

REUNIÃO DE VOLUNTARIOS DO GRUPO DE TRABALHO PMES

Vania Borgerth

09 e 15 Julho 2025



**COMISSÃO BRASILEIRA
DE ACOMPANHAMENTO DO RELATO INTEGRADO**



Porque é necessário:

- Empresas listadas e instituições financeiras irão publicar relatórios de sustentabilidade de forma mandatória a partir de 2026
- Relatórios precisarão considerar a cadeia de valor, afetando PMEs e empresas fechadas

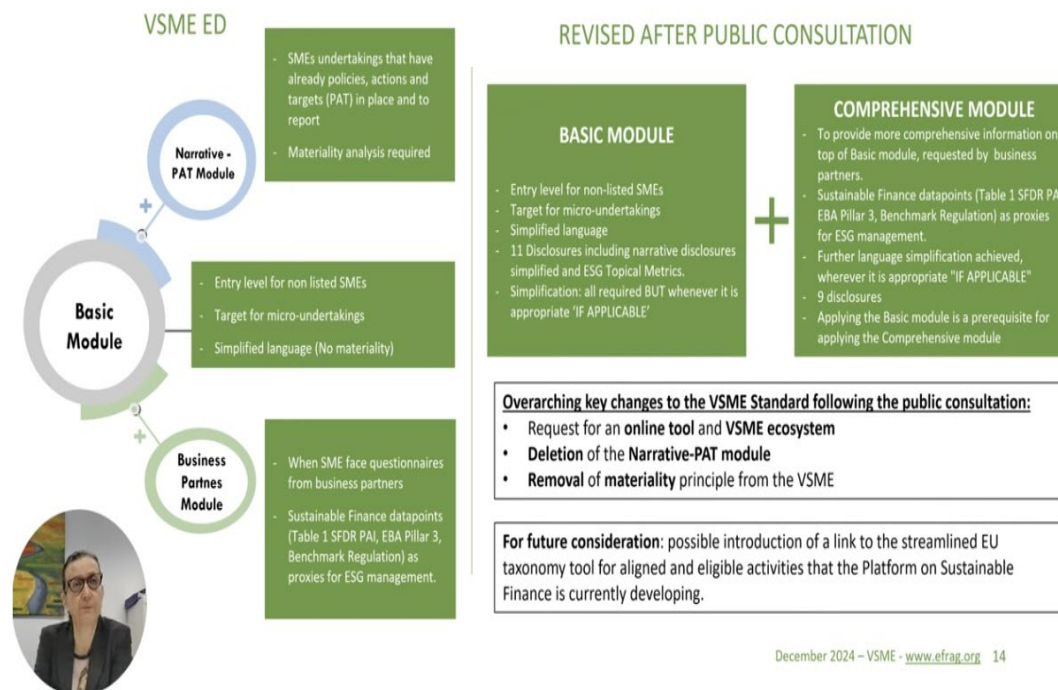
**Resolução CVM
193/23**

**Resolução CMN
5185/24**

Modelo Proposto:

- VSME elaborado pelo EFRAG
- Adoção voluntária
- Uso de plataforma digital
- Template facilita preenchimento
- Material Educativo disponível

4.1 VSME: Structural Changes from the VSME ED



December 2024 – VSME - www.efrag.org 14

Modelo Proposto:

REVISED AFTER PUBLIC CONSULTATION

BASIC MODULE

- Entry level for non-listed SMEs
- Target for micro-undertakings
- Simplified language
- 11 Disclosures including narrative disclosures simplified and ESG Topical Metrics.
- Simplification: all required BUT whenever it is appropriate 'IF APPLICABLE'



COMPREHENSIVE MODULE

- To provide more comprehensive information on top of Basic module, requested by business partners.
- Sustainable Finance datapoints (Table 1 SFDR PAI, EBA Pillar 3, Benchmark Regulation) as proxies for ESG management.
- Further language simplification achieved, wherever it is appropriate "IF APPLICABLE"
- 9 disclosures
- Applying the Basic module is a prerequisite for applying the Comprehensive module

Overarching key changes to the VSME Standard following the public consultation:

- Request for an **online tool** and **VSME ecosystem**
- **Deletion of the Narrative-PAT module**
- **Removal of materiality principle** from the VSME

For future consideration: possible introduction of a link to the streamlined EU taxonomy tool for aligned and eligible activities that the Platform on Sustainable Finance is currently developing.

Modelo Proposto:

Basic Module	8
Basic Module – General information	8
B1 – Basis for preparation	8
B2 – Practices, policies and future initiatives for transitioning towards a more sustainable economy	8
Basic Module – Environment metrics	9
B3 – Energy and greenhouse gas emissions	9
B4 – Pollution of air, water and soil	9
B5 – Biodiversity	9
B6 – Water	10
B7 – Resource use, circular economy and waste management	10
Basic Module – Social metrics	10
B8 – Workforce – General characteristics	10
B9 – Workforce – Health and safety	10
B10 – Workforce – Remuneration, collective bargaining and training	10
Basic Module – Governance metrics	11
B11 – Convictions and fines for corruption and bribery	11
Comprehensive Module	12

Modelo Proposto:

VSME Basic Module – Applicability of Disclosures



BASIC MODULE	Questionnaires in which it is asked (#)	"If applicable" / Always to be reported on / May disclosure
B1 – Basis for Preparation	Public Consultation	Always to be reported on If applicable
B2 - Practices, policies & future initiatives for transitioning towards a more sustainable economy	7	If applicable
B3 – Energy and greenhouse gas emissions	12	Always to be reported, breakdown if available Always to be reported on
B4 – Pollution of air, water and soil	7	If applicable
B5 – Biodiversity	4	If applicable May disclosure
B6 – Water	9	Always to be reported on If applicable
B7 – Resource use, circular economy and waste management	9	If applicable Always to be reported on
B8 – Workforce – General characteristics	8	Always to be reported on If applicable To be reported on when above the threshold
B9 – Workforce – Health and safety	3	Always to be reported on
B10 – Workforce – Remuneration, collective bargaining and training	7	Always to be reported on To be reported on when above the threshold
B11 – Convictions and fines for corruption and bribery	4	If applicable

For more information, please see EFRAG's Educational Videos on the VSME

3 April 2025 - VSME - 1st Meeting - EFRAG Summary - 14

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Modelo Proposto:

Comprehensive Module	12
Comprehensive Module – General information	12
C1 – Strategy: Business Model and Sustainability – Related Initiatives	12
C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	12
Comprehensive Module - Environmental Metrics	12
Consideration when reporting on GHG emissions under B3 (Basic Module)	12
C3 – GHG reduction targets and climate transition	13
C4 – Climate risks	13
Comprehensive Module – Social Metrics	13
C5 – Additional (general) workforce characteristics	13
C6 – Additional own workforce information - Human rights policies and processes	13
C7 – Severe negative human rights incidents	14
Comprehensive Module – Governance Metrics	14
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	14
C9 – Gender diversity ratio in the governance body	14

Modelo Proposto:



VSME Comprehensive Module – Applicability of Disclosures



COMPREHENSIVE MODULE	Questionnaires in which it is asked (#)	"If applicable"/ Always to be reported on/ May disclosure
C1 – Strategy: Business Model and Sustainability – Related Initiatives	10	Always to be reported on
		If applicable
C2 – Description of practices, policies and future initiatives for transitioning towards a more sustainable economy	7	If applicable
		If applicable + may disclosure
Consideration when reporting on GHG emissions under B3 (Basic Module)	9	If applicable
C3 – GHG reduction targets and climate transition	7	If applicable
		If applicable + may disclosure
C4 – Climate risks	9	If applicable
		May disclosure
C5– Workforce (General) Additional characteristics	Public Consultation	May disclosure + threshold included
C6 – Additional own workforce information - Human rights policies and processes	6	Always to be reported on
		If applicable
C7 – Severe negative human rights incidents	3	Always to be reported on
		If applicable
C8 – Revenues from certain sectors and exclusion from EU reference benchmarks	5	If applicable
		Always to be reported on
C9 – Gender diversity ratio in governance body	6	If applicable

Modelo Proposto:

Basic Module: Guidance	15
Basic Module Guidance – General information	15
Basic Module Guidance – Environmental Metrics	17
Basic Module Guidance – Social Metrics	38
Basic Module Guidance – Business Conduct Metrics	41
Comprehensive Module: Guidance	43
Comprehensive Module Guidance – General information	43
Comprehensive Module Guidance – Environmental Metrics	44
Comprehensive Module Guidance – Social Metrics	46
Comprehensive Module Guidance – Business Conduct Metrics	47

Definição utilizada pelo EFRAG:

2. This Standard is voluntary. It applies to undertakings¹ whose securities are not admitted to trading on a regulated market in the European Union (not listed). [Article 3 of Directive 2013/34/EU] defines three categories of small- and medium-sized undertakings based on their balance sheet total, their net turnover and their average number of **employees** during the financial year.
- (a) An undertaking is micro if it does not exceed two of the following thresholds:
- i. €450,000 in balance sheet total;
 - ii. €900,000 in net turnover; and
 - iii. an average of 10 employees.
- (b) An undertaking is small if it does not exceed two of the following thresholds:
- i. €5 million in balance sheet total;
 - ii. €10 million in net turnover; and
 - iii. an average of 50 employees.
- (c) An undertaking is medium if it does not exceed two of the following thresholds:
- i. €25 million in balance sheet total;
 - ii. €50 million in net turnover; and
 - iii. an average of 250 employees.

Ferramenta desenvolvida pelo IFAC:



International Federation of Accountants

The **Small Business Sustainability Checklist** is an interactive tool designed for use in your practice and with your clients. By working through this checklist, you can establish a framework to assess your current position and track progress across environmental, social responsibility, and governance initiatives.

This tool features specific questions, and at the end, you'll receive a score based on

Small Business Sustainability Checklist

Instructions:

For each question, answer "**Limited**", "**Underway**", or "**Maturing**" and provide a brief explanation or evidence if needed. Use the scoring system to assess your progress.

Scoring System:

Limited: 1 point

Underway: 2 points

Maturing: 3 points



Section 1 Environmental Initiatives



Section 2 Social Responsibility Initiatives



Section 3 Governance Initiatives

Plano de Trabalho:

- Desenvolver plataforma para recolher informação
- Definir gestor para a plataforma
- Divulgar plataforma incentivando PMEs a aderir

Parceria:

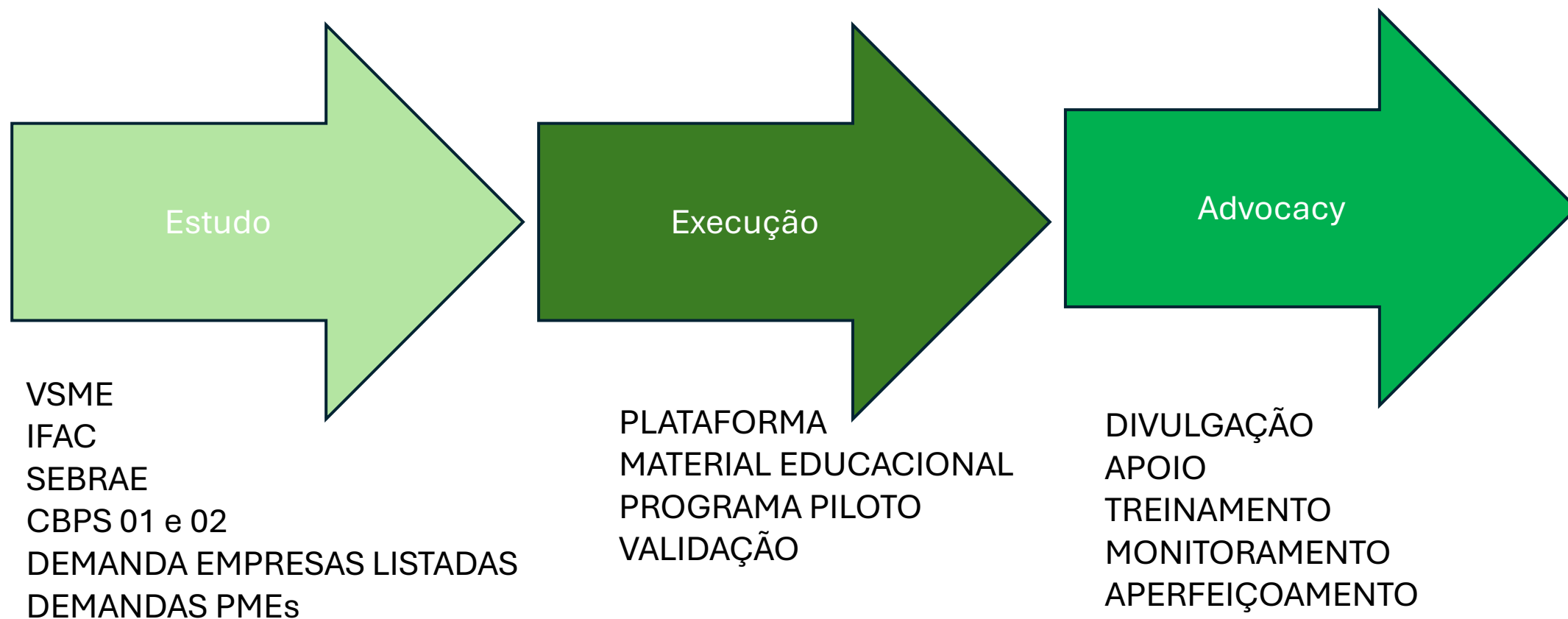
GRUPO GESTOR

- CBPS
- CFC
- SEBRAE
- CNI
- IBRACON
- CBARI

GRUPO VOLUNTÁRIOS

- ANALISTAS SISTEMAS
- PEQUENOS CONSULTORES
- AUDITORES PMES
- EMPRESAS LISTADAS
- PEQUENAS EMPRESAS
- REGULADORES

PLANO DE TRABALHO:



Agenda:

- Reuniões mensais
 - Grupo Gestor
 - Grupo Voluntário

Formulário de Registro:



Material:

- **Standard -** [VSME Standard.pdf](#)
- **Video explicando devido processo -**
<https://www.youtube.com/watch?v=PsuAE17u4zA>
- **Digital Template e XBRL Taxonomy -**
<https://www.efrag.org/en/vsme-digital-template-and-xbml-taxonomy>
- **Cursos:** [VSME Courses | CSRD Institute](#)