

**While this translation was carried out by a professional translation agency, the text is to be regarded as an unofficial translation based on the latest official Proposal for an Act amending the Danish Financial Statements Act of 8 October 2008. Only the Danish document has legal validity.**

**December 2008, GlobalDenmark Translations**

**Proposal for an Act amending the Danish Financial Statements Act. (Report on social responsibility for large businesses).**

Introduced on 8 October 2008 by the Danish Minister for Economic and Business Affairs (Mrs Lene Espersen)

## **Proposal**

for an

### **Act amending the Danish Financial Statements Act**

(Report on social responsibility for large businesses)

#### **1**

In the Danish Financial Statements Act ("Årsregnskabsloven"), cf. Consolidated Act no. 647 of 15 June 2006, as amended by section 5 of Act no. 108 of 7 February 2007, section 63 of Act no. 468 of 17 June 2008 and Act no. 516 of 17 June 2008, the following amendments shall be made:

**1.-** After section 99 the following shall be inserted:

**“99a.-(1)** Large businesses shall supplement their management's review with a report on social responsibility, cf. subsections (2)-(7). Corporate social responsibility shall mean that businesses voluntarily include considerations for human rights, societal, environmental and climate conditions as well as combating corruption in their business strategy and corporate activities. Businesses without policies on social responsibility shall disclose this information in their management's review.

**(2)** The report shall contain information about

- 1) the policies of the business on social responsibility, including any standards, guidelines or principles for social responsibility that the business is using;
- 2) how the business realises its policies on social responsibility, including any systems or procedures in this respect;
- 3) assessment of the business on achievements resulting from its work on social responsibility in the financial year, and any future expectations to the work of the business.

**(3)** The report shall be submitted in connection with the management's review. However, instead the business may choose to submit its report

- 1) as part of a supplementary statement to the annual report, cf. section 14 and to which reference is made in the management's review, cf. subsection (4), 1st clause, or

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- 2) on the website of the business with a reference in the management's review, cf. subsection (4), 2nd clause.

(4) The Danish Commerce and Companies Agency shall lay down rules for publication of the report on social responsibility in a supplementary statement to the annual report as well as the duties of the auditor in relation to the information published in such a statement, cf. subsection (3), no. 1. The Danish Commerce and Companies Agency shall lay down rules on publication of the report on social responsibility on the website of the business, including rules on updating information on the website of the business and the duties of the auditor in relation to the information published on the website, cf. subsection (3), no. 2.

(5) For businesses that prepare consolidated financial statements, it shall be considered sufficient to submit information for the group as a whole pursuant to subsections (1) and (2).

(6) A subsidiary which is part of a group may refrain from including this information in its management's review, if

- 1) the parent company complies with the disclosure requirements according to subsections (1) and (2) for the whole group; or
- 2) the parent company has prepared a progress report in connection with accession to the UN Global Compact or the UN principles for responsible investments.

(7) A business which has prepared a progress report in connection with accession to the UN's Global Compact or the UN principles for responsible investments may refrain from providing the information described in subsections (1) and (2). The business shall state in its management's review that it is making use of this exemption and state where the report is publicly available.”.

2. In section 135(5) the following shall be inserted as the 1st clause:

“Where it is permitted by legislation that information which is given in the financial statements or consolidated financial statements may alternatively be placed in other documents, etc. to which reference is made in the financial statements or consolidated financial statements, the audit obligation under subsection (1), 1st clause shall include the information stated in such documents etc.”.

3. In section 135(5), the following shall be inserted after the 2nd clause as the 3rd clause:

“The 2nd and 3rd clauses shall apply to information stated in the management's review and information, which under this Act or regulations issued pursuant to this Act, is alternatively published elsewhere and to which reference is made in the management's review.”.

4. In section 135a(1), 1st clause, "management's review, cf. section 135(5), 2nd clause", shall be amended to "management's review etc., cf. section 135(5), 3rd and 4th clauses".

5. After section 149 the following shall be inserted before the heading "Non-receipt or late receipt of the annual report or exemption statement:

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“149a. Where it is permitted by legislation that information which shall be stated in the annual report may be alternatively placed in other documents etc. than the annual report, such documents etc. shall be made available to the users of financial statements at the same time as the annual report.”.

2

This Act shall enter into force on 1 January 2009 and shall apply for the financial year commencing on 1 January 2009 or later.

3

This Act shall not apply to the Faeroe Islands and Greenland, but may be brought into force wholly or partly by Royal Decree for Greenland subject to any variations necessitated by the specific conditions prevailing in Greenland.

### *Explanatory notes to the Proposal*

1. Introduction
2. Background and purpose of the Proposal
  - 2.1. Background of the Proposal
  - 2.2. Purpose of the Proposal
  - 2.3. Legislation in other countries
3. Content of the Proposal
  - 3.1. Businesses that will be covered by the Proposal
  - 3.2. Corporate Social Responsibility (CSR)
  - 3.3. Content of the report
  - 3.4. Publication of the report on social responsibility and the duties of the auditor in connection with the report
  - 3.5. Use of UN's principles for social responsibility
4. Financial and administrative implications for the public sector
5. Financial and administrative implications for the business sector
6. Administrative implications for the general public
7. Environmental implications
8. Relation to Community Law
9. Consultation with authorities and organisations
10. Summary table

#### *General notes*

##### *1. Introduction*

3

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The Proposal implements an initiative laid down in the Action Plan of the Danish Government on Corporate Social Responsibility. The purpose of the Proposal is to encourage about 1,000 of the largest Danish businesses, listed companies and state-owned public limited companies covered by the Danish Financial Statements Act to work actively on ways in which they can contribute to solving social challenges.

Social responsibility means that the business must voluntarily integrate considerations for human rights, societal, environmental and climate conditions and combating corruption in its business strategy and activities. Thus the business will not be obligated to this under the legislation in the country in which the business is operating.

Therefore, it is proposed that such businesses be obligated to make an account of their work on social responsibility as part of their financial reporting.

The Proposal will be introduced with a sole requirement that businesses covered by the Proposal must provide information about their policies on social responsibility, how such policies are realised by the business, and the assessment of the business on what has been achieved as a result of its work on social responsibility in the financial year, and any future expectations to the work. Businesses without policies on social responsibility are obliged to provide information in this respect.

Despite the Proposal, corporate social responsibility remains a voluntary matter. The business chooses if and how it wishes to integrate the above considerations in its business strategy and activities. The disclosure requirement thus does not obligate businesses covered by the Proposal to draw up a policy on social responsibility, and there are no requirements on how the individual business works on social responsibility.

In support of the objective to make Denmark well known for responsible growth, Danish businesses and their work on social responsibility should be based on an internationally recognised reference framework. Therefore, businesses and investors may profit from basing their work on the UN principles for social responsibility, i.e. the UN Global Compact and the UN principles for responsible investments (UN PRI). The principles are described in section 3.5.

The same disclosure requirements as in this Proposal will be introduced for institutional investors, investment associations and listed financial companies (banks and insurance undertakings, etc.) which are not covered by the Financial Statements Act. The accounting rules for certain businesses are to a wide extent laid down in executive orders issued by the Danish Financial Supervisory Authority (Danish FSA). The disclosure requirement concerning social responsibility will therefore be determined by the Danish FSA in executive orders in respect of such businesses. This will be done on the basis of the existing authorisations to lay down accounting rules in the acts regulating such businesses.

## *2. Background and purpose of the Proposal*

### *2.1 Background of the Proposal*

Globalisation means that financial, cultural and political connections across borders are becoming ever closer. Globalisation means increased trading and a higher degree of international distribution of work in relation to e.g. the production of goods. Accordingly, a number of challenges are made visible in relation to for instance social conditions, working conditions, the environment and climate which all require cooperation

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between the countries and various players in society.

Intensified international competition, global societal and environmental challenges and continuously more open and global information means businesses and investors need to consider the international agenda actively. Thus, businesses wishing to play a prominent role in global markets must be open about their social responsibility. Such responsibility could take the form of requiring a foreign supplier to observe basic environmental requirements and comply with workers' and human rights.

### *2.2 The purpose of the Proposal*

The purpose of the Proposal is to encourage businesses and investors to work actively on social responsibility. Businesses may contribute to solving social challenges through their business-driven social responsibilities, and at the same time, create better business opportunities for themselves. Business-driven social responsibility means that the social responsibility of the business must be combined with its core business activities.

Denmark will grow stronger in a global perspective as more businesses and investors work actively on social responsibility and communicate this to the public. This may help make Denmark and Danish businesses become well known for responsible growth. It will be easier for Danish businesses to distinguish themselves from competitors in global markets if Danish products and services are considered reliable and sustainable. The proposed disclosure requirements will create greater openness and thus strengthen the opportunities of customers, local communities, investors, employees and the media to react to businesses' and investors' work on social responsibility.

However, the proposed disclosure requirement will not change the obligation of individual businesses and investors to choose if and how work on social responsibility is to be done in future. Furthermore, businesses will continue to be responsible for deciding how to meet these challenges, as well as selecting the information best describing the work of the business on social responsibility.

### *2.3 Legislation in other countries*

A number of countries have implemented legislation encouraging businesses and investors to work more actively on social responsibility. This section only describes legislation that is more extensive than the current reporting requirements on non-financial conditions in the Danish Financial Statements Act.

Since 2001, all listed companies in France have been required to disclose information about social and environmental conditions as an element of their annual reports. The purpose is to encourage businesses to measure social and environmental consequences of their business activities on the basis of a strategy assessment. Furthermore, they must state how the business communicates with its stakeholders.

Listed companies in the UK have been required to report on social and environmental conditions since October 2007, including in relation to all existing policies and the effect of these policies. If the annual report does not include information about the above, the areas not described must be stated.

### *3. Content of the Proposal*

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### *3.1 Businesses that will be covered by the Proposal*

According to the Government's Action Plan on Social Responsibility, 1,000 of the largest Danish businesses will be covered by the disclosure requirement concerning corporate social responsibility laid down in the Danish Financial Statements Act.

The Danish Financial Statements Act from 2001 is based on the "building block model" according to which the rules that businesses are obligated to comply with in their preparation of annual reports (financial statements, etc.) primarily depend on the size of the business. The principle of this model is that small businesses must follow relatively few and specific requirements, whereas larger businesses must follow a greater number of and more detailed requirements. The background for this is that, typically, few people use the financial statements of small businesses, whereas large businesses, and businesses which have securities admitted to trading on a regulated market in an EU/EEA member state, have a wide circle of users of their financial statements with different needs, including a higher degree of public attention. The model consists of four building blocks - reporting classes A, B, C and D.

Reporting class A applies to sole trading businesses etc., which are not obligated to present annual reports. Reporting class B applies to small limited companies and small private limited companies etc. Reporting class C applies to medium-sized and large limited companies and private limited companies etc., and is subject to more detailed rules. Finally, reporting class D applies to enterprises with securities that are admitted to trading on a regulated market in an EU/EEA member state, and state-owned public limited companies. Irrespective of their size, such businesses will always be covered by the stricter rules laid down for reporting class D. It is proposed that the disclosure requirement be applicable to large businesses in reporting class C and all businesses in reporting class D in that such businesses have a special socio-economic importance according to the Growth Report of the Ministry of Economic and Business Affairs of 2005, p. 53. Large businesses in reporting class C are businesses that exceed two of the three size limits laid down in the Financial Statements Act for medium-sized businesses, i.e. a balance sheet total of DKK 143 million, net revenues of DKK 286 million, and an average number of full-time employees of 250. However, businesses which have already submitted information at group level are exempted from the disclosure requirement. Calculations by the Danish Commerce and Companies Agency show that the disclosure requirement will subsequently cover about 1,100 businesses. In addition, institutional investors, investment associations and listed financial companies will also be covered by the disclosure requirement through amendments to executive orders.

According to the Proposal, small businesses in reporting class B and medium-sized businesses in reporting class C will not be obligated to describe their policies and practices on social responsibility. Naturally, this does not prevent such businesses from voluntarily providing information about policies and practices as all Danish business could benefit from working on social responsibility.

If a business covered by the Proposal is a parent company, it must submit the information for the group in its consolidated financial statements, but it may refrain from giving this information in its own financial statements. Furthermore, a subsidiary which is part of a group where the parent company prepares consolidated financial statements and meets the disclosure requirements for the group as a whole, may refrain from including this information in its own management's review.

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Furthermore, it is proposed that businesses which accede to the UN Global Compact or the UN principles for responsible investments, and which publish a progress report in this connection, be exempted from the obligation to prepare a report on social responsibility in pursuance of this Proposal. The business will then undertake to clarify in its management's review that it makes use of this exemption and state the place where the report has been made public. The principles mentioned are described in section 3.5.

### *3.2 Corporate Social Responsibility (CSR)*

In this Proposal, Corporate Social Responsibility (CSR) means that businesses voluntarily integrate considerations for human rights, societal, environmental and climate concerns, and combating corruption in their business strategies and activities. "Voluntarily" refers to activities etc. that are not subject to Danish legislation or the legislation applicable in the foreign country where the business is operating.

Societal concerns may consist in work on helping foreign suppliers observe workers' and human rights. Societal concerns may also be about health and safety at work, employee satisfaction and development, or consist of businesses making special efforts to retain or integrate people who are disabled, seniors, persons with reduced capacity or persons with other ethnic background in the labour market.

Environmental and climate concerns may be about preventing pollution, reducing consumption of energy and other resources, developing or using environmentally efficient technologies or eco-labelling products.

Thus corporate social responsibility may embody many different activities, and the above are merely examples. The individual business can choose which activities will be of the greatest value to the business and society.

The Danish Commerce and Companies Agency will prepare guidelines to advise businesses on how they can draw up satisfactory and reliable reports on social responsibility while at the same time, reducing the administrative implications. The guidelines will also describe the activities where corporate social responsibility has been put into practice.

### *3.3 Content of the report*

According to the Proposal, the report on social responsibility must include information on:

- 1) the policies of the business on social responsibility, including any standards, guidelines or principles for social responsibility implemented by the business;
- 2) how the business turns its policies on social responsibility into action, including any systems or procedures in this respect;
- 3) the assessment of the business on achievements resulting from the business' work on social responsibility in the financial year, and any future expectations to the work of the business.

The three points mentioned above correspond with the UN recommendations stating which matters should be included in the report of a business on social responsibility. More details on the UN principles for social responsibility are given in section 3.5. However, according to this Proposal, businesses will be exempted from preparing a report on social responsibility if they have acceded to the UN Global Compact or the UN principles for responsible investments (UN PRI), and if the businesses publish a progress report as part of their accession.

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The report will not be subject to detailed requirements in that the business concerned will continue to decide independently and voluntarily the fields in which the business will work on social responsibility and how this work should be done. The intention is to promote the basic idea behind business-driven social responsibility.

Businesses are not obligated to assess which measurable financial results the work on social responsibility has entailed.

Businesses which have not formulated policies, internal guidelines, objectives, strategies or other matters describing the business' work on social responsibility, must provide such information.

Even for large businesses, managing social responsibility may be a challenge involving difficult problems. Therefore, even businesses representing best practice both nationally and internationally usually implement policies on social responsibility over several years, and difficulties and setbacks occur along the way - this is also recognised by the UN.

### *3.4 Publication of the report on social responsibility and the duties of the auditor in connection with the report*

Businesses covered by the Proposal are obliged to include a report on social responsibility in their management's review. Alternatively, businesses may incorporate a report on social responsibility in a supplementary review to their annual report or on their website.

Businesses that choose to use either one of the methods of publication stated as an alternative to the management's review, must provide information about where the report can be found and how the stakeholders can find this information in the report. The general public must have access to the report.

The management's review of the business is subject to a consistency check by the auditor. This means that the auditor must ensure that information provided in the management's review is in compliance with the information disclosed in the financial statements and in the consolidated financial statements if such have been prepared. The auditor is obligated to express an audit opinion. The auditor's opinion will also include any relationship between information and conditions stated in the management's review which have come to the attention of such auditor in connection with the audit. This does not imply that the auditor must act in a specific way in order to procure such information. The information concerned only comprises information that the auditor has received prior to the audit of the financial statements.

However, it would be considered inappropriate for a business to put the information somewhere other than in the management's review, as this may mean that such information is not subject to the auditor's consistency checks in the same way as it would be if the information had been included in the management's review. Therefore, it is proposed that the suggested methods of publication be subject to the same duty to perform consistency checks of the correctness of the information, as required by the management's review. Reference is made to section 1, no. 3 of the Proposal.

Thus, the idea is neither to restrict nor expand the duties of an auditor in relation to the information in the management's review, merely because the information is given on the website instead or in a supplementary review.

### *3.5 Use of the UN principles for social responsibility*



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Many businesses can benefit from basing their report on social responsibility on how the business complies with the UN principles for social responsibility. This is because the proposed requirements for the content of the report on social responsibility, as stated in section 99a(2), nos. 1-3 of section 1, no. 1 of the Proposal, follow the UN recommendations on the content of the progress reports that should be prepared by members of the UN Global Compact. The UN Global Compact ([www.unglobalcompact.org](http://www.unglobalcompact.org)) is the worlds' largest voluntary network of businesses working on social responsibility. The core of the Global Compact is the following ten principles:

*“Human rights*

- 1) businesses should support and respect the protection of internationally proclaimed rights; and
- 2) make sure they are not complicit in human rights abuses.

*Labour rights*

- 3) businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- 4) support the elimination of all forms of forced and compulsory labour;
- 5) support the effective abolition of child labour; and
- 6) eliminate discrimination in respect of employment and occupation.

*Environment*

- 7) businesses should support a precautionary approach to environmental challenges;
- 8) undertake initiatives to promote greater environmental responsibility; and
- 9) encourage the development and diffusion of environmentally friendly technologies.

*Anti-corruption*

- 10) businesses should work against corruption in all its forms, including extortion and bribery.

The UN principles for social responsibility are not to be regarded as a checklist for completion by businesses. However, individual businesses are responsible for choosing the areas and efforts relevant to their core business activities. This supports the principles on business-driven social responsibility.

The principles on human and workers' rights and anti-corruption are already applicable by Danish legislation through accession to international conventions on which the principles are based. These are the UN Universal Declaration on Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the UN Anti-Corruption Convention.

In addition, the precautionary approach is a fundamental principle in Danish health and safety legislation. In the management of the Danish Environmental Protection Act, emphasis is on businesses using the best available technology, and special importance is attached to promoting preventive measures.

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Danish businesses are therefore already obligated to meet the ten principles of the Global Compact relative to their business activities in Denmark. However, this is not the case when Danish businesses operate abroad, where societal and environmental conditions often do not meet Danish standards.

Furthermore, the UN has prepared six principles for social responsibility that are specifically targeted at investors - the UN principles for responsible investments ([www.unpri.org](http://www.unpri.org)). The principles are as follows:

- 1) we will incorporate ESG issues into investment analysis and decision-making processes;
- 2) we will be active owners and incorporate ESG issues into their ownership policies and practices;
- 3) we will seek appropriate disclosure on ESG issues by the entities in which they invest;
- 4) we will promote acceptance and implementation of the Principles within the investment industry;
- 5) we will work together to enhance our effectiveness in implementing the principles;
- 6) we will report on their activities and progress towards implementing the principles.

In addition to the UN Global Compact and the UN principles for responsible investments there are a number of other guidelines and principles on social responsibility that businesses may use. For example, the OECD has drawn up "Guidelines for Multinational Enterprises" which is based on the same international conventions as the UN Global Compact. The guidelines are recommendations from governments to multinational enterprises. The principles make up a voluntary framework for good corporate practice. Moreover, the Global Reporting Initiative (GRI) can be mentioned as a multi-stakeholder network that issues global guidelines for reporting on sustainability. The guidelines are used by businesses that wish to document their sustainability.

#### *4. Financial and administrative implications for the public sector*

The Proposal does not have financial and administrative implications for the public sector.

#### *5. Financial and administrative implications for the business sector*

The Danish government finds it important that the administrative burden in connection with the Proposal is minimised as far as possible. Accordingly, efforts are being made to ensure the greatest possible degree of flexibility for businesses in relation to using the specific method of publication that best suits the individual businesses.

The Proposal has been submitted to the Centre for Quality in Business Regulation (CKR) at the Danish Commerce and Companies Agency for the purpose of assessing the financial and administrative implications of the Proposal. The CKR has the following comments:

#### *Financial implications*

The CKR assesses that the Proposal may lead to positive structural financial implications for the businesses that choose to work on social responsibility. Such businesses may achieve a competitive advantage in that consumers, suppliers, investors etc. require businesses to work

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more on social responsibility. However, this is not clear-cut as there may be significant differences from sector to sector and from product to product.

#### *Administrative implications*

About 1,100 businesses will be covered by this Proposal. The administrative implications of this Proposal have been examined by the business panel of the Ministry of Economic and Business Affairs. The CKR made a presentation before the business panel in July 2008. With this Proposal the report on social responsibility may be given a very different scope. Consequently, the quantitative results from the business panel are subject to some uncertainty. Therefore, the CKR has made the overall assessment of the administrative implications on the basis of qualitative interviews with three businesses that work with social responsibility to an expected maximum extent. This provides an overview of the maximum potential administrative implications of the Proposal.

#### *Transitional implications*

Based on the presentation before the business panel, the CKR assesses that this Proposal will result in transitional implications for about 180 businesses which do not already incorporate the policies drawn up for corporate social responsibility. If such businesses choose to prepare policies for social responsibility and implement these, the transitional implications will vary according to the scope of business policies on social responsibility.

The CKR has made enquiries with large businesses as to time consumption in connection with preparing their policies on social responsibility. Businesses estimate that it takes between 2-6,000 hours to prepare relatively extensive and thorough policies on social responsibility, if the business has not previously worked on social responsibility. Businesses that also choose to report on social responsibility are estimated to spend about double this amount of hours. However, the business concerned is still responsible for clarifying whether it wants to prepare policies on social responsibility, and deciding how many hours it wants to spend on drafting such policies.

#### *Ongoing implications*

On the basis of the presentation before the business panel, the CKR assesses that this Proposal will lead to a limited number of ongoing implications for the businesses covered by the Proposal.

The CKR estimates that approx. 1,030 businesses out of about 1,100 businesses covered by the Proposal are working on social responsibility. Such businesses may disclose information in their management's review or by preparing a reference text. The CKR estimates that about 340 businesses will give an account of their social responsibility in their management's review, which for each business will cause ongoing administrative implications of between 1 and 7.5 hours.

Similarly it is assessed that the remaining approx. 690 businesses which are expected to use less burdensome opportunities of referral, will spend 40 minutes on preparing such referral. At societal level, this requirement is expected to entail ongoing implications of about 3,000 hours per annum as a maximum.

About 70 businesses out of 1,100 businesses do not work on social responsibility, and the CKR estimates that it will take each of these businesses a maximum of 40 minutes to state that they

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do not work on social responsibility. Thus, at societal level, there will be a maximum of approx. 50 hours per annum of ongoing implications.

Overall, this Proposal will lead to ongoing implications of about 3,000 hours per annum as a maximum at societal level, broken down by the 1,100 businesses covered by this Proposal.

#### *6. Administrative implications for the general public*

There are no administrative implications for the general public.

#### *7. Environmental implications*

To the extent that the reporting obligation encourages more businesses covered by this Proposal to work on social responsibility, the Proposal will entail environmental implications in the form of positive effects as a result of the enterprises' work on e.g. climate and environmental management or investments in environmental and energy efficient technology. This may reduce energy consumption and emissions of chemicals and CO<sub>2</sub> by businesses.

#### *8. Community Law*

The Proposal includes no aspects related to the EU.

#### *9. Consultation with authorities and organisations*

Before being introduced, the Proposal has been in consultation with the following authorities and organisations:

Amnesty International, the Ministry of Employment, the Danish Brewers' Association, Copenhagen Business School, CSR Forum, the Danish Shipowners' Association, the Confederation of Danish Employers, the Danish Construction Association, the Danish Chamber of Commerce, Danish Ethical Trading Initiative, Danish Standard, the Danish Society of Financial Analysts, the National Network of Business Managers, the Confederation of Danish Industries, the Ministry of Finance, the Danish Bankers' Association, the Danish Employers' Association for the Financial Sector, First North, FN Global Compact, DanChurchAid, the Danish Consumer Council, the Institute of State Authorized Public Auditors in Denmark, the Danish Institute of Certified Auditors, Insurance & Pension, Aarhus School of Business, the Union of Commercial and Clerical Employees in Denmark, the Danish Federation of Small and Medium-Sized Enterprises, International Commission of Jurists, the Federation of Danish Investment Associations, the Ministry of Climate and Energy, Corporate Governance, Local Government Denmark, University of Copenhagen, Danish Agricultural Council, Agricultural Advisory Centre, the National Centre, the Organisation of Managerial and Executive Staff, Danish Confederation of Trade Unions, LD Pensions, the Ministry of the Environment, the Ministry of Refugee, Immigration and Integration Affairs, the Ministry of Food, Agriculture and Fisheries, the Ministry of Health and Prevention, the Ministry of Science, Technology and Innovation, OMX Nordic Exchange in Copenhagen, Association of Mortgage-Credit Institutions, the Association of Danish Mortgage Banks, Save the Children, Accounting Council, Roskilde University, the Danish Council for Sustainable business development, the Ministry of Taxation, the Prime Minister's Office, University of Southern Denmark, Ministry of Transport, the Ministry of Foreign Affairs, the Minister of Education,

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the Ministry of Social Welfare, WWF World Wide Fund for Nature, University of Aalborg University of Aarhus.

	Positive implications/ Fewer expenses	Negative implications/ Extra expenses
Financial and administrative implications for the public sector	None	None
Financial and administrative implications for the business sector	None	Overall, the Proposal will lead to ongoing implications of about 3,000 hours per annum as a maximum on societal level, broken down by 1,100 enterprises covered by the Proposal.
Administrative implications for the general public	None	None
Environmental implications	None	None
Relation to Community Law	The Proposal includes no aspects related to the EU.	

*10. Summary table*