

# JURISDICTIONAL SNAPSHOT:

## Uganda



*‘The implementation of the Sustainability disclosure standards calls for a strong focus on collaborative efforts for regulators, business associations, professional trainers and policymakers as well as other stakeholders to deliver effective pathways that guarantee meaningful application of the standards.’*

*The Institute of Certified Public Accountants of Uganda*

The IFRS Foundation is providing this high-level overview of the regulatory approach the jurisdiction has proposed or indicated it intends to take for the adoption or other use of ISSB Standards (including local sustainability-related disclosure requirements (or standards) designed to deliver functionally aligned outcomes to those resulting from the application of IFRS S1 and IFRS S2). The IFRS Foundation has undertaken a preliminary review of the proposed regulatory framework. The final jurisdictional approach may differ from the preliminary summary provided herein. This overview may therefore differ from content the IFRS Foundation may publish in a future jurisdictional profile including as a result of additional information or changes made by a jurisdiction in finalising its regulatory approach to sustainability-related reporting.

<b>Regulatory stage</b>	<p>In progress.</p> <p>The Institute of Certified Public Accountants of Uganda issued a roadmap titled <a href="#">Roadmap for Adoption of Sustainability Disclosure Standards - Uganda</a> for public consultation that closed on 31 July 2024. The final roadmap has not yet been issued.</p>
<b>Relevant authority or authorities</b>	<p><a href="#">Bank of Uganda</a></p> <p><a href="#">Capital Markets Authority</a></p> <p><a href="#">Institute of Certified Public Accountants of Uganda</a></p> <p><a href="#">Insurance Regulatory Authority of Uganda</a></p> <p><a href="#">Uganda Securities Exchange</a></p>

## Proposed requirements

<b>Name of framework or standards</b>	<p>IFRS S1 <i>General Requirements for Disclosure of Sustainability-related Financial Information</i> and IFRS S2 <i>Climate-related Disclosures</i>.</p> <p>It is proposed that all provisions in ISSB Standards will apply, subject to the extension of one transition relief (see section <i>Extension of transition reliefs</i>).</p>
<b>Date when requirements are proposed to become effective</b>	<p>To be determined. The following summarises effective dates under the proposed roadmap:</p> <p>Voluntary reporting permitted for all entities for fiscal years beginning on or after 1 January 2026.</p> <p>Mandatory reporting for fiscal years beginning on or after 1 January 2028 by:</p> <ul style="list-style-type: none"> <li>listed entities (entities whose debt or equity instruments are traded in a public market (a domestic or foreign stock exchange or an</li> </ul>

	<p>over-the-counter market, including local and regional markets) or are in the process of issuing such instruments for trading in a public market);</p> <ul style="list-style-type: none"> <li>• financial institutions and micro-finance deposit-taking institutions;</li> <li>• insurance and reinsurance entities;</li> <li>• savings and credit cooperative organisations qualifying to be public interest entities; and</li> <li>• public utility entities that apply IFRS Accounting Standards.</li> </ul> <p>Mandatory reporting for fiscal years beginning on or after 1 January 2029 by retirement benefit schemes, large companies and other public interest entities not referred to above.</p> <p>Mandatory reporting for fiscal years beginning on or after 1 January 2030 by small and medium enterprises.</p>
<b>Reporting entities</b>	<p>To be determined. Under the proposed roadmap, requirements would apply to the following entities at different timelines as per above:</p> <ol style="list-style-type: none"> <li>a) listed entities—an entity whose debt or equity instruments are traded in a public market (a domestic or foreign stock exchange or an over-the-counter market, including local and regional markets) or is in the process of issuing such instruments for trading in a public market;</li> <li>b) financial institutions and micro-finance deposit-taking institutions;</li> <li>c) insurance and reinsurance entities;</li> <li>d) savings and credit cooperative organisations qualifying to be public interest entities*;</li> <li>e) public utility entities that apply IFRS Accounting Standards;</li> <li>f) retirement benefit schemes;</li> <li>g) large companies**;</li> <li>h) other public interest companies not referred to above; and</li> <li>i) small and medium enterprises.***</li> </ol> <p>* This means an entity that meets at least two of the following criteria:</p> <ol style="list-style-type: none"> <li>i) voluntary savings of three billion (3,000,000,000) Uganda shillings and above</li> <li>ii) institutional capital of one billion (1,000,000,000) Uganda shillings and above</li> <li>iii) membership of 500 people and above.</li> </ol> <p>**A large company means an organisation limited by guarantee or shares as defined under section 4 of the Companies Act, 2012, and which on its balance sheet date exceeds the limits of at least two of the following criteria:</p> <ol style="list-style-type: none"> <li>i) balance sheet total—one hundred billion (100,000,000,000) Uganda Shillings</li> <li>ii) turnover—fifty billion (50,000,000,000) Uganda Shillings</li> <li>iii) average number of 500 employees during the accounting period.</li> </ol> <p>*** A small and medium enterprise is defined as an entity:</p> <ol style="list-style-type: none"> <li>i) that does not have public accountability;</li> <li>ii) that publishes general-purpose financial statements for external users;</li> <li>iii) whose debt and equity instruments are not traded in a public market (a domestic or foreign stock exchange or an over-the-counter market, including local and regional markets), or is not in</li> </ol>

	<p>the process of issuing such instruments for trading in a public market; and</p> <p>iv) that does not hold funds in a fiduciary capacity for a broad group of outsiders as one of its primary businesses such as banks, credit unions, insurance companies, securities brokers/dealers, mutual funds and investment banks.</p>
<b>Required or permitted</b>	To be determined. Under the proposed roadmap, disclosures would be required.
<b>Focus</b>	To be determined. The proposed roadmap anticipates that the focus will be on existing and potential investors, lenders and other creditors.
<b>Scope of sustainability-related risks and opportunities on which entities must report</b>	To be determined. Under the proposed roadmap, entities would be required to report in accordance with the requirements in IFRS S1 and IFRS S2.
<b>Materiality filter for disclosures</b>	<p>To be determined. Under the proposed roadmap, required disclosures would be subject to materiality.</p> <p>The definition of 'material information' would be as provided for in ISSB Standards.</p>
<b>Timing, location and reporting entity</b>	Proposed to be as provided for in ISSB Standards.
<b>Extension of Transition reliefs</b>	<p>It is proposed that reporting entities would be permitted to not disclose Scope 3 greenhouse gas emissions in the first and second year of reporting.</p> <p>Transition reliefs per ISSB Standards are permitted for all reporting entities.</p>
<b>Jurisdictional modifications from requirements in ISSB Standards</b>	None proposed.
<b>Additional disclosure requirements</b>	None proposed.
<b>Assurance requirements</b>	<p>The proposal for assurance of public interest entities' sustainability-related disclosures is as follows:</p> <p>Voluntary reporters:</p> <ul style="list-style-type: none"> <li>• 2027: permitted to obtain limited assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2028: permitted to obtain reasonable assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2029: permitted to obtain reasonable assurance for sustainability-related disclosures <i>other than</i> Scope 3 greenhouse gas emissions, for which limited assurance is permitted.</li> </ul>

	<p>Mandatory reporters (listed entities, financial institutions, insurance and reinsurance, savings and credit cooperatives, public utilities):</p> <ul style="list-style-type: none"> <li>• 2029: required to obtain limited assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2030: required to obtain reasonable assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2031: required to obtain reasonable assurance for sustainability-related disclosures <i>other than</i> Scope 3 greenhouse gas emissions, for which limited assurance is permitted.</li> </ul> <p>Mandatory reporters (retirement benefit schemes, large companies and other public interest entities):</p> <ul style="list-style-type: none"> <li>• 2030: required to obtain limited assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2031: required to obtain reasonable assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2032: required to obtain reasonable assurance for sustainability-related disclosures <i>other than</i> Scope 3 greenhouse gas emissions, for which limited assurance is permitted.</li> </ul> <p>Mandatory reporters (small to medium enterprises):</p> <ul style="list-style-type: none"> <li>• 2031: required to obtain limited assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2032: required to obtain reasonable assurance on sustainability-related disclosures <i>excluding</i> Scope 3 greenhouse gas emissions, scenario analysis and transition plans.</li> <li>• 2033: required to obtain reasonable assurance for sustainability-related disclosures <i>other than</i> Scope 3 greenhouse gas emissions, for which limited assurance is permitted.</li> </ul>
<b>Further information</b>	None.
<b>Relevant document(s)</b>	<a href="#">Pronouncement on adoption of ISSB Standards</a>