

# CSRD

## lessons from early reporters



Top takeaways from L'Oréal, Voltalia, Qonto, and Auchan

GUIDE

L'ORÉAL

voltalia

Qonto

Auchan

### CSRD

Collect Manage Report

Indicator materiality

57%

Material 66

Disclosure coverage

3%

Covered

66 Indicators

# What's inside:

- 01 Mastering double materiality
- 02 Build governance that spans the business
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- 04 Engage your supply chain and broader network
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- 06 Turn reporting into strategy

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# Introduction

As the first wave of companies completes their CSRD-aligned disclosures, valuable lessons are emerging on what makes the process successful – or painfully inefficient.

The Corporate Sustainability Reporting Directive, or CSRD is more than a reporting exercise. It's a transformation in how companies understand their impact, govern sustainability, and connect environmental and financial performance.

Companies preparing to report in the coming years now have a rare advantage: they can learn directly from those who have already done it.

The guidance below draws on insights from early reporters such as **L'Oréal**, **Volta**, **Qonto**, and **Auchan**, as well as expert perspectives from François Gemenne (IPCC Lead Author and climate resilience specialist), David Carlin (international sustainability advisor), and Julien Denormandie (former French Minister of Agriculture).

# 01 Mastering double materiality

**The first step to CSRD reporting is understanding what's significant for your organization - or in CSRD-speak, “material”.**

Double materiality requires companies to assess two dimensions: impact materiality (how the business affects people and the planet) and financial materiality (how sustainability issues affect the business).

Many companies that have already reported via the CSRD learned that this assessment determines everything that follows – from which metrics to collect to how to prioritise limited resources. The biggest mistake? Trying to report on everything. As David Carlin warns, collecting every possible data point wastes time and risks obscuring what really matters.

A strong double materiality process links business strategy with ESG priorities. It's not a one-off study, but a continuous review that evolves with stakeholder expectations, new regulations, and emerging risks.



“Many companies rush into reporting by trying to collect every possible data point. That’s a mistake. If you don’t get double materiality right, you risk wasting time on irrelevant metrics and missing the real risks and opportunities. Double materiality shouldn’t just be a compliance exercise; it should be a compass.”

**David Carlin**

International sustainability expert

David Carlin is an acknowledged authority on climate change and its implications for the financial system. He is the founder of D. A. Carlin and Company, an advisor to governments, corporates, and financial institutions on climate and ESG topics.

## Case Study

# Votalia – aligning impact and opportunity

Votalia, an international energy producer, shows how a clear double materiality assessment can guide both investment and risk management.

### Impact materiality

Votalia identifies its primary positive impacts as producing renewable energy that helps decarbonize national grids and enabling clients to meet their own net-zero targets. Negative impacts, such as emissions embedded in supply chains and manufacturing, are openly disclosed and tracked.

### Financial materiality

On the financial side, Votalia recognises opportunities from the growing demand for renewable energy and corporate Power Purchase Agreements (PPAs), balanced against risks from climate-related physical impacts such as extreme weather and changing regulation.

By linking these insights, Votalia uses materiality not as a reporting task but as a strategic decision-making tool.

## In practice

- ✓ Start early and update annually.
- ✓ Remember: materiality is the compass that keeps your CSRD report – and your sustainability strategy – on course.

## How we can help

Sweep helps you perform your double materiality assessment efficiently and transparently. The platform guides you through:

- **Scoring Impacts, Risks, and Opportunities** (IROs) using market-standard best practices to quantify materiality across impact and financial dimensions.
- **Integrating the relevant datapoints** you need for your reporting based on your double materiality results.
- **Visualising results** as a materiality matrix so you focus on what truly matters.
- **Generating traceable outputs** ready for assurance and disclosure.



"When it comes to CSRD compliance, Sweep already helps us a lot with the double materiality analysis.

Being able to directly integrate our most significant impacts, risks, and opportunities, and identify our most material issues and then see the list of ESRS we need to address is absolutely crucial and lets us focus our energy where we add the most value."

**Marine Jacquier**

Director of Sustainable Development, Voltalia

The Voltalia logo, featuring the word "voltalia" in a lowercase, sans-serif font. The "v" is stylized with a small circular icon containing a blue and yellow gradient.

# 02 Build governance that spans the business

**CSRD compliance requires collaboration far beyond the sustainability team.**

The first reporting wave showed that success depends on a governance model that distributes ownership – from board-level oversight down to operational implementation.

Establishing clear roles, committees, and approval flows ensures accountability and avoids bottlenecks. Sustainability data touches finance, HR, procurement, risk, and audit functions. Coordination between them is essential.





“CSRD is more than a sustainability reporting exercise; it is a company-wide project. You'll need to engage finance for business resilience assessment, internal control for data accuracy, HR for social disclosures, procurement for supply chain inputs, and leadership for credibility.”

**David Carlin**

International sustainability expert



## Case Study

# Auchan – translating governance into action

Auchan, one of Europe's largest retailers, has embedded ESG oversight directly into its governance structure, ensuring that sustainability is managed at the highest level of the organization.

The company's comprehensive **Supplier Code of Conduct** reinforces this commitment by covering key areas such as:

- **Anti-corruption** – ensuring transparency and ethical business practices across all operations
- **Fair tax** – promoting fiscal responsibility and compliance in every market
- **Whistleblower protection** – safeguarding employees who report unethical behavior

Together, these measures ensure that sustainability expectations cascade consistently throughout Auchan's global network — translating governance principles into everyday business action.

## In practice

- ✓ Establish a CSRD steering committee chaired by the CSO or CFO.
- ✓ Appoint topic champions (e.g. climate, workforce, supply chain) responsible for collecting and validating data.
- ✓ Document reporting lines and meeting frequency.

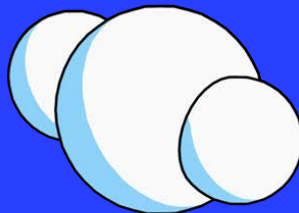
## How we can help

Sweep provides a single source of truth for sustainability governance.

- **Clearly define within Sweep the various roles and responsibilities** across departments.
- **Assign topic owners** for climate, social, and governance disclosures.
- **Track progress and approval status** across framework requirements.
- **Maintain a full audit trail** of every change and decision for assurance readiness.

“Our Board’s ESG & Ethics Committee reviews progress on climate, supply chain, and social impact each quarter. Country ESG managers translate group policies into local action, focusing on issues such as food waste, sustainable packaging, and community engagement.”

From Auchan CSRD report



# 03 Set measurable targets aligned with KPIs

**The CSRD's strength lies in its emphasis on data.**

The CSRD's strength lies in its emphasis on data. By requiring companies to collect, verify, and disclose detailed sustainability information, it pushes organizations to move beyond vague commitments toward measurable impact. But without clear KPIs and defined targets, even the most robust data can lose its meaning.

To turn information into action, companies need to set measurable, time-bound goals that align directly with their broader business strategy. This means linking sustainability metrics to performance outcomes, embedding accountability across teams, and reporting progress with the same rigor as financial results. Organizations that take this approach not only ensure compliance – they build trust with stakeholders and drive continuous improvement through transparency.



“Don’t just disclose your environmental impact – show how you’ll change it. A credible CSRD report needs clear baselines, measurable milestones, and a transition plan that proves you can deliver.”

**Julien Denormandie**

Former French minister and CIO at Sweep



Julien Denormandie is a French engineer and former Minister of Agriculture, where he advanced sustainable farming and food system initiatives. He previously led government efforts on urban development and housing, promoting more resilient communities. Today, he drives corporate climate action as Chief Impact Officer at Sweep, helping organizations measure and reduce emissions.



## Case Study

# Votalia – tracking progress to build credibility

Votalia publishes detailed year-on-year performance metrics to show progress:

- Renewable generation increased to 4.7 TWh, avoiding 1,379 kt CO<sub>2</sub>e.
- Carbon intensity of solar plants fell 10% year-on-year.
- Biodiversity alignment improved from 44% to 53% of capacity.

This trajectory-based disclosure demonstrates both transparency and commitment, building trust with investors and regulators alike.

## In practice

- ✓ Define baseline data for each KPI.
- ✓ Disclose trajectories, not just outcomes.
- ✓ Integrate targets into financial and operational planning.



## Case Study

# Qonto – understanding financed emissions

This mindset reflects a core CSRD principle: sustainability reporting isn't about static disclosure, but about building an evolving understanding of impact. By focusing on Scope 3 emissions, Qonto shows how data-driven insight can turn measurement into meaningful change.

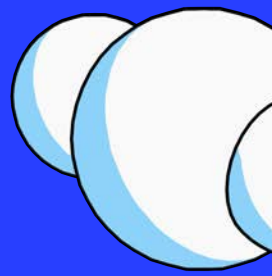
# How we can help

Sweep automates KPI tracking and performance management across all ESRS categories.

- **Collect and calculate Scope 1–3 emissions** and other ESG metrics.
- **Set targets and initiatives** directly in the platform.
- **Monitor progress** with interactive widgets and live dashboards.
- **Export verified indicators** in CSRD-compliant formats.

With Sweep, sustainability data becomes measurable, actionable, and always aligned with financial performance.





“We want to understand our full footprint in order to act on it. This isn’t a ‘one and done’ activity – it involves continuous improvement, hypotheses, and adjustments to our approach.”

From Qonto CSRD report

**Qonto**



# 04 Engage your supply chain and broader network

For most companies, the majority of environmental and social impacts – and many of the biggest risks – lie beyond their own walls. Companies which have already reported via the CSRD emphasised that supplier engagement is essential not only for data collection, but for achieving real emissions reduction and social progress.

The CSRD requires companies to identify and manage impacts across their entire value chain, which means understanding supplier practices, dependencies, and readiness levels. But it also means recognising that these external relationships are part of a wider web of interconnected risks.

His observation underscores a key lesson from those businesses that have already reported via the CSRD: companies that build true resilience engage with their ecosystem as a system – connecting climate, operational, and social dependencies rather than treating them as separate issues.



“In my experience, companies are usually quite good at identifying the main risks that affect their business.

But what’s truly essential is to see how those risks can interact with and reinforce one another. They can also be influenced by external risks, in the supply chain, among suppliers, or in external infrastructure, and that’s often where the real problem lies.”

**François Gemenne**

IPCC Lead Author and climate resilience expert

François Gemenne is a lead author of the IPCC’s 6th Assessment Report and a leading expert on environmental geopolitics and climate-related migration. He is a professor at HEC Paris, where he directs the Master in Sustainability and Social Innovation, and heads the Hugo Observatory at the University of Liège. He also co-directs the Observatory on Defence and Climate for the French Ministry of Defence, focusing on the links between climate change, migration, and security.



## Case Study

# Votalia – creating local shared value

By treating engagement as partnership, Votalia improves acceptance of its projects among communities as well as project resilience – embedding sustainability across its operations and supply chain.

## In practice

- ✓ Map your Tier 1 and Tier 2 suppliers for emissions, human rights, and biodiversity risks.
- ✓ Build engagement tiers (beginner, developing, advanced) to match supplier maturity.
- ✓ Share tools, guidance, and training to help suppliers collect and report consistent data.



## Case Study

# L'Oréal – continuous stakeholder dialogue

L'Oréal's long-term, trust-based approach helps ensure that its sustainability objectives are shared by suppliers, distributors, and communities alike.

## How we can help

Sweep's Supply Chain Module helps you manage value-chain engagement from a single platform.

- **Send tailored surveys** and data-collection requests to suppliers.
- **Benchmark suppliers** against industry peers and track their emission trends over time.
- **Monitor emissions** and social indicators across suppliers and regions.
- **Identify dependencies** and model systemic risks across your ecosystem.

By combining automation with collaboration tools, Sweep turns supplier engagement into a continuous, data-driven partnership that builds resilience across the value chain.



“We place great emphasis on dialogue with stakeholders, incorporating their expectations, interests, and points of view into our strategy. This engagement informs our goals and keeps our sustainability efforts focused.”

From L'Oréal CSRD report

L'ORÉAL

# 05 Secure leadership buy-in and build assurance early

## **CSRD success depends on top-down buy-in.**

Reporting on sustainability touches financial statements, investor relations, business resilience and strategic planning: domains owned by leadership.

Strong executive backing ensures credibility and resource allocation. Equally, assurance readiness – testing systems and verifying data early – saves enormous effort later.

This phased approach allows the company to identify process gaps before formal external audits begin.

# How we can help

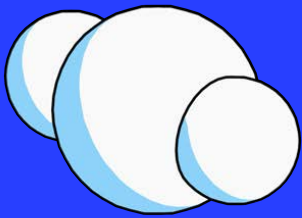
Sweep simplifies assurance readiness with built-in control and validation features.

- **Track every data change** and approval automatically.
- **Run internal control checks** to detect errors or missing information.
- **Provide auditors with transparent data tracing** and supporting documents.
- **Create tailored dashboards** to communicate progress internally with management
- **Generate complete audit-ready reports** aligned with CSRD assurance standards.

By embedding assurance into everyday workflows, Sweep helps leadership build confidence in sustainability data long before external verification begins.

## In practice

- ✓ Get your CEO, CFO, and board involved from day one.
- ✓ Run internal “dry audits” of ESG data ahead of reporting deadlines.
- ✓ Assign assurance responsibility to the same team managing financial audits for integration.



“We conducted our first internal ESG audit in 2024, will pursue limited external assurance in 2025, and target reasonable assurance by 2028.”

From Voltalia CSRD report

 **voltalia**

# 06 Turn reporting into strategy

**Companies that have already reported via the CSRD stress that it is not just a regulatory exercise – it's an opportunity to rethink how sustainability is embedded in business operations.**

The best reports are not the longest or most detailed, but the most strategic. They focus on what truly matters, align ESG with governance and finance, and use technology to ensure rigour and traceability.

For the next wave of reporting companies, this is the time to act:

- Start materiality mapping now.
- Build governance structures early.
- Define KPIs and ensure data ownership.
- Engage suppliers proactively.
- Secure C-suite commitment.

Above all, view CSRD as a catalyst for transformation. With the right systems – like Sweep's integrated data platform – compliance can become a competitive advantage: turning sustainability data into insight, insight into action, and action into measurable impact.





"Working on our CSRD report underlined for us how relevant Sweep's platform is: how much time and energy it will save us, and really make us more efficient."

**Marine Jacquier**

Director of Sustainable Development, Voltalia

 **voltalia**



**SWEEP**

The leading sustainability data management platform.

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