

Comparing current UK Climate-related reporting requirements and the FCA proposal on aligning UK Listing Rules with UK Sustainability Reporting Standards ('UK SRS')

	Current FCA UK Listing Rules - TCFD-aligned reporting	Proposed FCA UK Listing rules - UK SRS	Companies Act 2006: Climate-related financial disclosures
Relevant requirement	UKLR 6.6.6(8) (Equity shares (commercial companies)) UKLR 14.3.24 (Equity shares (international commercial companies secondary listing) category) UKLR 15.3.1 (Certificates representing certain securities (depository receipts category)) UKLR 16.3.23 (Non-equity shares and non-voting equity shares) UKLR 22.2.24 (Equity shares (transition))	UKLR 6 (Equity shares (commercial companies)) UKLR 14 (Equity shares (international commercial companies secondary listing) category) UKLR 15 (Certificates representing certain securities (depository receipts category)) UKLR 16 (Non-equity shares and non-voting equity shares category) UKLR 22 (Equity shares (transition))	The UK Companies Act 2006 S414CB(1A) The Limited Liability Partnerships (Accounts and Audit) Regulations 2008 S12 S414C (4A)
Application date	Current requirement for the above categories of listed issuers.	Mandatory for the financial periods beginning on or after 1 January 2027. Voluntary early adoption allowed for earlier periods.	Current requirement for large UK companies and LLP (including AIM-listed).
Scope of sustainability disclosures	Climate-related disclosures, but may include some additional environmental topics and KPIs depending on the relevance to the industry and business model.	UKLR 6, 16 and 22 All sustainability-related topics, with the following transitional reliefs available: 1 year transitional relief on reporting Scope 3 emissions (with 'comply or explain' option after the transitional relief period). 2 year transitional relief on reporting non-climate topics (with 'comply or explain' after the transitional relief period). UKLR 14 and 15 Companies with secondary listing in the UK DO NOT need to report under the UK SRS, but instead will need to disclose which overseas sustainability standards they are subject to or report against on a voluntary basis.	Climate-related disclosures Reporting requirements on GHG emissions and carbon intensity ratios are covered separately through a different regulation - Streamlined Energy and Carbon Reporting (SECR).

	Current FCA UK Listing Rules - TCFD-aligned reporting	Proposed FCA UK Listing rules - UK SRS	Companies Act 2006: Climate-related financial disclosures
Statement of compliance	Statement of compliance with the TCFD framework and supplemental guidance is required . Disclosures are required to be made on a 'comply or explain' basis.	Statement of compliance is required, however, by opting to 'explain' rather than to 'comply' in relation to Scope 3 emissions and/or non-climate topics an issuer may not be able to state full compliance with the UK SRS.	It is mandatory to include the climate-related financial disclosures requirement in the NFSI Statement. No separate statement of compliance is required. Omission of certain disclosures is permitted if the directors of a company/ members of an LLP deem the disclosures are not necessary for understanding the business. Clear explanation needs to be provided if this is the case.
Location of disclosures	Expected to be included in the annual report. In rare circumstances, it can be included in documents other than the annual report with clear explanation in the annual report on where it can be found and the reason for not including it in the annual report.	The sustainability-related disclosures and, where relevant, any explanations are to be made in the annual report (no specific section is prescribed to allow flexibility). Climate-related disclosures may be included by cross-reference in circumstances set out in UK SRS S1 B45-47.	Must be included in the Non-Financial and Sustainability Information (NFSI) Statement within the Strategic Report or Energy and Carbon Report (for LLPs that do not prepare a strategic report).
Materiality	Focus on financial materiality only : information is material if its omission or misrepresentation could reasonably be expected to influence the economic decisions primary users make on the basis of the report that contains the disclosure required by the relevant requirements.		
Timing of reporting	At the same time as the annual report.		
Comparative information	Comparative information is preferable if it enables users to understand the development of the impacts of climate-related issues and is generally expected in line with common practice.	<ul style="list-style-type: none"> ▶ It is mandatory to provide comparative information for all amounts presented ▶ Comparative information for narrative and descriptive information is to be presented if it is useful for understanding the current period information. First year transitional relief: Comparative information is not required for the first annual reporting period.	Comparative information is preferable but no mandated by the CFD However, the SECR which sets out the reporting requirements in respect of GHG emissions, the most commonly reported KPI, does require comparative information.
Sector-specific considerations	<ul style="list-style-type: none"> ▶ Sector-specific guidance - Section C of the TCFD Annex 'Guidance for All Sectors', Section D of the TCFD Annex 'Guidance for the Financial Sectors' and Section E of the TCFD Annex 'Guidance for the Non-Financial Sectors' needs to be considered and followed where applicable ▶ SASB Standards and Climate Disclosure Standards Board (CDSB) Application Framework can be used as a means to implement the TCFD's recommendations. 	Companies may refer to SASB Standards and CDSB Framework Application Guidance. Note this is different from IFRS S1 and S2 that require reference to SASB Standards.	No reference to sector-specific guidance.

	Current FCA UK Listing Rules - TCFD-aligned reporting	Proposed FCA UK Listing rules - UK SRS	Companies Act 2006: Climate-related financial disclosures
Transition plan disclosures	Current framework encourages listed companies to consider the TCFD Guidance on Metrics, Targets and Transition Plans.	No requirement to prepare a transition plan. A requirement to include a statement in annual financial report explaining whether entity has disclosed a climate-related transition plan, and where it can be found. If a transition plan is not published, entity is required to explain why.	No specific requirement to disclose transition plans.
Assurance	Voluntary	Voluntary , however issuers will need to specify whether third-party sustainability assurance has been obtained. If so - further information is required about the assurance provider, assurance standards used and where the assurance opinion can be found.	Voluntary



Any use of this publication or reliance on it for any purpose or in any context is at your own risk, without any right of recourse against BDO LLP or any of its partners, employees or agents. BDO LLP, a UK limited liability partnership registered in England and Wales under number OC305127, is a member of BDO International Limited, a UK company limited by guarantee, and forms part of the international BDO network of independent member firms. A list of members' names is open to inspection at our registered office, 55 Baker Street, London W1U 7EU. BDO LLP is authorised and regulated by the Financial Conduct Authority to conduct investment business. BDO is the brand name of the BDO network and for each of the BDO member firms. BDO Northern Ireland, a partnership formed in and under the laws of Northern Ireland, is licensed to operate within the international BDO network of independent member firms.

Copyright © March 2026 BDO LLP. All rights reserved. Published in the UK.

www.bdo.co.uk