informed feedback in this consultation.
4. The Draft Article 8 XBRL Taxonomy has been developed by EFRAG based on reporting templates provided as part of Regulation (EU) 2021/2178 (Disclosures Delegated Act). EFRAG bears no responsibility for the structure and content of the Article 8 disclosure requirements and Acts, as EFRAG serves merely as a digital and technical support for the EC, transposing the Article 8 disclosure requirements into machine-readable format. The Draft Article 8 XBRL Taxonomy is not subject to the due process from SR TEG and SRB.
5. The purpose of the consultation is to receive feedback from constituents on the draft version of the taxonomy. The feedback will be considered by EFRAG in the finalisation of this deliverable and, when appropriate, adjustments will be made in the final version of the taxonomy.
6. The release of the draft Article 8 XBRL Taxonomy for consultation is accompanied by *Article 8 Illustrative Implementation Practices* and *Article 8 Illustrative Examples of XBRL Reports* prepared by EFRAG.
7. *Draft Article 8 Illustrative Implementation Practices* presents detailed illustrations of **preparers'** best practices for implementing the draft taxonomy. It aims at testing the technical feasibility of converting the sustainability statement into machine-readable format. It may be considered in the next phase by ESMA and, ultimately, the EC when defining the final tagging rules. It could be implemented as rules, recommendations or best practices suggestions.

¹ In order to not confuse the terms "taxonomy" which is used for both, the digital taxonomy and the EU Taxonomy, which is a classification system, the term taxonomy in this document is used for the digital XBRL taxonomy, while the EU Taxonomy in general is referred to as "Article 8".

8. *Draft Article 8 Illustrative Examples of XBRL Reports* presents a set of technical illustrative reports (XBRL reports in ***Inline XBRL***). Those reports have meaningless content (nonsense text and random numbers) but try to mimic the structure of the digital Article 8 disclosures. The tagging used in the illustrative reports should not be considered the only possible way to use the Draft Article 8 XBRL Taxonomy, as the authoritative tagging rules will be developed by ESMA and incorporated into the ESEF Regulation. The sole purpose is to demonstrate the technical correctness of the XBRL taxonomy, the feasibility of the tagging and to provide technical details and illustrations on how a disclosure could be tagged. The tagged illustrative reports should not be used as templates. The tagged illustrative reports (including ***iXBRL*** Viewers) can be displayed in any web browser (Chrome, Firefox, Edge, Opera, Safari, etc.).
9. In this document, terms that are defined in the glossary (see Chapter 2.3. Glossary and defined terms) are marked in ***bold italic*** when they appear in the text for the first time.

2. Objective of the Draft Article 8 XBRL taxonomy released by EFRAG for consultation

2.1. Legal background

10. Regulation (EU) 2020/852 (EU Taxonomy Regulation)² has established a classification of environmentally sustainable economic activities (EU Taxonomy-aligned activities) in the European Union (EU). The EU Taxonomy Regulation has introduced in Article 8 disclosure obligations to be provided in the sustainability reporting (i.e., the former non-financial statement).
11. Undertakings that fall under the scope of the Corporate Sustainability Reporting Directive (CSRD) will disclose whether they perform taxonomy-aligned activities. In particular, Article 8 of the EU Taxonomy Regulation mandates that '*any undertaking which is subject to an obligation to publish non-financial information pursuant to Article 19a or Article 29a of Directive 2013/34/EU shall include in its non-financial statement or consolidated non-financial statement information on how and to what extent the undertaking's activities are associated with economic activities that qualify as environmentally sustainable under Articles 3 [Criteria for environmentally sustainable economic activities] and 9 [Environmental objectives] of this Regulation*'.³
12. Disclosure obligations of undertakings under Article 8 of the EU Taxonomy Regulation are further specified in Commission Delegated Regulation (EU) 2021/2178 supplementing Regulation (EU) 2020/852 by specifying the content and presentation of information to be disclosed by undertakings subject to Articles 19a or 29a of Directive 2013/34/EU concerning environmentally sustainable economic activities and by specifying the methodology to be

² Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 on the establishment of a framework to facilitate sustainable investment, and amending Regulation (EU) 2019/2088.

³ Ibidem.

used to comply with that disclosure obligation (Disclosures Delegated Act). The Disclosures Delegated Act was amended in June 2023 by the EU Taxonomy Environmental Delegated Act,⁴ which ensured that the Disclosures Delegated Act requirements are consistent with the EU Taxonomy Environmental Delegated Act.

13. The [draft] Article 8 XBRL Taxonomy aims to enable undertakings subject to the Delegated Act to mark up (tag) their disclosures in a structured and machine-readable data format as part of the digital sustainability reporting.
14. The legal basis for the development of a digital XBRL taxonomy for the Disclosures Delegated Act is provided by the CSRD.⁵ Its recital 55 states that *‘Digitalisation creates opportunities to exploit information more efficiently and holds the potential for significant cost savings for both **users** and undertakings. Digitalisation also enables the centralisation at Union and Member State level of data in an open and accessible format that facilitates reading and allows for the comparison of data.’*
15. Furthermore, Article 29d of the CSRD provides that:
 - *‘Undertakings subject to the requirements of Article 19a of this Directive shall prepare their management report in the electronic reporting format specified in Article 3 of Commission Delegated Regulation (EU) 2019/815 and shall mark up their sustainability reporting, **including the disclosures provided for in Article 8 of Regulation (EU) 2020/852**, in accordance with the electronic reporting format specified in that Delegated Regulation’* and that
 - *‘Parent undertakings subject to the requirements of Article 29a shall prepare their consolidated management report in the electronic reporting format specified in Article 3 of Delegated Regulation (EU) 2019/815 and shall mark up their sustainability reporting, **including the disclosures provided for in Article 8 of Regulation (EU) 2020/852**, in accordance with the electronic reporting format specified in that Delegated Regulation’.*
16. This implies that, pursuant to ESEF Regulation,⁶ the sustainability reporting, including disclosures provided for in Article 8 of the EU Taxonomy Regulation, should be made public in XHTML format and should be marked up using Inline XBRL standard.
17. The following undertakings are subject to this requirement:

⁴ Commission Delegated Regulation (EU) 2023/2486 of 27 June 2023 supplementing Regulation (EU) 2020/852 of the European Parliament and of the Council by establishing the technical screening criteria for determining the conditions under which an economic activity qualifies as contributing substantially to the sustainable use and protection of water and marine resources, to the transition to a circular economy, to pollution prevention and control, or to the protection and restoration of biodiversity and ecosystems and for determining whether that economic activity causes no significant harm to any of the other environmental objectives and amending Commission Delegated Regulation (EU) 2021/2178 as regards specific public disclosures for those economic activities.

⁵ Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting.

⁶ Commission Delegated Regulation (EU) 2019/815 of 17 December 2018 supplementing Directive 2004/109/EC of the European Parliament and of the Council with regard to regulatory technical standards on the specification of a single electronic reporting format (Regulation (EU) 2019/815)

- non-financial undertakings subject to the disclosure obligations laid down in Articles 19a and 29a of the Accounting Directive as amended by the CSRD and
- financial undertakings subject to the disclosure obligations laid down in Articles 19a and 29a of the Accounting Directive as amended by the CSRD, which are
 - asset managers,
 - credit institutions as defined in Article 4(1), point (1) of Regulation (EU) No 575/2013,⁷
 - investment firms as defined in Article 4(1), point (2) of Regulation (EU) No 575/2013,⁸ and
 - insurance undertakings as defined in Article 13, point (1) of Directive 2009/138/EC,⁹ or reinsurance undertakings as defined in Article 13, point (4) of Directive 2009/138/EC.¹⁰

2.2. Description of the Draft Article 8 XBRL taxonomy

2.2.1. Disclosures Delegated Act

18. The digital Article 8 XBRL taxonomy reflects the Disclosures Delegated Act structure, which in Annexes 1 to 12 mandates the content and presentation of the disclosures for relevant types of undertakings (Annexes 1 through 11) or for specific activities (Annex 12). The following Annexes of the Disclosures Delegated Act have been converted to digital format in the Article 8 XBRL taxonomy:

- Annex 1 – KPIs of non-financial undertakings;
- Annex 2 – Templates for the KPIs of non-financial undertakings;
- Annex 4 – Template for the KPI of asset managers;
- Annex 6 – Template for the KPIs of credit institutions;
- Annex 8 – Template for KPIs of investment firms;
- Annex 10 – Template for KPIs of insurance and reinsurance undertakings;
- Annex 11 – Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings; and
- Annex 12 – Standard templates for the disclosure referred to in Article 8(6) and (7).

⁷ Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and amending Regulation (EU) No 648/2012.

⁸ Ibidem.

⁹ Directive 2009/138/EC of the European Parliament and of the Council of 25 November 2009 on the taking-up and pursuit of the business of Insurance and Reinsurance (Solvency II).

¹⁰ Ibidem.

2.2.2. Structure of the Disclosures Delegated Act

19. The main body of the Disclosures Delegated Act provides disclosure rules common to financial and non-financial undertakings, and it identifies and defines the types of undertakings for which disclosures are mandated by this delegated act. The information to be disclosed is specified in the Annexes to the Disclosures Delegated Act.
20. In general, for a given type of undertaking, the Disclosures Delegated Act first specifies in a dedicated Annex the information to be disclosed and in another Annex provides a tabular form for presentation of those disclosures. Therefore, Annexes 2, 4, 6, 8, 10 and 12 setting out the templates (structured disclosures) have been digitised as well as some of the Annexes mandating unstructured disclosures such as Annex 1, where a number of disclosures have been identified and converted to digital format – i.e., disclosures related to accounting policy, assessment of compliance with EU Taxonomy Regulation and contextual information – and Annex 11, where qualitative disclosures common to financial undertakings have been indicated.

2.3. Glossary and defined terms

21. The glossary shall be read in conjunction with the [XBRL Glossary from XBRL International](#).

Name	Description
Abstract element	Reportable element with the abstract attribute set to false. Abstract elements are, for instance, dimensions or elements introduced simply for grouping purposes in the presentation linkbase.
Default dimension	A dimension member that provides to a dimension a default value for facts where the dimension is not explicitly reported and omitted. The default dimension often represents the total number of members in that dimension. It is also referred to as a default member.
Dimension	A qualifying characteristic that is used to uniquely define or further disaggregate a datapoint. For example, a fact reporting <i>revenue</i> may be qualified by a ‘country’ dimension to indicate the region to which the revenue relates. A dimension may be either a taxonomy-defined dimension with explicit dimension members or an entity-specific dimension that can be defined in the XBRL report (typed dimension). Synonym: Domain.
ESEF	European Single Electronic Format set out in Delegated Regulation (EU) 2019/815.
ESRS	European Sustainability Reporting Standards adopted by the EC on 31 July 2023 and published in the Official Journal of the European Union on 22 December 2023.

(Explicit) dimension member	Taxonomy-defined value for an explicit dimension, e.g., <i>Italy, Spain, France, Germany and Other Countries</i> .
Fact	A value tagged and therefore reported for an XBRL element.
Hypercube	Groups' valid dimensions and reportable XBRL elements (line items) in a table.
Inline XBRL (or iXBRL)	The Inline XBRL document (set) is set out in XHTML, which means it can be rendered in a web browser. The tagged numerical and non-numerical facts can be converted into an XBRL instance document.
Label	A human-readable description of a taxonomy XBRL element. XBRL labels can be defined in multiple languages and can be of multiple types, such as a 'standard label', which provides a concise name for the component, or a 'documentation label', which provides a more complete definition of the component.
Preparer	An undertaking (company) preparing (digital) ESRS statements.
Textblock (element)	A narrative disclosure or its related XBRL element that is not restricted in any way. It can contain an unstructured sentence of formatted text, multiple paragraphs or pages, images, tables, diagrams, etc.
Typed dimension	Entity-specific value for a taxonomy-defined dimension, e.g., <i>Cancer medication, App-based medical advice or Pharmaceutical devices</i> for the typed dimension of 'Products' or 'Operating Segments'.
Unit	XBRL unit that defines the currency and/or physical unit of a XBR fact. Complex units can not only have measures like EUR but also numerators and denominators. Units are defined in XBRL reports and linked to numerical XBRL facts.
User	An analyst, data provider, investor or any other individual or organisation using (digital) sustainability disclosures.
(XBRL) Element	An XBRL taxonomy element that represents a datapoint in a reporting standard and has a number of attributes (period type, balance, abstract, ID) and a unique technical name. It can be used for tagging of a fact value. Synonym: Concept or tag.
XBRL report	An XBRL instance document (XML, CSV or JSON) or Inline XBRL document (set). An XBRL report uses one or more XBRL taxonomies.

3. Methodology and architecture of the Draft Article 8 XBRL Taxonomy

22. EFRAG has developed a Draft **ESRS** Set 1 XBRL Taxonomy based on a methodology and architecture approved by the SBR on the 26 of April 2023. This methodology anticipates a detailed implementation of **XBRL elements** for each dedicated numerical and narrative disclosure. The same methodology has been applied wherever possible while developing the Draft Article 8 Taxonomy.
23. EFRAG does not bear any responsibility for the structure and content of the disclosure requirements in Article 8 of Taxonomy Regulation as, in contrast to the CSRD, it has not been requested to provide any technical advice regarding this regulation. In this context, EFRAG merely offers digital and technical support to the EC, transposing the Article 8 disclosure requirements into a machine-readable format.
24. The main differences between the ESRS and Article 8 XBRL Taxonomy from a methodological and architectural point of view are presented below.
- There is a different architecture for each disclosure requirement as the Article 8 disclosure requirements are mainly template-based reporting.
 - Most of the Article 8 disclosures are quantitative. Qualitative disclosures are mainly contextual information to be reported along with the quantitative requirements, whereas more than 60% of the ESRS data points are narrative disclosures.
 - The Draft Article 8 XBRL Taxonomy is a closed taxonomy; no entity-specific disclosures are expected to be disclosed and tagged.
 - The Article 8 XBRL Taxonomy has been developed considering real reports based on public available disclosures even if limited to the Climate Change Adaptation and Mitigation objectives¹¹. In contrast, the sustainability statements based on the first set of ESRS will be published in 2025 for the 2024 financial year.
 - The ‘EU Taxonomy’ activities play an important role in the disclosure of information under the Article 8 disclosures. Those are maintained and updated regularly by the EC.
25. Annex I of the Article 8 Delegated Act contains almost exclusively qualitative (narrative) disclosures and its digitisation has relied on the identification of the disclosure requirements regarding the accounting policy, the assessment of compliance with the Regulation (EU) 2020/852 and the contextual information linked to the Key Performance Indicators. [The derived XBRL Taxonomy closely follows the structure of Annex I.]
26. In some rare cases, a deeper granularity was introduced as compared to the corresponding paragraph in the Delegated Act (e.g., separate tags introduced in relation to the compliance with the different criteria referenced in 1.2.2.1 (b)) while in others, a single tag covers two

¹¹ It is worth noting that the “taxo4” amendments regarding the other 4 objectives are not reported yet.

items (eg., 1.2.1 a) and b)), to acknowledge that they could be covered by a single corresponding qualitative disclosure.

Appendix: Digitising disclosures using the Article 8 XBRL Taxonomy

27. In this section, explanations and recommendations for using the Article 8 taxonomy are presented to facilitate the tagging process of the disclosures of information mandated by the Disclosures Delegated Act. Please note, however, that these are not to be considered as tagging rules due to the process related to the development and approval of the ESEF RTS. ESMA is the competent authority responsible to prepare the draft RTS and develop the authoritative tagging rules which will be included in the draft RTS. The draft RTS will be submitted to the EC for adoption of [draft] RTS performed by ESMA and thus incorporated into the ESEF Regulation.
28. The following technical tagging illustrations of Inline XBRL documents shall be read in conjunction with the official XBRL specifications¹², which prevail.

A1. Illustration of tagging application instructions

29. Each reportable Annex in the Disclosures Delegated Act is defined in the Article 8 taxonomy in a dedicated, extended link role hosting presentation and in the definition linkbase structures that represent relationships between taxonomy elements contained within such annex. Some of the Article 8 taxonomy structures representing unstructured disclosures are provided with a top-level root element defined as a **text block**. The role of such element is to allow preparers to apply it for block tagging the entire section of the report (pertaining to a corresponding disclosure) should such a requirement be imposed by the implementing authority. It is worth mentioning that in cases where multi-layer tagging is imposed by the implementing authority, undertakings may set the transformation rule for such extensive block tags to *ixt:fixed-empty* to avoid duplication of the information already tagged with more detailed elements. Such approach would allow for the simple flagging of a certain part of the report that contains relevant information for a given disclosure without the need of carrying (and transforming) its contents to an actual **fact** value (it will be marked as an empty value and could be used for navigating the report).
30. In the example below, the element *Disclosure of information accompanying relevant KPIs of non-financial undertakings [text block]* could be used by preparers to block tag the entire Annex 1. Specification of disclosures should accompany KPIs of non-financial undertakings if such a requirement is imposed by the implementing authority.

¹² <https://specifications.xbrl.org/specifications.html>

Figure 1: Taxonomy representation of Annex 1. Specification of disclosures accompanying KPIs of non-financial undertakings – general

ROW :	COLUMN :
Disclosure of information accompanying relevant KPIs of non-financial undertakings [text block]	Column
Specification of disclosures accompanying KPIs of non-financial undertakings [abstract]	
Contribution to multiple objectives [abstract]	
Disaggregation of KPIs [abstract]	
Contextual information about CapEx KPI - breakdown of numerator [abstract]	
Contextual information about CapEx and OpEx KPI - period for Taxonomy alignment [abstract]	
Contextual information about CapEx and OpEx KPI - capital expense [abstract]	

31. In a second example below, the element ‘*Disclosure of qualitative information to support financial undertakings’ explanations and markets’ understanding of KPIs’ [text block]* could be used by preparers to block tag the entire Annex 11. *Qualitative information for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings* should be disclosed if such a requirement is imposed by the implementing authority.

Figure 2: Taxonomy representation of Annex 11. Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings

ROW :	COLUMN :
Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings - general [abstract]	Column
Disclosure of qualitative information to support financial undertakings’ explanations and markets’ understanding of KPIs [text block]	
Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings [abstract]	
Additional or complementary information in support of financial undertaking’s strategies and weight of financing of Taxonomy-aligned economic a...	

32. In both examples, the top-level **text block** root element is followed by non-reportable **abstract elements** indicating related subordinate taxonomy tables, which contain more granular taxonomy elements representing more detailed disclosures in a specific Annex of the Disclosures Delegated Act. Such elements allow for more precise (or even individual) tagging of relevant parts of the report and aim at improving comparability of the tagged information. Those child elements are presented at different levels of indentation, where each level usually represents a given section/subsection of a disclosure.
33. In the example below, the element ‘*Disclosure of total value of OpEx denominator and explanation of absence of materiality of operational expenditure in business model’ [text block]* is one of the child elements of ‘*Disclosure of information accompanying relevant KPIs of non-financial undertakings’ [text block]* and is contained in a taxonomy table in Annex 1

‘Specification of disclosures accompanying KPIs of non-financial undertakings’ that is related to the taxonomy table in Annex 1 ‘Specification of disclosures accompanying KPIs of non-financial undertakings – general’, with the relationship represented by a non-reportable abstract element ‘Specification of disclosures accompanying KPIs of non-financial undertakings’ [abstract].

Figure 3: Taxonomy representation of Annex 1. Specification of disclosures accompanying KPIs of non-financial undertakings

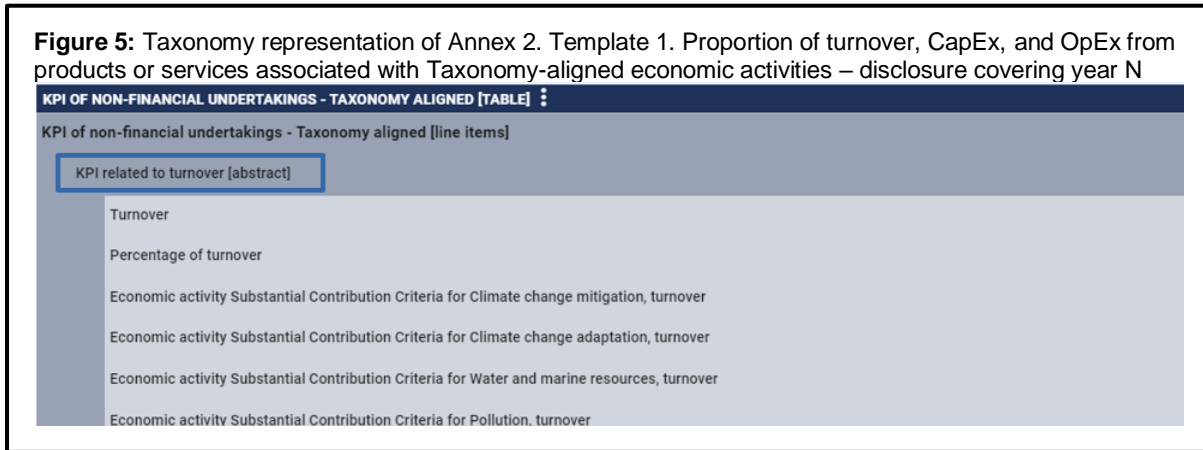
SPECIFICATION OF DISCLOSURES ACCOMPANYING KPIs OF NON-FINANCIAL UNDERTAKINGS [TABLE] ⌵		REPORTING SCOPE [AXIS] ⌵
Specification of disclosures accompanying KPIs of non-financial undertakings [line items]		Current and retrospective [member]
		Restated, corrected or revised [member]
Specification of key performance indicators (KPI) [abstract]		
Specification of key performance indicators (KPI) - KPI related to OpEx (OpEx KPI) [abstract]		
Disclosure of total value of OpEx denominator and explanation of absence of materiality of operational expenditure in business model [text bl...]		
Accounting policy [abstract]		
Accounting policy - KPI related to turnover [abstract]		
Explanation of how turnover was determined and allocated to numerator and basis on which turnover was calculated [text block]		
Disclosure of references to related line items in financial statements, turnover [text block]		
Explanation of why changes in application of calculations result in more reliable and relevant information, turnover [text block]		

34. In a second example below, the element ‘Disclosure of contextual information in support of quantitative indicators’ [text block] is one of the child elements of ‘Disclosure of qualitative information to support financial undertakings’ explanations and markets’ understanding of KPIs’ [text block] and is contained in a taxonomy table in Annex 11 ‘Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings’ that is related to the taxonomy table in Annex 11. ‘Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings – general’, with the relationship represented by a non-reportable abstract element ‘Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings’ [abstract].

Figure 4: Taxonomy representation of Annex 11. Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings

QUALITATIVE DISCLOSURES FOR ASSET MANAGERS, CREDIT INSTITUTIONS, INVESTMENT FIRMS AND INSURANCE AND REINSURANCE UNDERTAKINGS [TABLE] ⌵		NAME OF KEY PERFORMANCE INDICATOR (KPI) [TYPED AXIS] ⌵	REPORTING SCOPE [AXIS] ⌵
Qualitative disclosures for asset managers, credit institutions, investment firms and insurance and reinsurance undertakings [line items]			Current and retrospective [member]
			Restated, corrected or revised [member]
Disclosure of contextual information in support of quantitative indicators [text block]			
Explanation of nature and objectives of Taxonomy-aligned economic activities and evolution of Taxonomy-aligned economic activities over time [text blo...]			
Description of compliance with Regulation (EU) 2020/852 in financial undertaking’s business strategy, product design processes and engagement with c...			
Disclosure of credit institutions qualitative information on alignment of trading portfolios with Regulation (EU) 2020/852 [text block]			
Disclosure of additional or complementary information in support of financial undertaking’s strategies and weight of financing of Taxonomy-aligned ...			

35. When the Disclosures Delegated Act contains specific information requirements that involve disclosure of fact values separately for a given type of fact value, e.g., monetary values provided separately for turnover, capital expenditure (CapEx) or operating expenditure (OpEx), then relevant taxonomy structures detailing and complementing the disclosure requirements have been created. In such cases, each complementing structure is defined with a non-reportable abstract root element, such as *KPI related to turnover [abstract]* in the example below, followed by a set of elements to be applied in the tagging of the relevant type of fact value.



36. Furthermore, for some information requirements it is essential to use XBRL **dimensions** allowing for detailed breakdowns of the information to be disclosed by undertakings. These breakdowns are of different nature and hence are implemented differently depending on the provisions of specific disclosures. In case of breakdowns with a predefined set of **members**, explicit dimensions were applied. For those where explicit definition of members was not possible to be applied at the taxonomy level, **typed dimensions** were used instead, and undertakings will be required to provide value of a typed dimension directly in their filings. On some occasions, mixed approach was followed to precisely reflect the relevant disclosure.
37. These dimensional parts of the taxonomy can be distinguished through the application of **hypercubes** (items marked as *[table]*) connecting the reportable elements (items grouped under elements marked as *[line items]*) and specific XBRL dimensions (items marked as *[axis]*) combined with domain members (items marked as *[member]*). In terms of tagging of disclosure requirements broken down by set of XBRL dimensions, preparers will need to apply dimensional contexts to fact values present in iXBRL report.
38. Figure below presents an example of *Annex 12. Template 2. Taxonomy-aligned economic activities (denominator) - total* mixing the use of a typed dimension (*Name of key performance indicator (KPI) [typed axis]*) and explicit dimensions (*Reporting scope [axis]*, *EU Taxonomy objectives [axis]*, and *Economic activities pursuant to EU Taxonomy [axis]*).

Figure 6: Taxonomy representation of Annex 12. Template 2. Taxonomy-aligned economic activities (denominator) – total

TAXONOMY-ALIGNED ECONOMIC ACTIVITIES (DENOMINATOR) - TOTAL [TABLE]	
Taxonomy-aligned economic activities (denominator) - total [line items]	
Total KPI, amount	
Total KPI, percentage	

NAME OF KEY PERFORMANCE INDICATOR (KPI) [TYPED AXIS]	
REPORTING SCOPE [AXIS]	
Current and retrospective [member]	
Restated, corrected or revised [member]	
EU TAXONOMY OBJECTIVES [AXIS]	
EU Taxonomy objectives [member]	
Total Climate change mitigation and Climate change adaptation / NA [member]	
Climate change mitigation [member]	Climate change adaptation [member]
ECONOMIC ACTIVITIES PURSUANT TO EU TAXONOMY [AXIS]	
Economic activities pursuant to EU Taxonomy [member]	
Taxonomy-aligned [member]	

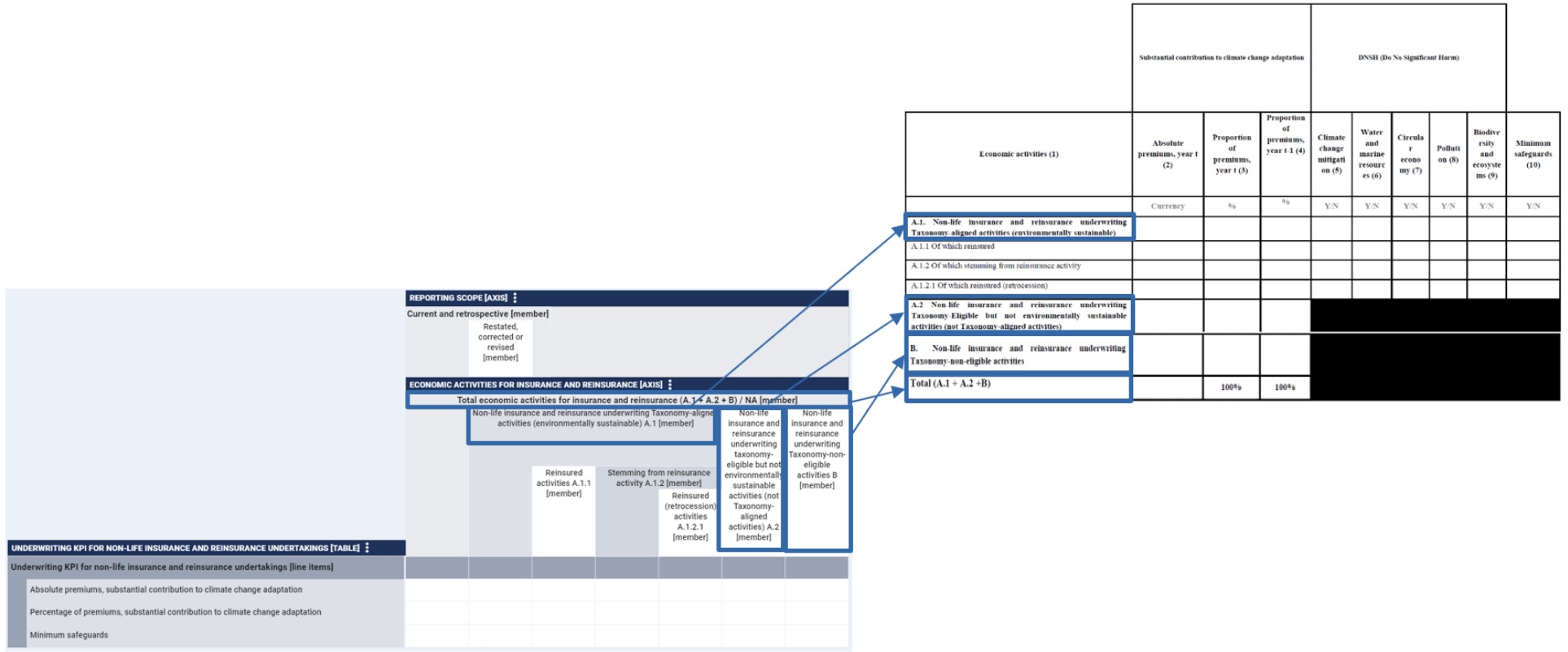
39. Further sub-sections of the document present specific use case examples of tagging of particular parts of the Disclosures Delegated Act disclosure requirements.

Use case 1: Dimensional structures

40. Some of the disclosures under the Disclosures Delegated Act require breaking down of general information into more context-specific parts. The Article 8 taxonomy reflects such disclosures through the application of XBRL dimensions to limit the number of elements defined in the schemas and to ensure their reusability. Example of such dimensional breakdowns is presented in *Annex 10. Template 1. Underwriting KPI for non-life insurance and reinsurance undertaking*.

41. Figure below presents an example of the relation between a template in Annex 10 of the Disclosures Delegated Act and the corresponding set of elements from the Article 8 taxonomy.

Figure 7: Relation between Annex 10. Template: The underwriting KPI for non-life insurance and reinsurance undertakings disclosures and corresponding taxonomy structure



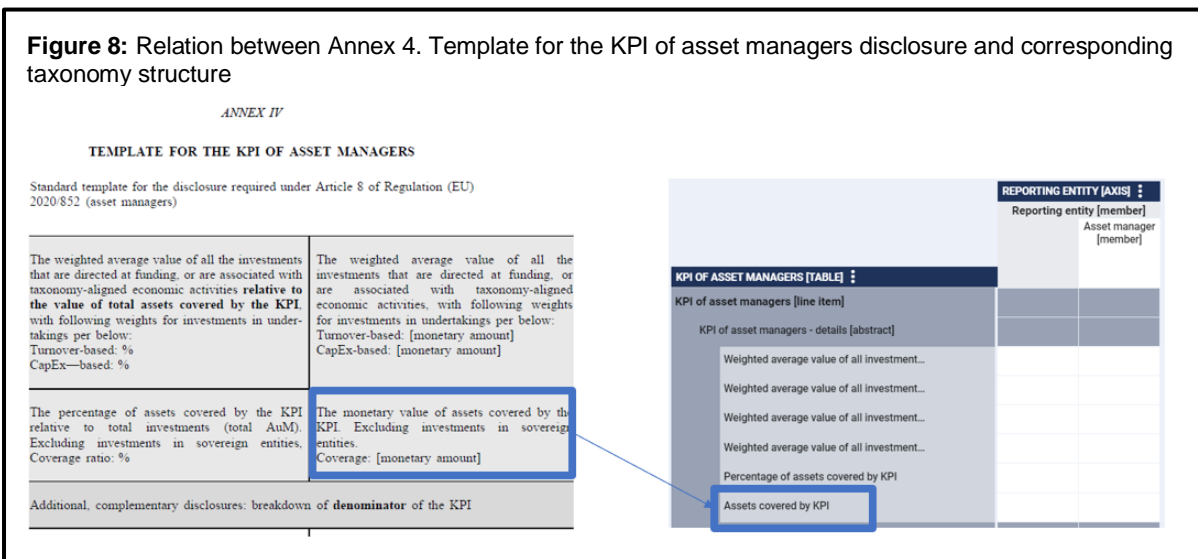
42. As visible in the figure above, this particular Article 8 taxonomy structure envisages application of two axes (XBRL dimensions) that will assist the undertaking with disclosure of information on the underwriting KPI for non-life insurance and reinsurance. These are *Economic activities for insurance and reinsurance [axis]*, which is an explicit dimension having pre-defined **elements** for non-life insurance and reinsurance underwriting, and *Reporting scope [axis]*, which is also an explicit dimension with a pre-defined element for the marking up of figures that are restated, corrected or revised. The undertaking, when using relevant elements from the taxonomy, shall apply in such cases information on the applicable dimensional breakdowns in the XBRL context in which the given information is reported in the iXBRL report.

Use case 2: Tagging of Specific types of elements

43. The Article 8 taxonomy predominantly provides definitions of taxonomy elements where expected values are non-textual, i.e., numeric values expressing monetary amounts (*monetaryItemType*), percentages (*percentItemType*), true/false indicators (referred to as Boolean, *booleanItemType*), integers (*integerItemType*) and enumerations (*enumerationItemType* and *enumerationSetItemType*). The following sub-sections present how to approach tagging of these specific elements.

monetaryItemType

44. The taxonomy element defined as *monetaryItemType*, is used for values representing monetary amounts that are expressed in a certain currency as per the ISO 4217. Example of such **element** – *Assets covered by KPI* – can be found in the taxonomy structure *804011 Annex 4. KPI of asset managers* reflecting one of Annex 4 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned element as defined in the Article 8 taxonomy with Annex 4 of the Disclosures Delegated Act requirement.

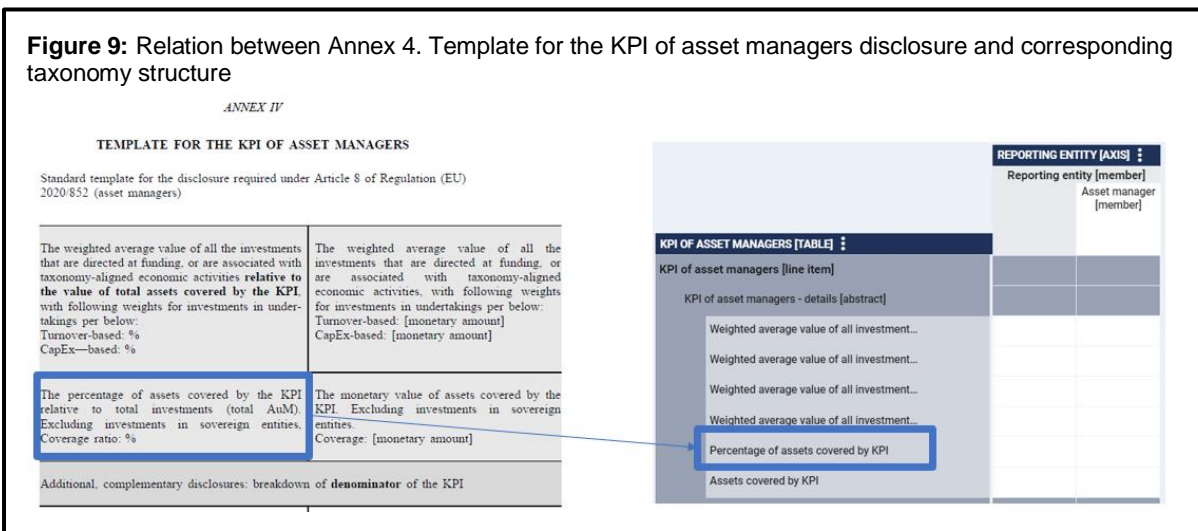


45. In terms of tagging, monetary elements shall be tagged with use of `<ix:nonFraction>` element with all relevant attributes as defined by the inline XBRL 1.1 specification¹³. The `<ix:nonFraction>` must include at least three main attributes: name that points to the corresponding taxonomy element through a qualified name (QName); `contextRef` that points to the XBRL context, in which the undertaking is disclosing a given fact, as well as the `unitRef` that points to the declaration of *unit* in which the numeric value shall be expressed. The `<ix:nonFraction>` may contain additional attributes as part of its content, of which the following shall be considered by the implementing authorities to impose on undertakings through filing rules and guidelines:

- *format* – indicating transformation rule with set of instructions which when applied to a string, outputs a value in an XBRL-valid format and in a predefined data type;
- *decimals* or *precision* – indicating the range in which the actual value of the fact that gave rise to its expressed value in the XBRL instance lies;
- *scale* – indicating a scaling value for a reported fact¹⁴.

percentItem

46. The taxonomy element defined as *percentItem* is used for values representing percentage values. Example of such element – *Percentage of assets covered by KPI* – can be found in the taxonomy structure *804011 Annex 4. KPI of asset managers* reflecting one of Annex 4 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned element as defined in the Article 8 taxonomy with Annex 4 of the Disclosures Delegated Act requirement.



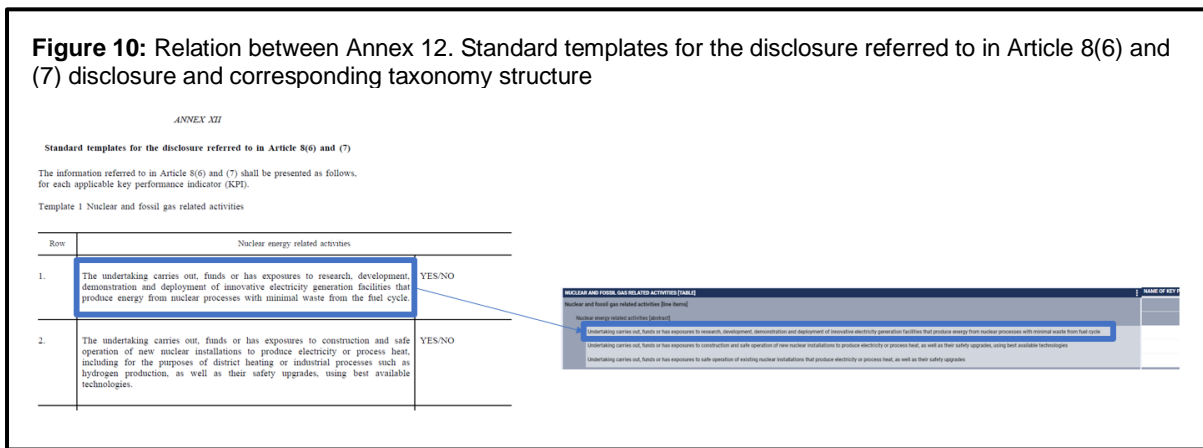
¹³ See: <https://www.xbrl.org/specification/inlinexbrl-part1/rec-2013-11-18/inlinexbrl-part1-rec-2013-11-18.html#sec-nonFractions>

¹⁴ See: <https://www.xbrl.org/guidance/ixbrl-tagging-features/#3-scaling-numeric-values>

47. In terms of tagging, percent elements shall be tagged with use of `<ix:nonFraction>` element with all relevant attributes as defined by the inline XBRL 1.1 specification.

booleanItemType

48. The taxonomy element defined as *booleanItemType* is used by elements like True/False or Yes/No indicators. Example of such element – *Undertaking carries out, funds or has exposures to research, development, demonstration and deployment of innovative electricity generation facilities that produce energy from nuclear processes with minimal waste from fuel cycle* – can be found in the taxonomy structure 812011 Annex 12. Template 1. Nuclear and fossil gas related activities reflecting one of Annex 12 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned **element** as defined in the Article 8 taxonomy with Annex 12 of the Disclosures Delegated Act requirement.

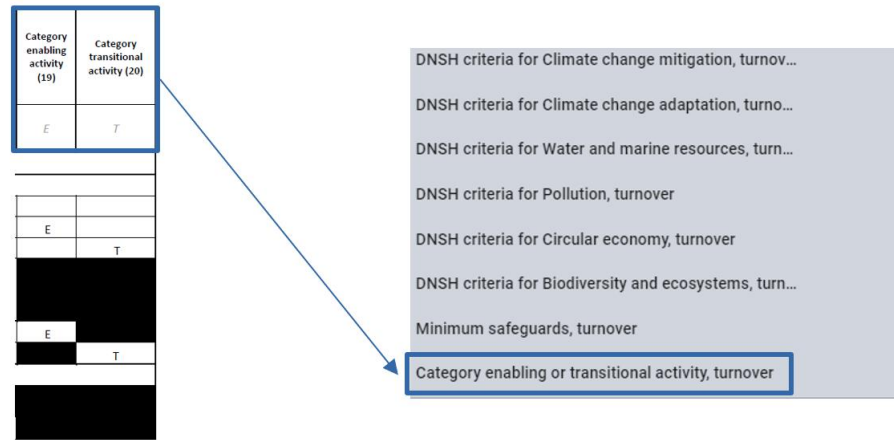


49. In terms of tagging, *boolean* elements shall be tagged with use of `<ix:nonNumeric>` element with all relevant attributes as defined by the inline XBRL 1.1 specification (and already described in the previous section of this document). Moreover, it is recommended that such elements are applied on narrative parts of the document, i.e. sentences instead of using XBRL-expected values true/false or 0/1. This can be achieved with the application of transformation function through the use of format attribute set to either *fixed-true* (representing true or 1 values of boolean) or *fixed-false* (representing false or 0 values of boolean).

enumerationItemType

50. The taxonomy element defined as *enumerationItemType* is used by elements where the value must be selected from a closed list of available options. Example of such element – *Category enabling or transitional activity, turnover* – can be found in the taxonomy structure 802011 Annex 2. Template 1. Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N reflecting one of Annex 2 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned element as defined in the Article 8 taxonomy with Annex 2 of the Disclosures Delegated Act requirement.

Figure 11: Relation between Annex 2. Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N disclosure and corresponding taxonomy structure



51. The item *Category enabling or transitional activity, turnover* can have only one value as per the figure below.

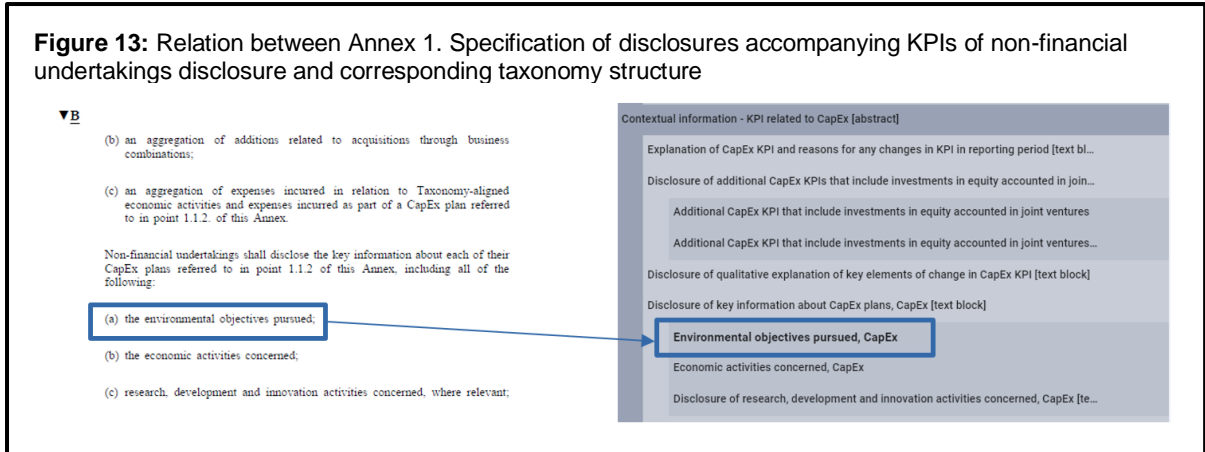
Figure 12: Possible value for the enumeration Category enabling or transitional activity

- CategoryEnablingOrTransitionalActivityMember** Category enabling or transitional activity [me...
- EnablingActivityMember** Enabling activity [member]
- TransitionalActivityMember** Transitional activity [member]

enumerationSetItem

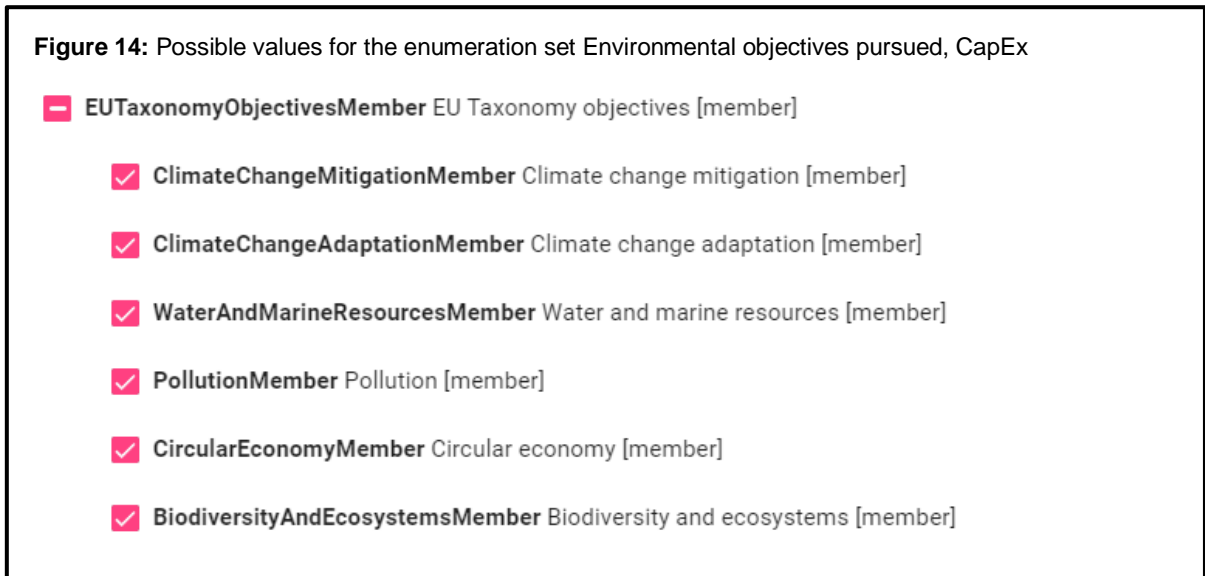
52. The taxonomy element defined as *enumerationSetItem* is used by elements where the value(s) must be selected from a closed list of available options (allowing for multi-choice selection). Example of such element – *Environmental objectives pursued, CapEx* – can be found in the taxonomy structure *801001 Annex 1. Specification of disclosures accompanying KPIs of non-financial undertakings* reflecting one of Annex 1 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned element as defined in the Article 8 taxonomy with Annex 1 of the Disclosures Delegated Act requirement.

Figure 13: Relation between Annex 1. Specification of disclosures accompanying KPIs of non-financial undertakings disclosure and corresponding taxonomy structure



53. The item *Environmental objectives pursued, CapEx* can have different enumeration values, see the figure below.

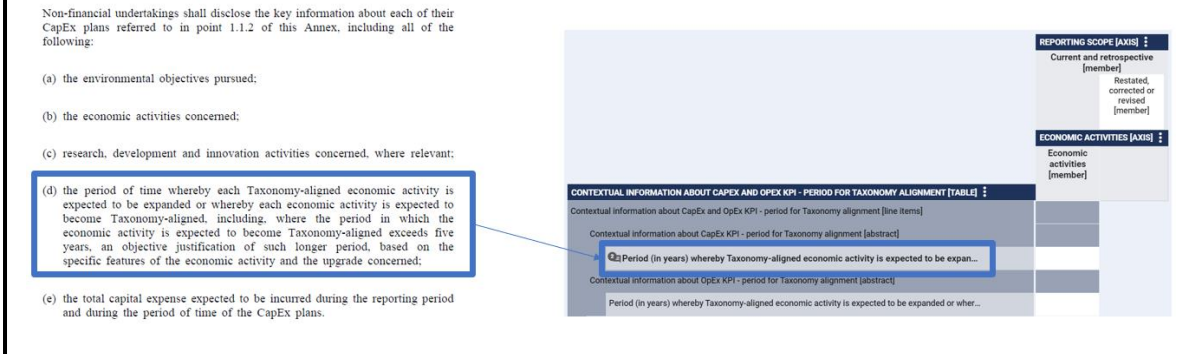
Figure 14: Possible values for the enumeration set *Environmental objectives pursued, CapEx*



integerItemType

54. The taxonomy element defined as *integerItemType* is used for values representing integer values. Example of such **element** – *Period (in years) whereby Taxonomy-aligned economic activity is expected to be expanded or whereby economic activity is expected to become Taxonomy-aligned, CapEx* – can be found in the taxonomy structure 801014 Annex 1. *Specification of disclosures accompanying KPIs of non-financial undertakings - contextual information about CapEx and OpEx KPI - period for Taxonomy alignment* reflecting one of Annex 1 of the Disclosures Delegated Act requirements. Figure below presents the relation of the beforementioned element as defined in the Article 8 taxonomy with Annex 1 of the Disclosures Delegated Act requirement.

Figure 15: Relation between Annex 1. Specification of disclosures accompanying KPIs of non-financial undertakings disclosure and corresponding taxonomy structure



Use case 3: restatements and corrections

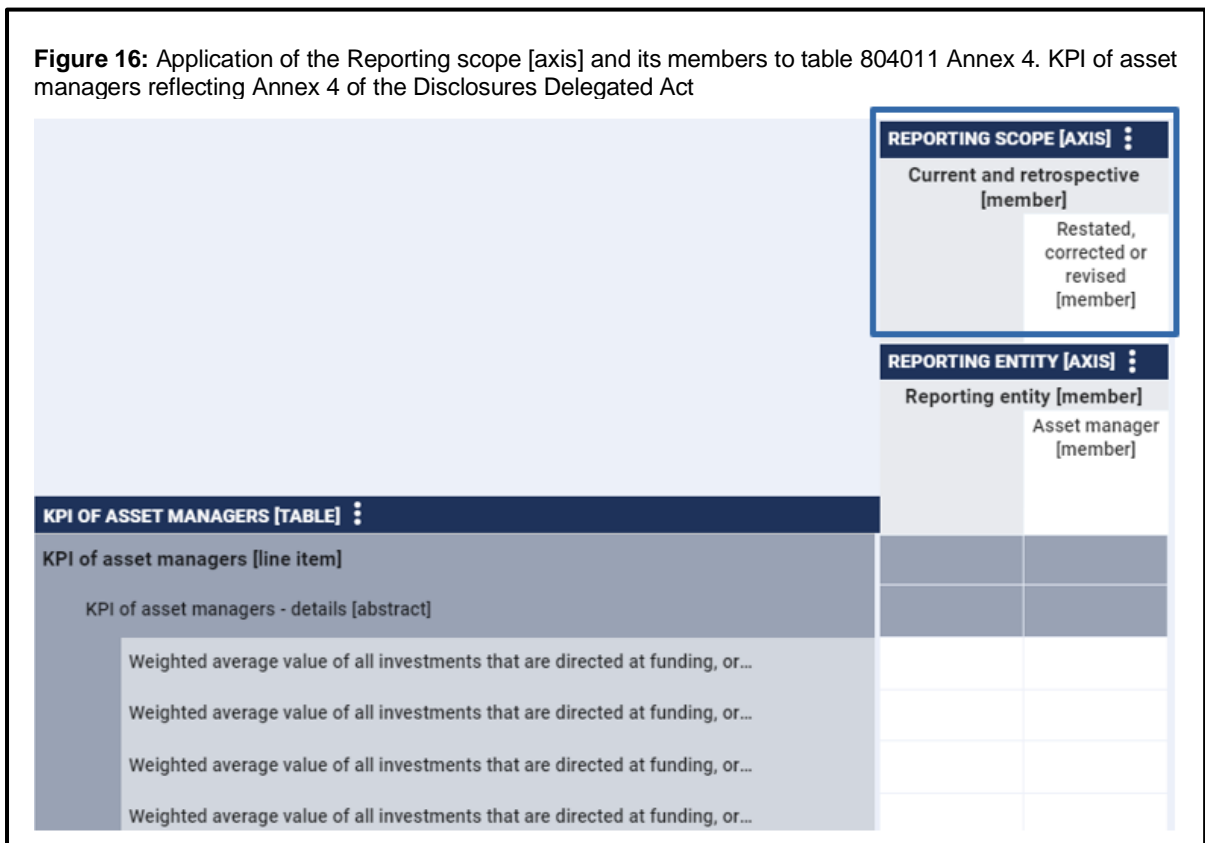
55. Each taxonomy table with numeric values has a *Reporting scope [axis]* with the following members:

Current and retrospective [member]

Restated, corrected or revised [member]

56. The figure below provides example of how the *Reporting scope [axis]* and its members *Current and retrospective [member]* and *Restated, corrected or revised [member]* are applied in the taxonomy table 804011 Annex 4. *KPI of asset managers* reflecting Annex 4 of the Disclosures Delegated Act.

Figure 16: Application of the Reporting scope [axis] and its members to table 804011 Annex 4. KPI of asset managers reflecting Annex 4 of the Disclosures Delegated Act



Additional guidance on tagging

57. The list below provides additional guidance on tagging. Examples are provided as part of the document entitled 'Illustrative examples of XBRL reports' (Annex 2):

- (a) The Article 8 taxonomy is based on disclosures mandated by the Disclosures Delegated Act, such as human readable templates of the Delegated Act. As the taxonomy contains tags corresponding to disclosures mandated by the relevant templates in the Disclosures Delegated Act Annexes', it can also entail elements for information requirements that appear to be redundant.
- (b) The Article 8 taxonomy representation of Annex 2 of the Disclosures Delegated Act *Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N* required creation of an optional technical key (*Row ID [typed axis]*) to allow for the tagging of disclosures in which a single economic activity is disclosed by undertaking more than once with different fact values for that particular activity, but with the same name of the economic activity and the same EU taxonomy objectives pursued. In order to differentiate the rows, the implemented technical key *Row ID [typed axis]* relies on the use of a row ID, assigned by the disclosing undertaking, that serves to differentiate the same economic activity when disclosed more than once to avoid error messages due to inconsistent duplicate facts.

The typed dimension *Row ID [typed axis]* has been implemented in the Article 8 taxonomy template *802012 Annex 2. Template 1. Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N - more than one disclosure per economic activity*. At the same time the Article 8 taxonomy contains a template without this technical key, *802011 Annex 2. Template 1. Proportion of turnover, CapEx, OpEx from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N*, that is to be used for the purpose of tagging by the disclosing undertaking when the issue addressed by the *Row ID [typed axis]* does not occur, ie., when the name of economic activity and objectives are unique per row.

- (c) The Article 8 taxonomy representation of Annex 2 of the Disclosures Delegated Act *Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N* required creation of unique taxonomy elements combining more than one of EU taxonomy objectives to address situation when a given economic activity meets more than one of the EU taxonomy objectives. To enable tagging of such disclosures, the *EU Taxonomy objectives [axis]* applied in the Article 8 taxonomy representation of Annex 2 of the Disclosures Delegated Act in taxonomy templates *802011* and *802012* has explicit unique members representing possible combinations of the EU taxonomy objectives.

- (d) Those members of the EU Taxonomy objectives [axis] serve to mark-up disclosures mandated in column 2 (Code) of the Annex 2 of the Disclosures Delegated Act Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N and should be also applied to tag other fact values disclosed in a row corresponding to a given economic activity. However, if the tagging of the activity uniquely identifies each row in the template, the objective dimension could also be omitted. The Article 8 taxonomy representation of reference (c) to Annex 2 of the Disclosures Delegated Act Template: Proportion of turnover from products or services associated with Taxonomy-aligned economic activities – disclosure covering year N required creation of an element Yes, taxonomy-eligible and taxonomy-aligned activity with most relevant environmental objective [member] in enumeration Economic activity Substantial Contribution Criteria for environmental objective. This element allows to tag disclosure of the most relevant environmental objective for the purpose of computing the KPIs, when an economic activity contributes substantially to multiple environmental objectives.