

## **In search of legitimacy: a semiotic analysis of business model disclosure practices**

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## In search of legitimacy: A semiotic analysis of business model disclosure practices

### Structured Abstract

#### Purpose

This paper investigates how firms disclose the presentation and content of Business Model (BM) information in corporate reports to manage their legitimacy in response to European Directive 2014/95.

#### Methodology

Legitimacy theory is used to identify disclosure strategies pursued by firms in reaction to the new regulation. To understand how firms adopt these strategic responses, semiotic analysis is applied to a sample of European companies' reports through Crowther's (2012) framework, which is based on a mechanism of binary oppositions.

#### Findings

Half of the sample strategically choose to comply with the EU Directive regarding BM information through the use of non-accounting language, figures, and diagrams. Other firms did not disclose any substantive information but managed the impression of compliance with the regulation, while the remainder of the sample dismissed the regulation altogether.

#### Research limitations/implications

This study demonstrates how organisations use the disclosure of BM information in their corporate reports to control their legitimacy. The results support the idea that firms can acquire legitimacy by complying with the law or giving the impression of compliance with the regulation. This study provides evidence on the first-time adoption of the EU Directive and, therefore, future research can enlarge the sample and conduct the analysis over a broader time frame.

#### Practical implications

A more precise indication of the EU Directive regarding "where" firms should report BM information, "how" the description of a BM should refer to the environmental, social, governance (ESG) factors, and a set of performance measures to track the evolution of a company's BM overtime is needed.

#### Originality

While there has been a notable amount of research that has applied content analysis methodologies to investigate the thematic and syntactic aspects of BM disclosure in corporate reports, only a few studies have investigated BM disclosures in relation to the EU Directive. Furthermore, the application of semiotic analysis extends beyond traditional content analysis methodologies because it considers the structure of the story at many levels, thus developing a more complete textual picture of how BMs are described, allowing an analysis of the reasons behind the disclosure strategies pursued by firms.

**Keywords:** Business model; European Directive 2014/95; Non-financial information; Semiotic analysis; Legitimacy theory.

**Article classification:** Research paper

## 1. Introduction

The European Directive 2014/95 on non-financial and diversity information (EU Directive) introduced a new compulsory reporting requirement in the 28 EU Member States<sup>1</sup> for large undertakings that are public-interest entities. This regulation emphasises the role of non-financial information in increasing investors and consumers' trust and in aiding the measurement, monitoring, and management of firms' performance and their impact on society. One of the elements required by the EU Directive is "a brief description of the undertaking's business model". The Business Model (BM) connects the theory of a firm and its accounting measurements with the objective of enhancing the communicative nature of business reporting (Institute of Chartered Accountants England and Wales (ICAEW), 2010), but the introduction of this concept has also introduced new problems (Tweedie *et al.*, 2018). Recent reviews of the BM literature (e.g., Zott *et al.*, 2011; Wirtz *et al.*, 2014; Di Tullio *et al.*, 2018) show widespread and increasing interest in the topic but also indicate that its meaning and features are not described by a singular and broadly accepted definition (Jensen, 2013). How a company's BM is communicated is also an underexplored phenomenon, because of the relative novelty of BM disclosures in corporate reports (Michalak *et al.*, 2017).

This paper investigates firms' responses to the requirements of the EU Directive regarding communication of their BMs in corporate reports. Specifically, the objective is to observe whether and how firms use the presentation and content of the BM sections in both financial and non-financial corporate reports to manage their legitimacy.

Considering that corporations do whatever they can to protect their image as a legitimate business (de Villiers and van Staden, 2006) and employ a variety of strategies for this aim (Suchman, 1995), this study draws upon Oliver's (1991) evaluation of disclosure strategies to analyse firms' reaction to the EU Directive's request for BM information. Such analysis is carried out through semiotic analysis by adopting the framework developed by Crowther (2012). Specifically, semiotic analysis of BM sections in corporate reports published in 2016 and 2017 enables an understanding of how firms pursue three disclosure strategies (i.e., acquiescence, avoidance, and defiance) in response to EU Directive. While prior studies, to a large extent, have used content analysis as a methodology to investigate the thematic and syntactic aspects of corporate reports (Jones and Shoemaker, 1994), the advantages of semiotic analysis are numerous. In particular, while content analysis assumes that the frequency by which a piece of information is disclosed is important, the semiotic analysis considers the structure of the story at many levels (Breton, 2009). Moreover, semiotic analysis develops a more complete textual picture and extends results beyond their immediate appearance (Neergaard and Ulhøi, 2007). Furthermore, the content analysis "only tell what is disclosed, not why" (Dumay *et al.*, 2015, p. 3), while the joint adoption of semiotic analysis and legitimacy theory allows for an analysis of the reasons behind firms' responses. Indeed, semiotic analysis can reveal the strategies employed to manage readers' perceptions of the information being communicated (Yusoff and Lehman, 2009).

The remainder of this paper is structured as follows. The next section presents the thematic and theoretical contributions inspiring and motivating our study. The research method adopted is described in Section 3. Section 4 reports the categorisations of the findings. Section 5 is dedicated to a discussion of the findings. The final section indicates the conclusion and the implications of the results and provides several insights for future research.

## 2. Background

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<sup>1</sup> According to the EU Directive, Member States were required to bring into force the laws, regulations and administrative provisions necessary to comply with this Directive by 6 December 2016.

## 2.1 Business Model

The theme of BM attracted increasing attention from the 1990s, driven by the advent of new information and communication technologies and the globalization of markets (Nielsen *et al.*, 2019). The essence of the BM is that it explains how an organisation creates, delivers, and captures value (Osterwalder and Pigneur, 2010). The literature on BM has moved through a number of phases. After an initial focus on the components comprising a BM (Viscio and Pasternak, 1996; Dubosson-Torbay *et al.*, 2002), and BM taxonomies (Timmers, 1998; Weill and Vitale, 2001), the focus of research moved to the development of BMs, also called BM innovation (Mitchell and Coles, 2004; Spieth *et al.*, 2014), and the openness (Chesbrough, 2007; Saebi and Foss, 2015), sustainability (Lüdeke-Freund and Dembek, 2017; Ritala *et al.*, 2018) and performance (Nielsen *et al.*, 2018) of BMs.

The BM is frequently defined as a critical factor for competitive advantage and firm performance (Afuah and Tucci, 2003; Zott and Amit, 2008; Wirtz, 2011). The BM has been found to have the capacity to communicate the business logic of a company to a wider audience of stakeholders, such as analysts, investors, partners, society, and potential employees (Bukh, 2002; Nielsen and Lund, 2014). In light of this, several accounting organisations (i.e., ICAEW, 2010; European Finance Research Advisory Group (EFRAG) -, 2013; International Integrated Reporting Council (IIRC), 2013) have considered how a BM approach to corporate disclosure could increase the relevance and clarity of information disclosed in financial statements (Haslam *et al.*, 2015). Additionally, Beattie and Smith (2013, p.252) noted that the BM “represents a natural top-level capstone in a business reporting hierarchy”. In this context, the EU Directive requires a “brief description of the undertaking’s BM”, and this commitment is transposed in all the implementing decrees of Member States (CSR Europe and GRI, 2017). Nevertheless, the BM concept and its disclosure are characterised by several gaps. The first is a “cognitive gap” (Giunta *et al.*, 2013) and refers to the lack of a commonly agreed-upon definition of BM (Sukhari and de Villiers, 2018). The second is a “technical gap”, which concerns the lack of guidelines for the presentation of BM information (Giunta *et al.*, 2013). Additionally, while demand for external communication of how value is created is increasing (Nielsen, 2014), current reporting on BM has been described as uninformative by recent academic and professional studies (Melloni *et al.*, 2016). Finally, several frameworks of BM are provided by organisations (i.e., IIRC, Chartered Institute of Management Accountants (CIMA)) and academics (i.e., the BM Canvas) (Osterwalder and Pigneur, 2010); however, none are considered standard.

The present EU Directive does not indicate how BMs should be reported and in which way a BM should refer to ESG factors (Jeffrey *et al.*, 2017). However, in its guidelines on non-financial reporting, the EU Commission (2017) invites companies to consider a set of elements that should characterise the description of their BM as follows: their business environment; their organisation and structure; the markets in which they operate; their objectives and strategies; and the main trends and factors that may affect their future development. Companies should avoid immaterial disclosures of a promotional or aspirational nature that distract from material information. However, as argued by Bebbington *et al.* (2012, p. 90), the design of a standard does not ensure that it will be interpreted and applied consistently with the objectives of the legislator. These unresolved issues lead to the need for an analysis of how the BM concept has emerged in reporting practices and how it is presented to stakeholders.

Many academics have investigated the contributions of the EU Directive and the level of compliance with it. The main issues addressed by such studies are the quality of non-financial information in

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2  
3 different countries (Dumitru *et al.*, 2017; Venturelli *et al.*, 2017; Peršić and Halmi, 2018), as well as  
4 the level of compliance to the EU Directive before (Carini *et al.*, 2018; Manes-Rossi *et al.*, 2018) and  
5 after its adoption in specific countries or sectors (Szabó and Sørensen, 2015; Matuszak and Rozanska,  
6 2017; Primec and Belak, 2018; Sierra-Garcia *et al.*, 2018). It should be noted that these works do not  
7 pay specific attention to BM since the BM is considered only one of the elements required by the EU  
8 Directive. Furthermore, these analyses are focused on specific countries (e.g., Italy, Poland, and  
9 Romania) and were conducted before the introduction of the EU Directive. Finally, the results stem  
10 from only one methodological approach, as the content analysis is the most frequently used method  
11 to verify the reports' disclosure quality and level of compliance with the EU Directive.  
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15 These previous researches call for further studies that consider the development path of non-financial  
16 disclosure beyond the 2016 fiscal year to assess the real effects of the new regulation. In this context,  
17 semiotic analysis is a useful methodology, as its previously noted advantages (Breton, 2009) could  
18 elucidate new aspects when exploring the early reporting practices of firms after the initial application  
19 of the EU Directive requirements. In particular, it is interesting to consider how semiotic analysis  
20 permits investigating the ways in which firms use the presentation and content of BM sections to  
21 manage their legitimacy in response to the new regulation.  
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## 25 **2.2 Legitimacy theory**

26  
27 Legitimacy theory is one of the theoretical perspectives originating from political economy theory  
28 (PET). The political economy has a long historical tradition based on the assumption that society,  
29 politics, and economy are inseparable (Gray *et al.*, 1995; Deegan, 2002) and that their relationship is  
30 ruled by a social contract (Deegan, 2010). The social contract is constituted by “the expectations that  
31 society has with regards to how an entity shall act” (Deegan, 2010, p.133). In this sense, organisations  
32 exist only if society confers them the “state” of legitimacy (Deegan, 2002).  
33  
34

35 Legitimacy is conferred by outsiders but can be controlled by an organisation itself (O'Donovan,  
36 2002). In particular, legitimacy is influenced by information disclosure (de Villiers and van Staden,  
37 2006). Indeed, “information is a major element that can be employed by the organisation to manage  
38 (or manipulate) the stakeholder in order to gain their support and approval or to distract their  
39 opposition and disapproval” (Gray *et al.*, 1996, p.45).  
40  
41

42 Mandating information disclosure as a means of regulating organisational behaviour has become  
43 widespread in recent years (Doshi *et al.*, 2013). A critical branch of PET recognises that the State  
44 plays a crucial role in the process of legitimation undertaken by firms. In particular, the State can  
45 intervene in such a way that firms are successful with regard to their legitimising strategies (Archel  
46 *et al.*, 2009). According to La Torre *et al.* (2018), the EU Directive is a concrete example of policy  
47 action that intervenes in the non-financial reporting practices of large undertakings to provide them  
48 legitimacy. Thus, companies acquire legitimacy simply by complying with the law. Furthermore,  
49 even the “comply or explain” principle could be considered “a means of legitimating deviations from  
50 individual code provisions” (Seidl *et al.*, 2013, p. 796). In this perspective, corporate report  
51 “legitimises actions that are orchestrated from the position of power” through the omission or use of  
52 “carefully worded phrases” (Archel *et al.*, 2009, p.1289).  
53  
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56 According to Beck *et al.* (2017), compliance with guidelines such as the Global Reporting Initiative  
57 (GRI) and Integrated Reporting (IR) can also provide legitimacy to firms. Indeed, it is through the  
58 development of these guidelines that society exerts its authority to redefine and explicitly express  
59 “social norms” with respect to reporting (Beck *et al.*, 2017). In particular, GRI has been actively  
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1  
2  
3 engaged in supporting the EU with the implementation of the new EU Directive (GRI website).  
4 However, as argued by Manes-Rossi *et al.* (2018), firms that choose to adopt the GRI 4 guidelines  
5 must be aware of the need to include additional information on their BM.  
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### 9 **3. Research method**

#### 10 *3.1 Research question*

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14 In accordance with the requirement of the EU Directive, the analysis is focused on written reports,  
15 which are considered more reliable since they are formal tools characterised by “higher accuracy in  
16 their preparation and they are the result of accountability systems” (Carini *et al.*, 2018, p.4). The  
17 research examines the financial and non-financial communication channels of EU firms (e.g.,  
18 Integrated Report, Sustainability Report, Corporate Responsibility Report, Non-Financial Report)  
19 published in 2016 and 2017. This study conducts a comparative analysis of the presentation and  
20 content of the BM sections in corporate reports before and after the implementation of the EU  
21 Directive. The objective is to identify which disclosure strategies firms have adopted to manage their  
22 legitimacy in response to the requirements. Therefore, our study’s objective is to address the  
23 following research question:  
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26  
27 *RQ: How do firms use the presentation and content of the Business Model (BM) in corporate*  
28 *reports to manage their legitimacy in response to the European Directive 2014/95?*  
29

30 As a first step, this study examines corporate reports to verify the impacts of the EU Directive on the  
31 disclosure of BMs. Particularly, our interest is in investigating which specific strategies firms have  
32 adopted to manage their legitimacy in response to EU Directive requirements regarding BM  
33 information.  
34

#### 35 *3.2 Sample and data collection*

36  
37 We selected a random sample of 46 firms in the OSIRIS database from the first quartile of European  
38 companies with higher capitalisation in 2016. The sample size was determined by applying the  
39 Neyman optimal allocation formula, stratified by industrial sectors and geographic areas. CSR Europe  
40 and GRI (2017) have realised an overview of how Member States have implemented the EU  
41 Directive. Through this document, we first verified the actual transposition of the EU Directive in  
42 each country in the sample, including the mandate of BM description and compliance with the  
43 dimensional requirements by the selected firms. Thus, the final sample is composed of 46 firms  
44 distributed as shown in Table 1. We then collected the financial reports and non-financial reports  
45 published on the companies’ corporate websites before (2016) and after (2017) implementation of  
46 the EU Directive in each country.  
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52 **INSERT TABLE 1 HERE**  
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56 To address the research question, each report was carefully scrutinised, and their relevant elements  
57 were recorded in a chart. In particular, we noted:  
58

- 59 • The presence or absence of a BM section. This was done by reading the titles of the sections  
60 because a simple keyword search could not be effective (e.g., we found a section called

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2  
3 “Realize the value” which is actually devoted to a description of the firm’s BM although the  
4 term “business model” is not used). Thus, we gained a clear picture of the BM reporting  
5 practices of the firms over time (i.e., between 2016 and 2017) in both financial and non-  
6 financial reports.

- 7  
8 • The use of the term “business model” by firms that do not provide a BM section. In this case,  
9 a keyword search was conducted to individuate which parts of the text to extract and analyse.  
10 The objective is to understand whether firms deflect attention from the requirements towards  
11 other related issues.  
12

### 13 14 3.3 Methodology

#### 15 16 3.3.1 Legitimacy perspective

17  
18 The perspective of our research design is based on Oliver’s (1991) work on the identification of  
19 strategic responses that organisations enact as a result of institutional pressures to conform. Oliver  
20 (1991) identified five types of strategic responses: acquiescence, compromise, avoidance, defiance,  
21 and manipulation. Each strategic response is associated with a different degree of attainable  
22 legitimacy, as they vary in active organisational resistance, from passive conformity to proactive  
23 manipulation. For the purpose of this study, we identify three different disclosure strategies based on  
24 the work of Criado-Jimenez *et al.* (2008) on compliance with mandatory environmental reporting in  
25 financial statements: acquiescence (with the tactic “comply”), avoidance (with the tactic  
26 “concealment”), and defiance (with the tactic “dismiss”).  
27

28  
29 Acquiescence refers to organisations that accede to institutional pressure to disclose, as required by  
30 regulation, and could take the form of compliance. Compliance is defined as “conscious obedience  
31 to or incorporation of values, norms, or institutional requirements” (Oliver, 1991, p. 152). This tactic  
32 is employed by firms that consciously and strategically choose to comply with regulations.  
33 Acquiescence is pursued when the degree of legitimacy attainable from conformity is high.  
34 Concerning our analysis, this behaviour is exhibited by firms that introduced a section dedicated to  
35 their BM in 2017 corporate reports and by organisations that had already provided a section in 2016.  
36

37  
38 Avoidance is a strategy employed by organisations in an attempt to avoid the need for conformity  
39 (Oliver, 1991). A related tactic is concealment, which consists of managing the impression of  
40 compliance (Criado-Jimenez *et al.*, 2008). Indeed, as argued by Oliver (1991), concealment can take  
41 the form of “window dressing” (p. 154), allowing firms to avoid disclosing any substantive  
42 information so that they can give the impression of compliance with the regulation. In this case, the  
43 appearance of conformity is sufficient to attain legitimacy, since legitimacy is “a generalised  
44 perception or assumption that the actions of an entity are desirable, proper, or appropriate within some  
45 socially constructed system of norms, values, beliefs, and definitions” (Suchman, 1995, p. 574). This  
46 tactic was adopted by companies that introduced a BM section in their corporate reports in 2017 with  
47 the same content that was in a differently named section in 2016.  
48

49  
50 Defiance is a more active form of resistance to institutional pressure (Oliver, 1991). In the form of  
51 dismissing tactics, this strategy is realised by ignoring or dismissing the regulation. Essentially, this  
52 behaviour entails non-compliance with the rules. Companies may not want to report information  
53 considered critical for the firm’s performance (Adams *et al.*, 1995) or for competitive reasons (Beck  
54 *et al.*, 2017), such as BM information. As argued by de Villiers and van Staden (2006), hesitancy to  
55 report sensitive information is consistent with legitimacy since “disclosing sensitive information can  
56 in itself become a legitimacy threat” (p. 767). This tactic is employed by firms that did not introduce  
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3 a section dedicated to BM information after implementation of the EU Directive. However, these  
4 companies attempted to manipulate perception by deflecting attention from the issue of concern to  
5 other related issues (Lindblom, 1994), particularly by strengthening adjectives in isolated statements  
6 regarding their BM or citing the EU Directive or the related law in their country in their reports.  
7

8  
9 The way in which firms use these three disclosure strategies to manage their legitimacy is evaluated  
10 through the semiotic methodology. In this context, the process of legitimation may be seen as an  
11 attempt to establish a semiotic relation between action and values (Richardson, 1987). Therefore, an  
12 organisation's existence is legitimate by the ritual use of accounting information providing a  
13 validation of the present through its connection to the past (Crowther, 2012).  
14

### 15 16 3.3.2 *Semiotic methodology*

17  
18 Semiotic methodology is defined as “a formal mode of analysis used to identify the rules that govern  
19 how signs convey meaning in a particular social system”<sup>2</sup> (Eco, 1979 in Fiol, 1989, p. 278). The sign  
20 is considered the relationship between a signifier (word) and the signified (object/concept); hence,  
21 meaning is generated and communicated through the association between the signifier and the  
22 signified in the sign system (Saussure, 1916). However, it should be noted that each sign in a corporate  
23 report is not static but is contextually dependent upon the other signs produced in that report  
24 (Crowther, 2012).  
25

26  
27 Communication in corporate reports occurs through three devices: natural language (i.e., the English  
28 language), the language of accounting, and non-linguistic devices (e.g., pictures, graphs, and colours).  
29 Accounting is considered the language of business and is a highly specialised “dialect” of natural  
30 language (Davidson *et al.*, 1974; Evans, 2010). The accounting language's syntax, grammar, and  
31 usage rules should assure an understanding of the message contained in corporate reports. However,  
32 it should be noted that the accounting language provides not merely a representation of objects and  
33 events but also a representation of the desires, intentions, and goals of the communicator (Crowther  
34 *et al.*, 2006). Conversely, reading is an activity in which meaning is an event in the readers'  
35 consciousness (Fish, 1972). Based on these assumptions, Crowther (2012) proposed a framework  
36 based on a mechanism of binary oppositions, which is considered “a fundamental operation of the  
37 human mind basic to the production of meaning” (Culler, 1975, p. 5). The understanding of binary  
38 oppositions and their inherent tensions from the perspective of different stakeholders is important for  
39 traversing the semiotic analysis of reports (i.e., for discovering meaning within a text).  
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### 43 44 *Synchronicity–Diachronicity*

45  
46 Saussure (1916) distinguished between synchronic and diachronic linguistic arguing that a synchronic  
47 study of the text examines the relationships that exist among its elements, and a diachronic study  
48 examines the manner in which the narrative evolves (Berger, 2005). Indeed, synchronicity refers to  
49 “the timelessness of the text and provides a means for an examination of recurring themes within the  
50 text” (Crowther *et al.*, 2006, p.182; Crowther, 2012, p. 167). Diachronicity, instead, is based on  
51 references to past activities that are compared with the present and have implications for the future.  
52

### 53 54 *Accounting–Non-accounting*

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58 <sup>2</sup> As argued by Massaro *et al.* (2018), in this section, we often use direct citations to define the concepts used to conduct  
59 this research, to avoid mis-citation problems.  
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3 Every report has an accounting component, which contains financial information to satisfy statutory  
4 requirements, and a non-accounting component, which strives to create an image deemed desirable  
5 by the authors of the script. Generally, these two parts are presented in different manners. In  
6 particular, accounting information is displayed in a smaller font and in a single colour, while the non-  
7 accounting part of the text is displayed in various colours, font sizes, and layouts (Crowther *et al.*,  
8 2006; Crowther, 2012).  
9  
10

### 11 *Past–Future*

12  
13 The perception of time is a semiotic problem (Uspenski, 2010) as the historical perception transforms  
14 objects into historical events (Passerini, 1999). In particular, the past also exists in the present,  
15 influencing, but not determining it. In fact, an emergent event depends on the past in the sense of  
16 understanding the meaning of the past (Mead, 1964). Additionally, the future exists in a hypothetical  
17 manner, which consists of the anticipation of events (Halas, 2013). A corporate report should provide  
18 a description of the past and a view of the present and future of the organisation. Specifically, the past  
19 pole of this binary opposite should be portrayed as bad to make the future pole appear good (Crowther  
20 *et al.*, 2006; Crowther, 2012).  
21  
22

### 23 *Financial performance–Environmental performance*

24  
25 There is a constant tension between financial and environmental performance, with each responding  
26 to different pressures from different stakeholders. The former strives to measure the effect of an  
27 organisation upon itself; the latter strives to measure and report the effects of an organisational  
28 activity upon the external environment (Crowther, 2012). These dimensions cannot be maximised, as  
29 good performance for a selected dimension entails sacrificing performance along the other dimension.  
30 Accordingly, firms are prone to report environmental performance separately from financial  
31 performance to segregate the readership and represent a different pole as the dominant pole when  
32 presenting the script to different parts of the audience (Crowther *et al.*, 2006). Additionally, the lack  
33 of environmental performance indicators in reports entails that the image created by the authors can  
34 not be refuted through quantitative comparative evaluation. This practice aligns with the use of a non-  
35 linguistic mechanism and statements concerning continual improvement towards a better future to  
36 strengthen a firm's image.  
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### 41 *Myth–Ritual*

42  
43 The myth explains the present and the past as well as the future and continues to be experienced as a  
44 myth by readers throughout the world (Lévi-Strauss, 1955). Therefore, the myth has the power to  
45 present a single perspective, in this case, the existence of the organisation. The corporate report as  
46 myth presents authoritative communication about the organisation using the same format, language,  
47 and style over time to ensure that the image of the organisation remains immutably fixed in the present  
48 (Crowther *et al.*, 2006; Crowther, 2012). In binary opposition to the myth, there is the ritual. In the  
49 ritual, certain elements of reality are arranged in the same combination of time, space, actors, and  
50 acts. This repetition provides the idea of the impossibility of change (Leone, 2011) and maintains the  
51 social cohesiveness of the organisation through the participation of members in these rituals. In  
52 corporate reports, the ritual is used by the author, who is the decision-maker of the organisation, to  
53 signal that the firm “is moving forward to better times in the manner previously outlined” (Crowther  
54 *et al.*, 2006, p.193; Crowther, 2012, p.191).  
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### 59 *City–Environmentalists*

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3 A key assumption of the semiotic approach to corporate reporting is the segregation of the audience  
4 into those assumed to be concerned with financial performance and those assumed to be concerned  
5 with environmental performance. Thus, the city-environmentalist binary opposition refers to  
6 shareholders/investors and societal issues, respectively (Crowther, 2012). This reference requires an  
7 analysis of both financial reports and environmental/social reports to identify different messages  
8 delivered to different parts of the audience without the necessity of reconciling contradictory  
9 messages.  
10  
11

### 12 *Internal–External consumption*

14 Two levels of accounting can be individuated based on the purpose of the information. The first is  
15 management accounting, which concerns the internal operations of a business and the allocation of  
16 its resources. The second is financial accounting, which is characterised by reporting on activities of  
17 the organisation to the external world. Therefore, this binary opposition considers the internal  
18 consumption pole as a representation of the organisation through its individual components and the  
19 external consumption pole as a representation of the organisation as a whole (Crowther, 2012). This  
20 representation entails the use of non-linguistic devices to portray the company for external instead of  
21 internal consumption.  
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25 The selected framework is applied in this study to verify how firms use the presentation and content  
26 of the BM in corporate reports to manage their legitimacy in response to the EU Directive. This  
27 application could also be useful to gather insights on the trustworthiness of the information provided  
28 by firms since the corporate report as a tool is not necessarily used to tell the truth (Breton, 2009).  
29

30 The EU Directive allows the use of a separate report for non-financial information and does not force  
31 firms to use financial reports to communicate this type of information. The only limit is on the time  
32 of publication. The separate report should be made publicly available no later than six months after  
33 the balance sheet date. Therefore, this study considers both financial and non-financial corporate  
34 reports to consider all the possible reporting choices of firms. Specifically, we carefully scrutinise the  
35 BM sections, focusing on their presentation and content. In particular, we have devoted attention to  
36 the differences and similarities between 2016 BM sections and those from 2017. This analysis lets us  
37 to identify binary oppositions and further explore their nuanced meaning in the current context.  
38 Moreover, the examination of single statements enables us to identify the way in which companies  
39 react to EU Directive requirements on BM to manage their legitimacy.  
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## 45 **4. Findings**

47 During the preliminary analysis, a set of interesting evidence emerged. Firstly, there was an increase  
48 in the number of non-financial reports compared to 2016. In fact, as of 2016, 10 financial reports  
49 addressed sustainability issues, and 3 firms do not provide information on these matters. In 2017,  
50 only 4 firms embedded sustainability matters in financial reports, and all the firms in the sample  
51 disclosed non-financial information. Moreover, the adoption of the GRI guidelines was verified for  
52 28 firms (60%). This percentage is in line with the results of KPMG (2017) which found that 63% of  
53 reports from the largest companies in terms of revenue stream adopted the GRI guidelines when  
54 preparing their non-financial information.  
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58 Furthermore, concerning “where” the BM sections are presented, surprisingly, no preference emerged  
59 between the two communication channels, with exactly the same number in both financial and non-  
60 financial reports (17).

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3 The reaction of firms to the EU Directive could be different; therefore, results that are presented  
4 combine legitimacy theory and the semiotic analysis adopted in this paper. The main classification  
5 distinguishes three strategic responses identified through the background of legitimacy theory: 1)  
6 acquiescence; 2) avoidance; and 3) defiance. Each disclosure strategy is further analysed using the  
7 binary oppositions identified in the discussion of the methodological perspective of semiotic analysis.  
8 Hence, we consider the synchronicity-diachronicity opposition as a starting point of the semiotic  
9 analysis, which we further develop through the investigation of the remaining binary oppositions of  
10 Crowther's framework. Such oppositions are referenced in square brackets where appropriate.  
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#### 15 *4.1 Acquiescence*

##### 16 *4.1.1 Firms providing a Business Model section both before and after the EU Directive*

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20 Several firms dedicated a section to their BM before the application of the EU Directive. Of these  
21 firms, 4 provided a section describing their BM in both communication channels.  
22

23 RNB and ENEL presented the BM section in a synchronic manner, using the same figure and the  
24 same text to describe their BM in both years and reports [synchronicity]. Thus, such companies signal  
25 the temporal independence of their BM to highlight a message of stability over time. Therefore, the  
26 use of an unchanged representation of the BM can be interpreted as a myth, which is a means of  
27 signalling the importance of an organisation's existence as immutable (Crowther, 2012). Moreover,  
28 for RNB, it should be noted that the depiction of BM references long-term concepts (i.e., strategy,  
29 business plans, and vision). Additionally, while in RNB's sections there is no binary opposition of  
30 city-environmentalist and the same script is provided to shareholders and environmentalists, ENEL  
31 appears to communicate the environmental pole as "good", integrating sustainability into all aspects  
32 of its business in the "The sustainable business model" section. Indeed, the main aspects of  
33 environmental performance achieved in 2017 are disclosed in the financial report instead of in the  
34 non-financial report. In particular, ENEL earmarked a part of BM section to explain the importance  
35 of ESG sustainability indicators. This practice demonstrates a total adherence to the EU Directive  
36 requirements and environmental engagement aimed at socially responsible investors.  
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41 The remaining two firms present different situations. TAKKT preserved the same BM description in  
42 financial reports for both years [synchronicity] and included several diachronic statements in which  
43 future goals are suggested as an ongoing improvement upon the present. Additionally, the firm  
44 highlighted its global presence, thus reinforcing the myth of the organisational existence. In contrast,  
45 the sections are different from year to year in the non-financial reports. In 2016, the BM representation  
46 consists of a combination of images and text, while in 2017, the report outlines the BM through a  
47 graphical representation, followed by a brief comment in which the ritual pole emerges ("we made  
48 significant progress AGAIN in 2017"). SAP presented "horizontal" synchronicity using the same  
49 content and form for the corporate reports published in each observed year. Indeed, in 2016, SAP  
50 named the section in the two reports "Financial Business Model", indicating how it uses its revenue  
51 to address investors' claims [financial performance]. In 2017, the company entitled the sections "Our  
52 Business Model", highlighting the creation of value for customers [environmental performance].  
53 Such a change is probably due to the EU Directive requirements, which led management to disclose  
54 more information on the BM, moving the audience from investors to customers.  
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59 Certain undertakings chose to communicate their BM in only one of the reports. Indeed, 7 published  
60 the section only in the financial report, and 5 published it in the non-financial report. In this case, in

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3 accordance with the semiotic methodology, the segregation between city and environmentalist  
4 audiences is verified after the implementation of the EU Directive.  
5

6 In 2016, Eurazeo provided a brief description of its BM, concentrating on the creation of financial  
7 value for shareholders and portfolio companies [city]. In 2017, the BM consisted of a diagram  
8 indicating accounting values in bold and geographical expansion detailing the cities where the  
9 company operates to reinforce the organisation's boundaries [myth]. Similarly, in 2017, Bakkafrost  
10 reduced the narrative part of the section to dedicate more space to a graphical representation [non-  
11 accounting]. Additionally, the illustration was modified as follows: the resources are not divided into  
12 internal and external categories. In addition, a list of competitive advantages was added; the channels  
13 and segments were substituted with an indication of the beneficiaries of the created value, and the  
14 KPIs were eliminated. Therefore, both the accounting and financial performance poles are considered  
15 irrelevant compared to the societal issues (e.g., community investments, tax contributions).  
16  
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19 GEA and First Sensor demonstrated perfect synchronicity between years, using the same words in  
20 their financial reports. Similarly, Nis Group and BASF used the same representation of their BM in  
21 non-financial reports. Specifically, GEA focused on the principles (i.e., IFRS) and guidelines (i.e.,  
22 GRI) used to reinforce the validity of the information presented [myth]. First Sensor used the third  
23 person to illustrate its business, customer segments, core competencies, and strategy to strengthen its  
24 myth role. Nis Group uses only a graphical depiction to indicate the principal activities of the firms  
25 to communicate with the financially illiterate [non-accounting], while BASF, in a schematic manner,  
26 indicated the segments, operating divisions, values, and competitive advantages [external  
27 consumption]. Again, the analysis reveals a lack of KPIs, whereas more attention was devoted to  
28 strategic issues even before the introduction of the EU Directive.  
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32 For Unibail-Rodamco and L'Oreal, synchronicity is reflected in the use of the same content presented  
33 with a different graphical interface. Specifically, in 2017, the design and the terms used by Unibail-  
34 Rodamco recall the IIRC framework. However, for both years, accounting information was presented  
35 in a single colour (i.e., black), while the non-accounting parts utilise different colours. Additionally,  
36 in the description of environmental performance, the firm's promise of "Better places" continues to  
37 be made year after year to create "the image desired amongst the readers of the diachronically  
38 unfolding script" (Crowther, 2012, p. 185). L'Oreal concentrated only on accounting information by  
39 selecting five years for comparative purposes and using a graphical illustration to highlight the  
40 continual improvement of its financial performance. Hence, the message provided to the readers could  
41 be that ensuing year will be even better [ritual]. Finally, showing the financial results of the group,  
42 further separated into divisions, geographical areas, and business segments, the firm contributes to  
43 creating an image of the organisation as a whole for external users [external consumption].  
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48 In 2017, Mitie Group plc changed the format and the content of its BM sections. Interestingly, the  
49 report indicates the specific parts (i.e., pages) related to content suggested by the EU guidelines (i.e.,  
50 the strategy, KPI, and market review).  
51

52 In 2017 BNP used the same figure and content as in 2016 to describe the creation of value for clients  
53 [synchronicity], adding an explanation of the impact of the company's activities on stakeholders. In  
54 particular, a series of accounting information is listed in bold in response to the demands of investors  
55 and shareholders. In contrast, Bufab inserted non-accounting information dedicated to suppliers and  
56 customers and retained an unchanged graphical representation of the customer satisfaction process  
57 [synchronicity].  
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3 In its 2017 Integrated Report, Sanofi provided a section titled “Our five Global Business Units: a  
4 diversified and strong business model”, that was only a part of the “Business Model and Strategy”  
5 section in the 2016 Integrated Report. In both years, attention is focused on the portfolio, market  
6 ranking, and accounting information [financial performance]. Moreover, in 2017, the firm attempted  
7 to strengthen the image of its BM, adding the adjectives “diversified and strong” [myth].  
8  
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10 It is also interesting to highlight that certain firms that previously provided a BM section in one of  
11 their reports decided to introduce a similar section in the other report as well. Nis Group inserted  
12 “Business Model” section in its the financial report; this was identical to the section available in the  
13 non-financial report [synchronicity] and consisted of a graphical representation of realised activities  
14 [non-accounting]. Similarly, BASF copied the content of the section previously published in the  
15 “2016 Integrated Report”. In the part of 2017 financial report dedicated to investments, the Swedish  
16 company Bufab introduced a paragraph named “Robust business model”, which was streamlined to  
17 a brief description of the cost and profit model [financial performance]. In this last case, the term  
18 “Robust” highlights the link to a concept of sustainability as “the company’s ability to create revenue  
19 in the long term” (Nielsen *et al.*, 2019, p.55).  
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23 There is another instance in which a firm that provided a BM section in 2016 but did not provide one  
24 after the implementation of the EU Directive. In this study, this behaviour was observed for only one  
25 firm (i.e., Salini Impregilo S.p.a.), and it is thus considered a marginal case.  
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#### 29 4.1.2 Firms providing a Business Model section only after the EU Directive

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31 The analysis reveals that 5 firms of the sample introduced an original BM section in 2017, realising  
32 a “conscious obedience” (Oliver, 1991, p. 152) to EU Directive requirements. In this case, we can  
33 refer to a “disclosure” of the BM in Dumay’s (2016, p.178) sense, as the “revelation of information  
34 that was previously secret or unknown”.  
35  
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37 In these cases, the synchronicity pole is irrelevant, while the presentation of a new section could be  
38 considered an effect of the EU Directive. However, each firm chooses a different set of elements to  
39 characterise its BM; therefore, our analysis is concentrated on the other binary poles to find potential  
40 attempts to facilitate their desired manner of interpretation to influence meaning for the readers.  
41 Particularly, it is interesting to verify whether firms have dedicated specific attention to  
42 “environmental performance” and “environmentalist” poles by linking BM and ESG factors.  
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45 Total included a BM section in both the 2017 financial and non-financial reports. In the first report,  
46 the section describes the activities and their synergies, the value chain, and the future objectives [non-  
47 accounting]. These components are among those that characterise the BM in the literature. Several  
48 authors have argued that a firm must select which activities it performs and when it performs them  
49 (Afuah and Tucci, 2001, Zott and Amit, 2010) to make its BM work (Osterwalder and Pigneur, 2010),  
50 with a particular focus on how the activities are linked (Zott and Amit, 2010) and configured for value  
51 creation (Voelpel *et al.*, 2004). Total’s activities are depicted in an image that is not replicated in the  
52 non-financial report, where the explanation is focused on the natural gas sector [environmentalist].  
53 This finding can be interpreted as a choice to completely change the subject of the description by  
54 referring to an area of activity that is more environmentally sensitive, addressing the demands of  
55 environmentalists. Additionally, the firm signalled that it is moving forward in the manner previously  
56 outlined, stating “we are maintaining our commitment to natural gas”, as a ritual step along the path  
57 to wholeness [ritual]. Finally, Total suggested that the future will be more glorious: “we will be  
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3 managing nearly 40 million tons of LNG in 2020, making us the world's second-largest operator in  
4 the sector, with a 10% market share" [future and ritual]. The German company Siltronic published a  
5 "2017 Non-financial report" that was extracted from the "2017 annual report", introducing a new  
6 section entitled "The Siltronic business model". This section describes the company's profile and the  
7 process, the resources to realise its products [non-accounting], while also considering another set of  
8 elements identified in the literature, namely the elements that allow a company to deliver value (Alt  
9 and Zimmermann, 2001; Johnson *et al.*, 2008) using key resources and competencies (Weill and  
10 Vitale, 2001; Demil and Lecocq, 2010; Christensen *et al.*, 2016). The firm emphasised its dominance  
11 in the global market ("a globally operating market and technology leader"), favouring the  
12 construction of its mythical role.  
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16 Two firms introduced a BM section only in the non-financial report, addressing the expectations of  
17 environmentalists; however, they adopted completely different behaviour. On the one hand, Esprinet  
18 Group included the section among the environmental topics, illustrating the principles and the codes  
19 adopted by the firm to highlight its commitment to achieving excellence [environmental  
20 performance]. On the other hand, Tokmanni Group introduced the "Circular economy business  
21 models" section, which did not explain its BM. Indeed, the company illustrated the features of the  
22 five types of BMs introduced by an independent public foundation and not its own BM.  
23  
24

25 Quest Holdings took the EU Directive literally, providing a "Brief description of the business model"  
26 section in its 2017 financial report in the "non-financial performance" section. In this paragraph, the  
27 firm identified its business, its sectors, and the geographical areas in which operates. The lack of  
28 accounting information or future-oriented statements and the desire to highlight expansion across the  
29 world [myth] are evident. At the same time, the environmental pole and the connection between BM  
30 and ESG factors were not mentioned.  
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33 These cases show that undertakings attempt to protect their legitimacy by complying with the new  
34 regulation. However, they often continue to use the same approach in reporting BM information  
35 without clearly connecting the BM with ESG factors.  
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38 It is also interesting to verify how the BM concept emerges and is used in the reports of firms that do  
39 not provide a BM section.  
40

#### 41 4.2. Avoidance

42  
43 Three firms attempted to preclude the necessity of conformity using the concealment tactic.  
44 Specifically, they used "window dressing" (Oliver, 1991, p. 154) by not disclosing any substantive  
45 information but giving the impression of compliance with the regulation. Substantially, these three  
46 firms confirm the prediction of Dumay and Hossain (2018) that companies will simply adapt their  
47 current reporting practices to comply with the Directive and maintain a "business as usual" approach.  
48 Indeed, in the "Sustainable Strategy 2017" report, Inditex included a section "Sustainable Model",  
49 which had the same content as the section titled "Sustainable Strategy" in the previous year. However,  
50 the section focuses on sustainability issues such as human right protection and sustainable  
51 development, indicating the firm's corporate values [environmental performance]. In Natra S.A., the  
52 "Company Profile" section of the "Progress Report 2016" is transformed in "Aim and Business  
53 Model" section in the 2017 report. In this case, the section emphasises the global presence of the firm  
54 [myth], its value proposition and its consumption and industrial division trying to make up an image  
55 of the organisation as a whole for external users [external consumption]. Lastly, Artic Paper S.A.  
56 included the "Our Business Model" section in its "CSR Report 2017", duplicating the "Description  
57 of the business of the Artic Paper Group" contained in the 2016 financial report. Indeed, the section  
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3 includes an image illustrating the distribution of its sales organisations in Europe [non-accounting]  
4 and provides a list of inputs, business activities, outputs, and results. Only in the outputs section, there  
5 is a reference to environmental issues.  
6

7  
8 In all these cases, the synchronicity pole is used to comply with the EU Directive without the  
9 introduction of new contents. Indeed, information that was already included in 2016 corporate reports  
10 was “dressed” in a different manner. It has been argued that, when confronted with diverging  
11 demands, firms have simply changed the name of sections. Finally, it is interesting to note that all  
12 these firms used a non-financial report to strengthen the appearance of conformity.  
13

#### 14 4.3 Defiance

15  
16 Nearly half of the sample, exactly 20 firms, did not provide a BM section in either year, adopting a  
17 more active form of resistance to institutional pressure (Oliver, 1991). Specifically, in the form of a  
18 dismissing tactic, this behaviour entails non-compliance with the rules. However, companies  
19 manipulate perception by deflecting attention from the issue of concern to other related issues through  
20 an appeal to, for example, emotive symbols (Gray *et al.*, 1995).  
21  
22

23  
24 Indeed, many of these firms cited the EU Directive or the relative law of their country in their reports,  
25 demonstrating an awareness of the necessity to comply with it. Telenet Group Holding NV listed the  
26 issues required by the EU Directive: “The present statement outlines the Company’s management of  
27 labor, environment, human rights, anti-corruption, and bribery issues; in accordance with the Belgian  
28 Law 2017/20487 on integrated non-financial reporting”. Similarly, another firms emphasised “As  
29 envisaged by Art. 5 of Legislative Decree 254/16, this document is a separate report containing  
30 specific wording in order to bring it in accordance with the Non-Financial Consolidated Disclosure  
31 required by law” (La Doria S.p.a.), and “[...] we are complying with the statutory provisions as per  
32 the new CSR Directive Implementation of Directive 2014/95/EU” (DMG Mori AG). Additionally,  
33 certain undertakings highlighted that they published a non-financial report for the first time to meet  
34 the requirements of the new regulation. For example, “With this first edition of the non-financial  
35 consolidated statement the Prima Industrie Group is responding to the requirements of Legislative  
36 Decree 254/16”, and “Buzzi Unicem has decided to include its first consolidated non-financial  
37 declaration (Art. 4 of Legislative Decree 254/2016) within its Sustainability Report”.  
38  
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40  
41 Other firms used disconnected statements on BM in their reports to give the impression of  
42 compliance. Indeed, the majority of firms (75%) that did not provide a BM section use the term  
43 “Business Model” within their report. In particular, they strengthen the image of their BM [myth]  
44 using adjectives or explaining the key elements on which their BM are based, as shown in Table 2.  
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#### 47 **INSERT TABLE 2 HERE**

48  
49 Lastly, despite the EU Directive promoting the “comply or explain” principle (Senn, 2018), only VÚB  
50 Banka emphasised that it does not need to observe the EU Directive, because “the parent company of  
51 VÚB Banka, Intesa Sanpaolo, is processing and issuing such report for all its subsidiaries”.  
52  
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### 54 **5. Discussion**

55  
56 The objective of this study is to investigate how firms use the presentation and content of BMs in  
57 corporate reports to manage their legitimacy in response to the EU Directive 2014/95. In this section,  
58 we first discuss the results of the preliminary analysis and then the findings on the disclosure strategies  
59 of firms through semiotic analysis of the BM sections in corporate reports.  
60



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3 The findings of the preliminary analysis reveal an increasing use of non-financial reports in 2017.  
4 These results could be interpreted in different ways. As argued by La Torre *et al.* (2018), the EU  
5 Directive is a policy that intervenes in the non-financial reporting practices of large undertakings and  
6 provides legitimacy to these firms. Thus, firms understand the benefit of this type of communication  
7 as the legitimisation of an organisation's operations (Deegan, 2002). Indeed, legitimacy theory argues  
8 for a positive relationship between sustainability performance and sustainability disclosure (Hummel  
9 and Schlick, 2016); however, "increased disclosure does not always instil trust or develop legitimacy"  
10 (Dumay *et al.*, 2019).  
11

12  
13 Additionally, the adoption of the GRI guidelines by the majority of firms was verified. As González  
14 *et al.* (2018) stated, Europe continues to be the primary GRI reporting adopter. However, since it is  
15 through the development of these guidelines that society exert its authority to redefine and explicitly  
16 express "social norms" with respect to reporting (Beck *et al.*, 2017), the results of our analysis can be  
17 interpreted as the firms' desire to obtain legitimacy. Furthermore, the presence and use of voluntary  
18 reporting standards and guidance have a positive influence on the quality of reports (Dumitru *et al.*,  
19 2017) and the homogeneity of information (Carini *et al.*, 2018).  
20  
21

22  
23 Finally, no preference emerged between the two communication channels (i.e., financial and non-  
24 financial reports) concerning "where" the BM sections are presented. Several papers demonstrated  
25 that a firms' choice of "where" to disclose corporate information is the result of external pressure and  
26 the firms' attempt to influence external stakeholders and the capital market (e.g., Botosan, 1997; de  
27 Villiers and van Staden, 2011).  
28  
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30 The results of the analysis of firms' disclosure strategies are summarised in Table 3.

### 31 32 **INSERT TABLE 3 HERE**

33  
34 Our analysis reveals that close to half of the companies in the sample strategically chose to comply  
35 with the regulation, observing the requirements of the EU Directive regarding the BM. Indeed, as  
36 argued by La Torre *et al.* (2018), within the dialogical dynamic between the State, companies, and  
37 society, companies can rest assured that they obtain legitimacy by merely complying with the law.  
38

39  
40 Specifically, several firms dedicate a section to describing their BM before the implementation of the  
41 EU Directive, choosing to communicate their BM in only one of the reports (i.e., 7 included a section  
42 only in the financial report; 5 included a section only in the non-financial report) or in both  
43 communication channels (4 firms). Through the semiotic analysis, we discovered that the majority of  
44 these firms present the BM section in a synchronic manner using the same figure and the same text  
45 to describe their BM in both years and reports. In these cases, synchronicity is most likely used to  
46 signal the temporal independence of their BM to give a message of stability over time. Furthermore,  
47 the unchanged representation of the BM signals the immutability of the organisation's existence.  
48 There are some exceptions, for example, the use of a figure instead of a textual description, the  
49 inclusion of an additional section on the BM, or the enrichment of the disclosed content. For example,  
50 in 2017, Mitie Group plc changed the format and the content of its BM sections. Interestingly, the  
51 company indicated the specific parts (i.e., the pages) of the report related to content suggested by the  
52 EU guidelines (i.e., the strategy, KPI, and market review). This practice can be interpreted as an  
53 example of textual connectivity, which is the connection of different sections of text in a corporate  
54 report. In this regard, connectivity is considered a key feature of communicative effectiveness based  
55 on two elements: cohesion which refers to the way surface features of the text (i.e., words and phrases)  
56 are linked to each other grammatically; and coherence which refers to the mode by which concepts  
57 introduced in the text are linked to each other in a meaningful manner. Therefore, readers can  
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3 understand the manner in which the ideas are organised (Merkl-Davies and Brennan, 2017).  
4 Conversely, 5 firms of the total sample of 46 provided for the first time a BM section in 2017, and  
5 thus these cases are examples of companies that realised the “revelation of information that was  
6 previously secret or unknown” (Dumay, 2016, p.178). These cases show that undertakings attempted  
7 to protect their legitimacy by complying with the new regulation. However, they often continued to  
8 use the same approach in reporting BM information without clearly connecting the BM with ESG  
9 factors. This evidence confirms Jeffrey *et al.* (2017)’s concern regarding the risk of disconnection  
10 between BM and ESG factors and the resulting undermining of integrated reporting. However, for  
11 the majority of companies that adopted an acquiescent response, the BM section presents comparative  
12 data indicating future goals in order to highlight the continual improvement of the firm’s financial  
13 performance and underline their commitment to maintaining performance levels. The dominance of  
14 information on financial performance could be interpreted as a company’s decision to dismiss the  
15 demands of environmentalists to meet the demands of financial stakeholders perceived as being more  
16 powerful (Bebbington *et al.*, 2008).  
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21 Three firms adopted an avoidance strategy by simply adapting their current reporting practices to  
22 comply with the Directive and maintaining a “business as usual” approach (Dumay and Hossain,  
23 2018). Specifically, these firms employed a concealment tactic that implies a symbolic degree of  
24 compliance to attain legitimacy. In these cases, synchronicity was used to comply with the EU  
25 Directive without the introduction of new content. Moreover, these firms avoided integrating  
26 information on future goals, concentrating on the year of the report, with only one undertaking  
27 introducing information on sustainability issues. The use of this tactic in response to the EU Directive  
28 suggests the strength of the regulation rather than its weakness (Criado-Jimenez *et al.*, 2008).  
29 Furthermore, all three firms used a non-financial report to introduce their BM section. This evidence  
30 confirms that non-financial reporting is used to respond to significant external pressures in attempting  
31 to achieve external acceptance (Beck *et al.*, 2017).  
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36 Concerning the content of the BM disclosure in both companies that used acquiescence and avoidance  
37 tactics, our results indicate that the firms disregarded the guidelines of the EU Commission regarding  
38 the use of KPIs to explain their BM. This practice appears to support the critical interpretation of the  
39 indicators as creating seriousness because they are published but does not explain the mechanism by  
40 which the firms attempt to construct knowledge management activities (Mouritsen *et al.*, 2001).  
41 However, as argued by Jeffery *et al.* (2017), the EU Directive lacks a prescription of what relevant  
42 KPIs might be and how they should be measured. At the same time, the undertakings indicated the  
43 markets in which they operate, as required by the EU Commission, to affirm the myth of the  
44 organisation. BM sections were used to restate the organisational existence, privileging the creation  
45 of an image of the organisation as a whole, instead of providing a description of its internal processes.  
46 In general terms, the semiotic approach reveals consistent patterns concerning the presentation of BM  
47 sections. First, the use of non-accounting language is prevalent. This practice could be interpreted as  
48 a desire to create an image that cannot be refuted through quantitative comparative evaluation  
49 (Crowther, 2012). Second, the widespread use of graphical representation of BMs emerged. Nielsen  
50 and Lund (2014) emphasised that a problem in BM visualisation is that it becomes a generic  
51 organisational diagram illustrating the process of transforming inputs to outputs in a chain-like  
52 fashion. This process is likely a consequence of the IIRC Framework which encourages the use of a  
53 simple diagram (IIRC, 2013).  
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58 Several companies adopted a defiance strategic response and did not provide a BM section in either  
59 year. This “secrecy” could be interpreted as a desire to avoid negative media attention around  
60 unexpected events (Michalak *et al.*, 2017) or to avoid making information available to competitors

(Sukhari and de Villiers, 2018) and facilitating their imitation (Beattie and Smith, 2013). This explanation is persuasive, especially when the disclosure of the BM means divulging commercially sensitive information (Dumay *et al.*, 2019). The reluctance to report sensitive information is consistent with legitimacy theory since “disclosing sensitive information can in itself become a legitimacy threat” (de Villiers and van Staden, 2006). Moreover, in line with the PET perspective, “firms may not be complying with the legislation since to do so would open them to challenge where it is known that they do not have the appropriate policies” (Adams *et al.*, 1995, p. 104). Furthermore, these firms deflect attention from the requirements of the EU Directive towards other issues. Therefore, they manipulate the perception of their legitimacy. Specifically, they provide scattered use of the term Business Model within their reports, using it as an adjective and focusing on the image communicated to their stakeholders regarding their capacity to create value. These practices provide examples of BM disclosure in a fragmented manner; in other words, they evoke an image of the firms as “containers enclosing a hidden reality, which is (partly or selectively) revealed through disclosures in corporate narrative documents” (Merkl-Davies and Brennan, 2017, p.439). Despite the presence of statements linked to the BM, they are considered to be not fully compliant with the EU Directive because extracted sentences are contained in parts of the report (e.g., the “Letter from the chairman”, “Strategy Risks”, “Financial Risks”) dedicated to the explanation of issues not related to the BM.

Finally, the EU Directive promotes the “comply or explain” principle (Senn, 2018), which can be interpreted as “providing a means of legitimating deviations from individual code provisions” (Seidl *et al.*, 2013, p.796). However, only one firm explained why did not follow the requirements of the EU Directive.

## 6. Conclusions and implications

The recently adopted EU Directive reinforces academic interest in BM disclosure, providing an opportunity to increase corporate accountability through non-financial reporting (La Torre *et al.*, 2018). In this context, an interesting implication of this study concerns the legitimation that firms try to attain by manipulating the presentation and content of BM information in response to the new regulation. The semiotic analysis of corporate reporting represents an interesting method to examine different strategic responses. According to Crowther (2012), languages create a reality that then becomes truth, and the managers of an organisation are in a position to shape the semiotics of corporate performance as they please. Indeed, as argued by Casonato *et al.* (2018), the annual reviews are nothing more than an exercise in rhetoric, which is needed because exposing the truth undermines trust. Even non-financial reports are less forthcoming on many controversial aspects of firms’ operations that impact the public domain, and this reduces public trust in the quality of these reports (Sethi *et al.*, 2016). However, since legitimacy is considered a vital resource to organisational survival (Deegan, 2002), firms continue to use strategies to manipulate external perceptions. Additionally, the policy action of the EU Directive provides legitimacy through non-financial reporting practices (La Torre *et al.*, 2018). Considering that more than half of the sample is compliant (in reality or apparently), we argue that the EU Directive is effective at shining a light on BM information.

Regarding the presentation of BM information within non-financial statements, it would be useful to indicate more precisely “where” firms should report the required BM information. This change could reduce the practice of duplicating the information in different parts of a report and other communication channels. Additionally, the EU Directive should specify “how” to disclose the information with more precise indications of how the description of a BM should refer to ESG factors

(Jeffery *et al.*, 2017) and a set of performance measures to track the evolution of a company's BM over time (Nielsen *et al.*, 2018).

This study has certain limitations. First, the sample **can be enlarged**. Specific focus on different sectors and countries is also needed to compare the reporting practices in different contexts. Second, this analysis considers only the first year of EU Directive adoption. However, the effects of standards "are not always clear-cut in highly complex environments" (Trombetta *et al.*, 2012, p.130), and strict compliance with new regulations occurs gradually over a long timeframe (Senn, 2018). Therefore, it would be interesting to verify the changes in the content of corporate reports over the years to evaluate whether firms maintain the same disclosure strategies in response to the requirements of the EU Directive on the communication of the BM in their corporate reports. In particular, companies can mainly use the "comply or explain" principle to legitimate a deviation from the EU Directive or decide to adopt a particular guideline to be compliant with the new regulation. Additionally, the use of websites and social media should be considered for strengthening the public image of companies and transforming reporting into communication, thus enhancing the engagement of stakeholders with a corporation (Lodhia, 2018). The EU Directive is a "backward and old-fashioned policy" because it requires the publication of a non-financial statement and does not allow the adoption of a more flexible form of reporting, as much as possible, via the corporate websites (La Torre *et al.*, 2018). In this context, web-based reporting eliminates the binary city-environmentalist opposition because the information is available to anyone who is interested (Crowther, 2012). Future research should investigate if and how firms communicate their BM through corporate websites and social media platforms to establish an electronic presence and an appealing dialogue with readers.

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**Table 1 – Sample breakdown by sector and geographic area**

<b>Company name</b>	<b>Country</b>	<b>Industrial Sector</b>	
INDUSTRIA DE DISEÑO TEXTIL SA	SPAIN	Consumer discretionary	
TELENET GROUP HOLDING NV	BELGIUM		
TAKKT AG	GERMANY		
TOKMANNI GROUP OY	FINLAND		
VIKING LINE ABP	FINLAND		
INTRALOT S.A. - INTEGRATED LOTTERY SYSTEMS & SERVICES	GREECE		
AD PLASTIK D.D.	CROATIA		
RNB RETAIL AND BRANDS AB	SWEDEN		
L'OREAL SA	FRANCE		Consumer staples
P/F BAKKAFROST	DENMARK		
LA DORIA S.P.A.	ITALY		
NATRA S.A.	SPAIN		
TOTAL S.A.	FRANCE	Energy	
NIS A.D. NOVI SAD	SERBIA		
BNP PARIBAS	FRANCE	Financials	
EURAZEO	FRANCE		
VSEOBECNA UVEROVA BANKA A.S.	SLOVAKIA		
BANK OF GREENLAND - GRONLANDSBANKEN A/S	DENMARK		
SANOFI	FRANCE	Health care	
ALK-ABELLO A/S	DENMARK		
SIEMENS AG	GERMANY	Industrial	
GEA GROUP AG	GERMANY		
DMG MORI AG	GERMANY		
SALINI IMPREGILO S.P.A.	ITALY		
MITIE GROUP PLC	UNITED KINGDOM		
SEMPERIT AG HOLDING	AUSTRIA		
BUFAB AB	SWEDEN		
PRIMA INDUSTRIE SPA	ITALY		
SANTA FE GROUP A/S	DENMARK		
EDDING AG	GERMANY		
HAMON & CIE (INTERNATIONAL) NV	BELGIUM		
FRIGOGLASS SA	GREECE		
SAP SE	GERMANY		Information technology
SILTRONIC AG	GERMANY		
ESPRINET S.P.A.	ITALY		
FIRST SENSOR AG	GERMANY		
QUEST HOLDINGS S.A.	GREECE		

VETRYA S.P.A	ITALY	
BASF SE	GERMANY	Materials
BUZZI UNICEM S.P.A.	ITALY	
SOL SPA	ITALY	
ARCTIC PAPER S.A.	POLAND	
UNIBAIL-RODAMCO SE	FRANCE	Real estates
UBM REALITAETENENTWICKLUNG AG	AUSTRIA	
ENEL SPA	ITALY	Utilities
ALBIOMA	FRANCE	

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Table 2 – Statements on Business Model image

STATEMENT ON BM	COMPANIES
<i>“Telenet sets new standards in the telecom, media and entertainment segments and builds DISRUPTIVE business models and innovative products that make a real difference in this digital age”</i>	Telenet Group Holding NV
<i>"our SCALABLE business model is supported by our advanced IT platform which allows us to optimize product development by minimizing customization requirements during development while at the same time providing for further product adaptation (“micro tailoring”) upon distribution, making our product offering more adaptable"</i>	Intralot S.A.
<i>"ALK is committed to partnering with allergy specialists to succeed in establishing a SCALABLE business model for the tablets in North America"</i>	Alk-Abello A/S
<i>"The business model is therefore based on the quality of the product and on a constant commitment to improving environmental sustainability"</i>	La Doria S.p.a.
<i>"In Frigoglass, we put the customer in the centre of our business model"</i>	Frigoglass
<i>"The Group’s business model is based on long-term partnerships with local stakeholders in the sector"</i>	Albioma Group

**Table 3 – The results of the analysis of the disclosure strategies of firms**

		DISCLOSURE STRATEGIES		
		ACQUIESCENCE	AVOIDANCE	DEFIANCE
BINARY OPPOSITIONS	SYNCHRONICITY - DIACHRONICITY	Firms that provide BM sections before the introduction of EU Directive use synchronicity to signal the temporal independence of their BM in order to give a message of stability over time. The other firms include in BM sections several diachronic statements in which the future goals are suggested as an ongoing improvement upon the present.	Firms use synchronicity to be compliant with the EU Directive without the introduction of new contents. Indeed, the information that are already included in corporate reports of 2016 are “dressed” in a different manner.	
	ACCOUNTING - NON-ACCOUNTING	There is a widespread use of graphical depiction and images to explain the BM to financially illiterate while the insertion of KPI is rare. This practice could be interpreted as a desire to create an image that could not be refuted through quantitative comparative evaluation.	Companies use images and figures in BM sections to illustrate the organisation of sales and distribution in order to create an image that could not be refuted through quantitative comparative evaluation.	
	PAST - FUTURE	In the majority of case, the BM section presents comparative data indicating the future goals in order to highlight the continual improvement of its financial performance.	Companies avoid to insert future goal focusing on information on the year of the report.	
	FINANCIAL PERFORMANCE - ENVIRONMENTAL PERFORMANCE	Few firms introduce information on sustainability indicators and environmental topics in BM sections. Indeed, the majority of companies use the BM sections to show their financial results.	Only one firm introduces sustainability issues and indicates its corporate values. The other two focus the attention on the organisation issues and results.	
	MYTH - RITUAL	The use of unchanged representation of the BM signal the importance of the organisation existence as immutable. On the other hand, firms highlight their commitment in maintain actual performance levels.	BM sections are used to emphasise the global presence of firms.	Several companies provide disconnected statements on BM in their reports using adjectives to strengthen the image of their BM and to give the impression of compliance.
	CITY - ENVIRONMENTALIST	Several firms provide information on BM focusing on the creation of financial value for shareholders and investors. This could be interpreted as a choice to dismiss the demands of environmentalists to meet the demands of more powerful perceived financial stakeholders.	These firms use voluntary reports to introduce BM sections and cite the sustainability in the name of the sections in order to strengthen the appearance of conformity to EU Directive requirement.	
	INTERNAL - EXTERNAL CONSUMPTION	Many BM sections contain information about the operating divisions, competitive advantages, and business segments to create an image of the organisation as a whole.	Undertakings use BM information to makeup an image of the organisation as a whole for external users. After all, they did not change the internal operations of the business and the allocation of resources but only the way in which information are communicated.	
DISTRIBUTION OF STRATEGIC RESPONSES WITHIN CORPORATE REPORTS		Non-financial Reports                    4 Financial reports                            8 Both reports                                    9 Financial in 2016 Non-financial in 2017    1	Non-financial reports                    3	
		22	3	20
Firms with a BM section in 2016 and not in 2017				1