



Webinar on the Omnibus package: Prepare for revised and simplified standards

9th December 2025



Agenda

1 General Omnibus updates

2 Revised ESRS:

2.1: Timeline

2.2: Key simplifications at high level

2.3: Cross cutting standards

2.4: E, S, G standards

3 Q & A session



General Omnibus update



Omnibus proposal: Status

‘Stop the clock’ proposal



Current stage:

The EU published the final text of the omnibus stop-the-clock mechanism on 16 April 2025 in the Official Journal of the EU. The final text is now also adopted in Danish law and will enter into force on 31 December 2025.



Goal:

Granting 2 more years for CSRD-implementation for Wave 2 companies.

Content proposal



Current stage:

The European Parliament has scheduled the final vote on Content proposal on 16 December. The Content proposal is expected to be adopted by EU in the beginning of 2026 (maybe before).

EFRAG provided draft simplified ESRS 3 December.



Goal:

Reduce scope and simplify reporting requirements under CSRD.

Revised ESRS: Timeline



2.1

Timeline



EFRAG delivered technical advice on 3 December

- On 26 February 2025, the European Commission published the first of several expected ‘Omnibus’ packages intended to simplify sustainability reporting requirements.
- The European Commission **requested** that EFRAG provide technical advice on the simplification of European Sustainability Reporting Standards (draft ESRS’) consistent with the areas targeted for change in the ‘Omnibus’ package.
- EFRAG delivered the **draft ESRS** to the European Commission on 3 December.

26 February 2025

- The European Commission published the first ‘Omnibus’ package

8 April

- EFRAG published an online questionnaire requesting input from stakeholders by May 6

31 July

- EFRAG published exposure drafts of the simplified ESRS

3 December

- EFRAG delivered the draft simplified ESRS to the European Commission

27 March

- The European Commission issued a letter to EFRAG requesting technical advice on the simplification of ESRS by 31 October

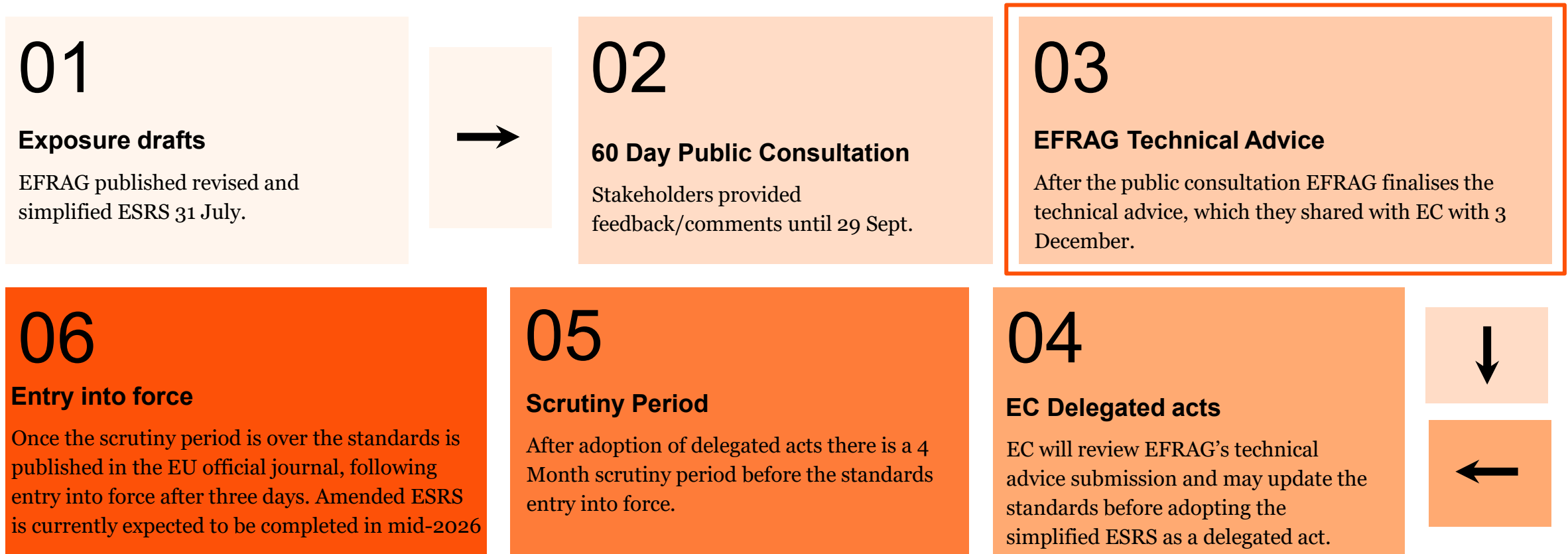
1 July

- The European Commission issued another letter to extend the deadline for the technical advice to 30 November

29 September

- Public consultation deadline on the exposure drafts of the simplified ESRS

Process of adoption Revised ESRS



According to Omnibus-proposal the EC aims to adopt the amended ESRS Delegated Act six months, at the latest, after the entry into force of the proposed amendments to the CSRD reporting framework ('content'-proposal).

Key simplifications at high level



Guidelines on EFRAG's technical advice

The European Commission's letter refers to the Omnibus' explanatory memorandum as a guide for EFRAG's technical advice



Substantially reduce the mandatory datapoints



Clarify provisions that are deemed unclear



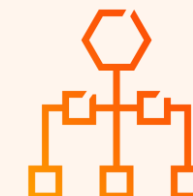
Improve consistency with other pieces of EU legislation



Improve instructions on how to apply double materiality



Simplify structure and presentation of the standards



Enhance interoperability with global reporting

Key simplifications implemented

EFRAG highlighted the following key simplifications in its [press release](#)

Usefulness of information as a general filter

“Usefulness of information as a general filter and emphasis on **fair presentation** for more relevant and less compliance-oriented reporting”

Principles-based standards for narrative disclosures

“Principles-based standards for narrative disclosure particularly for policies, actions and targets, flexibility on how to present the information, greater focus on how sustainability matters are managed”

Simplified materiality assessment

“Simplified materiality assessment: clearer guidance, reduced documentation, and better alignment with audit needs”

Easier to understand and implement

“ESRS are now shorter, clearer, easier to understand and to implement”

Reduced pressure for data collection in the value chain

“Elimination of the preference for direct data in the value chain, reducing the pressure for data collection”

Reduced datapoints required

“61% reduction of (mandatory) datapoints that are required if material, deletion of all voluntary disclosures”

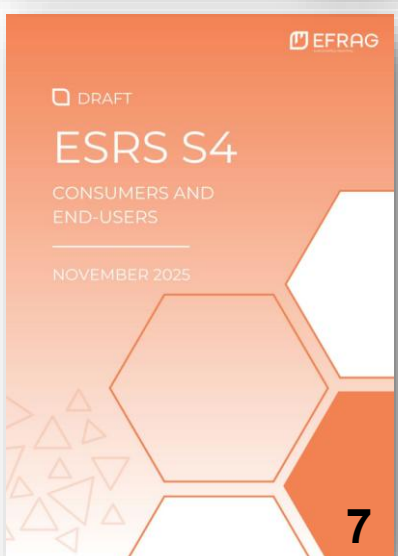
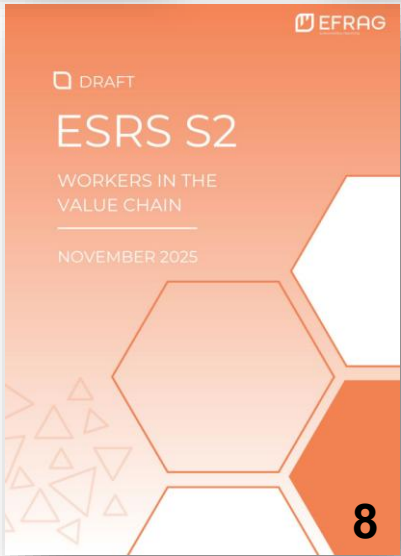
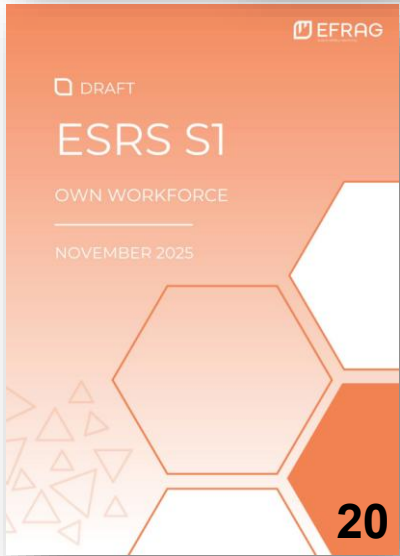
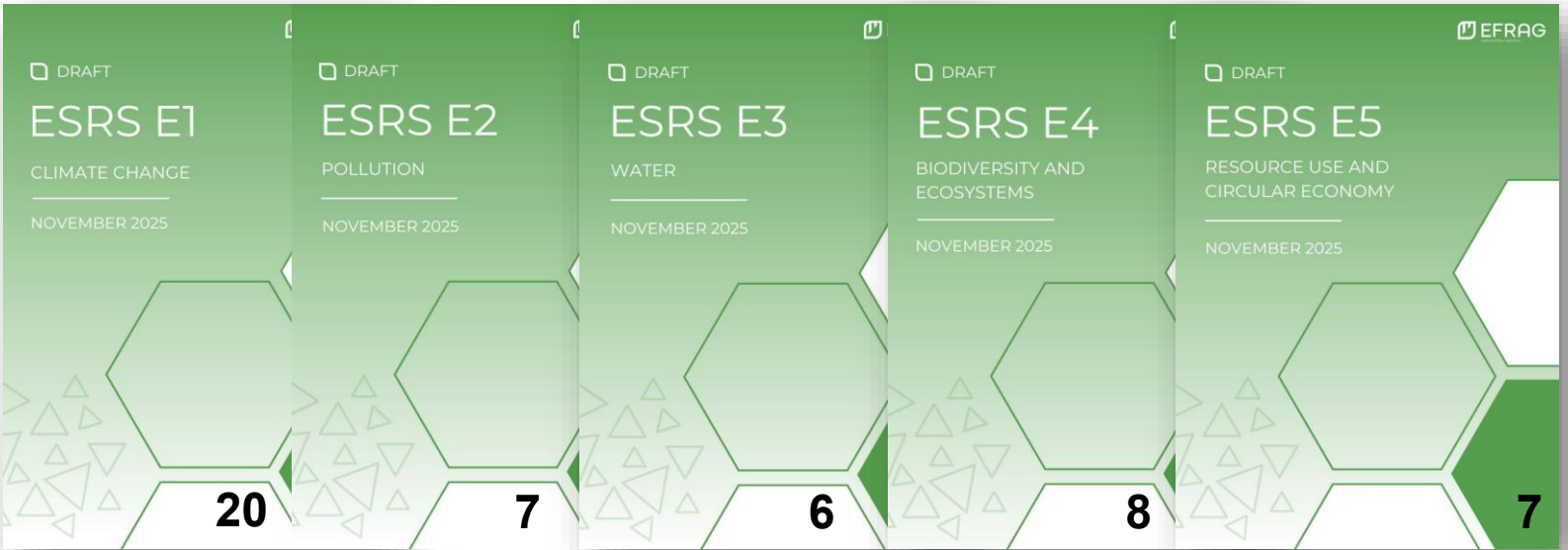
New reliefs and expanded phase-in

“Substantial reliefs, proportionality mechanisms and ad hoc phasing-in for challenging disclosures”

Enhanced interoperability with the ISSB standards

“Enhanced interoperability with the ISSB Standards: common disclosures preserved where possible, enhancement thanks to fair presentation, revised GHG boundary and provisions for anticipated financial effects. As some reliefs in ESRS go beyond those in the ISSB Standards, companies should pay attention when using them if they wish to comply with the ISSB Standards”

Revised ESRS



First look at key simplifications

Cross cutting standards

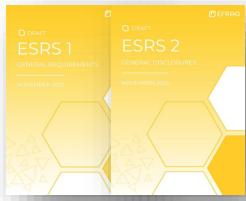
- Simplification of DMA
- Explicit reference to fair presentation
- Relief of undue cost and effort when collecting data, and calculating metrics
- Emphasis of better readability
- Relief for acquisitions and disposals
- Extended phase-in provisions for anticipated financial effects
- Expanded phase-in provisions for ‘wave one’ entities

2.3



First look at key simplifications—cross-cutting standards

- Simplification of the DMA



ESRS 1 contains additional guidance related to the DMA, including:

- New flexibility to perform the DMA either **starting at the topic level ('top-down')** or **from the level of individual IROs ('bottom-up')**
- Clarification that a full DMA is not required annually unless significant changes arise
- How an entity **should consider mitigation, remediation, and prevention actions** when assessing the materiality of actual and potential negative impacts

Negative impacts

- The severity of **actual negative impacts** – those that manifest during the reporting year - shall be assessed as they actually manifested during the reporting year
 - Their severity is assessed based on the current reporting period, i.e. **taking into account how they were mitigated in the previous periods**. Remediation of impacts realised during the reporting period shall not be considered;
- The severity and likelihood of **potential negative impacts** – those that may manifest in the future - shall be assessed taking into account only implemented prevention and mitigation policies and actions

Positive impacts

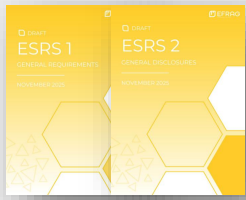
- Positive impacts shall be assessed on their own, without netting against negative impacts
 - The results of prevention, mitigation or remediation actions to address negative impacts the undertaking is connected to, or compliance with law and regulation, **are not positive impacts**.
 - **Positive impacts include effects of the undertaking's business activities**, products or services **that mitigate or remediate another party's negative impacts**, when the undertaking is not connected to those impacts

First look at key simplifications—cross-cutting

- Explicit reference to fair presentation

In conjunction with the DMA changes: A reference to a **fair presentation** framework has been made explicit

- Fair presentation requires disclosure of relevant information about the undertaking's material IROs
- Fair presentation also requires that the undertaking discloses:
 - information that is **comparable, verifiable and understandable**
 - **entity-specific information** when applying ESRS is not sufficient to enable users to understand the undertaking's material IRO
- Clarification that the undertaking is not required to disclose information prescribed by ESRS that is not material



Purpose of the streamlined DMA and the explicit emphasis on fair presentation:

- To encourage undertakings to **focus on what really matters** and to **avoid unnecessary granular information** often associated with a compliance exercise.

First look at key simplifications—cross-cutting standards

Relief of undue cost and effort when collecting data, and calculating metrics



Undue cost and effort

Introduction of the concept of **using all reasonable and supportable information that is available** to the undertaking at the reporting date **without undue cost or effort** to a number of requirements including:

- An entity's process to identify material IROs and to determine the scope of its value chain.
- To prepare information on metrics
- To report on current and anticipated financial effects.

The assessment of what constitutes undue cost or effort depends on the undertaking's specific circumstances and **requires a balanced consideration of the costs for the undertaking and the benefits of the resulting information for users.**

This is **subject to reassessment each year** and given a constant increase in reporting experience, as a result, availability of information is expected to increase over time.

Calculation of metrics

Relief for metrics when activities are not drivers of material IROs:

- An entity **may omit information relating to specific activities** from the calculation of a metric **if the activity is not a significant driver of the IRO** related to the metric
- The undertaking shall disclose if this relief is used and include any relevant information to enable users to understand the scope limitations resulting from it.

Relief for metrics due to lack of data:

- An entity may **report only an objectively defined part of the scope of the reporting boundary** for a particular metric if there is a lack of reliable data obtainable without undue cost and effort
- When this relief is used, transparency is required on the actions to increase coverage overtime.

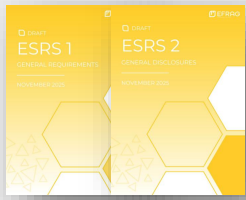
Elimination of the preference for direct data over estimates in the value chain reporting reducing the pressure for direct data collection

First look at key simplifications—cross-cutting

- Emphasis of better readability

ESRS 1 and 2 introduces greater flexibility to present information in a clear manner:

- Option to include an **executive summary** at the beginning of the sustainability statement
- Option to use **appendices** for more **detailed information and for EU Taxonomy related information**,
- Clearer guidance on the inclusion of **supplementary disclosures**
 - The undertaking may include in its sustainability statement supplementary information e.g. stemming from other legislation or generally accepted reporting standards or frameworks **even if that information is not material**.
- Amended ESRS **do not require anymore the justifications for not having PATs in place and timetables for future adoption** (i.e., no behaviour mandated).

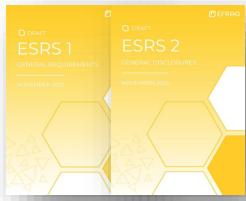


Purpose of these amendments:

- To **enable undertakings to “tell their story” in a balanced and consistent manner** while also providing access to the related detailed data without blurring the management report type information.

First look at key simplifications—cross-cutting standards

Relief for acquisitions and disposals

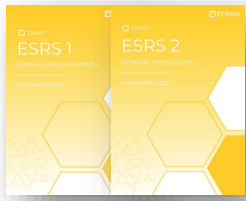


- An entity is **allowed to defer the inclusion of a newly acquired subsidiary or business** from both its materiality assessment and sustainability statement **to the next reporting period**.
- An entity may exclude a **disposed subsidiary** or business from the beginning of the period in which it is disposed.
- If the undertaking uses the relief, it **shall use available information to disclose significant events** that affected during the reporting period the subsidiary or business acquired or sold since acquisition or until disposal, if this has an effect on the group's exposure to material impacts, risks and opportunities.



First look at key simplifications—cross-cutting standards

Extended phase-in provisions for anticipated financial effects



The final draft of ESRS 2 requires an entity to **provide both quantitative and qualitative information about its anticipated financial effects**, unless certain circumstances exist.

- Draft ESRS 1 also includes **extended phase-in provisions for anticipated financial effects**:
 - A ‘wave one’ entity would be **permitted to omit the quantitative information about anticipated financial effects** required by draft ESRS 2 and draft ESRS E1 for financial years prior to 2030.
 - This relief **does not apply to certain anticipated financial effects** disclosures in draft ESRS E1 **related to an entity’s assets exposed to material physical or transition risk**.
- These changes substantially **align the disclosure requirements with IFRS S1** General Requirements for Disclosure of Sustainability-related Financial Information, improving interoperability.



First look at key simplifications—phase-in provisions for ‘wave 1’



The draft simplified ESRS contains a number expanded phase-in provisions for ‘wave 1’ entities

Financial years the phase-in is applicable	ESRS disclosure requirements or datapoints permitted to be omitted
Years prior to 2027	All disclosure requirements of: ESRS E4 <i>Biodiversity and Ecosystems</i> , ESRS S2 <i>Workers in the Value chain</i> , ESRS S3 <i>Affected Communities</i> , ESRS S4 <i>Consumers and End-users</i>
Years prior to 2027	All information about anticipated financial effects <u>except for</u> certain anticipated financial effects disclosures in draft ESRS E1 related to an entity’s assets exposed to material physical or transition risk
Years prior to 2030	Quantitative information about anticipated financial effects <u>except for</u> certain anticipated financial effects disclosures in draft ESRS E1 related to an entity’s assets exposed to material physical or transition risk
Years prior to 2030	Quantitative information about substances of concern as required by ESRS E2-5
Years prior to 2027	Selected disclosure requirements in ESRS S1 <i>Own workforce</i>: <ul style="list-style-type: none">• Characteristics of non-employee workers (S1-6)• Collective bargaining coverage and social dialogue for non-EEA countries (S1-7)• Social protection (S1-10)• Persons with disabilities (S1-11)• Training and skills development (S1-12)• Selected datapoints on health and safety (S1-13 paragraphs 40(d) and (e))• Datapoints on health and safety for non-employees (S1-13)• Work-life balance (S1-14)

2.4

E, S, G Disclosures



First look at key simplifications—E1-6

Narrowing down the changes made in E1, they includes changes to disaggregation of GHG emissions, the target-setting process, and how to monitor reductions

Metrics and targets

Disclosure Requirement E1-6 – *Targets related to climate change*

22. (32 amended) The undertaking shall disclose its *climate change targets* in accordance with the provisions of ESRS 2 GDR-T.
23. (34 amended) The undertaking shall disclose the *GHG emission reduction targets* it has set, including:
 - (a) absolute GHG emission reduction targets for scopes 1, 2 and 3, either separately or combined, and where relevant, in intensity value. The undertaking shall specify, in case of combined GHG emission reduction targets, which *GHG emission* scopes (1, 2 and/or 3) are covered by the target and the share related to each respective GHG emission scope;
 - (b) (AR 24 amended) if the scope (geography, GHGs covered, entities included) of the GHG emission reduction target diverges from the scope of the GHG inventory (reported under ESRS E1-8), the percentages for scopes 1, 2 and 3 covered by the target, as well as which GHGs are covered; and
 - (c) a statement on whether the GHG emission reduction targets are science-based and compatible with limiting global warming to 1.5°C. The undertaking shall state which framework and methodology has been used to determine these targets, including whether they are derived using a sectoral decarbonisation pathway, and the underlying climate and policy scenarios. As part of the critical assumptions used for setting GHG emission reduction targets, the undertaking shall briefly explain how it has considered future developments (e.g. changes in sales volumes, shifts in customer preferences and demand, regulatory factors, and new technologies) and how these will potentially impact both its GHG emissions and emissions reductions.

When calculating the target (AR), an entity shall:

- If the undertaking discloses a net-zero target separately to any GHG emission reduction targets it has set, as per ESRS 2 GDR-T, it shall explain how it intends to permanently neutralise any residual GHG emissions. **(amended)**
- The GHG emission reduction target shall be gross targets **(amended wording)**
 - *If only intensity targets is set, the associated absolute value is to be reported*
- The baseline value is not to be changed unless key changes occur in the target or reporting boundary – the base year must be recent and representative **(amended wording)**
- If reporting under ESRS E1-8 (Gross GHG emissions) is based on an operational control boundary, this may be applied in the emission reduction targets **(new)**
- The target value(s) shall be compared with sector-specific or cross-sector emission pathway compatible with limiting global warming to 1.5°C. For this purpose, the undertaking shall calculate a 1.5°C-aligned reference target value for scope 1 and 2 (and a separate one for scope 3 if it has scope 3 *GHG emissions reduction targets*) against which its own GHG emission reduction targets or interim targets in the respective scopes can be compared. **(amended wording)**

First look at key simplifications—E1-8

Narrowing down the changes made in E1, they includes changes to disaggregation of GHG emissions, the target-setting process, and how to monitor reductions

Disclosure Requirement E1-8 – *Gross scope 1, 2, 3 GHG emissions*

28. (45 amended) The objective of this DR is to enable an understanding of the undertaking's direct and indirect **impacts** on climate change as a result of activities in its own operations and in its upstream and downstream value chain.
29. (44 amended) The undertaking shall disclose absolute gross **GHG emissions** generated during the reporting period, expressed as metric tonnes of CO₂eq classified as:
 - (a) (44(a) amended) **scope 1 GHG emissions**, including the percentage of scope 1 GHG emissions from the EU Emission Trading System (EU ETS) if it has emissions from this system;
 - (b) (44(b) amended) **scope 2 GHG emissions** (location-based and market-based); and
 - (c) (44(c) amended) **scope 3 GHG emissions** from each significant **scope 3 category** as a total and per category.
30. (AR 43(c) amended) The undertaking shall disclose its direct biogenic CO₂ emissions from the combustion or biodegradation of biomass separately from **scope 1 GHG emissions**.

Reporting boundaries

- The starting point of the reporting boundary corresponds to financial control (as per GHGP). In additional, the undertaking applies the provisions in paragraphs 72 (leased assets), 73 (benefit schemes) and AR 35 for paragraph 62 (joint operations) of ESRS 1 General Requirements.
- When information reported is not sufficiently portraying the emission from operated assets, the undertaking shall report GHG scope 1 and scope 2 emissions calculated on the basis of its operational control boundary as defined by GHGP.

Emission disaggregation

- The undertaking **may** present its GHG emissions in accordance with the table below, populating the rows as relevant in line with its disclosures under paragraph 29. A comparison of the undertaking's emissions over time may be performed by comparing current year emissions to a meaningful comparative, e.g. a GHG emission reduction target base year, indicating the percentage change (reduction/increase) in the corresponding column. **(amended from shall to may)**
- The table includes scope 1, 2, 3 as well as scope 1 biogenic emissions

	Comparative		Current Year	% Change
	Year	Emissions	Emissions	
Scope 1 GHG emissions				
Gross scope 1 GHG emissions (tCO ₂ eq)				
Percentage of scope 1 GHG emissions from the EU Emissions Trading System (EU ETS) (%)				

First look at key simplifications—S1-5

Narrowing down the changes made to S1, new guidance has been introduced for categorization of accidents, adequate wage has been discussed, and gender pay gap is kept to reported as unadjusted



Disclosure Requirement S1-5 – *Characteristics of the undertaking's employees*

18. (49 amended) The objective of this DR is to provide insight into the undertaking's approach to employment practices, including security of employment for its **own workforce**. It also serves as the basis for calculating certain quantitative **metrics** required by other DRs in this Standard and provides contextual information for those metrics.
19. (50 amended) The undertaking shall disclose:
- the total number of **employees** by headcount and breakdowns by gender and by country for the countries in which it has 50 or more employees and that are the ten largest countries in terms of employee numbers;
 - the total number by headcount or full time equivalent (FTE) of:
 - permanent employees with a breakdown by gender;
 - temporary employees with a breakdown by gender;
 - non-guaranteed hours employees**;
 - the rate of employee turnover in the reporting period; and
 - a qualitative explanation in case there is an inconsistency between information reported under point (a) above and the most representative number reported in the financial statements.

Gender	Number of employees (headcount) – current reporting period	Number of employees (headcount) – previous reporting period
Male		
Female		
Other		
Not reported		
Total employees		

FEMALE	MALE	OTHER*	NOT REPORTED	TOTAL
Number of permanent employees (headcount / FTE) – Current reporting period				
Number of permanent employees (headcount / FTE) – Previous reporting period				
Number of temporary employees (headcount / FTE) – Current reporting period				
Number of temporary employees (headcount / FTE) – Previous reporting period				
Number of non-guaranteed hours employees (headcount / FTE)				

Reporting on the characteristics of the undertaking's employees

- The definitions of permanent, temporary and non-guaranteed hours employees differ among countries. If the undertaking has employees in more than one country, it shall use the definitions as per the national laws of the countries where the employees are based to calculate country-level data. Country-level data shall then be added up to calculate the total numbers. **(amended wording)**
- In accordance with ESRS 2 GDR-M, the undertaking shall disclose the method used to calculate and compile **employee** data (for example, at the end of the reporting year or as an average) and provide contextual information. **(moved from DR to AR)**
- Tabular format still “shall” requirements
- For the employee turnover calculation, the undertaking shall divide the number of employees who leave voluntarily or due to dismissal, retirement or death in service by the average employee headcount. **(moved from DR to AR)**

Country	Number of employees (headcount) – current reporting period	Number of employees (headcount) – previous reporting period
Country A		
Country B		
Country C		
Country D		

First look at key simplifications—S1-9

Narrowing down the changes made to S1, new guidance has been introduced for categorization of accidents, adequate wage has been discussed, and gender pay gap is kept to reported as unadjusted

Disclosure Requirement S1-10 – Adequate wages

67. The undertaking shall disclose whether or not its employees are paid an adequate wage, and if they are not all paid an adequate wage, the countries and percentage of employees concerned.
68. The objective of this Disclosure Requirement is to enable an understanding of whether or not all the undertaking's *employees* are paid an *adequate wage*, in line with applicable benchmarks.
69. The undertaking shall disclose whether all its *employees* are paid an *adequate wage*, in line with applicable benchmarks. If so, stating this will be sufficient to fulfil this disclosure requirement and no further information is needed.
70. If not all its *employees* are paid an *adequate wage* in line with applicable benchmarks, the undertaking shall disclose the countries where employees earn below the applicable adequate wage benchmark and the percentage of employees that earn below the applicable adequate wage benchmark for each of these countries.
71. The undertaking may also disclose the information specified in this disclosure requirement with regard to *non-employees* in its workforce.

Disclosure Requirement S1-9 – Adequate wages

27. (68 amended) The objective of this DR is to enable an understanding of whether or not the undertaking's *employees* are paid an *adequate wage* and the benchmark the undertaking uses for its assessment.
28. (69 and 70 amended) The undertaking shall disclose whether or not its *employees* are paid an *adequate wage* and the benchmarks it uses to determine adequate wages with country-level context. If employees are not paid an adequate wage, the undertaking shall disclose the countries and the percentage of employees concerned.

Slight changes in scope, but objective stays the same

- The objective of the DR on adequate wage is still to enable an understanding of whether or not the employees are paid an adequate wage, and the percentage hereof – the wording and setup, however is different
- The ARs stay the same, with slightly different wording, stating the calculation is performed excluding interns and apprentices, and the benchmark should be stated in accordance with Directive (EU) 2022/2041 in the EU. The benchmark for calculation of wage levels outside EU has changed to be based on ILO principles on estimating a living wage. **(amended)**

First look at key simplifications—S1-15

Narrowing down the changes made to S1, new guidance has been introduced for categorization of accidents, adequate wage has been discussed, and gender pay gap is kept to reported as unadjusted

Disclosure Requirement S1-15 – *Remuneration metrics*

39. (96 amended) The objective of this DR is to enable an understanding of the gap in **pay** between women and men amongst the undertaking's **employees** and of the level of remuneration inequality within the undertaking.
40. (97(a)(b) amended) The undertaking shall disclose:
- (a) the gender **pay** gap defined as the difference in average pay levels between female and male **employees**, expressed as a percentage of the average pay level of male employees;⁷ and

APPLICATION REQUIREMENTS

<p>AR 31 for para. 40(a)</p> <p>(Calculation of gender pay gap)</p>	<p>(AR 98 amended) The gender pay gap disclosure in accordance with paragraph 40(a) shall include all male and female employees' gross hourly pay level and be calculated as follows:</p> $\frac{\text{(Average gross hourly pay level of male employees – average gross hourly pay level of female employees)}}{\text{Average gross hourly pay level of male employees}} \times 100$
---	---

Reporting on the (unadjusted) gender pay gap

- When compiling the information required by paragraph 40(a), the undertaking shall:
 - a) include all male and female employees;
 - b) include the ordinary basic salary; and
 - c) include any other remuneration made available to all employees, whether in cash or in-kind, which the employee receives directly or indirectly (complementary or variable components) in respect of his/her employment from his/her employer. **(amended wording)**
- Paragraph 40(a) requires a disclosure of the unadjusted gender pay gap, which measures the overall difference in average **pay** between male and female **employees** but does not account for specific factors that can further explain these differences in pay. The adjusted gender pay gap by employee category and/or broken down by country may provide additional contextual information that complements the unadjusted gender pay gap. **(new)**

First look at key simplifications—G1

Narrowing down the main changes to G1 they include the exclusion on the DR on “management of relationships with suppliers”, and an emphasis on convictions related to corruption and bribery.

Impact, risk and opportunity management

- Disclosure Requirement related to ESRS 2 IRO-1 – Description of the processes to identify and assess material impacts, risks and opportunities
- ► **C1** Disclosure Requirement G1-1 – Business conduct policies and corporate culture ◀
- Disclosure Requirement G1-2 – Management of relationships with suppliers
- Disclosure Requirement G1-3 – Prevention and detection of corruption and bribery

Metrics and targets

- ► **C1** Disclosure Requirement G1-4 – Incidents of corruption or bribery ◀
- Disclosure Requirement G1-5 – Political influence and lobbying activities
- Disclosure Requirement G1-6 – Payment practices

Appendix A: Application Requirements



Table of Contents

OBJECTIVE.....	3
DISCLOSURE REQUIREMENTS	3
<i>Impact, risk and opportunity management</i>	3
Disclosure Requirement G1-1 – Policies related to business conduct	3
Disclosure Requirement G1-2 – Actions related to business conduct	4
<i>Metrics and Targets</i>	5
Disclosure Requirement G1-3 – Targets related to business conduct	5
Disclosure Requirement G1-4 – Metrics related to corruption or bribery	5
Disclosure Requirement G1-5 – Metrics related to political influence, including lobbying activities	5
Disclosure Requirement G1-6 – Metrics related to payment practices	6

Overall changes to an already short standard

- Management of relationships with suppliers has changed to be included within G1-2 “Actions related to business conduct”
- G1-4 has been amended to include the “former requirements” from G1-3 on prevention and detection of corruption and bribery and G1-4 on Incidents on corruption and bribery. The amended DR is requiring the undertaking to report on “convictions and sanctions”.
- G1-5 on payment practices has been cut, and focus is on the undertaking’s payment practices, and the percentage of its payment aligned with these practices

Q & A Session



Thank you for your attendance



Carina Ohm
Partner, Assurance

+45 2442 8398
carina.ohm@pwc.com



Olivia Norma Jørgensen
Manager, Assurance

+45 6024 5979
olivia.norma.jorgensen@pwc.com

This publication has been prepared for general guidance on matters of interest only, and does not constitute professional advice. You should not act upon the information contained in this publication without obtaining specific professional advice. No representation or warranty (express or implied) is given as to the accuracy or completeness of the information contained in this publication, and, to the extent permitted by law, PricewaterhouseCoopers Statsautoriseret Revisionspartnerselskab, its members, employees and agents do not accept or assume any liability, responsibility or duty of care for any consequences of you or anyone else acting, or refraining to act, in reliance on the information contained in this publication or for any decision based on it.