

From: Committee <committee@hkfi.org.hk>

Sent: Friday, October 10, 2025 3:57 PM

To: P.T. Comment Letter <commentletters@hkicpa.org.hk>

Subject: RE: [External] Invitation to Comment on the ISSB Exposure Drafts: Proposed Amendments to the SASB Standards and Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2

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Dear sirs

Please find enclosed the comments regarding the subject consultation for your consideration.

If you have any questions, please feel free to contact us.

Best regards

The Communications & Committee Unit

The Hong Kong Federation of Insurers

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Comment on ISSB Exposure Drafts: Proposed Amendments to the SASB Standards and Proposed Amendments to the Industry-based Guidance on Implementing IFRS S2

We welcome the proposed amendments to the SASB standards and IFRS S2, as they enhance consistency across frameworks and facilitate improved risk assessment and investment decision-making for insurers.

Standardizing disclosures on common topics across industries enables direct peer comparisons, strengthens portfolio-level analysis, and provides a clearer understanding of sustainability-related exposures.

Given that the proposed amendments mainly target non-financial sectors, we would appreciate if the ISSB could also establish a clear roadmap for the financial services sector, particularly insurance. This would help insurers prepare for upcoming reporting requirements and ensure consistent, comparable disclosures.

(Remarks: The above are comments from one member insurer.)

Oct 2025