



VSME Medals

From VSME to VS: what changes

The new European Voluntary Standard.



Five steps to understand the VS

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From VSME to VS

02

**Scope and
objectives of
the VS**

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**Value chain cap,
support and tools**

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**What changes
compared with
the VSME**



Key dates



*The CSRD applies to companies with more than 1,000 employees and over 450 million euros in net turnover (with the total balance sheet criterion being removed entirely). At the same time, the due diligence component (CSDDD) is refocused exclusively on very large companies with more than 5,000 employees and 1.5 billion euros in turnover.



A Wider Scope: from 250 to 1,000 Employees



250 → 1,000

EFRAG specifies that the VSME was originally designed for companies with fewer than 250 employees, whereas the VS targets a wider scope, up to 1,000 employees.

€450M

Net annual turnover: the financial threshold the directive sets for mandatory reporting, together with the 1,000-employee criterion.

If the company has fewer than 1,000 employees or a net turnover of less than 450 million, it reports according to the VS.

The VS: Who Is It For and What For?

WHO FOR

Companies with less than 1,000 employees and less than €450M net annual turnover

WHAT FOR

Answer data requests

From companies subject to the CSRD, banks and investors.
Ease access to finance and better manage your sustainability issues.

KEY ROLE

Value chain cap

Protected undertakings cannot be asked for more than the mandatory datapoints.

Commission Delegated Regulation (EU) 2026/1560, supplementing Directive 2013/34/EU (Annex I, para. 1–2 and Article 3).

Two Modules

The Basic Module is the entry point. The Comprehensive Module builds on it.

11 Basic Module

disclosures · B1 to B11

- Entry point, in plain language
- Target for micro-undertakings, minimum for others
- Simplified narrative information and ESG metrics

9 Comprehensive Module

disclosures · C1 to C9

- Information requested by banks, investors and customers
- Requires applying the Basic Module as well
- Metrics drawn from SFDR (PAI), EBA Pillar 3 and the Benchmark Regulation

Key principle: No materiality assessment is required. Datapoints are mandatory, "if applicable", voluntary or sector-specific. Policies and targets: a statement in B2, a brief description in C2.

Basic Module: 11 Disclosures

The information every company using the VS reports.

B1 Basis for preparation

B2 Practices, policies and future initiatives

B3 Energy and GHG emissions

B4 Pollution of air, water and soil

B5 Biodiversity

B6 Water

B7 Resource use, circular economy and waste management

B8 Workforce: general characteristics

B9 Workforce: health and safety

B10 Workforce: remuneration, collective bargaining and training

B11 Convictions and fines for corruption and bribery

B Outside the scope of the value-chain cap for undertakings with 10 employees or less: B3, B6 and B7.

Comprehensive Module: 9 Disclosures

The additional information expected by banks, investors and customers.

C1 Strategy: Business Model and Sustainability-Related Initiatives

C2 Practices, policies and transition initiatives

C3 GHG reduction targets and climate transition

C4 Climate risks

C5 Additional workforce characteristics

C6 Human rights policies and processes

C7 Severe negative human rights incidents

C8 Revenues from certain sectors

C9 Gender diversity in the governance body

C Outside the scope of the value-chain cap for undertakings with 10 employees or less: C1, C3, C4, C6 and C7.

The Value Chain Cap

The main protection the VS gives companies.

THE PRINCIPLE

A company subject to the CSRD cannot require its partners with fewer than 1,000 employees and an annual turnover below €450 million to provide more than the mandatory datapoints of the VS.

Any request beyond the cap must flag the extra information sought and the right to decline.

The datapoints covered are listed in Annex II, with a lower cap for undertakings with 10 employees or less.

Note: the cap applies only to information gathered for CSRD reporting, from financial years starting on or after 1 January 2027.

What Changes (1/2): Scope and Framework

Commission Delegated Act (2013/34/UE) compared with Commission Recommendation (EU) 2025/1710.

Wider scope

From unlisted SMEs to all companies with up to 1,000 employees.

Guidance moved out

The guidance annex disappears.
EFRAG guidance is on the Knowledge Hub: English now, 19 EU languages by end 2026.

New Annex II for the value chain cap

List of the data covered, separate for 10 employees or fewer and more than 10.

EMAS and VS combined

A single report can cover both frameworks.

Wider omissions

Aligned with the simplified ESRS, no longer only classified or sensitive information.

Simpler topic list

Appendix B follows the simplified ESRS 1, without sub-sub-topics.

What Changes (2/2): Metrics

Few changes of substance: some metrics removed, aligned or moved.

New exemption: 10 employees or fewer

Certain datapoints in B3, B6, B7, C1, C3, C4, C6 and C7 become voluntary.

Data removed

GHG intensity (B3), land use (B5), Paris-aligned benchmarks (C8).

Data aligned with the simplified ESRS

Biodiversity (B5), water (B6), waste (B7), fatalities (B9), training (B10).

Employee turnover

Moves from B8 to C5. The 50-employee threshold disappears for turnover, the gender ratio and self-employed workers.

Commission Delegated Act (2013/34/UE) compared with Commission Recommendation (EU) 2025/1710.



Key Takeaways

Three things to remember about the VS.

- 1** The VS replaces the VSME as the single Voluntary Standard, for all companies with up to 1,000 employees or up to €450 million in annual turnover.
- 2** It protects these companies: companies subject to the CSRD cannot ask them for more than the VS mandatory datapoints
- 3** The content stays close to the VSME: a few metrics removed or aligned, and relief for companies with 10 employees or fewer.



Thank you

Questions about the VS?

Write to us at hello@vsme-medals.eu