ESEF

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Latest developments



No 2026 update of the taxonomy for ESEF

- Normally the update primarily constitutes a purely technical amendment

No 2026 update of the ESEF reporting manual

- The 2025 version stays applicable for filings concerning reporting periods starting on or after 1 January 2025 (so also FY 2026)

ESMA published on 13 October 2026 the ECEPs for FY 2026

- Enforcement priorities concerning annual reports 2026

ESAP regulation is implemented in Dutch law as per 7 July 2026

- Phased implementation, TD in first phase

ESAP and annual reporting

The European Single Access Point (ESAP) provides access to a single central European platform with financial and sustainability information from companies and financial institutions

What does not change

- ESAP does not introduce a new reporting obligation; however, it does increases the importance of timely and digital reporting
- Companies keep reporting to the (current) collecting body such as the AFM or Chamber of Commerce; they do not have to report to ESMA

What does change

- For companies, what they have to report does not change, but their reports will become accessible on ESAP in Europe

ESAP will be implemented in three phases in the coming years: From 2027, more and more publicly available reports will be made available to ESAP via national collection points.

Current information via the AFM / ESMA websites:
AFM url: https://www.afm.nl/nl-nl/sector/themas/belangrijke-europese-wet--en-regelgeving/esap
ESMA url: https://www.esma.europa.eu/press-news/esma-news/esma-launches-data-collection-under-first-phase-esap

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Recap ECEPs 2025 Statement of cashflows Correctness of mark-ups



IFRS taxonomy concepts in the statement of cash flows are misapplied due to misinterpretation of their scope or granularity

An issuer disclosed in the statement of cashflows the line item Dividend paid. From the Statement of changes in equity it became clear that this was dividend paid to shareholders of the entity since there was also a separate line item Dividend paid to shareholders of non controlling interests.

RTS on ESEF, Annex IV, §3 requires that issuers shall use the core taxonomy element with the closest accounting meaning to the disclosure being marked up.

In this case the closest element was ***DividendsPaidToEquityHoldersOfParentClassifiedAs…*** instead of the tag ***DividendsPaidClassifiedAs…*** used by the Issuer.

In tagging always take into account all information available in the annual financial report and choose then the tag with the closest accounting meaning.

Recap ECEPs 2025 Statement of cashflows Completeness of markups



The ESEF AFR is missing mandatory text block element per RTS on ESEF on human-readable notes related to the cash flow statement

An issuer disclosed in the notes the accounting policy for the statement of cashflows.

RTS on ESEF article 4.2 on ESEF requires that Issuers shall, as a minimum, mark up the disclosures specified in Annex II where those disclosures are present in those IFRS consolidated financial statements.

Annex II specifies as one of the **mandatory elements** the text block element: ***DescriptionOfAccountingPolicyForCashFlowsExplanatory***. This disclosure should have been tagged with this mandatory element.

Pay attention and check for any inconsistencies between monetary elements in the primary financial statements and text block elements in the notes.

Recap ECEPs 2025 Statement of cashflows Consistency of markups



Inconsistent tagging of financial line items

An issuer tagged the line item 'Profit for the year' in the consolidated statement of cash flows with the element 'ProfitLossFromContinuingOperations' and in the consolidated statement of profit or loss and other comprehensive income with the element 'ProfitLoss'.

RTS on ESEF, Annex IV, §3 requires that issuers shall use the core taxonomy element with the closest accounting meaning to the disclosure being marked up.

The Issuer should have been consistent in the element used to tag two line items with the same accounting meaning and amount.

Pay attention and check for any inconsistencies between tagging of the same monetary elements in the primary financial statements.

Recap ECEPs 2025 Statement of cashflows Extension taxonomy elements & anchoring



Unnecessary extensions stem from unfamiliarity with the IFRS taxonomy. Issuers should review the taxonomy thoroughly.

An issuer disclosed in the statement of cashflows the line item **Loans granted to related parties** and created an extension element for this line item.

- RTS on ESEF, Annex IV, §4 requires that issuers shall only create an extension taxonomy element if the closest core taxonomy element would misrepresent the accounting meaning of the disclosure being marked up.

The core taxonomy contains an element called ***CashAdvancesAndLoansMadeToRelatedParties*** for which the documentation label states ***The cash outflow for loans and advances made to related parties*** and reference is made to IAS 7.16. In this case an extension element may not have been necessary.

Always familiarize yourself with the full IFRS taxonomy. Use for instance the searchable Excel spreadsheet provided by the Foundation.

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ECEPs 2026 Statement of Changes in Equity



- Correctness of markups

- Completeness & consistency of markups

- Structural, presentation & calculation correctness

- Extension taxonomy elements & anchoring

- Correctness of signs, scales & numerical representation

ECEP 2026 Statement of changes in equity
Correctness of markups



The Issuer reports a 202X FVOCI revaluation of equity instruments net of tax in the Fair value reserve. It does not have other Financial Assets at FV.

POSSIBLE MISTAKE

Tag the OCI movement with the concept “Other Comprehensive Income **Before Tax** Gains Losses From Investments In Equity Instruments”.

Application as ComponentsOfEquityAxis the component “Reserve Of Gains And Losses On **Financial Assets** Measured At Fair Value Through Other Comprehensive Income Member”.

RIGHT APPROACH

Use an OCI movement concept that matches **the fact’s tax basis**, e.g. “Other Comprehensive Income **Net Of Tax** Gains Losses From Investments In Equity Instruments”.

Application as ComponentsOfEquityAxis the component “Reserve Of Gains And Losses From Investments In **Equity Instruments** Member”.

WEBINAR TAKEAWAY | Always select the elements with the closest accounting meaning. Check concept name, standard, description and guidance label.

AFM

ECEP 2026 Statement of changes in equity
Completeness & consistency of markups



Missing markups of monetary facts (including footnotes) relating to equity movements, and of Annex II elements for narrative text blocks supporting the SOCE. For instance (not exhaustive):

- ✓Disclosure of dividends [text block]
- ✓Disclosure of issued capital [text block]
- ✓Disclosure of non-controlling interests [text block]
- ✓Disclosure of reserves within equity [text block]
- ✓Disclosure of share capital, reserves and other equity interest [text block]
- ✓Description of accounting policy for dividends [text block]
- ✓Description of accounting policy for issued capital [text block]
- ✓Description of accounting policy for treasury shares [text block]
- ✓Description of accounting policy for warrants [text block]

ECEP 2026 Statement of changes in equity
Completeness & consistency of markups

Nil values

- Markup completeness also includes nil values, but only when a fact is genuinely nil and not where information is absent because it is non-applicable.
- Similarly, the fixed-zero transformation should be used only where the reported value is genuinely zero.
- Issuers should consider the accounting meaning and presentation context to determine whether the disclosure represents a true zero value or the absence of an applicable fact.

	Share capital (excluding share premium)	Revaluation reserve	Retained earnings	Total equity attributable to equity holders of the parent	Non-controlling interest	Total equity
Balance at 1 January 2025						
Profit/(loss) for the period						
Transfer of revaluation reserve						
Dividends distributed (Note 19)						
Balance at 31 December 2025						

ECEP 2026 Statement of changes in equity
Extension taxonomy elements & anchoring



Allocation of prior year result to retained earnings

POSSIBLE MISTAKE	RIGHT APPROACH
Issuer created an extension element “Allocation Of Prior Year Result” and anchored to base element “Increase Decrease In Equity”	Use element “Increase (decrease) through appropriation of retained earnings, equity” with the appropriate axis members, e.g. “Appropriate Of Results Member” and “Retained Earnings Member”, where the table structure requires them. Used anchor incorrect since movement between two axes. When extension element, anchor should be “Increase Decrease Through Transfers And Other Changes Equity”. However, since base element used, no anchor necessary.

WEBINAR TAKEAWAY | Core taxonomy first. Extensions should add meaning—not duplicate it—and their anchors must reflect that meaning.

AFM

Recap ECEPs 2025 Statement of cashflows
Correctness of signs, scales & numerical representation



Example: a filing reports revenue of 1,234 in millions of dollars

SCALE

Changes the value's magnitude

Inline XBRL:
<ix:nonFraction scale="6">1,234</ix:nonFraction>

Interpretation: 1,234 × 10^6 = $1,234,000,000

Scale = 6 means the displayed number is in millions.

ACCURACY

Describes rounding / precision

XBRL fact: <... decimals="-6">1,234,000,000</...>

Interpretation: rounded to the nearest million

decimals = –6 means accuracy to the nearest 10^6—not a multiplier, so value in range [1,233,500,000:1,234,500,000>.

WEBINAR TAKEAWAY | scale tells you how to convert the displayed number; decimals tells you how precisely the reported fact is rounded.

ECEP 2026 Statement of changes in equity Accuracy and scale

Issuer discloses in footnote to SOCE the nominal value of the shares as EUR 135.

SOCE is stated with scale and accuracy in millions.



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IFRS 18 - Implications for ESEF reporting
ECEP General considerations and reminders



[...] Moreover, issuers are reminded that IFRS 18 will have implications for ESEF reporting.

Early assessment of the required XBRL mappings, taxonomy elements and potential extension needs (including for comparative information) may facilitate a smoother transition and help ensure high-quality digital reporting from first-time application

Issuers are reminded that the ESEF Taxonomy package published by ESMA in April 2026, applicable to 2026 annual financial reports, includes separate IAS 1 and IFRS 18 entry points to support early familiarisation, testing and implementation. [...]

IFRS 18 - Implications for ESEF reporting
Check guidance label



Element:

ImpairmentLossReversalOfImpairmentLossRecognisedInProfitOrLoss

Guidance label:

Do not use this line-item element for the statement of profit or loss. This element is used only to tag information in the notes. […]

For the statement of profit or loss use for instance:

ImpairmentLossReversalOfImpairmentLossRecognisedInProfitOrLossOperating

IFRS 18 - Implications for ESEF reporting
Check category



For Issuers to whom rental income is part of the operating category (f.i. REITs) use the element:

RentalIncome

With documentation label: "*The amount of income recognised from rental activities, in the operating category in the statement of profit or loss.*"

But for other Issuers most probably part of investing category so use element:

RentalIncomeInvesting

With documentation label: "*The amount of income recognised from rental activities, in the investing category in the statement of profit or loss.*"

IFRS 18 – Implications for ESEF reporting
Extension elements



✓Be concise in your label, so if an element belongs to the operating category, reflect this in your label (e.g. end with … operating, … investing, etc.)

✓Do not use elements specifically created for the notes to tag a primary statements item, instead create an extension element

Concept name	Preferred label	Standard label	Documentation label	Guidance label	Type	References
InterestExpenseOnBankLoansAndOverdrafts	Interest expense on bank loans and overdrafts	Interest expense on bank loans and overdrafts	The amount of interest expense on bank loans and overdrafts. [Refer: Interest expense; Bank overdrafts]	Do not use this line-item element for the statement of profit or loss. This element is used only to tag information in the notes. If no suitable element is included in the IFRS Accounting Taxonomy, an extension element needs to be created. The label of that extension element should reflect the category of the element in its label.	Monetary duration, debit	Effective 2027-01-01 IFRS 18.113 c Common practice

✓Anchor extension elements preferably to elements belonging to the same category (both for wider and narrower anchors)

✓Retain extension elements when representing same accounting concept but adjust label to reflect category (if relevant).

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- When you cannot find a precise element in the base taxonomy, check if your line item is allowed under IFRS (e.g. netting cashflows in your cashflow statement)

- Include tagging of your IFRS 18 primary statement as part of your IFRS 18 implementation process

- Follow the package convention, i.e. uses .xbri and structure the container in line with Report Package 1.0, this may prevent that your filing is rejected

- Once more, prepare your AFR directly as XHTML document instead of a PDF converted to XHTML.

Questions?

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