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*Getting ready for sustainability reporting outside of a legal obligation:  
how to use reporting standards like VSME to stand out?*

*December 8<sup>th</sup>, 2025*

*Déborah FISCHER & Cristina CIUPITU*





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*De in deze presentatie opgenomen informatie en ingenomen standpunten zijn voor rekening van de sprekers en geven niet noodzakelijk het standpunt van het IBR weer.*

*Les informations contenues dans cette présentation et les opinions exprimées au cours de cette présentation sont celles des orateurs et ne reflètent pas nécessairement l'opinion de l'IRE.*



## Who are we ?



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EU Taxonomy WG

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**BRIDGESTONE**  
*Solutions for your journey*



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## Bridgestone Aircraft Tire Europe Presentation







# Bridgestone Aircraft Tire Europe (BAE)



- ▶ Subsidiary of Bridgestone Corporation Group (Japan)
- ▶ All Operations for EMEA territory, selling New & Retreaded tires
- ▶ Local production of retreaded tires, in Frameries (Belgium)
- ▶ ~125M€ revenues & deliver ~110k tires across EMEA (Europe, Middle East, Africa)
- ▶ Thanks to ~200 teammates, mainly in Belgium
- ▶ EMEA Market Leader in commercial aviation (~44% share)
- ▶ Proudly serving top customers like (over 140 airlines and MROs):



AirArabia

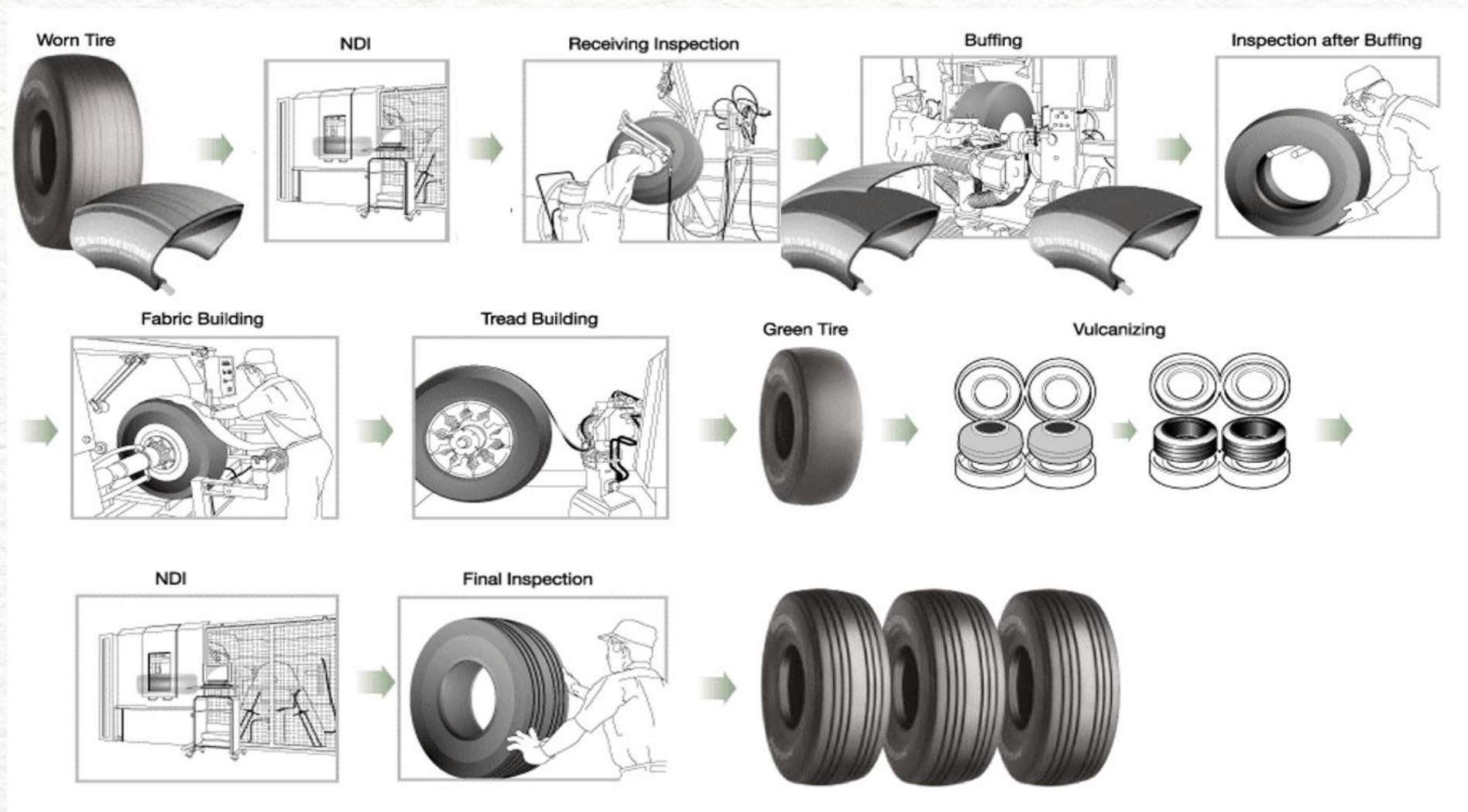






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# BAE Aircraft Tire Retreading Process





# Required Performance & Function of an Aircraft Tire

## Supporting ultra high loads



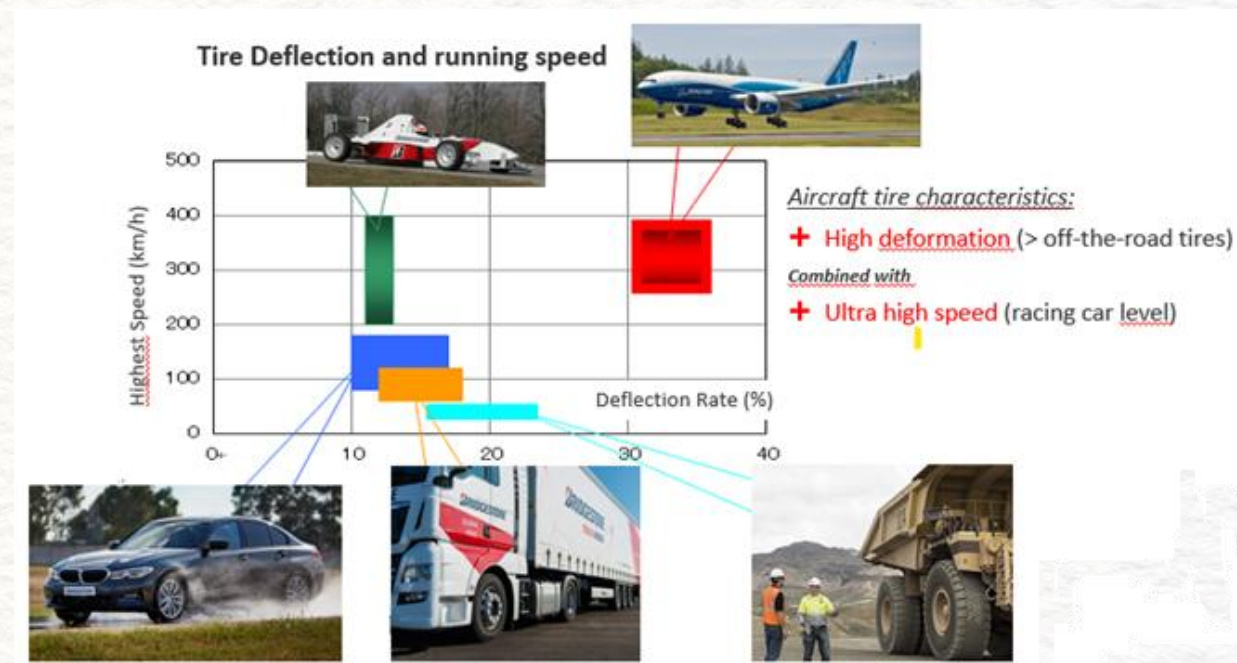
## Transferring braking forces to runway



## Changing direction of travel



## Absorbing Shocks



...and of course  
Ultra high-speed  
take-off &  
landings !!





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## Evolution of the European context





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# Evolution of the European context

Narrowing of the  
CSRD Scope

Reduction of the  
Reporting Content

Simplification of the  
EU Taxonomy

Postponement of  
Reporting Date

Adjustment of  
Assurance Requirements

Simplification &  
Delays CSDDD



# POLL

## What is the status of your company/group today

- a. We are in scope of the CSRD Wave 1
- b. We were in scope of the CSRD but expect to drop out of scope with Omnibus – we won't report further
- c. We were in scope of the CSRD but expect to drop out of scope with Omnibus – we will continue a reporting process
- d. We were not in scope of CSRD and will not adopt voluntary reporting
- e. We were not in scope of CSRD and will adopt voluntary reporting





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# Why address ESG now despite the current political evolution ?

## Voluntary reporting before Omnibus

**< 250 employees**

- **Simplified ESG reporting framework** tailored to the operational constraints of SMEs
- **Standardized reporting tool to:**
  - Replace the multitude of CSR questionnaires received by SMEs
  - Guide SMEs in identifying and managing their sustainability issues

## Voluntary reporting after Omnibus



**< 1.000/1.750 employees**

- **Recommendation of the EU Commission (by means of a delegated act) to use VSME** during the two-year deferral period for the application deadlines of the CSRD **to meet market expectations**
  - **Voluntary reporting**, no legal obligation
  - No requirement for external assurance



# What motivates sustainability voluntary action after Omnibus ?

## Expectations

Voluntary actions help address stakeholders' expectations

## Foresight

Voluntary action prepare for anticipated future demands

## Values

Voluntary action reinforces core values

## Value Creation

Voluntary action strengthens the value drivers of the company

## Communication

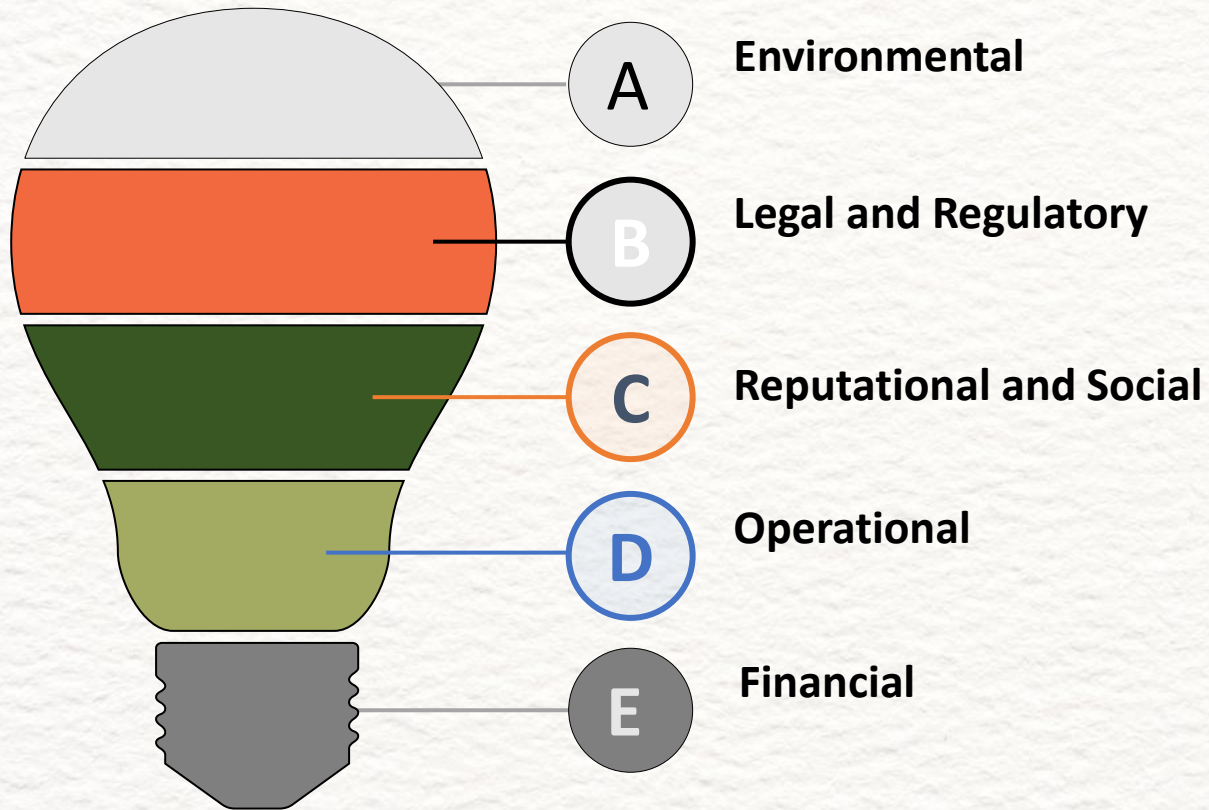
Voluntary action helps to develop a shared narrative





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# How sustainability efforts preserve and enhance value?





# Why address ESG now despite the current political evolution ?

VSME reporting gives you a **common language** to respond to what **banks, clients, suppliers and talents** already ask for

**Finance**

**Supply Chain**

**Reputation**

**Talent**



# Why address ESG now despite the current political evolution ?

## Finance

Financial sector **assess exposure to ESG risks**

Green or sustainability-linked products are more reachable with **standardized**, coherent and comparable data

VSME : process, tools and mechanisms making it easier for companies to access ESG linked loans

*SLB : Strong increase in volumes issued (27 times more) between 2019 and 2022*

## Supply Chain

## Reputation

## Talent



# Why address ESG now despite the current political evolution ?

**Finance**

## Supply Chain

VSME can be used to **answer ESG questionnaires from clients** (EcoVadis...) in **one standardized template** *(91% of companies take sustainability criteria into account in purchasing decisions\*)*

The report can be reused easily as it maps the **core topics needed** (CO<sub>2</sub>, workforce, conduct...)

**Reputation**

**Talent**



# Why address ESG now despite the current political evolution ?

**Finance**

**Supply Chain**

## **Reputation and Client**

Public buyers and RFP use  
**ESG pre qualification** and  
award criteria

Increase transparency to  
avoid green or social  
washing

Prevention of risks and  
controversies

**Talent**



# Why address ESG now despite the current political evolution ?

**Finance**

**Supply Chain**

**Reputation**

## **Talent**

People want to work for impactful companies: companies need to **measure and manage ESG to retain talents** (66% of European respondents consider companies' CSR commitments to be important when applying for a job\*)

Credible informations for current staff and future hires



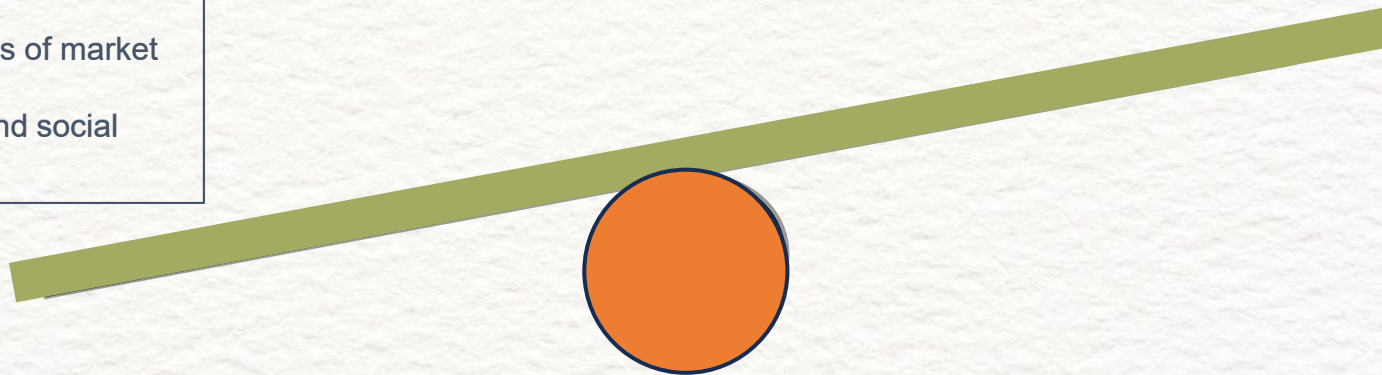
# Benefits of VSME: a comparison

## Costs of not reporting

- Time consuming requests from stakeholders
- Higher perceived risk in banking, less access to financings and slower credit processes
- Missed RFQ leading to loss of market share
- Increased risks of green and social washing

## Benefits of the VSME reporting

- Easier financial sector dialogue
- More complete answer to RFPs and gain of market share
- A foundation to initiate ESG data collection if CSRD becomes applicable
- A clearer ESG reporting that aligns with your strategy
- A standardized and exhaustive risks management system



The cost of not doing it is higher than the low investment in VSME reporting





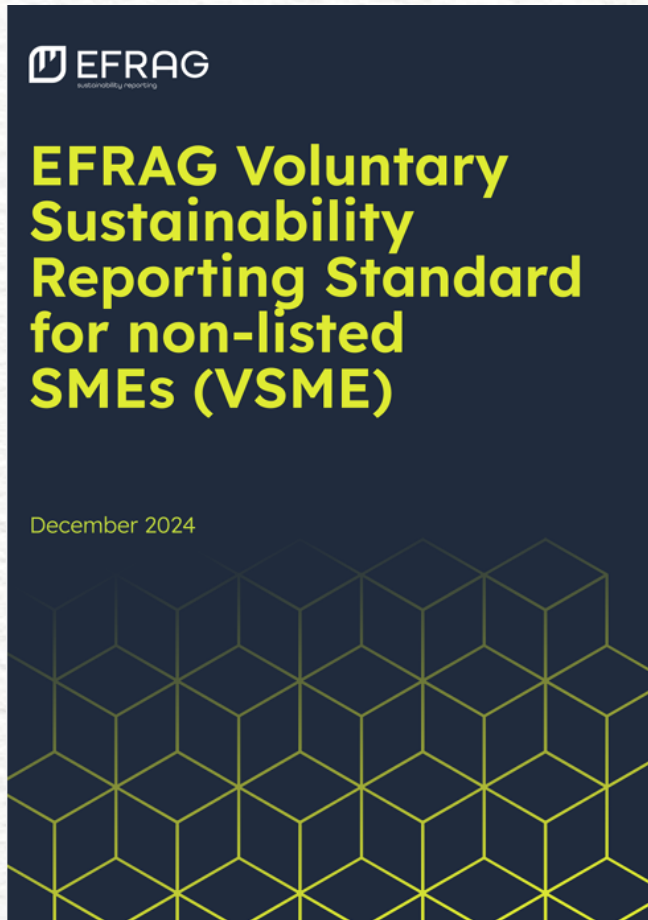
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VSME

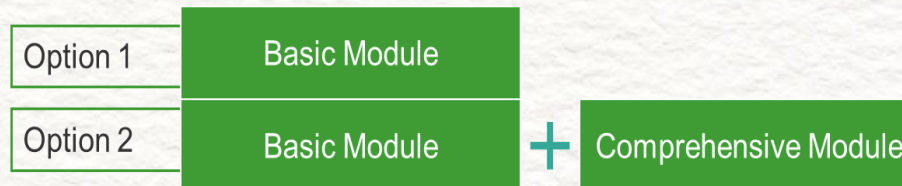


# VSME



- A tool to help businesses
- Simplified version for structuring simple sustainability reporting that addresses stakeholder concerns
- Allows you to highlight the actions taken in terms of sustainability
- Provides a single document that can be shared with customers and suppliers
- Also allows you to highlight other certifications
- Beneficial for everyone

There are 2 options to use the standard:

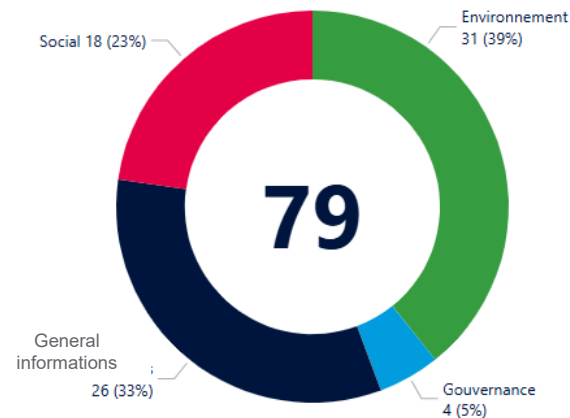


# VSME

- **No Double Materiality Analysis required**
- **Similar structure to ESRS**
- **Simplified structure compared to CSRD (79 datapoints vs 1178 for CSRD)**

## VSME Overview

Number of datapoint per theme



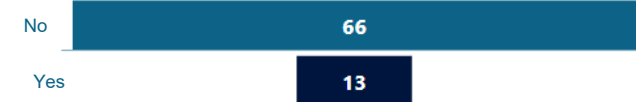
Datapoints per module



Datapoints per type



Voluntary datapoints





# VSME Basic Module



## Benefits

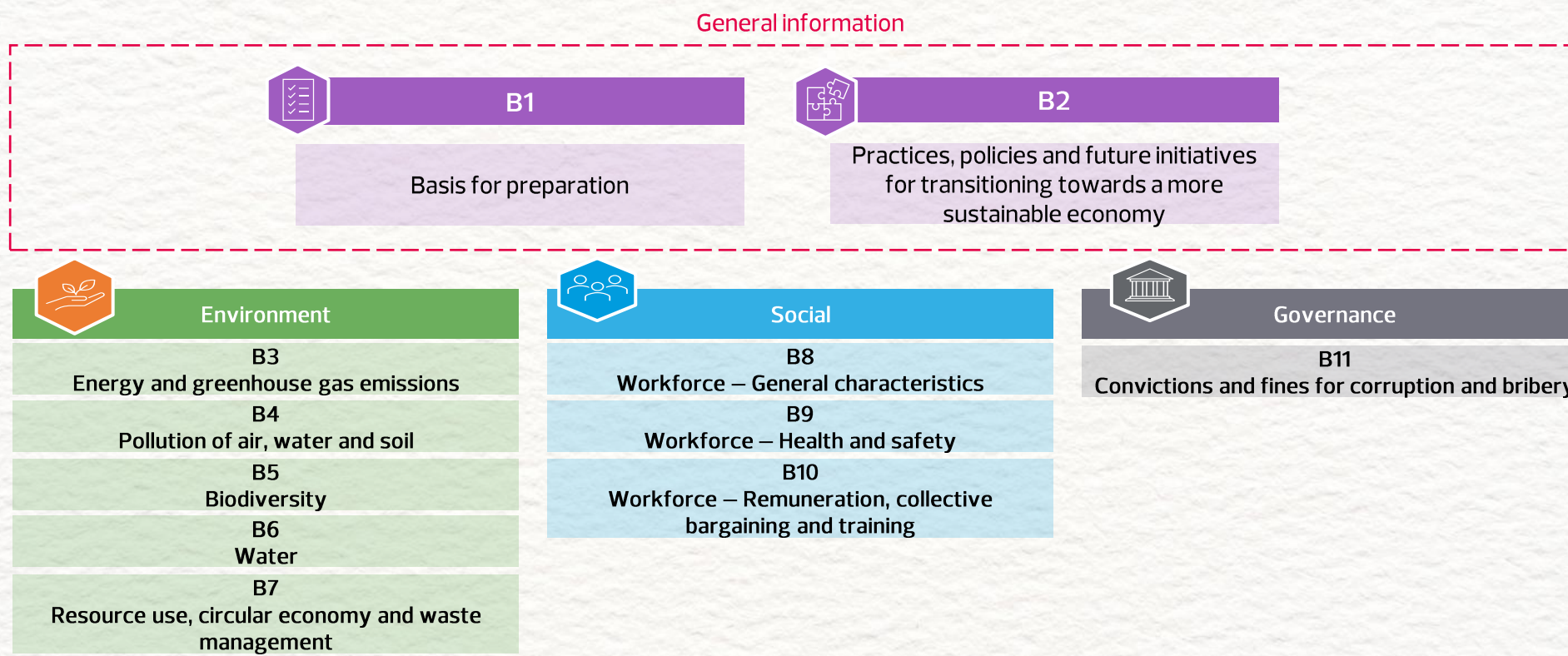
- A minimum viable sustainability profile that **covers the main issues**
- Unique and standardized reporting
- Formalize the data collection and governance processes
- Give **credibility** to lenders



## Who is it for ?

- First time reporters SMEs that might have limited resources dedicated to ESG
- Suppliers whose clients mainly ask for core operational ESG data
- Companies that want to start the process of collecting data

# VSME Basic Module





# VSME Comprehensive module

## Financing

- To apply for a green loan
- To apply for a sustainability-linked facility

**Example:** If the company apply for a green loan it needs to provide information on your emissions, workforce or governance practices to the bank. The VSME report makes due diligence and credit process **faster** and make the company **risk profile clearer** to the bank

## Business

- To get business with public or large-companies

**Example:** A company responding to a public tender needs to provide proof of sustainability practices, as a part of the global evaluation. The VSME report covers in a **credible manner the data points the authority is looking for.**

## Transparency

- Retail buyers and worldwide clients may ask for CSR policy attestations on human rights and environmental issues

**Example:** A company is a mid-sized supplier to a large automotive OEM, it needs to answer a **50-question ESG questionnaire** about various subjects (energy consumption, bribery, training hours...). The company send its annual report instead, **covering all their CSRD needs and save hours** gathering data.

## Sector exposure

- If you run business in a controversial or carbon-intensive sector you may be asked to disclose your revenues (C8)

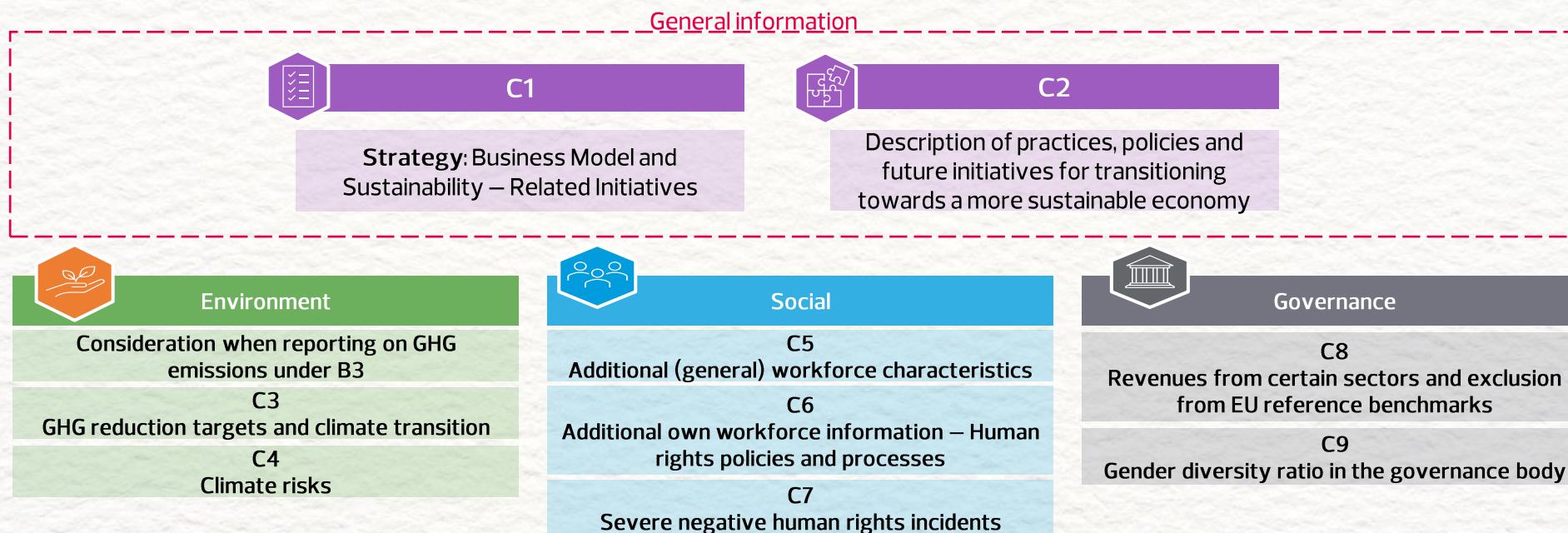
**Example:** Companies from fossil fuels breakdown, tobacco, certain weapons, pesticides.

## Reputation & growth

- Anticipation of growth in the CSRD scope
- Reputation as a credible and reliable company
- CSR commitment beyond regulatory expectations

**Example:** Tech/SaaS mid-cap company may add C1, C2 (strategy, structured policies) and C9 (diversity) to strengthen employer brand

# VSME Comprehensive Module





# Phase your ambition

1

**If you were  
subjected to NFRD  
or CSRD**

## **Year 1 : Basic + Comprehensive**

As the VSME requires less data than NFRD and CSRD, you won't have difficulties to fill in both modules in the first year

2

**If you don't have  
any ESG strategy**

## **Year 1 : Basic Module**

- Structure your backbone
- Set roles and responsibilities
- Publish your 1st report

## **Year 2 : Prepare and publish the Comprehensive Module**

- Develop processes to prepare the data
- Collect the most relevant elements for your stakeholders and identify ESG risks
- Work on your qualitative data and complete the module

Start step by step, then go on disclosures as strategy, branding and data integration maturity

# How to get started

Getting started with VSME is about **organization**, not reinvention.  
Give **roles**, **collect** what you already have, do a **gap analysis**,  
choose your **module** and set a **cycle**

1

## Internal readiness

**Objective:**

Create a cross-functional team, so responsibility is embedded where the data lives.

2

## Data Mapping

**Objective:**

The challenge is to collect existing data and generate missing ones.

3

## Perform a Gap Analysis

**Objective:**

Highlight your gaps regarding VSME

4

## Prepare the report

**Objective:**

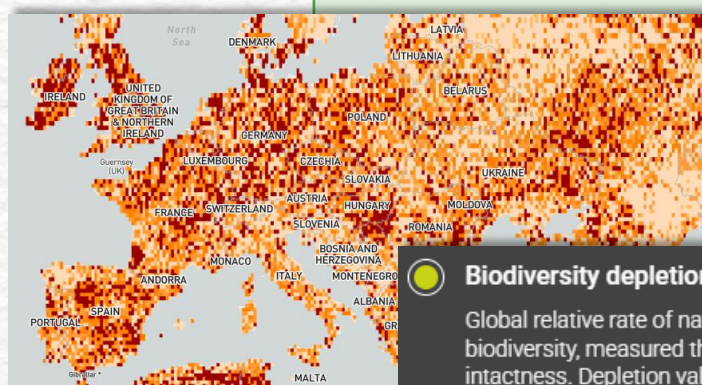
Anticipate reporting to lower the work over the years



# Examples of useful public tools

## Biodiversity (B5)

- Check public maps of sensitive areas ([ENCORE](#)) to complete **DP B5** about lands owned or managed near a biodiversity sensitive area

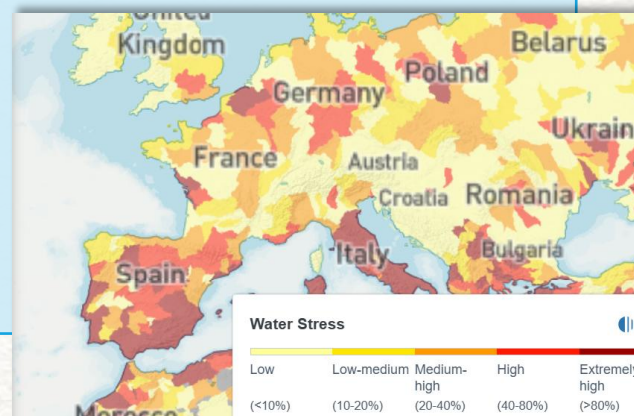


### Biodiversity depletion

Global relative rate of natural capital depletion of biodiversity, measured through biodiversity intactness. Depletion values were sorted from highest to lowest and split into 5 quantiles. The highest 20% relative depletion values correspond to hotspots, where human activities will be associated with higher risks of ecosystem service loss or degradation.

## Water (B6)

- Public resources are available to complete **DP B6** about your water consumption in high water stress area ([Aqueduct](#))



## Climate Risks (C4)

- The TCFD report can help you identify and communicate the climate risks linked to your activities ([FINAL-2017-TCFD-Report-11052018.pdf](#))

### 1. Climate-Related Risks

The Task Force divided climate-related risks into two major categories: (1) risks related to the *transition* to a lower-carbon economy and (2) risks related to the *physical* impacts of climate change.

#### a. Transition Risks

Transitioning to a lower-carbon economy may entail extensive policy, legal, technology, and market changes to address mitigation and adaptation requirements related to climate change. Depending on the nature, speed, and focus of these changes, transition risks may pose varying levels of financial and reputational risk to organizations.

#### Policy and Legal Risks

Policy actions around climate change continue to evolve. Their objectives generally fall into two categories—policy actions that attempt to constrain actions that contribute to the adverse effects of climate change or policy actions that seek to promote adaptation to climate change. Some examples include implementing carbon-pricing mechanisms to reduce GHG emissions, shifting energy use toward lower emission sources, adopting energy-efficiency solutions, encouraging greater water efficiency measures, and promoting more sustainable land-use practices. The risk associated with and financial impact of policy changes depend on the nature and timing of the policy change.<sup>1</sup>



## POLL

Will you consider or have you adopted VSME ?

- a. Yes, we have started using VSME
- b. Yes, we are considering using VSME
- c. No, We are planning to use/ using ESRS
- d. No, this seems too complicated
- e. No, we do not see the benefits





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# Consider Double materiality assessment as a strategic exercise

## The concept of double materiality

### Impact materiality Outward impact

**An organisation's actual or potential impacts on people or the environment (either positive or negative).**

Undertakings are expected to report on all their material impacts, irrespective of whether actions have been undertaken or are planned to address them.

### Financial materiality Inward impact

**Refers to material risks or opportunities that sustainability matters trigger or may trigger on an organisation.**

Both will have to be assessed across short-, medium- and long-term horizons, and across your entire value chain.

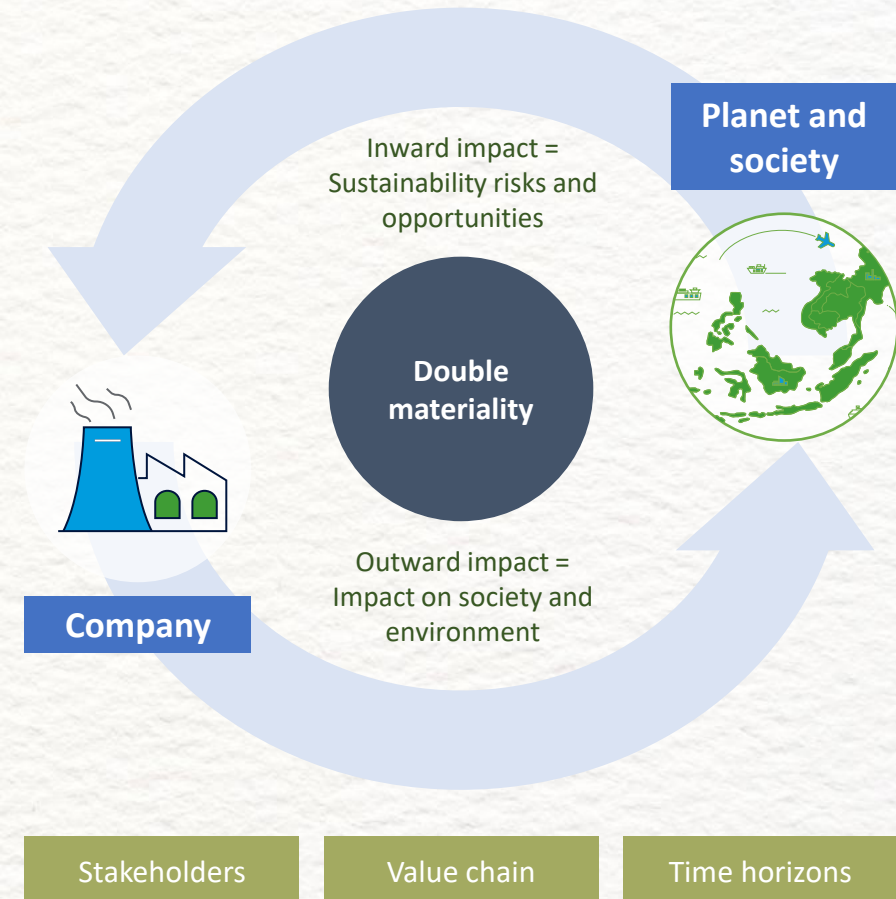






Illustration : BAE





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# Omnibus package



## 2. Sustainability Reporting – Moving from CSRD to VSME

**CSRD:** Corporate Sustainability Reporting Directive (*requires companies to report on the impact of corporate activities on the environment and society, and requests the audit (assurance) of reported information*).

Due to the geo-political context evolution, **EU has postponed / lightened on Feb 26<sup>th</sup> the sustainability-related Directive (CSRD):**

Not mandatory  
anymore



The VSME, or the Voluntary Sustainability Reporting Standard for non-listed Small and Medium-sized Enterprises, provides a simplified yet robust framework for sustainability reporting, aligning closely with the European Sustainability Reporting Standards (ESRS) while accommodating the unique business models of SMEs.

### EU Omnibus package:



	Under pre-Omnibus CSRD	Under Omnibus CSRD proposal
Large entities with more than 1000 employees	Reporting in 2026 under ESRS	Reporting in 2028 under revised ESRS
Large entities with less than 1000 employees	Reporting in 2026 under ESRS	Voluntary Reporting

**Simplified voluntary  
CSR reporting is  
possible**



Before Feb 26<sup>th</sup>, we were  
subjected to CSRD

In April 2025, we decided  
to go for VSME





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# A brief overview of the Basic Module



2024	
General Information	
Company	Bridgestone Aircraft Tire Europe SA
Country of primary operations and location of significant asset(s)	Belgium
Address	Route de Bavay 2, 7080 Frameries
Contact person	Cristina Ciupitu
Phone	0478/500.824
Email	ciupitu-c@bridgestone-bae.com
Legal Form	Other - please specify 22.110 (Manufacture, retreading and rebuilding of rubber tyres and manufacture of tubes)
Nace Code(s)	
Data reporting period	2024



Size of the organisation	
Size of the company	Large
Net turnover (in Euro)	122.580.749,00 €
Total balance sheet (in Euro)	114.558.646,00 €
Number of employees	175,80 FTE

Micro (hoover here)  
Small  
Medium  
Large  
(2 out of 3 thresholds are needed)

**Disclosure B 1 – Basis for preparation**  
Check this box if you completed this section: ☐

OPTION A: Basic Module (only)  
OPTION B: Basic Module and Comprehensive Module  
Is there sensitive information that has been omitted from disclosing?

Indicate the disclosure(s)












Individual basis

Please list the subsidiaries and sites included in your (consolidated) sustainability report:					
Sites (office/warehouse/plant/...)	Address	Postal code	City	Country	Code
BAE Frameries	Route de Bavay 2	7080	Frameries	Belgium	

Click on "+" if you want to enter more

**ESG certificate or label obtained.**

Label issuer or certificate	Description	Date	Rating score
Ecovadis silver medal	Sustainability assessment	april 2024	Silver medal
ISO 14001	Environmental Management Systems		Certified ISO 14001
ISO 45001	Occupational Health and Safety Management Systems		Certified ISO 45001
Factory of the Future	Factory of the Future Awards honor companies excelling in digitalization, talent development, smart processes, sustainability, and world-class manufacturing.	February 2024	Factory of the Future award winner

VSME Content Collection	
Description	
This tool facilitates content collection for the Basic and Comprehensive Modules of the VSME Standard, developed by EFRAG. It is designed to support reporting across three years.	
Structure of the document	
Worksheet 1   Cover	 <a href="#">Link</a>
Worksheet 2   Basic Module Y	 <a href="#">Link</a>
Worksheet 3   Basic Module Y-1	 <a href="#">Link</a>
Worksheet 4   Basic Module Y-2	 <a href="#">Link</a>
Worksheet 5   Comprehensive Module Y	 <a href="#">Link</a>
Worksheet 6   Comprehensive Module Y-1	 <a href="#">Link</a>
Worksheet 7   Comprehensive Module Y-2	 <a href="#">Link</a>
Worksheet 8   B&C Modules Consolidated	 <a href="#">Link</a>
Worksheet 9   Sustainability Matters	 <a href="#">Link</a>
Worksheet 10   Definitions	 <a href="#">Link</a>
Worksheet 11   RSM Contact	 <a href="#">Link</a>



# VSME report

## Index

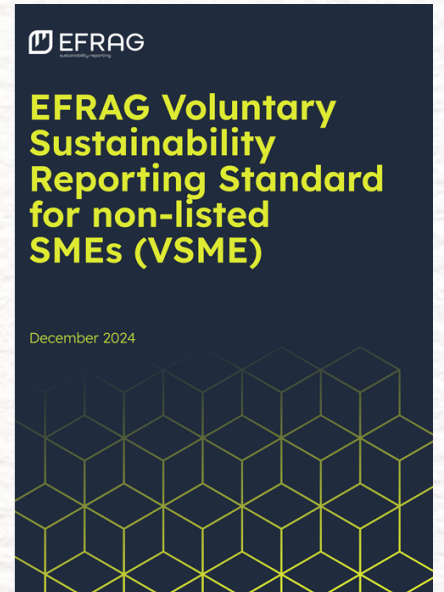
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*BAE VSME Report is a comprehensive document of 50 pages, with the following content and BAE ESG metrics.*

# What motivated sustainability voluntary action after Omnibus ?

## The VSME Report provides a unique opportunity for BAE:

- To be a first mover and **leader** in sustainability **transparency**
- To strengthen **trust** within our **ecosystem** and with our key strategic customers
- To engage them in our **sustainability transformation journey**, highlight the **value** we create through sustainability, and **demonstrate** how we can further contribute to more sustainable aviation
- To **reinforce** the positioning of the Bridgestone brand as a **sustainable solutions** provider in the aviation market
- To further **differentiate** ourselves from competitors
- To have our sustainability progress **recognized** and enable us to be **certified** by an international organization.







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## Ecovadis assessment 2025: from Silver to Gold

2023 BAE result



2024 BAE result



2025 BAE result



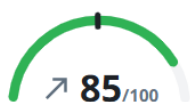
Overall score

Percentile  
97th ⓘ

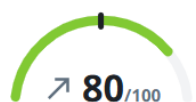
↗ 81/100



Environment



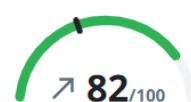
Labor & Human  
Rights



Ethics



Sustainable  
Procurement



Frameries - Belgium | [Manufacture of rubber products](#) ⓘ

Company size: M ⓘ | Assessment scope: Entity ⓘ

### Key improvements in 2025

- First time VSME Voluntary sustainability report
- Revised BAE Global policy
- Full Carbon footprint assessment (scope 1, 2, 3)
- Energy audit and action plan
- ESG KPI's report (for 3 years)
- Additional HR policies and actions (DE&I, recruitment, training, etc)
- HR Monthly Progress report
- IT penetration testing (risk assessment)
- Purchasing: Supplier Risk assessment report
- Ethics and Compliance measures

BRIDGESTONE AIRCRAFT TIRE (EUROPE) SA has earned a **Gold Medal**, a recognition awarded to the **Top 5%** of companies assessed by **EcoVadis** in the 12 months prior to the medal issue date. It reflects the quality of the company's sustainability management system and demonstrates a commitment to promoting transparency throughout the value chain.





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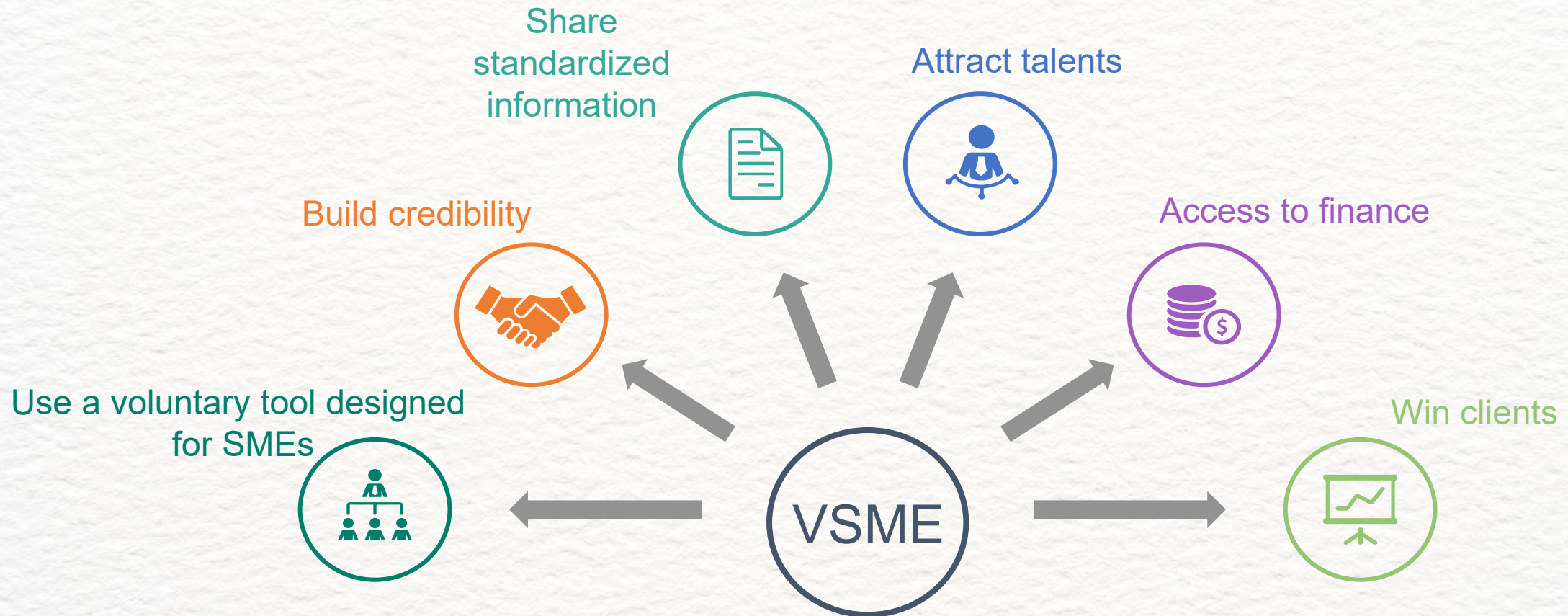
To conclude





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# Key Takeaways



# Questions ?





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# Thank you for your participation

