

Acta Sci. Pol. Oeconomia 19 (2) 2020, 79-86 ISSN 1644-0757

eISSN 2450-047X

DOI: 10.22630/ASPE.2020.19.2.20

ORIGINAL PAPER

Received: 27.03.2020 Accepted: 05.05.2020

NON-FINANCIAL REPORTING IN ECONOMIC PRACTICE

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ABSTRACT

Within the framework of legal regulations resulting from both the Directive 2014/95/EU, and the amended Polish Accounting Act, large entities and groups of entities were obliged to disclose, apart from financial information, also non-financial information. Legal regulations in this area are not exhaustive and leave some freedom for entities to interpret and perceive such information. The purpose of this publication is to measure the chaos that has resulted in terms of public release of non-financial information. The basic research method was quantitative and qualitative analysis. It referred to the verification of non-financial information in terms of the form of publication, the level of detail and the standards and guidelines used in this respect. The analysis of non-financial data was performed on the example of 30 companies included in the Warsaw WIG30 Stock Market Index. The study showed that non-financial reporting is characterized by great diversity.

Key words: non-financial information, non-financial reporting, corporate social responsibility JEL codes: M41, M14, Q56

INTRODUCTION

In a changing legal, economic and business environment, the perception of businesses and the need to present information about their developments have transformed. The financial information published so far by companies, in light of ongoing changes and globalization, is no longer sufficient for both investors and society. Hence, the evolution of information from traditional financial to non-financial aspects of operations, allowing for a more comprehensive assessment of the operating conditions and position of a company, is becoming increasingly important. Thus, the role of non-financial information in the communication process between an enterprise and its external environment is growing [Słoniec et al. 2017, Bek-Gaik and Krasodomska 2018]. The role of non-financial information is growing not only in the communication process

between the company and its external parties, but also in the investment environment. This is due to the fact that non-financial information not only provides valuable data about the enterprise, but often supports the interpretation of financial data [Błażyńska 2018]. It is a form of business information focused on financial and management aspects which in addition to presenting financial results also aims to provide information about the structure, business model, policies, risk management and other organizational solutions undertaken within the enterprise. Such information is an economic and business asset [Webster 2014] currently perceived as one source of a company's competitive advantage. Unfortunately, existing EU and national regulations, under which large entities are obliged to publish non--financial information, leave some leeway in disclosing it. This is reflected in the quality of published non--financial information and increases its diversity.

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The purpose of this publication is to measure the chaos in terms of public release of non-financial information. Within the framework of such an objective, an analysis of the non-financial information published by market operators in terms of its diversity was carried out. The study was conducted on a sample of 30 companies included in the WIG 30 Index, which are legally obliged to report non-financial information. Each of them was verified in terms of the form of publication of non-financial information, the standards used in this respect and the level of detail in the data presented. The basic research method was quantitative and qualitative analysis. The results of the study were used not only to assess the perception and interpretation of nonfinancial information, but also to assess the degree of diversity. There was also a discussion on the degree of lack of homogeneity in this area and its causes. The results of the analysis are the starting point for an extended study on publishing non-financial information and its comparability.

NON-FINANCIAL INFORMATION IN THE LIGHT OF THE LITERATURE ON THE SUBJECT

Information is an economic resource, a business asset, whose role and importance in the modern economy is highly significant [Dziekański 2012, Łęgowik-Świącik et al. 2016]. Both information and access to it are one of the guarantors of a company's competitive advantage. They improve the decision-making process both for the entity and its stakeholders. However, for this to happen, both parties must have the same level of information at their disposal, otherwise information asymmetry occurs, which, in the light of financial theory, is one of the determinants of the formation of the capital structure of companies [Hughes et al. 2007, Armstrong et al. 2011, Blajer-Gołębiewska 2012].

Until not long ago, from the point of view of both market entities and stakeholder needs, financial information satisfied the needs of both these environments to some extent [Jędrzejka 2016]. Over time, however, it has become insufficient, and this has been met by the provisions of the EU Directive introducing an obligation for large entities to publish non-financial information in selected aspects in the form of a statement or a separate report. These legal changes have a significant impact on the development of corporate reporting, which evolves from the strictly traditional financial data of an entity to the non-financial aspects of its activities relating to its resources, performance and creation of values [Krasodomska 2009]. This involves continuous complementation of financial reporting with elements such as additional information, commentary or management statement, with the ultimate aim of developing the currently binding form of non-financial reporting into the form of non-financial information reports [Walińska 2015].

It is worth noting that this form of reporting also includes aspects of corporate social responsibility, relating to the impact of corporate activities on society, which are reflected in employee and environmental issues of non-financial reporting [Stawicka 2016], and which should not be ignored in the company valuation process. Hence, non-financial information is currently not only an aspect that enriches the data presented in the form of a financial report, but one of the key communication tools [Zyznarska-Dworczak 2016]. Its role and importance are extremely important for the assessment of a company's situation. However, in order to be useful, it should be subject to certain generally accepted principles which will not only determine the area of its perception and presentation but also enable comparability of entities in this respect.

This problem is widely discussed in national literature [Matuszak 2014, Sobczyk 2017, Skoczylas and Dziadula 2018] as well as foreign literature [Arvidsson 2011, Erkens et al. 2015, Aluchna 2018, Stolowy and Paugam 2018], both from the point of view of reporting in the frame of corporate social responsibility and non-financial reports [Perrini 2005, Breitbarth et al. 2010, Sznajder 2013]. In the literature, the polemic regarding the perception of non-financial information and the chaos that accompanies it is examined [Monciardini 2016, Dumitru et al. 2017, Fijałkowska and Macuda 2017, Gulin et al. 2018]. In practice, this results in a diversity of data presented by market operators, which creates information asymmetry where the parties (the entity and its investors) do not have the same knowledge about the entity, necessary for management and investment decisions [Durtan 2014, Sroka 2016].

NON-FINANCIAL INFORMATION IN THE LIGHT OF LEGAL REGULATIONS

The reporting obligation for non-financial information was introduced by Directive 2014/895/EU amending Directive 2013/34/EU as regards disclosure of non--financial information and diversity information by certain large entities and groups. The provisions of the Directive established an obligation for a selected group of entities to include in their financial statements non-financial information relating in particular to environmental, social and labour issues, human rights and the prevention of corruption and bribery. The EU regulations require that an entity covered by the Directive should make public a correct and complete picture of its policies, performance and risks, in particular as regards environmental, social and labour issues, respect for human rights, and the fight against corruption and bribery, which is a type of non-financial information. The EU legislation does not indicate in a detailed and unambiguous way what the data are to be, it only gives examples of what they may concern [Directive 2014/95/EU]. The data should be presented in the form of a non-financial statement as a part of the management report and a statement of the non-financial information that constitutes the source of the presentation and its location, so that it is accessible to those concerned.

In the frame of the implementation of legal regulations, the EU legislators have also developed guidelines for reporting non-financial information, the socalled non-financial reporting methodology. Their aim is to help companies, both obliged and interested in non-financial information disclosure, to ensure that the information is relevant, useful, consistent and more comparable. The guidelines developed by the European Commission are a non-binding document, as companies can use other frameworks established at international, EU and national levels for non-financial reporting [Communication from the Commission C/2017/4234].

In order to implement the provisions of the directive in the framework of the disclosure of non-financial information, Member States are required to provide sufficient and effective measures by adapting their national law in this respect. Hence, Article 49 of the Accounting Act has been introduced into Polish law. The regulations of the Act fully reflect the provisions of the Directive on the form of publication of non-financial information in a statement or report. Moreover, the non-financial issues included in the Act are equivalent to the Directive's records, however they indicate that this is not an exhaustive catalogue of information that the entity may publish in this respect. The legislators have left the entities some discretion by indicating items that "at least" should be included in the statement. Furthermore, under the 1994 Accounting Act, entities that are required to publish non-financial information present it only to the extent that is necessary to assess their development, performance and situation. This means that entities themselves decide on the significance and salience of some information over others.

EVALUATION OF NON-FINANCIAL INFORMATION PRESENTED BY MARKET ECONOMY ENTITIES WITHIN THE FRAMEWORK OF NON-FINANCIAL REPORTING

Assumptions for the research

The study of non-financial information published by companies was carried out on the example of companies listed on the Warsaw Stock Exchange included in the WIG30 Index. These entities are obliged to publish non-financial information in the form of a separate report or statement under both EU [Directive 2014/95/ /EU] and national regulations [1994 Accounting Act].

In order to verify the diversity of the data contained therein, they were analysed in detail, taking into account the following issues:

- place/form of posting non-financial information,
- type of non-financial reporting guidelines adopted,
- specificity of the presented information included in the description of the business model,
- policies and procedures as well as risks within the framework of legally required issues.

The study covered a period of two years. The year 2017, when the national law introduced the obligation of non-financial reporting and the year 2018, the last year for which the analysed entities provided non-financial reports. Previous periods were not included

in the study, as they were related to reporting under corporate social responsibility, and out of the analysed group of companies, only 57% publish CSR reports, which is related to their inclusion in the Respect Index.

Results of research

Non-financial information, in accordance with European Commission guidelines and the provisions of Articles 49b and 55(2b) of the Accounting Act, may be published in two documents. The first one is a statement on non-financial information which is a part of the management report. The second is a separate report relating to the same financial year as the management report, but equivalent in content to the Directive's requirements for the disclosure of non-financial information. The results of the analysis of the form of non-financial reporting among the surveyed entities are presented in Figure 1.

The data presented in Figure 1 indicate that in the first reporting year, 70% of entities published non-financial information in the form of a statement which is a part of the annual management report or, in some cases, the consolidated annual report. Only 30% decided to develop a separate document which would constitute a report on non-financial information. In the following year, some entities resigned from combining this document with a statement of operations or a consolidated report and decided to publish non-financial information in a separate report (37%). Still, 63% of the surveyed companies publish this information in

the form of a statement which is a part of the report on operations.

In non-financial reporting, the analysed entities use various guidelines and standards. Given that neither the EU nor the national legislation has indicated a closed catalogue of guidelines, for analytical purposes, the list of guidelines has been established taking into account only those demonstrated by the analysed companies. These include the Global Reporting Initiative (GRI), the International Integrated Reporting Council (IIRC), the UN Global Compact, the ISO 26000 standard of the International Organization for Standardization, as well as the Non-Financial Information Standard developed on the Polish ground as well as the companies' own standards not defined by name and type. Figure 2 shows which of them are used and to what extent.

The presented data indicate that the vast majority of the surveyed entities (73%) use Global Reporting Initative (GRI) Standards for non-financial reporting, while 17% of companies use their own standards, however not defined in more detail. Additionally, entities that use GRI Standards also use other standards, such as the International Integrated Reporting Council (IIRC) (13%), UN Global Compact (3%), National Non-financial Information Standard (10%) or ISO 26000 (10%). On the other hand, 13% of the respondents did not include the source of the guidelines they used in non-financial reporting at all. It should be noted that the choice of reporting standards during the two-year reporting period did not changed significantly. The changes concerned only two out of 30 analysed



Fig. 1. Forms of publishing non-financial information

Source: Authors' own analyses based on consolidated annual reports and reports on the activities of management boards of companies included in the WIG30 indices as at 9 November 2019. Skoczylas-Tworek, A. (2020). Non-financial reporting in economic practice. Acta Sci. Pol. Oeconomia 19 (2), 79–86, DOI: 10.22630/ ASPE.2020.19.2.20



Fig. 2. Standards used in non-financial reporting

Source: Authors' own analyses based on consolidated annual reports and reports on the activities of management boards of companies included in the WIG30 indices as at 9 November 2019.

entities and were related to guidelines applied in addition to those adopted so far.

Non-financial reporting in accordance with the provisions of the Directive covers issues of employment, respect for human and social rights, environment, and anti-corruption. As already mentioned, a preliminary analysis has shown that all these issues have been included in the content of the reports examined. However, the level of detail of the information presented in this respect is diverse. From general statements and descriptions as well as the specification of several indicators to comprehensive descriptions supported by figures. Hence, the study verified the level of detail of non-financial reporting on selected issues such as description of policies, procedures and risks. The starting point in this respect was primarily to relate the non-financial information contained in one statement or report to others within the same stock index group. The results of the study are presented in Figure 3.

The data presented indicate that the general form of the business model description was presented by 37% of the analysed entities, while the remaining 63% included a very detailed description of their own structure and activity. Policies and procedures functioning in relation to non-financial information in the indicated areas were adopted by almost all companies, of which 37% mentioned what activities are in force in the company in this respect, while 60% of the analysed companies described them in more detail. The risks within the presented non-financial issues was generally reported by 20% of those surveyed, and as much as 77% described it in quite a detailed way, as





Source: Authors' own analyses based on consolidated annual reports and reports on the activities of management boards of companies included in the WIG30 indices as at 9 November 2019.

well as included information about countermeasures taken against them. As regards the described aspects, only one entity, apart from a concise description of the business model, did not refer to the remaining issues specified in the legal regulations, justifying its decision with the specificity of the industry.

Non-financial data were presented in detail by 57% of the analysed entities, while other entities published very general data or presented only to the description of the actions without referring to their actual results. This does not mean that more non-financial information means better compliance, but indicates a different approach to non-financial reporting, resulting in a lack of comparability of this information between entities of such a small but key group within the market economy.

With regard to several of the companies analysed, it was found that to a large extent the description of the business model included a list of awards won by the entities, and some of them paid significant attention to this in the report. According to the guidelines of the European Commission, within the framework of the business model description, companies should avoid disclosing irrelevant information of a promotional or aspirational nature. It is difficult to question the relevance of this aspect for a market player, but the high degree of concentration of some players on this aspect calls this issue into question. It is worth noting that the analysis has drawn attention to some good practices adopted in non-financial reporting among some entities. It implies that selected individuals engage in a social dialogue among investors as well as with employees of the company on the relevance of the inclusion of data in non-financial reporting. In addition, it was also indicated in relation to several entities that non-financial reporting was assessed by an independent auditor, in other cases, in the opinion of the independent auditor verifying the financial statements, there was information that the non-financial report in the form of a report or statement was prepared but was not subject to audit. The Directive in this respect indicates that the external auditor should only state whether a statement or report on non-financial information has been created [Directive 2014/95/EU]. Therefore, the inclusion of the external auditor in its audit should also be considered as some good practice.

The assessment of the details of the data provided with regard to their possible changes in the reporting year 2018 in relation to 2017 showed that during the two reporting periods, if the changes took place within the form of publication or applied standards, entities in most cases continued the once adopted reporting model with regard to the selection of areas and types of information provided within them.

CONCLUSIONS

The presented data analysis indicates different approaches of market entities to non-financial reporting, not only in terms of its form and guidelines used, but also in terms of the details of the information provided. It should be emphasized that the conducted research referred to the largest public companies listed on the Warsaw Stock Exchange. These are entities operating on international markets, whose activity, however, has a significant impact on the possibility of achieving the objectives of sustainable development in Poland. These, in turn, should be implemented through the publication of non-financial information ensuring the comparability of the data. Unfortunately, the current way of presenting non-financial data in practice, as well as the legal regulations and guidelines adopted in this respect are not sufficient to provide non-financial information with features that would ensure its transparency, homogeneity and comparability. The overly generalized nature of the provisions included in the legal regulations cause considerable information chaos in this respect.

The diversity of the information presented could be explained by the fact that the company would adapt to the information needs of its users. However, this is not convincing, as the information needs are different and it is not possible to create a strictly defined set of them. Nevertheless, in order to meet the needs of users of non-financial information, it is worthwhile to strive to develop a set of non-financial information based on consistent rules for its preparation, so as to enable and at the same time make it easier for its recipients to compare the economic situation of enterprises. This is because non-financial information has synergistic properties, which means that only by combining it with financial information Skoczylas-Tworek, A. (2020). Non-financial reporting in economic practice. Acta Sci. Pol. Oeconomia 19 (2), 79–86, DOI: 10.22630/ ASPE.2020.19.2.20

will the recipient receive a clear understanding of the company itself. Entities that communicate non-financial data constitute a much safer investment objective than those that do not. Therefore, each company should ensure the widest possible access to information for both its external and internal stakeholders. However, it is important to make the published information transparent and to ensure its comparability. Proper, comprehensive and reliable information is important for making appropriate investment decisions. Therefore, it is necessary to strive to reduce the lack of transparency in the presentation of nonfinancial data and thus the accompanying chaos that significantly reduces the usefulness of non-financial reporting. To accomplish this, it is reasonable not only to clarify this issue on a legal ground, but also to develop uniform standards covering a catalogue of non-financial information for all market operators or industry groups, including the possibility of its verification. However, this process should be correlated with the needs both of companies' management and of their stakeholders.

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RAPORTOWANIE NIEFINANSOWE W PRAKTYCE GOSPODARCZEJ

STRESZCZENIE

W ramach uregulowań prawnych, wynikających zarówno z dyrektywy 2014/95/UE, jak i znowelizowanej polskiej ustawy o rachunkowości, duże jednostki oraz grupy podmiotów zostały zobligowane do ujawniania obok informacji finansowych również tych niefinansowych. Regulacja prawna w tym zakresie nie jest wyczerpująca i pozostawia pewną dowolność podmiotom w interpretacji i postrzeganiu tego rodzaju informacji. Celem publikacji jest pomiar chaosu w zakresie upubliczniania informacji niefinansowych. Podstawową metodą badawczą była analiza ilościowo-jakościowa. Odniosła się ona do weryfikacji informacji niefinansowych pod względem formy ich ujawniania, szczegółowości, a także wykorzystywanych w tym zakresie standardów i wytycznych. Analizy dokonano na przykładzie sprawozdań niefinansowych 30 spółek wchodzących w skład indeksu WIG30. Przeprowadzone badanie wykazało, że raportowanie niefinansowe cechuje duża różnorodność.

Słowa kluczowe: informacje niefinansowe, raportowanie niefinansowe, społeczna odpowiedzialność biznesu