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Q1

Do you agree with Proposal 1 to extend Adoption Provisions 4, 5 and 7 for scope 3 GHG emissions disclosures from one accounting period to two accounting periods?

Yes,

Comment:

Vista Group is supportive of Proposal 1. Vista Group has made good progress in measuring some of its Scope 3 GHG emissions, disclosing a selected subset in its first reporting year. We adopted a staged approach, initially focusing on categories with assumed readily available guidance and data. While this approach seemed straightforward, it presented challenges due to our global operations, where obtaining the necessary activity data internally or from our value chain was difficult. It has taken us 2-3 years to develop our processes and maturity for measuring these less complex categories. Currently, Vista Group is assessing GHG Protocol Category 11: Use of Sold Products and Category 12: End of Life Treatment of Sold Products, particularly for our web-based software and hardware offerings. These categories are more complex to measure, especially for web-based software, due to data collection and methodology development challenges. Vista Group would welcome the relief that an additional year would provide to refine our assessment, data collection and methodology to ensure our disclosures are reliable and meaningful for our primary users.

Q2

Do you agree with Proposal 2 to add a new Adoption Provision 8 that gives relief of one accounting period before scope 3 GHG emissions assurance is mandatory?

Yes,

Comment:

Vista Group is supportive of Proposal 2. As mentioned in our response to Proposal 1, Vista Group has been developing its systems and controls for selected Scope 3 emissions over the past 2-3 years. To prepare for the assurance of our second-year reporting, we obtained a pre-conditions assessment to evaluate our readiness for assurance and areas for improvement. Vista Group would welcome the relief of an additional year, allowing us to limit costs associated with the assurance engagement and the human resources needed to implement improvements to our systems and controls.

Q3

Do you agree that a one-year delay for scope 3 GHG emissions assurance is sufficient to enable systems to mature to support the availability of sufficient reliable data and to enable increased consistency across the assurance market?

Unsure,

Comment:

Vista Group is reasonably confident that a one-year delay is sufficient for the majority of its Scope 3 GHG emissions (currently our selected subset). However, for its challenging categories (Category 11 and 12), it is uncertain if the systems and controls will be ready for assurance by the end of 2025, to meet the new proposed Adoption Provision 8.

Q4

Do you agree with Proposal 3 to extend Adoption Provision 2 for anticipated financial impacts from one accounting period to two accounting periods?

Yes,

Comment:

Vista Group is supportive of Proposal 3. Vista Group has found that with the absence of published guidance for this disclosure, Vista Group must rely on external experts to provide guidance and support the development of internal processes, resulting in high operational costs for the business. In addition, Vista Group acknowledges that the XRB plans to provide guidance on this matter. As a company with a 31 December balance date, Vista Group urges the XRB to release this guidance as early as possible and in any event by 31 March 2025. This timing will allow CREs with a 31 December balance date to evaluate and implement the guidance, while also accommodating the availability of their finance teams outside of peak financial reporting periods (year-end and interim).

Q5

Do you agree with Proposal 4 to extend Adoption Provision 3 for transition planning from one accounting period to two accounting periods?

Yes,

Comment:

Vista Group is supportive of Proposal 4. Similar to Vista Group's response for Proposal 3, the limited detailed guidance on transition planning forces Vista Group to depend on costly external experts to help develop processes and train our internal teams.

Q6

Please provide your contact details:

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