

SUSTAINABLE FINANCE & DISABILITY

For real and measurable
inclusion



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Editorials



Think and act together

We often hear that “S is the poor relation of ESG” because responsible finance is said to be too focused on environmental issues, particularly climate change. While this may be true in a number of cases, the Forum pour l'Investissement Responsable – French SIF wishes to actively contribute to the integration of S in order to participate in the development of a comprehensive and robust approach to ESG. As a community of investors open to civil society, social issues are particularly close to our hearts.

In 2023, we launched a project within GSG France with our partners Fair and France Invest on what we call social taxonomy. This work was organized around three profiles identified in the European social taxonomy project: workers, end users, and citizens, using a matrix approach. In other words, we wanted not only to identify sectors that make a particular contribution, such as housing and healthcare, but also to identify social transformation strategies in all sectors, and of course the issue of disability is no exception.

In partnership with the Fonds de Garantie des Victimes, Malakoff Humanis encouraged the creation of the working group on disability and its integration within the FIR. MH has made disability a priority and approaches the subject from several angles: supporting our client companies, rolling out advanced internal initiatives whose effectiveness is reflected in the percentage of employees declared as disabled (12.5% at the end of 2024), and contributing to the public interest through our Disability Foundation, which has supported 281 projects in 11 years.

As demonstrated by the enthusiasm of FIR members for the working group, there is a clear desire among SRI stakeholders to integrate disability issues. This white paper is fully in line with our ongoing work to establish a European framework on social issues.

Enjoy reading it!

Aurélie Baudhuin

President of the Forum pour l'Investissement Responsable (FIR) and Chief Investment Officer at Malakoff Humanis



Invest for inclusion

The mission of the 400 employees of the Fonds de Garantie des Victimes is to embody national solidarity with victims of terrorism, common law crime, and accidents caused by uninsured drivers.

In 2024, the Fund supported nearly 38,000 victims of physical injury. Among them, 3,350 people now live with a very serious disability. Beyond financial compensation, the teams support their recovery with concrete solutions: meal delivery, adapted driver's license, home renovations, advice on medical equipment, etc.

Investing for a more inclusive world is at the heart of its approach. As a responsible institutional investor, 75% of its assets are invested in funds that align with its social and environmental values.

Since 2009, the Guarantee Fund has been supporting the Simon de Cyrène association and its “shared homes” where able-bodied people and people with disabilities live together. Thanks to more than €14 million in investments, the homes in Vanves, Marseille, and soon Croix offer and will offer a shared living environment for 78 residents. The company is also a partner of the Fédération Solidarité Femmes, to which it provides housing for victims of domestic violence.

Every year, the Fund supports the Handitech Trophy, which rewards technological innovations that help people with disabilities, and promotes professional inclusion on a daily basis by awarding contracts, such as mailing its letters, to ESATs (organizations that help people with disabilities find work). Finally, the Fonds de Garantie des Victimes is an employer serving people with disabilities, with a direct employment rate of 5.2% in 2024, compared to less than 3% in 2022.

This white paper, to which the Fonds de Garantie des Victimes contributed, marks a decisive step forward: it opens a dialogue between sustainable finance and inclusion, and invites each player to rethink its levers of impact so that, together, we can build a more humane society for all.

Julien Rencki

Managing Director of the Fonds de Garantie des Victimes

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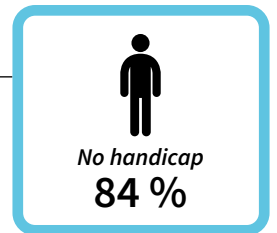
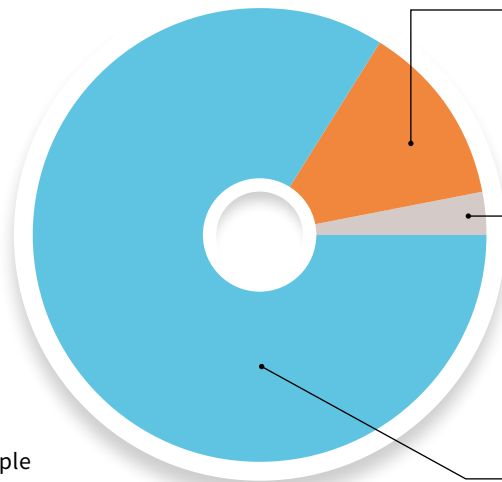
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EXECUTIVE SUMMARY

According to the WHO, 16% of the world's population lives with some form of disability. Among the seven major categories of disability (motor, disabling diseases, psychological, mental, cognitive, visual, or hearing), 80% are invisible and 80% are acquired during a lifetime.

The main obstacles faced by people with disabilities relate to mobility, building accessibility, digital accessibility, and discrimination. These barriers limit their access to training, administrative services, healthcare, and employment. As a result, they are more vulnerable to poverty and unemployment than the rest of the population. They are also less likely to have a degree and, when they do work, they are mostly employed as manual workers or clerical staff, often on a part-time basis, with increased difficulty in staying in employment.

Despite the multitude of regulatory measures, true equality between people with disabilities and able-bodied people remains out of reach. As a result, some depend on their caregivers, who themselves face difficulties in balancing their role as caregivers with their professional activities.



Workers:

much more than a question of quotas

In France, the law requires companies to employ at least 6% of people with disabilities, or else pay a financial contribution to Agefiph. However, in 2023, only 29% of companies comply with this requirement. Companies with more than 250 employees must also appoint a disability officer.

Interviews with companies and associations show that, in addition to an inclusive recruitment policy, it is essential to create a climate of trust within organizations. This involves raising awareness among employees and providing training and support for managers. A supportive environment encourages employees to disclose their disability, which makes it easier for them to remain in employment. Line managers, disability advisors, and workplace adaptations play a central role.

Adapted companies or ESATs (organisation that offers people with disabilities professional activities and medical, social, and educational support) offer people with disabilities who need it a protected working environment.

Companies also have a key role to play in preventing accidents, occupational illnesses, and psychosocial risks.

Successful companies do not forget the issues faced by caregivers.



Users:

safe products and services accessible to all

To ensure that people with disabilities have equal access to products, services, public places, and digital tools, it is not enough to comply with accessibility standards: a universal design approach must be adopted, integrating the needs of all from the outset.

Products and services can pose specific risks to users. For example, the quality of food products (alcohol, sugar, fat) has a direct impact on health and can contribute to the onset of disabilities.

In addition, some companies are developing products or services designed to compensate for the effects of disability, a rapidly growing market, particularly in relation to the aging population, as disability increases with age.

Citizens:

administrative obstacles and lack of political voice

The political representation of people with disabilities remains very limited. This contributes to their interests being underrepresented in public policy. This lack of a voice makes it more difficult to effectively take their needs into account in the design of laws, public services, or accessibility measures.

Between mobility issues and the digitization of public services, which are often poorly designed in terms of accessibility, administrative procedures can become a real obstacle course.

In terms of prevention, there is also a significant issue concerning the exposure of populations living near industrial sites (pesticides, persistent pollutants, etc.), which can lead to situations of disability.



What if the financial sector truly committed to inclusion?

Investors have a role to play in ensuring that people with disabilities have equal access to capabilities, as defined by Nobel Prize-winning economist Amartya Sen, i.e., the effective possibilities to lead the life they choose, considering their specific limitations.

***“It is not disability that defines a person,
but the way society views them.”***

*Philippe Pozzo di Borgo,
businessman and author of Le Second Souffle (which inspired the film Intouchables)
and Honorary President of the Simon de Cyrène association*



The consideration of disability in responsible investment remains marginal. These issues are often diluted in the “diversity” pillar of ESG (Environmental, Social, and Governance) criteria. Investors and ESG rating agencies encounter difficulties in accessing data on corporate disability policies due to the heterogeneity of the information available.

Some agencies specialize in analyzing this data, while investors collect information directly from companies. The European Sustainability Reporting Standards (ESRS) are set to include several disability-related indicators, which should facilitate access to more reliable information.

All investors, whether they invest in equities or bonds, can incorporate these issues into their strategy. Some funds specifically target companies that produce goods or services for people with disabilities, or that have been selected for their exemplary behavior. Others adopt a shared fund model, which donates part of its income to associations working on behalf of people with disabilities. Finally, investors can encourage the companies in which they are shareholders to take these issues into account through an engagement process. These three approaches can be pursued simultaneously.

TYPE OF INVESTMENT	BEST PRACTICE AS AN INVESTOR
LARGE COMPANIES	<p>Select the best-performing companies in the following areas:</p> <ul style="list-style-type: none"> • Limit risks related to products and services • Formalize a policy: commitments to diversity, disability policy, disability representative, etc. • Act: specialized recruitment forums, agreements, training or awareness-raising for employees, etc. • Achieve results: employment rate of people with disabilities, number of workplace adjustments, accident frequency, use of adapted companies and ESATs, etc. <p>Engage in dialogue with companies to encourage best practices</p>
PRIVATE EQUITY	Support the production of innovative goods and services that compensate for disability
REAL ESTATE	Offer accessible and adapted housing and shared housing solutions
SOLIDARITY INVESTMENT	<p>Invest in organisations to promote the inclusion of people with disabilities</p> <p>Help finance associations that defend the rights of people with disabilities (sharing funds)</p>



INTRODUCTION

A tool for investors

This white paper is primarily intended for financial stakeholders and aims to propose best practices and indicators for integrating disability issues into investment strategies. Its content may also be of interest to other stakeholders, particularly companies seeking inspiration from concrete examples of inclusion.

A collective effort

It was drafted in response to the observation that disability remains a largely overlooked issue in the field of responsible investment. A working group was set up within the French SIF (FIR). It brought together a diverse range of stakeholders, drawing on both in-depth documentary research and testimonials from professionals. Discussions with experts and associations working on behalf of people with disabilities enriched the debate and helped identify the main issues. The organization of a “Disability Fresco” by NovaSancO also helped broaden understanding of the challenges associated with this topic.

Terminology that conveys a philosophy

In this document, we have chosen to use the term “person with a disability.” This choice emphasizes the individual above all else. It recognizes that disability is a contextual situation, not an intrinsic or defining characteristic. By using this wording, we emphasize that the limitations encountered by a person are often the result of interaction with an unsuitable environment, rather than an intrinsic disability.

By adopting this terminology, we are aligning ourselves with international standards that advocate for a society accessible to all, where physical, social, and cultural barriers are gradually being eliminated.

This choice is also a commitment to promoting a culture of respect and dignity, where everyone is recognized for their skills and potential contributions. By avoiding terms that could reduce a person to their disability, we promote a more balanced and positive perception, which is essential for the integration of disability issues into responsible investment. This white paper is therefore intended as a tool for raising awareness and inspiring action, with the aim of promoting more inclusive and sustainable practices in the world of finance and beyond.

A focus on the French context

Given the cultural and regulatory differences between countries, this white paper focuses specifically on the French context.

Three roles: worker, citizen, and user

The issue of disability is cross-cutting. The same person can be at once: a worker (employee of a company or supplier), a citizen (member of a local, national, or digital community), and an end user (who is not necessarily a direct customer). These roles have structured the white paper’s method for identifying the difficulties encountered and the best practices observed.



FOREWORD:

A philosophical approach to disability, responding to the challenges of disability through a capabilities approach

Elisabeth Gressieux,

Associate Professor, ESSCA School of Management

The main challenge in financial, material, and human terms can be understood as a challenge related to what Nobel Prize-winning economist **Amartya Sen** and, following him, American philosopher **Martha Nussbaum** have called “capabilities.”

1. WHAT DOES THE TERM “CAPABILITIES” MEAN?

This theory seeks to answer the following question at the individual level: “**What is this person capable of doing and being?**”¹ given their internal personal capabilities or “**powers of choice**”² (in the case at hand, a person with a disability will have lesser capabilities in terms of mobility or perception, for example, than an able-bodied person). These **capabilities** are linked to **so-called “external” capabilities**, namely the social, political, and economic conditions of the person’s environment that will enable them, regardless of their initial condition, to freely decide the life they wish to lead and to have the effective possibility of realizing these choices (hence the term “powers of choice”). Sen refers to substantial freedoms³, to describe a person’s effective ability to live the life they want and make their own choices. Access to education, a high-quality healthcare system, and an environment that ensures psychological and emotional security are among the most important conditions for adults to be able to make choices freely in a way that is satisfactory to them.

In the case of a person with a disability, as some of their endowments (or internal capabilities) are diminished, the **public authorities** (but in our case, **the employer** as well) should be concerned with **restoring** these individuals’ “**rights of access**”, namely the rights “that refer to all combinations of goods and services that an individual can legally obtain using their endowments”⁴.

Thus, according to this theory, a person with a disability who has reduced capabilities should, in the interests of social justice and human dignity, be supported by public policy and/or, in our case, their employer, to **ensure that their level of capabilities is as close as possible to that of an able-bodied person.**

While Sen has always refused to draw up a list of these capabilities, Nussbaum proposes ten: **life, bodily health, bodily integrity, senses** (associated with imagination and

thought), **emotions, practical reason, affiliation, other species, play, and control over one’s environment.** All of these capabilities, or abilities to function as closely as possible to an able-bodied person, can be a source of inspiration for the development of both corporate and public policies.

In the case that concerns us here, it would be a matter of companies, in conjunction with public authorities, creating an “enabling” environment in every respect in order to ensure that people with disabilities have the same level of “substantial freedoms” and the same “rights of access” as an able-bodied person. In other words, companies would benefit from focusing their attention on the effect of a measure on a person with a disability, given their unique situation, rather than on the measure itself in a compliance-based approach.

Some of the ten capabilities mentioned by Nussbaum seem to be priorities in the case of people with disabilities: life, health and bodily integrity, senses, and control over one’s environment. From this perspective, it would not be a question of the company substituting itself for the individual, doing things in their place, or compensating for an unattainable capability in strictly monetary terms, but rather **through individualized accommodations of all kinds, including, of course, financial considerations, to enable people with disabilities to live, act, choose, decide, and work in conditions very similar to those of an able-bodied person and adapted to their physical, mental, emotional, and affective needs.**

Based on this approach and reasoning through capabilities, this white paper proposes working to increase and improve physical, digital, and territorial accessibility, among other things, for people with disabilities so that discrimination, differences in treatment, and the resulting injustices are gradually reduced.

2. EXAMPLES OF POSSIBLE MEASURES BASED ON THIS PHILOSOPHY



PROPOSAL NO. 1: EXPRESSING NEEDS UPON ARRIVAL AT THE COMPANY...

*The first step an employer could take is undoubtedly to provide a questionnaire in which **each person with a disability can express their specific needs** in all areas (office layout, access, flexible working hours, dedicated spaces for any necessary care, etc.)⁵ as well as any obstacles they identify that reduce their «power of choice» or «rights of access.»*

... AND CONDUCT REGULAR SATISFACTION SURVEYS

An annual questionnaire could be sent to people with disabilities in a company to understand how their feelings have changed on the one hand, and their actual situation in terms of vulnerability on the other. In other words, do the measures implemented by the company have a real positive impact on the feelings of vulnerability and the actual vulnerability of people with disabilities, or not? The capability theory is closely linked to the concept of vulnerability and aims to reduce the latter through a radically new approach that focuses on the effect of the measure rather than the measure itself, and by enabling people with disabilities to enjoy the same choices and opportunities for self-fulfillment as able-bodied people.



PROPOSAL NO. 2: ADAPT THE WORKPLACE

Let's take the example of a person with a disability suffering from an incapacitating illness who may experience increased fatigue. For each disability, the employer should be able to offer appropriate solutions to achieve an equivalent level of performance and comfort (physical and mental).

Proposals could include a dedicated rest room, specific working hours to allow for breaks, a higher transport allowance or employer contribution, a special bonus, etc., always with the aim of providing the same choices or level of expenditure (in terms of purchasing power parity) as for an able-bodied person.

These measures, which are more costly for the company, should be offset/accompanied by lower employer and employee contributions or any other compensatory mechanism so that employment conditions do not constitute an additional obstacle to their employment. A better work-life balance and a more suitable work schedule could promote the mental and physical health of these individuals and thus indirectly reduce certain costs for health insurance.



PROPOSAL NO. 3: HELP WITH ADMINISTRATIVE PROCEDURES

Several people with disabilities are physically unable to complete administrative procedures on their own, yet the delays and waiting times for receiving assistance from a disability advisor in the public administration can be as long as a year. Again, when analyzed in terms of capabilities, it is ethically unacceptable that such disparities exist in terms of access to administrative procedures.

Employers could hire someone (on a subsidized contract?) to act as a disability advisor, whose role would include providing digital and administrative assistance to reduce waiting times. This contact person would have both an internal and external role as a liaison and expert/facilitator. The indicator is not to measure whether the disability advisor exists (logical compliance yes/no) but to measure/ assess the real impact of the actions of this person or these people on improving the capabilities of people with disabilities. An indicator measuring average access times could be monitored at the level of public administration.

I. UNDERSTANDING DISABILITY

A. DEFINING DISABILITY

In France, Law No. 2005-102 of February 11, 2005, on equal rights and opportunities, participation, and citizenship for people with disabilities provides a clear and inclusive definition:

“A disability, within the meaning of this law, is any limitation of activity or restriction of participation in society suffered by a person in their environment due to a substantial, lasting, or permanent impairment of one or more physical, sensory, mental, cognitive, or psychological functions, a multiple disability, or a disabling health disorder.”

This definition highlights the fact that disability is not limited to a person’s state of health, but results from the interaction between individual limitations and an unsuitable environment. Thus, a person may be disabled in one context but not in another, underscoring the importance of an approach focused on the relationship between the person and their environment rather than a strictly medical approach.

1. Identifying types of disability

DISABILITY CAN MANIFEST ITSELF IN MANY WAYS:	
	MOTOR DISABILITY Conditions such as low back pain, musculoskeletal disorders (MSDs), rheumatism, malformations, paralysis, and the after-effects of strokes. People with these conditions may have difficulty moving around, maintaining or changing position, and performing certain movements.
	DISABLING DISEASES Illnesses such as hypertension, heart failure, diabetes, allergies, eczema, cancer, and epilepsy. These illnesses lead to activity restrictions in terms of mobility or work capacity.
	PSYCHOLOGICAL DISABILITY Disorders such as neuroses, obsessive-compulsive disorder (OCD), phobias, addictions, and depression. These disorders are characterized by constant efforts to adapt and relate to others, as well as difficulties concentrating.
	MENTAL DISABILITY Conditions such as Down syndrome and fragile X syndrome. People with these conditions may have difficulty thinking, conceptualizing, communicating, and making decisions.
	COGNITIVE DISABILITY Disorders such as attention deficit disorder, hyperactivity, DYS disorders (dyslexia, dysphasia, dyspraxia), and autism spectrum disorders. These disabilities are characterized by impaired brain processes involved in acquiring and processing information.
	VISUAL IMPAIRMENT Conditions such as myopia, presbyopia, strabismus, retinitis, and color blindness. These visual impairments may be congenital, due to illness or accident, and are characterized by a loss of visual acuity that can lead to blindness.
	HEARING IMPAIRMENT Conditions that affect hearing, ranging from mild hearing loss to profound deafness. The causes can be varied: genetic, due to disease, exposure to noise, or aging.

Disability can manifest itself in many ways:

- visible, but above all invisible for 80% of disabilities⁶;
- permanent or temporary: 1 in 2 people will experience a disability at some point in their lives, either temporarily or permanently⁷;
- the same person may be affected by several types of disability;
- the risk of facing a disability increases with age: 85% of people with disabilities become disabled during their lifetime⁸.

2. Disability in figures

The answer to the question of figures is complex. The concept of disability covers a wide range of realities and there is no single definition. Its definition has evolved over time and varies significantly between countries and regulatory frameworks.








The World Health Organization (WHO) estimates that 16% of the world’s population lives with some form of disability⁹.

For France, the Directorate for Research, Studies, Evaluation, and Statistics (DREES) indicates that among people aged 15 and over¹⁰:

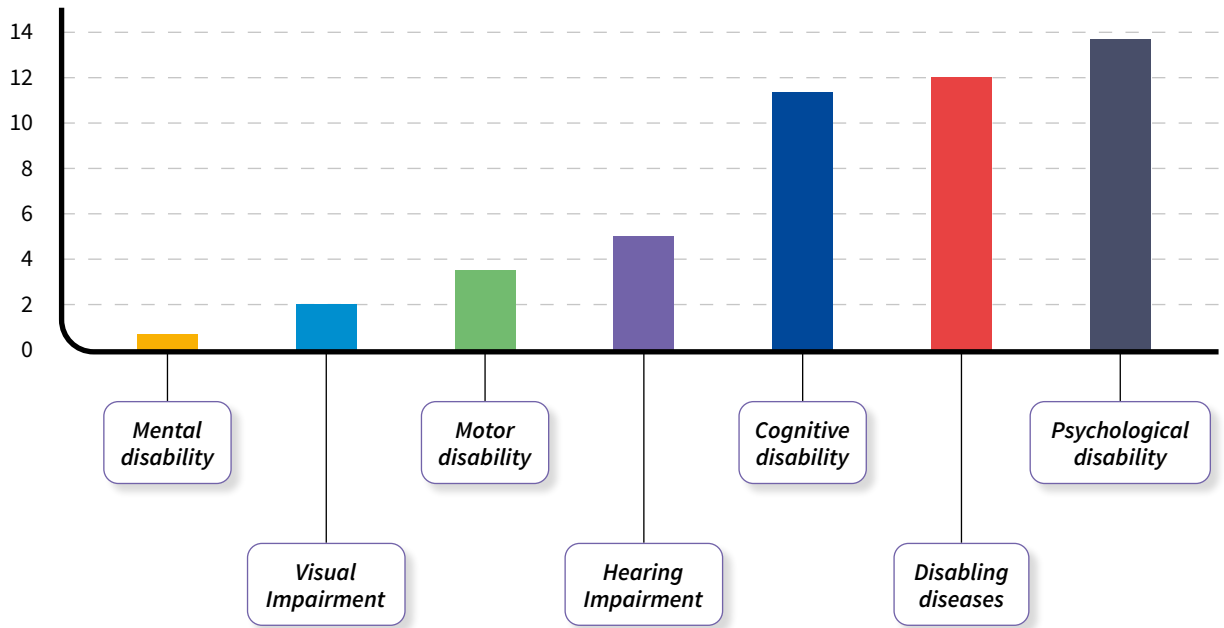
- 14.5 million (28%) report having at least one severe functional limitation. These difficulties may relate to vision or hearing (even with correction), mobility (such as climbing stairs), memory problems, or difficulties communicating with others.
- 5.4 million (10%) report experiencing major restrictions in essential daily activities, such as getting in and out of bed, getting dressed, shopping, eating, or washing.

The DREES estimates that, depending on the definition used, the number of children over the age of 5 and adults affected by disability in France is between 5.7 million and 18.2 million people, or between 8% and 26% of the population.

According to France Travail, in 2024, 3.3 million people (8% of the population) will have their disability officially recognized by the government¹¹.

KEY FIGURES ON THE DIFFERENT FORMS OF DISABILITY IN FRANCE:	
	<p>MOTOR DISABILITY</p> <p>Motor disabilities affect 3.5 million people. Among them, 650,000 use a wheelchair to get around¹².</p>
	<p>DISABLING DISEASES</p> <p>In France, 12 million people suffer from a chronic illness, often associated with a disability¹³.</p>
	<p>MENTAL DISABILITY</p> <p>According to the WHO, 1 in 5 French people is affected by a mental disorder¹⁴.</p>
	<p>MENTAL DISABILITY</p> <p>Approximately 700,000 people have a mental disability, representing around 20% of people with disabilities¹⁵.</p>
	<p>COGNITIVE DISABILITY</p> <p>Cognitive disorders, or neurodevelopmental disorders, affect one in six people¹⁶.</p>
	<p>VISUAL IMPAIRMENT</p> <p>Nearly 2 million people have a vision impairment, including 207,000 who are blind and 932,000 who are moderately visually impaired¹⁷.</p>
	<p>HEARING IMPAIRMENT</p> <p>More than 5 million people have a hearing impairment, including 300,000 who are profoundly or totally deaf¹⁸.</p>

MILLIONS OF PEOPLE AFFECTED BY TYPES OF DISABILITIES:



B. DIFFICULTIES ASSOCIATED WITH DISABILITY

Despite the advances brought about by the law of February 11, 2005, and developments in European law on inclusion, people with disabilities continue to face a multitude of obstacles. These difficulties, which are structural, social, and economic in nature, are evident in key areas such as employment, training, housing, health, mobility, accessibility to public and private spaces, independence, and social recognition.



1. Difficulties as workers

a) Access to education: a challenge from an early age

From the earliest stages of their education, people with disabilities encounter specific barriers. For example:

- Barely 7% of young people with disabilities in school manage to pursue higher education, and only 1% obtain a master's degree¹⁹ compared to 25% for the average population²⁰,
- 23% of children with disabilities do not have access to schooling²¹,

- Only 20% of autistic students have access to an appropriate solution combining mainstream schooling and specialized education²².

These examples highlight both the complexity of the educational and social integration of the individuals concerned and the urgent need to design specific integration pathways tailored to their needs.

Their daily lives, often marked by regular medical treatment, frequent hospitalizations, and social isolation, significantly hinder their access to mainstream education, internships, or higher education. As a result, only a tiny minority—just 1%—manage to attain a higher education degree (Bac +5).

In general, initial and vocational training remains insufficiently adapted to the needs of people with disabilities, despite the creation of Localized Units for School Inclusion (Ulis). The Ministry of Labor, Health, Solidarity, and Families emphasizes that only 1.5% of apprentices are disabled²³.

Furthermore, the accessibility of educational and training facilities still poses a major challenge for the students concerned. The COMET association highlights the importance of early support for employment, emphasizing that building a career plan from an early age, including during periods of hospitalization, is an essential lever for promoting sustainable integration.

b) Employment: a market that remains unequal

While 63% of managers say they are in favor of hiring people with disabilities, 67% of recruiters find this goal difficult to achieve²⁴.

On the side of people with disabilities, 66% believe that their job search is more complicated than for the rest of the population²⁵.

As a result, people with disabilities are more frequently excluded from employment and affected by precariousness.

Lower activity rate

The inclusion of people with disabilities in the labor market remains limited. In 2023:

- Their activity rate²⁶ (including the unemployed) stood at 45% (compared to 74% for the population as a whole) and their employment rate²⁷ at 39% (compared to 68%)²⁸.
- People with disabilities accounted for only 4.3% of those in employment, or 1,205,000 workers²⁹

More limited variety of occupations

People with disabilities have a more limited variety of occupations than the working population. Thus, 20 occupations account for 37% of their employment, compared with 25% for other workers. They mainly occupy blue-collar and white-collar positions³⁰. Furthermore, their access to the most skilled positions remains limited: only 8% of them occupy a managerial position, which is 2.3 times less than the average for the working population³¹.

Furthermore, their employment is more concentrated in large companies, public administration, and industry. Conversely, they are underrepresented among executives and professionals.

Part-time work more common

Part-time work remains more common among people with disabilities: 32% of employees recognized as disabled work part-time, compared with 17% of the working population as a whole³². Furthermore, their jobs are often not commensurate with their actual qualifications.

Difficulty in staying in employment

People with disabilities face major challenges in staying in employment: their average seniority is lower than that of other employees, with an over-representation in short-term contracts and higher turnover. In addition, 40% of people with disabilities in employment report having changed companies in the last five years, compared with 30% for the working population as a whole, reflecting increased precariousness and more fragmented career paths³³.

c) Employees who are caregivers

Employees who are caregivers, providing daily support to a loved one who has lost their independence, may also find it difficult to balance this role with their professional activities.

Often invisible and unidentified, these employees are nevertheless numerous and may encounter difficulties in terms of working time arrangements, mental load, or work-life balance. Millions of working people regularly provide non-professional care for a loved one who is frail or losing their independence. The number of employee caregivers will grow in the coming years, in direct correlation with the aging of the population.

Statistics from the Disability Compensation Benefit (PCH), the main financial assistance linked to loss of independence, clearly illustrate this issue. It is used to finance needs such as human assistance, technical equipment, and home modifications. Human assistance plays a central role: it accounts for 90% of PCH expenditure³⁴ and is used to compensate family caregivers.



Data from the end of 2022 confirms that the use of this assistance increases with age: 53% of PCH beneficiaries are aged 50 or over³⁵. This concentration can be explained by the increased prevalence of disability with advancing age. In mainland France, 46% of people aged 65 or over living at home have a disability, a proportion that rises to 61% among those aged 75 and over³⁶.

In France, it is estimated that around 20% of employees are caregivers, representing between 4.4 and 5 million people³⁷. On average, these employees devote more than eight hours per week to their caregiving role, which has a significant impact on their time, energy, and sometimes their mental health³⁸. Recognizing and supporting them is an essential part of a fully successful inclusive policy.

2. Difficulties as users

a) Travel

Mobility is one of the main barriers to the daily inclusion of people with disabilities. According to a study by DREES, 73% of them believe that their difficulties in getting around are a major obstacle to their independence³⁹. Although progress has been made since the 2005 law, the accessibility of transport, roads, and facilities remains insufficient.

Rural areas are particularly disadvantaged. The lack of infrastructure and transport services creates real blind spots where people with disabilities find themselves isolated and deprived of independent mobility.

In regions with public transport, accessibility for people with disabilities is not always guaranteed. Many train, metro, and bus stations remain inaccessible or poorly equipped. For example, only 29 of the 321 metro stations in the Paris network are accessible to wheelchair users, representing around 9% of the total⁴⁰.



The SNCF aims to make 100% of stations accessible to wheelchair users by 2027 (lifts, tactile paving for the visually impaired, raised platforms, and adapted signage, etc.). It is training its employees in this area. Modern trains (TER, TGV INOUI, Ouigo, Intercités) are equipped with dedicated areas for people with reduced mobility, adapted toilets, and reserved seats near the doors to facilitate access.

There are also many obstacles in individual transport: too few parking spaces, unsuitable roads, and private taxi services, which have been criticized for refusing guide dogs—a situation that is improving thanks to the gradual awareness of drivers.

b) Accessibility of buildings and public spaces

The accessibility of establishments open to the public (ERP), whether public or private, remains below legal requirements. Only 40% of ERPs are fully accessible to people with disabilities⁴¹, even though the law of February 11 2005, required all ERPs to be accessible by January 1, 2015⁴².

Many buildings remain inaccessible, including those housing essential services such as healthcare, education, government offices, and shops. Public spaces such as sidewalks, parks, and recreational facilities are often poorly designed or even dangerous for people with motor or sensory disabilities.

c) Housing

Housing is another major factor contributing to the exclusion of people with disabilities. In France, only 7% of housing is considered fully accessible⁴³. This shortage is particularly acute in social housing, where most homes do not meet accessibility standards, despite legal obligations. Less than 40% of the 350,000 homes built each year between 2006 and 2014 complied with accessibility rules⁴⁴, and the situation has improved only marginally since then. Waiting times for adapted social housing can exceed five years, and around 5% of households affected are forced to live in conditions that are not adapted to their disability⁴⁵.

Many homes remain inaccessible without specific, often costly, modifications. Modifying a home (widening doors, adapting bathrooms, installing elevators, etc.)



a) Inaccessibility and inequality in dealing with the administration

People with disabilities encounter several specific types of difficulties in their dealings with administrative services in France:

Physical, digital, and territorial inaccessibility:

Many administrative offices (town halls, prefectures, CAF, Pôle Emploi, etc.) remain inaccessible to people with reduced mobility or sensory impairments. Some people must give up on their procedures or rely on a companion to get there.

can cost several thousand euros, an investment that is beyond the reach of most households concerned. However, only half of applications for financial assistance (such as MaPrimeAdapt' or PCH) are successful, due to restrictive criteria or budgets⁴⁶. As a result:

- 67% of people with disabilities say they have encountered difficulties in finding suitable housing⁴⁷.
- Only 7% of housing is considered fully accessible⁴⁸.

This situation exacerbates precariousness, limits autonomy, and increases the isolation of people with disabilities.

d) Access to healthcare

Access to healthcare remains particularly unequal. Medical facilities are not always adapted or accessible.

Healthcare professionals are also not systematically trained to care for people with disabilities: only 29% consider that they have received sufficient ongoing training in this area⁴⁹.

Waiting times are longer, and specialized services, such as paramedical care or adapted psychological consultations, are often in short supply and poorly distributed across the country.

The digitization of services also penalizes people with visual, motor, or cognitive disabilities, especially those without assistance. Compliance with the General Accessibility Improvement Framework (RGAA), which sets digital accessibility requirements for public websites, remains very poor: in 2025, 96% of the administrative websites tested were non-compliant⁵¹.

Finally, the territorial divide is widening among people with disabilities. Support services (e.g., sign language interpreters, social workers) are poorly distributed across the country. Rural areas are particularly affected. In some departments, it takes more than a year to get an appointment with a disability advisor at the prefecture⁵².

Complexity of administrative procedures:

Procedures are often complex and ill-suited to cognitive disorders or comprehension difficulties (e.g., inaccessible online forms, jargon-filled administrative language). People with intellectual or psychological disabilities find it

3. Difficulties as citizens



In France, 26% of people with disabilities are considered poor, compared to 14% of the rest of the population aged 15 to 5950. This economic vulnerability exposes people with disabilities to increased dependence on public assistance programs. However,

administrative services find it difficult to respond effectively to their needs.



difficult to fill out forms such as those required by the Local House for Disabled Persons (MDPH), the departmental offices that examine applications for disability rights and benefits, where the rejection rate for applications reaches 30%, sometimes due to errors in the forms⁵³.

Lack of training for staff



Administrative staff are not always trained to deal with people with disabilities (e.g., lack of knowledge of sign language, lack of mediation for autism spectrum disorders, etc.). Many people with disabilities have already experienced misunderstandings or discrimination when dealing with administrative procedures. For example, testimonials published by Alliance Autiste illustrate the difficulties encountered in exchanges with government agencies: “There is also the serious problem of staff or civil servants who are very easily and quickly offended when an autistic person communicates in a ‘too sincere’ manner⁵⁴.”

Delays and lack of human resources

Specialized services are overwhelmed, with processing times that can exceed 6 to 12 months for disability recognition or benefits⁵⁵. For example, in 2024, the average time to receive a response from the MDPH (local disability office) was 8 months in some regions, compared to 4 months in theory⁵⁶.

b) Independence and social assistance

In France, several social assistance schemes aim to support people with disabilities. In 2023, the Court of Auditors published a report on *disability policy* and concluded that the assistance schemes are considered too fragmented and insufficiently adapted to the individual needs of people with disabilities⁵⁷. For example:

- The Adult Disability Allowance (AAH), the main financial benefit, covers 1.35 million recipients⁵⁸, for an amount of €1,033 per month⁵⁹, which is below the poverty line (€1,288 for a single person)⁶⁰.
- The Disability Compensation Benefit (PCH), intended to finance human, technical, or animal assistance, only reaches 382,000 people, with an average amount of

€604 per month⁶¹, which is often insufficient to cover all needs (e.g., an electric wheelchair costs between €900 and €7,500)⁶².

- Employment assistance measures, such as the obligation to employ disabled workers (OETH), are struggling to reduce unemployment among people with disabilities, which remains well above the national average (12% compared to 7%)⁶³.

Limited access to and the sometimes-insufficient amount of state aid measures can therefore be an obstacle to the independence and full participation of people with disabilities in social and economic life.

c) Discrimination and stigmatization

Disability is officially recognized as a ground for discrimination. And some people with disabilities may be at risk of multiple forms of discrimination. In addition to suffering from a disability, they may also be discriminated against on the basis of their origin, gender, physical appearance, economic situation, sexual orientation, age, etc.

For example, people with disabilities from disadvantaged backgrounds or immigrant communities suffer double or even triple exclusion: their disability is compounded by socio-economic and cultural barriers, exacerbating their vulnerability. These populations encounter increased difficulties in accessing their rights due to a lack of knowledge of administrative procedures, persistent stereotypes, and limited access to support networks.



Another example is that women also face greater discrimination⁶⁴:

- The inactivity rate among women with disabilities is 55% in France. It is only 32% for all women between the ages of 15 and 64 in France. And 45% for men with disabilities.
- The employment rate for people with disabilities who have a higher education degree is 66.9% for men, compared to 22.8% for women, according to the report.
- Nearly half of female workers with disabilities are employed part-time (47%), compared to only 16% of men.

C. UNDERSTANDING THE REGULATORY FRAMEWORK

Having defined the theoretical and practical aspects of disability, it is now essential to analyze the legal and regulatory framework governing the recognition of people with disabilities and the obligations of companies and institutions.

In France, this framework, influenced by requirements, is evolving to guarantee equal rights and encourage inclusion through voluntary actions.

This section provides an overview of national and European regulatory measures, focusing on:

- Tools for the administrative recognition of persons with disabilities.
- Non-financial reporting obligations, which are becoming increasingly specific, particularly with the CSRD (Corporate Sustainability Reporting Directive).

1. French legislation: recognition and declaration of persons with disabilities

a) Legal framework for the recognition of disability

The administrative recognition of disability is based on a solid legal foundation, centered on the law of February 11, 2005, a founding text for equal rights and opportunities, participation, and citizenship for people with disabilities.

b) Declaration procedures and administrative tools

The declaration of disability follows a procedure supervised by public institutions:

Applying: The first step is to have your disability recognized medically and administratively. The application for recognition is submitted to the MDPH. The MDPH plays a central role in coordinating assessments and following up on applications.

Multidisciplinary assessment: A multidisciplinary team (doctors, occupational therapists, social workers, psychologists, etc.) assesses the needs of the person with a disability to identify their difficulties (mobility, independence, employment, etc.). This assessment results in a Personalized Compensation Plan (PPC), an administrative and social document designed to compensate for the consequences of disability in daily life. The PPC proposes appropriate solutions: human, technical, financial, or organizational assistance to compensate for the impacts of disability daily.

Final decision by the Commission for the Rights and Autonomy of People with Disabilities (CDAPH): The commission decides on the disability rating of the person with a disability, the allocation of the PPC, and the associated assistance. In addition, if the person with a disability can work, they may be eligible for recognition as a disabled worker (RQTH).

2. Employment of persons with disabilities: legal framework vs. reality on the ground

a) The legal basis for professional inclusion

The obligation to employ disabled workers

France has established a robust legal framework to promote the employment of people with disabilities: the obligation to employ disabled workers. The 1987 law requires companies with at least 20 employees to employ at least 6% of disabled workers, under penalty of financial sanctions⁶⁵. Its provisions were reinforced by the 2005 law on equal rights and opportunities⁶⁶. This legal obligation can be fulfilled in three ways:

- By employing people with disabilities to make up 6% of the workforce;
- By implementing a state-approved industry, group, or company agreement providing for a multi-year program in favor of disabled workers for a maximum period of three years, renewable once;



- By paying an annual contribution to Urssaf, CGSS, or Caisses MSA when the 6% employment rate is not reached.

Certain expenses are deductible from the contribution:

- The use of subcontractors from adapted companies or ESATs (organisation that offers people with disabilities professional activities and medical, social, and educational support);
- Carrying out assessments and work to improve the accessibility of premises beyond legal requirements;
- Retaining employees within the company through professional retraining;
- Support services for people with disabilities, or awareness-raising/training initiatives for company employees carried out by other organisations on behalf of the company (associations, EA or ESAT) to promote access to employment or job retention for people with disabilities, etc.

The contribution may be reduced for two reasons:

- Deductions for jobs requiring special aptitude conditions (ECAP): calculated based on the number of ECAP jobs multiplied by 17 times the hourly minimum wage in force on December 31 of the previous year⁶⁷.
- Capping deduction: if the contribution for year N exceeds that for year N-1, the increase is limited to 50% of the surplus (threshold applicable in 2024)⁶⁸.

Other measures

In addition, support measures have been put in place to facilitate the professional integration of people with disabilities:

- Recognition of Disabled Worker Status (RQTH), which entitles individuals to assistance and accommodations.
- Cap Emploi⁶⁹, which supports people with disabilities and employers in finding jobs or adapting workplaces.
- Adapted Companies (EA) and Work Assistance Establishments and Services (ESAT), which offer protected working environments for people whose disability prevents them from entering the mainstream workplace.

To promote inclusion, companies are therefore encouraged to develop a comprehensive disability policy that is integrated into their CSR strategy. This involves:

- The appointment of a disability officer (mandatory for companies with more than 250 employees)⁷⁰, ideally reporting to senior management to ensure a cross-functional approach (recruitment, responsible purchasing, accommodations, communication, etc.)⁷¹.
- Evaluating their commitment through the resources deployed and concrete results, such as the direct employment rate of people with disabilities.

b) The reality on the ground: between progress and resistance

The most advanced companies are not content to simply meet the legal threshold of 6% but strive to exceed it. L'Oréal, for example, has implemented an inclusion program, with disability advisors in each subsidiary⁷². In the public sector, administrations such as Pôle Emploi and La Poste have exceeded the 6% quota thanks to proactive policies.

However, the results still fall short of the targets. In 2023, 112,300 French companies⁷³ were subject to the OETH⁷⁴. Among them, only 29% meet the legal target of 6% of workers with disabilities⁷⁵. Conversely, 30% of these companies have no employees with disabilities in their workforce⁷⁶. This figure highlights the difficulty of translating legal obligations into concrete actions⁷⁷.

Prejudice remains one of the main obstacles. Many employers still associate disability with lower productivity or organizational constraints. An Agefiph survey indicates that 39% of people with disabilities believe that managers and executives need better training on this issue⁷⁸.

Not all sectors are equal when it comes to inclusion. Certain professions, such as communications and construction, for example⁷⁹, struggle to attract OETH beneficiaries due to persistent barriers: lack of accessibility, lack of awareness of transferable skills, or unsuitable working conditions. In these contexts, it would be fairer to evaluate companies not only on their quantitative results, but also on their concrete actions in favor of inclusion—such as support mechanisms, awareness-raising initiatives, or workplace accommodations.

Despite the introduction of a financial contribution system—paid to AGEFIPH or FIPHFP when the 6% quota is not met—this is not always enough to guarantee the effective inclusion of people with disabilities. However, for companies, committing to hiring and retaining job seekers who are covered by the employment obligation (DEBOE) is becoming a strategic issue, reinforced by both national and European regulations.

3. Non-financial reporting requirements: the CSRD directive, ESRS standards, and SFDR regulation

In a context of economic models shifting towards greater sustainability and transparency, the European Corporate Sustainability Reporting Directive (CSRD) is a decisive step forward. It requires companies with more than 250 employees or more than €40 million in turnover to report on their non-financial performance in a standardized manner. This reporting is based on the *European Sustainability Reporting Standards* (ESRS), developed by the *European Financial Reporting Advisory Group* (EFRAG). Ongoing political discussions may change these provisions.

The ESRS are structured around three main areas:

- **Cross-cutting standards**, which set out the general requirements applicable to all sustainability topics;
- **Thematic standards**, which set out requirements on specific topics such as climate, human resources, and human rights;
- **Sector-specific standards**, currently under development, which will consider the specific characteristics of different economic sectors (industry, finance, services, etc.).

EUROPEAN SUSTAINABILITY REPORTING STANDARDS (ESRS) ⁸⁰

SECTOR-AGNOSTIC STANDARDS			
CROSS CUTTING STANDARDS	TOPICAL STANDARDS		
	Environment	Social	Governance
ESRS 1 General principles	ESRS E1 Climate change	ESRS S1 Own workforce	ESRS G1 Business Conduct
ESRS 2 General disclosures	ESRS E2 Pollution	ESRS S2 Workers in the value chain	
	ESRS E3 Water & marine resources	ESRS S3 Affected communities	
	ESRS E4 Biodiversity & Ecosystems	ESRS S4 Consumers & end-users	
	ESRS E5 Resource use & circular economy		

SECTOR-SPECIFIC STANDARDS
(coming later)

SME-PROPORTIONATE STANDARDS
(coming later)

Issues related to disability appear explicitly in several standards, including:

- **ESRS 1 – General requirements:** this requires companies to describe their policies on inclusion, diversity, and respect for fundamental rights, including those of people with disabilities.
- **ESRS S1 – Company-specific workforce:** this standard requires companies to provide detailed data on the composition of their workforce, including the proportion of employees with disabilities, specific actions taken to recruit and retain them, workplace adaptations, accessibility of physical and digital environments, and any discrimination observed.

In concrete terms, companies must provide qualitative and quantitative indicators to assess the impact of their HR policies on the inclusion of people with disabilities. This information will be subject to external verification

and will form an integral part of the annual sustainability report. Thus, the CSRD and ESRS standards require companies to integrate the issue of disability into their social strategy.

Under the European Sustainable Finance Disclosure Regulation (SFDR), two optional disability-related indicators may be included in the reporting of adverse impacts:

- The number of working days lost due to accidents, injuries, or illnesses,
- The number of incidents of discrimination.

However, these indicators are not mandatory and remain general. To date, disability is not treated as a separate category within the regulation.

The question that arises is therefore: what levers can companies activate to meet regulatory expectations?

II. IDENTIFYING GOOD BUSINESS PRACTICES

Beyond compliance with the legal framework, some companies have developed exemplary approaches to the inclusion of people with disabilities, in terms of human resources, products, services, and purchasing policies. These inspiring and replicable best practices provide a concrete foundation for advancing the extra-financial assessment of social performance. This second part explores these initiatives from different angles: governance, human resources, accessibility, innovation, management, and evaluation.

A. INCLUDING, SUPPORTING, AND VALUING ALL WORKERS



- Create partnerships with specialized websites (e.g., JobinLive, My Ability in Germany), participate in specialized forums and trade shows, and organize open houses;
- Raise awareness among students about the opportunities and careers available within the company and establish partnerships with training programs.
- Work with specialized firms to overcome internal biases and recognize atypical or non-linear career paths.

Experience shows that these practices are only effective if they are supported by company management, involving HR teams, managers, and internal stakeholders.

1. Creating a climate of trust to encourage the disclosure of disabilities

The first focus is on creating a climate of trust internally for existing employees. Internal awareness campaigns, listening mechanisms, and the involvement of specialized actors such as Agefiph or internal social services can play a facilitating role. These actions must be part of a professional approach focused on adapting the job, ergonomics, and working conditions, rather than on the medical situation itself.

The second focus area concerns future employees and the recruitment phase. To address these challenges, it is essential to develop an inclusive recruitment policy:

- Write open job descriptions that include the possibility of accommodations or adapted working conditions;
- Explicitly mention openness to people with disabilities in job offers and on the career website;

One often underestimated lever is to encourage administrative recognition of disability among existing employees. Many people work with a functional limitation but have not taken steps to obtain Recognition of Disabled Worker Status (RQTH). Awareness-raising, information, and training initiatives led by the company can help to bring these “invisible” situations to light and include them in the Mandatory Declaration of Employment of Disabled Workers (DOETH). For example, the organization **Pidiem** offers support with the RQTH application process.

However, this is not a trivial matter. Many employees, particularly managers, are reluctant to declare their disability for fear of stigmatization or obstacles to their professional development (see section II.B.2). There is a gap between the company’s intentions and personal feelings: disability is often seen as a private matter, which takes time to accept. This process, which involves phases of denial, adaptation, and then asking for help, must be understood and respected.

PROCESS OF ACCEPTING DISABILITY



It should be noted that companies benefit from an accounting bonus for disabled employees aged 50 or over: each job in this category counts as 1.5 people. This is an incentive that should not be overlooked⁸¹.

2. Raising awareness and adapting: towards an inclusive management culture

For inclusion policies to have a lasting impact, they must be based on a genuine corporate culture that is open to dialogue and attentive to individual situations. In the collective imagination, disability is synonymous with wheelchairs, even though this only applies to a small proportion of people with disabilities. Certain conditions can qualify for RQTH status, but this information is often unknown to companies and individuals who could obtain RQTH status (endometriosis, diabetes, cancer, DYS, obesity, color blindness, etc.). This requires, first and foremost, the development of a systematic approach to disability awareness, particularly among management teams. For example, the Fresque du Handicap (Disability Fresco) web, developed by Novasanco, provides a holistic understanding of disability issues.

Line managers have a key and delicate role to play

Most disabilities in the workplace are invisible. This invisibility creates a form of ambiguity and discomfort that hinders the expression of specific needs. Many employees with RQTH status do not dare to mention their situation for fear of being perceived as less efficient or of being penalized in their career. In this context, managers have a key role to play. They must be trained to address these issues appropriately, to differentiate between the medical situation and its concrete effects on the organization of work, and to adapt tasks in a pragmatic way. The aim is to discuss constraints without exposing the person's privacy. Manager training should take place shortly before the arrival of the employee with a disability.

The disability advisor coordinates all available tools

Some organizations have set up mentoring schemes or managerial pairs (manager + disability advisor), while others appoint disability advisors who are accessible to all employees. These advisors can also act as consultants to managers, in conjunction with specialist partners such as Agefiph or the National Federation of Accident Victims

and Disabled People (FNATH). The appointment of a disability advisor is also a key lever in the inclusion policy. Mandatory in companies with more than 250 employees, this role can be just as relevant in smaller organizations. The advisor acts as a designated point of contact for the employees concerned, but also as a support for managers and HR teams. They facilitate recognition procedures, identify accommodation needs, relay available support mechanisms, and help foster a culture of disability awareness within the company. Their presence helps normalize the subject, remove barriers related to self-censorship, and facilitate discussions about individual situations.

Workplace accommodations are essential

This awareness must also be accompanied by a real capacity to adapt working conditions. This may involve physical adjustments, such as the ergonomics of a workstation, the accessibility of premises or digital tools, but also specific organizational arrangements. For example, a diabetic person in charge of a switchboard may need to adjust their schedule to allow for medical care during peak call times. The key is to enable everyone to perform their duties in realistic conditions that are compatible with their state of health.

Returning to work after a long absence is also a critical moment. While a medical examination upon return to work is a legal requirement, it is too often insufficient. The pre-return visit, which is still rarely used, allows the groundwork to be laid in advance, the necessary adjustments to be identified, and any difficulties related to changes in the organization or workload to be anticipated. Without this preparation, the employee may find themselves isolated, in difficulty, and potentially facing rapid failure or even another period of absence.

The most committed companies take a reverse approach: they start with the skills available and then adjust the position or environment to allow them to be fully expressed. This logic places potential at the heart of human resources management. It is part of a virtuous model of inclusion, which considers accommodation not as a constraint, but as a condition of equality.

Two examples:

- At Amipi Bernard Vendre, 620 operators with cognitive disabilities are progressing through manufacturing work broken down into adapted learning tasks.
- At Vivre et travailler autrement (VETA), the skills of autistic people are highlighted by adapting workstations to avoid tasks that they are unable to perform well: the result is increased productivity, reduced absenteeism, etc.

3. Preventing the risks that cause disabilities

The first step is a strategy to prevent disabilities in the workplace. This prevention is based on two fundamental pillars: reducing risks related to professional activity (workplace accidents and occupational illnesses) and promoting physical and mental health at work.

Sectors exposed to high risks, such as construction, logistics, commerce, and retail, must be subject to increased vigilance. Workplace accidents are still frequently linked to the failure to wear protective equipment, business travel (particularly for sales positions), or poorly supervised practices, such as the use of noisy or dangerous tools. Some companies, such as those in the DIY or industrial sectors, have observed hearing loss caused by repeated use of machinery without adequate protection. In this case, prevention cannot be limited to simple theoretical training; it also requires realistic working time arrangements that allow employees to comply with safety instructions without sacrificing productivity.

At the same time, the prevention of musculoskeletal disorders (MSDs), occupational diseases (cancers, chronic conditions) and burnout is an integral part of this approach. Many companies are implementing awareness-raising initiatives on working postures, repetitive movements, and mental strain. Some go further by encouraging regular physical activity, improving workplace ergonomics, or rolling out initiatives focused on quality of life at work (QLW).

It is important to note that the ability to effectively prevent these risks depends heavily on the size of the organization. Large companies generally have tools, human resources, and services dedicated to occupational health that enable them to go further. Conversely, microbusinesses and SMEs, although faced with the same challenges, often have fewer resources at their disposal.

Finally, a well-established culture of prevention reduces the risk of exclusion from the world of work and therefore the occurrence of preventable disabilities. It also acts as a

lever for the company's overall performance by improving the safety, health, and retention of its employees. From this perspective, prevention should no longer be seen as a regulatory obligation, but as a strategic pillar.

4. Actively recruiting people with disabilities

Once the internal lever has been mobilized, companies must also open their recruitment to new talent recognized as disabled. The DOETH considers different types of contracts: permanent, fixed-term, temporary, work-study, and internships. External recruitment is therefore a direct vehicle for progress toward the 6% target.

However, this lever faces several structural obstacles: difficulty in identifying suitable profiles, a mismatch between recruiters' expectations and the available supply, and barriers to access in certain professions.

It should be noted that the complexity of recruiting people with disabilities depends on the sectors and positions being recruited for. Indeed, the pool of job seekers recognized as disabled, known as DEBOE (Demandeurs d'Emploi Bénéficiaires de l'Obligation d'Emploi, or Job Seekers Benefiting from the Employment Obligation), remains limited and concentrated in certain sectors. In 2023, 474,413 DEBOE were registered with France Travail, representing 8.7% of all job seekers. Most of them are looking for work in:

- personal and community services (24%),
- business support functions (19%),
- commerce, sales, and distribution (12%)⁸².

Sectors such as finance, engineering, and technology attract fewer people with recognized disabilities, creating an imbalance between supply and demand. Some employers, particularly in industry and technical services, therefore, encounter real difficulties in recruiting, not because of a lack of willingness, but because of a lack of available or qualified candidates. Disabilities are, in fact, not always compatible with certain activities (for example, working in a workshop with dangerous machinery for people with certain motor disabilities).

This raises the question of a differentiated assessment of companies, considering their sector of activity, their employment pool, and their inclusion efforts (accommodations, training, partnerships, etc.) rather than solely on the employment rate of people with disabilities.

Services aim to connect job seekers with disabilities with recruiters. Examples include Mission Handicap, Agefiph, Handicap-job, Tremplin Handicap, ARPEJEH, etc.





The DuoDay initiative, an annual event organized by ALGEEI in collaboration with the Ministry of Labor, Health, Solidarity, and Families, aims to enable people with disabilities to spend a day discovering different professions in companies.

5. Integrating the needs of employee caregivers

According to the caregiver barometer (2024) published by the Je t'aide collective, 23% of caregivers have no family or professional support, so they care for their loved ones alone⁸³. There is still a lack of awareness of the issue and therefore of the associated measures, even among caregivers themselves, even though one in four people in France are affected: one in three caregivers are unaware that they are caregivers. Despite these figures, companies remain largely uninvolved in this issue, even though they are stakeholders. This area remains largely unexplored in HR policies and is very rarely included in non-financial assessment systems or ESG ratings. However, employee caregivers express a strong need for recognition, listening, and flexibility. They often compensate for the shortcomings of public care systems, shouldering a heavy emotional and organizational burden on their own.

Using the Handéo “caregiving employees” label

Its objective is threefold: “to equip and support companies in recognizing and supporting employees who are caring for a vulnerable relative (with a disability, elderly and dependent, or suffering from illness)”⁸⁴. The label will enable companies to structure their approach and implement relevant actions according to their size (very small businesses, SMEs, large companies).

The caregiver representative, an emerging role

Some companies are starting to appoint caregiver representatives, like disability representatives, who are responsible for centralizing requests, directing employees to the right resources, and raising awareness among management. Internal communication on the subject, which is destigmatizing and concrete, is an essential first step. This can be achieved by sharing testimonials, promoting existing measures (caregiver leave, flexible working hours, occasional teleworking), or creating internal communities for peer-to-peer exchange.

Recognizing employee caregivers does not mean giving them special status but rather enabling them to balance their professional and personal responsibilities more easily. It also prevents the risks of disengagement, absenteeism, or job turnover. In this respect, taking caregivers into account is fully in line with the principles of social performance, equal opportunities, and quality of life at work.

6. Mobilizing purchasing policy: inclusive suppliers

Finally, beyond direct recruitment, companies can partially meet their obligations by subcontracting to the protected or adapted sector (ESATs, adapted companies). This can be done by:

- the inclusion of social clauses in public or private contracts;
- the creation of networks of suppliers committed to inclusion;
- solidarity-based purchasing with social impact assessment.

While companies highlight the high cost of certain products or services in this sector, it is important to remember that:

- Suppliers such as ESATs or adapted companies do not always charge above-market prices.
- Even if this is the case, if the company uses adapted companies or ESATs, it can deduct 30% of labor costs, as explained above.
- Furthermore, these additional expenses can also be viewed not as traditional budget items, but as investments with a social impact, integrated into the CSR strategy.

EA and ESAT companies indicate that establishing a business relationship is complicated because it requires approval from both human resources and purchasing teams. However, once the services are in place, any reservations are quickly overcome.

There is a French government website that allows you to identify inclusive suppliers: <https://lemarche.inclusion.gouv.fr/ressources/quest-ce-quun-fournisseur-inclusif/>

7. Organizations dedicated to the integration of people with disabilities

Not all people with disabilities are able or willing to immediately integrate into the so-called “ordinary” workplace. Some require additional support, an adapted professional environment, or a more gradual pace to access employment. In this context, specific structures such as Adapted Companies or Work Assistance Establishments and Services (ESAT) offer alternatives for professional inclusion, particularly in the service or custom manufacturing sectors. Although these models operate differently, they share a common goal: to enable everyone to find their place in the world of work, under realistic and secure conditions.

ESATs, between medical-social establishments and a professional integration structure

ESATs, which are mainly financed by public funds through grants and employment subsidies and run by the voluntary sector, are aimed at people with disabilities whose working abilities do not allow them, either temporarily or permanently, to work in a mainstream environment. They are subject to a framework that derogates from labor law and are not intended to generate the most competitive turnover possible. Few ESAT employees join conventional companies, but ESATs play a central role in social inclusion and preserving independence.

Adapted companies are conventional companies

Adapted companies, on the other hand, are subject to common law, employ workers on fixed-term or permanent contracts, and pursue an economic objective while fulfilling an important social mission. There are currently more than 800 adapted companies in France, providing more than 57,000 jobs, 40,500 of which are held by people with disabilities. These structures, often organized as micro-enterprises, SMEs, or mid-sized companies, generate a combined turnover of more than €1.8 billion⁸⁵. They offer a professional environment that is both demanding and supportive, enabling their employees to progress, train, and, for a minority of them, even join the mainstream job market. Most adapted companies are also social solidarity enterprises (ESUS).

Some adapted companies stand out for their particularly structured approach to inclusion. This is the case for SAPRENA, which employs 62% of workers with disabilities, with a high satisfaction rate: 98% of its employees want to stay there long-term, a sign of the quality of the

environment offered. The average length of service exceeds seven years⁸⁶. These companies sometimes charge prices above market rates, but this is offset for their customers by an exemption from the Agefiph contribution. Ultimately, the overall cost may be equivalent to that of an ordinary supplier, but with a significant social impact. Their main obstacle often remains the initial perception of their customers, who are unfamiliar with this model of inclusion.

The learning factories of the AMIPI Bernard Vendre Foundation inspired Professor Jean-Michel Oughourlian to write his book “Le travail qui guérit” (Work that heals), in which he describes how work heals people with disabilities working in these companies. This also represents a saving for society, as these people receive €30,000 per year in employment assistance, which would be two to three times higher if they were cared for by institutions⁸⁷.

One of the major advantages of adapted companies is their ability to offer a pressure-free environment, tailored training, and diverse career paths. Many are multi-activity, allowing employees to try out different jobs. Some integrate their disabled employees at all levels of the hierarchy, including in governance. This constitutes full recognition of their role in the organization.

Faced with the gradual withdrawal of state support and a growing need for change of scale, these structures are now turning to social investors such as France Active, which support their growth through participatory loans indexed to their social impact. This type of innovative financing, which is still in its infancy, makes it possible to adjust the conditions of intervention to the specific economic model of each adapted company.

ESATs and adapted companies cannot replace the employment obligations of the state or traditional companies, as UNAPEI points out. However, they are strategic partners for responsible purchasing policies and key players in a hybrid, flexible and locally based ecosystem of inclusion.

Some companies are attempting to build an economic model that is distinct from that of adapted companies, while developing an activity dedicated to the employment of people with disabilities. This is the case of Café Joyeux, a socially responsible company (ESUS) whose development is mainly supported by a foundation, backed by solidarity fund financing. This is also the case with Anticon, which promotes neurodiversity in the workplace.

These companies are attempting to develop a business model tailored to the skills of the people they recruit. However, the business model of these structures is not always clear and may require significant philanthropic funding.

B. CONSIDERING THE INCLUSION OF PEOPLE WITH DISABILITIES AS USERS AND CUSTOMERS

Including people with disabilities is not limited to offering them a job. It also means guaranteeing them effective and equitable access to the products, services, places, and digital tools offered by companies. Any organization

that designs a service or develops a digital offering must consider its ability to be used by as many people as possible, regardless of the physical, sensory, or cognitive profiles of its customers.

Adopting universal design

The challenge is to adopt a universal design approach that does not only target people with disabilities, but integrates their needs from the creation phase onwards, to offer a fluid, clear, and accessible experience for all. This approach requires going beyond regulatory compliance to integrate an inclusive dimension at the very heart of the innovation strategy.

The **APF France Handicap TechLab** illustrates this approach by supporting companies at every stage of inclusive design. Its work is based on two principles: universal design and co-construction with end users, via representative panels of people with disabilities who are involved from the outset of the process. These panels make it possible to test prototypes in real-life conditions and anticipate usage constraints that are often invisible to the untrained eye. This work includes a variety of profiles: elderly people, people with visual, motor, and hearing impairments, as well as people with cognitive disabilities. For example, they helped the company Tefal create the **Includeo** range of small appliances with an inclusive design (simpler, more ergonomic, easier to read).

Inclusion also requires compliance with physical and digital accessibility standards, the scope of which is gradually expanding. Since June 2025, interactive terminals (in transport, shops, restaurants) must be accessible, as are already, in principle, buildings open to the public and websites. In addition, the private sector will also have to comply with the General Accessibility Improvement Framework (RGAA), a digital accessibility framework based on European standards, designed to guarantee access to digital content for people with disabilities. Each company

is now required to publish its level of compliance, which must be at least 75%, or face potential penalties or exclusion from certain public contracts.

But accessibility does not stop at infrastructure. It must also cover the entire customer experience. This involves training reception staff, adapting signage and interfaces, and using adapted formats such as FALC (Easy to Read and Understand), designed for people with comprehension difficulties, whether due to intellectual disabilities, cognitive disorders, or language barriers.

Meeting the specific needs of people with disabilities

Beyond the issue of access, some companies design products or services specifically aimed at compensating for the effects of disability. These may include technical aids (wheelchairs, prosthetics, digital tools, audible signage, Braille books) or specialized services (accommodation, support, integration). These solutions, often developed by social and solidarity economy organizations, meet specific needs while participating in a market-based approach. Their social utility is obvious, and their economic potential is growing, particularly in the context of an aging population. For example, the Be My Eyes app connects visually impaired people with sighted volunteers to assist them, while bionic prostheses seek to mimic the natural functions of the human body.

Some companies are targeting consumers with disabilities to take advantage of this market neglected by their competitors. Ikea Israel has developed ThisAble extensions to adapt their furniture to the needs of people with disabilities, which can be printed in 3D. Procter & Gamble has



developed ergonomic razors and hairbrushes. In addition to expanding their customer base, they have strengthened their social impact and improved their reputation.

Finally, public procurement plays a decisive role as a lever. Companies such as Microsoft and Apple have incorporated accessibility requirements into their products to respond to demanding calls for tenders. This shows that regulation can be a driver of inclusive innovation. At the same time, companies such as Okeenea, the French leader in urban accessibility, demonstrate that inclusion can be a development strategy, rather than simply part of CSR.

Thus, thinking about the accessibility of products and services is not a constraint, but an opportunity: the opportunity to better serve the entire population, while responding to growing societal demands and an increasingly structured regulatory framework. The development of video telephony (notably FaceTime) has revolutionized the lives of deaf and mute people, won over all users, and is now used by everyone. There are also many other innovations that address this issue: elevators and escalators, subtitles, speech synthesis and recognition, automatic doors, remote controls, text prediction software, audio-books, and more.

C. PROMOTING CITIZEN INCLUSION



The inclusion of people with disabilities is not limited to their integration into the workforce or their access to goods and services. It also means that they can fully exercise their rights as citizens, on an equal footing with the rest of the population.

One of the first levers concerns the accessibility of public services, which are now largely digitized. If the digital transition is not designed to be inclusive, it risks permanently excluding people with disabilities. Today, only 3% of the 200 most visited public websites in France are truly accessible to all. This invisible barrier makes administrative procedures complex, if not impossible, for many citizens, particularly those with visual, cognitive, or motor impairments.

Citizen inclusion also requires representation: being heard, consulted, and represented in the bodies where decisions that impact daily life are made. Public consultation

processes must incorporate accessible formats and offer a participatory framework adapted to diverse profiles. Tools such as FALC (Easy to Read and Understand) or sign language translation should be widely used in all media intended for the public.

Finally, mobility remains a cross-cutting issue of citizenship. Access to public spaces, cultural venues, transportation, and polling stations determines the ability to participate in social and political life. An inclusive society is one in which everyone can move freely, assert their rights, and participate in decisions that affect them.

In this sense, citizen inclusion is the invisible but essential building block of a comprehensive approach to disability. It requires the joint mobilization of public actors, local authorities, businesses, and civil society to make the principle of equal rights a reality, rather than a mere declaration of principle.

III. INVESTING IN PROMOTING INCLUSION

The inclusion of people with disabilities is a fundamental social issue, but one that is still undervalued in responsible investment approaches. Today, disability is often addressed indirectly, diluted in broader themes such as diversity, human rights, or the fight against discrimination. To promote its effective integration, it is necessary to clarify existing practices, structure relevant indicators, and activate the right levers of engagement.

A. BEST PRACTICES AND RECOMMENDATIONS

1. Data use

a) Data availability

Today, access to reliable data on disability remains uneven across companies and geographic areas. Ethifinance, for example, reports that 70% of French companies provide information on the percentage of people with disabilities in their workforce, compared to only 26% globally. Why don't ESG providers offer a broader range of data on disability, similar to climate or biodiversity, for which indicators have multiplied in recent years?

The main obstacles identified are:

- Regulatory differences between countries (in some countries, it is prohibited to collect this data, and definitions vary)
- Heterogeneity of reporting formats,
- Data instability from one year to the next,
- A lack of strong demand from institutional investors.

Some agencies, such as Morningstar Sustainalytics, address the issue from two complementary angles: incidents or risks that could create situations of disability (health and safety at work, product hazards, social impact of activities), and the responses provided by issuers (diversity programs, respect for human rights, editorial treatment or representation of people with disabilities in the media). Disability is therefore indirectly integrated through other categories, but rarely measured on its own (for example, the percentage of people with disabilities in the company is not collected). The working group found that this conclusion was similar among other data providers.

Ethifinance goes a step further and adopts a three-pronged approach: policy, deployment, and results. These consider diversity and inclusion policies, actions taken, and indicators such as the percentage of employees with disabilities, workplace accident rates, and inclusive partnerships. However, sector-specific granularity still needs to be developed, particularly to monitor product accessibility or specific adaptations by sector of activity.

Finally, the ESG data sector has seen the emergence of social data specialists. Examples include Humpact and Denominator. This focus on the S pillar allows certain data providers to go further on social issues and offer indicators that complement the rate of people with disabilities, as well as sector comparisons and indices to assess a company's practices and results.

b) Exclusion policies

Investors apply exclusion criteria that they consider to be related to disability, including:

- Failure to respect fundamental rights (Global Compact, ILO),

- Serious controversies over discrimination or working conditions,
- High-risk activities (arms, alcohol, tobacco, etc.),
- Lack of a credible social policy.

Although not specific to disability, these practices can lead to the exclusion of companies whose activities have a negative impact on people's health and may lead to one or more disabilities. For example, alcohol is a factor that increases the risk of accidents, which can themselves cause disabilities. Monitoring controversies related to product safety or quality (e.g., accidents causing injuries or disabilities) is also part of the analysis methodology. Some controversies are directly linked to incidents that have led to disabilities, particularly in high-risk industrial sectors (automotive, chemical, construction). Agencies monitor these incidents using metrics such as the rate of accidents resulting in lost time, and deaths of employees or subcontractors.

These exclusions, which are relatively simple for any investor to implement, make it possible to establish minimum requirements to limit social risks, some of which are related to disability.

c) Selection criteria

Another lever is positive selection strategies, which are generally based on three levels:

- Formalized policies: existence of commitments to diversity, a disability policy, a disability representative, etc.
- Actions: participation in recruitment forums, existence of agreements, employee training plans, or awareness-raising initiatives.
- Results: employment rate of people with disabilities, number of job accommodations, accident frequency, use of adapted companies and ESATs (organizations that help people with disabilities find work).

The exclusion and selection approaches mainly enabled by access to ESG data providers remain limited when it comes to addressing more specifically how companies manage disability issues.

d) Overcoming data access limitations

To go further and overcome the limitations often encountered with ESG data providers, some investors are developing their own internal assessment grids. A company's disability data can thus be compared with that of its investment universe to assess its level of maturity on the issue of disability.

To structure a more accurate assessment of companies' performance on disability, some investors, such as Rothschild & Co and La Financière Responsable, use specific questionnaires that include indicators such as:

- The importance given to the issue in the CSR strategy,
- The accessibility of premises and digital tools,
- The use of committed subcontractors (adapted companies and ESATs),
- The consideration of disability in the design of products or services.

Given the more limited resources of management companies, the scope of data collection is generally more restricted than what data providers can offer. However, it includes much more specific indicators targeting different disability issues. In addition, the annual repetition of the data collection exercise enables management companies conducting the exercise to create databases that are essential for obtaining corporate performance trends.

Beyond approaches focused on employment or accessibility, some investment strategies aim to support solutions that improve the health, independence, and quality of life of people with disabilities, while easing the burden on caregivers. These strategies may target, for example, companies developing prevention devices, technical aids, adapted health or housing solutions, accessible digital services, or support tools for caregivers.

For example, Colville Capital Partners has developed an analysis grid that identifies companies whose products and services promote the independence of dependent people and improve their living conditions. This includes prosthetics, assistive technologies, home adaptations, adapted mobility solutions, and remote monitoring tools.

Finally, this practice makes it possible to combine commitment with responsible investment practices. Management companies engage in dialogue and raise awareness among companies on the subject. They also exert influence by identifying best practices among a company's peers or in other sectors that could be applied by the company.

2. Dialogue and engagement to promote best practices

Although there is currently no common framework for engagement, engagement and dialogue with stakeholders are a key lever and offer a wealth of best practices. Some investors are implementing:

- Regular dialogues with companies, followed up with formalized monitoring, to improve their practices
- Discussions with data providers to raise awareness of disability issues and their importance to investors.
- Partnerships with specialized stakeholders to guide the inclusion strategy,
- Mechanisms to support managers in the context of capital investment,
- A regional network, particularly in areas where integration structures are active.

These approaches can also be used to feed into a regional or sectoral inclusion index, depending on the density and quality of the practices identified.

3. Investing in impact

The rise of impact finance is opening new opportunities for integrating disability, particularly in:

- **Private equity:** by supporting inclusive or innovative structures in terms of accessibility, particularly in employment, as done by Raise Impact, Impact Partners, and Phitrust, for example. The Handitech Trophy, which rewards innovations in the field of disability, can provide investment ideas for these funds.
- **Real estate:** by developing adapted or well-located housing to promote employment and independent living for people with disabilities.
- **Private debt:** by financing impact companies and projects that promote independence, or by introducing impact clauses related to disability.
- **Solidarity-based investment, particularly those that have obtained the Finansol label.**
- **Solidarity-based investments:** by investing at least 10% in companies (ESUS) or associations in the social or solidarity economy (e.g., Phitrust or France Active).
- **Sharing funds:** choosing to donate a portion of the fund's management fees or performance results to organizations working on behalf of people with disabilities (e.g., the SICAV R-Co 4Change Inclusion & Handicap Equity fund).

Impact finance players have developed social indicator grids dedicated to these categories of social enterprises based on their inclusive objectives (employment, housing, accessibility, etc.). These grids include both quantitative criteria (number of employees, customers, or beneficiaries reached) and qualitative criteria (work environment, well-being of employees with disabilities, product accessibility, user feedback).

Investment vehicles already active in the field of disability inclusion have designed models that enable them to provide support tailored to the social impact sought by these companies and to develop this impact over time.

Solidarity finance plays an essential role in this context, as solidarity mutual funds can invest their solidarity portion (up to 15% of assets under management) in ESUS companies focused on these issues, or in financing players who themselves invest in companies dedicated to the inclusion of people with disabilities, thereby multiplying their support potential.

Beyond solidarity finance, foundations are key players in impact finance and participate in vehicles that deploy investments that are both profitable and focused on ambitious social objectives.



Some examples of companies supported by impact finance players:

→ Companies employing people with disabilities:

- Ecodair: ESAT shareholder in a specialized company employing 80% of employees with mental disabilities
- Dans le noir: restaurants run by blind or visually impaired guides/waiters, where customers eat in total darkness
- Koiki: Spanish company providing last-mile delivery using soft mobility by people with mental disabilities

→ Companies offering products or services for people with disabilities:

- Le Monde d'Ayden: inclusive playgrounds for all children, with or without disabilities, employing people with disabilities and offering respite care for families with disabled children
- GoSense: development of connected devices that improve the independence of people with visual impairments

- Alenvi: shared homes and roommate arrangements for people with Alzheimer's disease, with the aim of promoting their independence for as long as possible and delaying their entry into nursing homes with specialized support that enhances the role of care assistants.
- Fratries: develops co-living spaces where young working people, with and without disabilities, live together.
- Eqwal: French leader in custom-made external devices for the treatment of disabilities.
- NeuroNation: offers an app to improve cognitive function.

These inclusive companies, often developed according to a hybrid model (non-profit association owning a commercial company), require patient capital and often targeted human support (adaptation of commercial practices to improve cooperation with large groups, European development for players marketing products for people with disabilities) to enable development that preserves the social project.

B. PROPOSED INDICATORS

The objective is to capitalize on the context and regulations presented, the best practices identified for companies, and the best practices identified for investors.

To go beyond what is currently conventionally identified as indicators. Investors will be able to draw on one or more indicators from this toolbox depending on each

context. The indicators follow the verticals proposed several times in the document: workers, users, and citizens; each indicator has a source. The trend over several years can also be valuable information for assessing a company's progress.

1. Indicators as workers

Employment and HR policies:

- Direct employment rate of people with disabilities (DOETH/DSN) [Mandatory]
- Subcontracting rate to ESAT, EA, TIH (DOETH/DSN)
- Average annual employment rate with special conditions of aptitude (ECAP) [DOETH/DSN]
- Existence of a disability policy [Annual report / DOETH]
- Allocation of financial contribution in the event of failure to meet the 6% quota (as a deduction or in lieu of an AGEFIPH/FIPH payment)
- URSSAF contribution rate (a prohibitive indicator in the event of non-compliance with the 6% quota)
- Agefiph financial penalties or audit breaches [Social report]

Training, awareness, and governance:

- Percentage of employees trained in disability inclusion (including non-managers)
- Percentage of managers trained in accommodation measures and disability management
- Amount spent on annual awareness-raising [D&I or HR budget]
- Change in annual budget allocated to awareness-raising and projected budget
- Mobilization around December 3rd / participation in D&I events
- Existence of a disability representative, an ERG (Employee Resource Group), or internal dialogue bodies
- Number of identified or supported caregivers (donation of RTT, accommodations)
- Percentage of people with disabilities who have benefited from a promotion within the company, in absolute and relative terms, compared to the total workforce
- Use of a global management tool (e.g., Disability Equality Index)

Recruitment process and accessibility to employment:

- Adaptation of job descriptions at the time of recruitment
- Adaptation of the recruitment process
- Existence of partnerships to identify talented individuals with disabilities (e.g., MyAbility, Cap Emploi)
- Response rate to inclusive calls for applications/targeted sourcing initiatives

2. User/customer-related indicators

Accessibility of physical and digital environments:

- Compliance with RGAA/RG2A (European digital accessibility standards)
- Accessibility rate of the website, intranet, internal documents, digital tools (>75% recommended)
- Accessibility of premises open to the public [Mandatory – CSRD/ESRS S1]
- Internal accessibility feedback mechanism (form, dedicated service, etc.)
- Inclusion of people with disabilities in test panels during product design (co-design)
- Presence of an accessibility task force / number of tests carried out with beta testers with disabilities

Accessibility of services offered:

- Percentage of products or services explicitly designed for people with disabilities
- Percentage of products or services adapted for people with disabilities
- Mention of disability in customer communication documents (accessibility charter, FALC, etc.)
- Percentage of reception or customer relations teams trained in inclusion
- Consideration of caregivers in the services offered (e.g., simplified interface, support)

Partner commitment:

- Presence of accessibility clauses in calls for tenders or public/private contracts
- Inclusion of accessibility criteria in the selection of suppliers

3. Citizen-related indicators

Participation and territorial inclusion:

- Territorial inclusion index / cooperation with local social and solidarity economy actors
- Presence of an economic networking approach in areas with little coverage
- Accessibility of internal administrative procedures (e.g., recruitment, personnel management)

Corporate culture and social commitment:

- Number of internal testimonials or stories highlighting the experiences of people with disabilities
- Organization of internal forums for expression

- Representation of people with disabilities in communication materials or representative bodies
- Existence of external advocacy initiatives or contributions to collectives (e.g., ILO, Global Business and Disability Network)
- Existence of an ethics committee that regularly addresses these issues by putting topics related to people with disabilities on the agenda

4. Proposed tool: inclusion maturity assessment grid

To assist in the comparative analysis of companies, a maturity grid could be proposed, based on several pillars (Policy, Actions, Results), with a progressive reading:

- **Low maturity:** Disability is mentioned in a generic way in a diversity policy; few visible actions.
- **Intermediate maturity:** The company has identified its challenges, is taking specific actions, and is beginning to structure a dedicated policy.
- **Advanced maturity:** Clear policy, monitored indicators, actions deployed, measurable results, governance involved.

This approach, already used for other social issues (forced labor, gender equality), could be transposed to disability.

These indicators are not intended to be exhaustive, but provide an operational basis for developing a fairer, clearer, and more dynamic assessment of companies' commitment to disability.

The integration of disability into responsible investment approaches is progressing, but there is still much room for improvement. While certain tools already make it possible to identify best practices or major risks, they often lack granularity, comparability, and clarity. To make disability a true social analysis criterion, it is essential to:

- Clarify regulatory expectations,
- Encourage the publication of reliable data,
- Develop appropriate qualitative and quantitative indicators,
- Recognize the most committed companies,
- And strengthen the role of investors as active partners in transformation.

The dissemination of best practices, the sharing of assessment tools, and the joint mobilization of financial, public, and private actors will make the inclusion of people with disabilities an essential dimension of sustainable finance.

CONCLUSION

Disabilities are most often invisible and acquired during a person's life. People with disabilities encounter obstacles in all aspects of their daily lives because their needs are not sufficiently considered.

There is an urgent need to apply the principle popularized by the United Nations, "**Nothing about us without us!**", and to systematically consider the needs and opinions of people with disabilities:

- **WORKERS:** adapt recruitment and onboarding practices so that all companies concerned meet their obligation to employ 6% of workers with disabilities;
- **USERS:** design inclusive products and services by including people with disabilities in consumer panels;
- **CITIZENS:** guarantee effective access to rights by adapting digital tools, premises, and human assistance.

Investors have a role to play: **evaluating** companies according to available inclusion indicators, including this topic in their **dialogue** with companies, favoring **impact** investments, and supporting **sharing** funds that donate a portion of their revenues to associations.

For investors to apply the selection criteria, it is important for them to have access to information, and companies must therefore be encouraged to publish this data.

This white paper is written in the French context, but it would be relevant to broaden this discussion to the European or even global level to define universal indicators. The indicators identified must now also be used by investors.

"Companies that embrace diversity of talent, including people with disabilities, are the ones best prepared for the future." Ban Ki-moon

APPENDICES

GLOSSARY

AAH: Allowance for Disabled Adults	ESRS: European Sustainability Reporting Standards
ACTP: Compensatory Allowance for Third Party Assistance	FALC: Easy to Read and Understand
Agefiph: Association for the Management of the Fund for the Professional Integration of People with Disabilities	IPP: Permanent Partial Disability
CDAPH: Commission for the Rights and Autonomy of People with Disabilities	MDPH: Departmental Center for People with Disabilities
CMI: Mobility and Inclusion Card	MSA: Agricultural Social Mutual Fund
CSRD: Corporate Sustainability Reporting Directive	OETH: Obligation to Employ Disabled Workers
DOETH: Declaration of the Obligation to Employ Disabled Workers	PCH: Disability Compensation Benefit
DSN: Nominative Social Declaration	RQTH: Recognition of Disabled Worker Status
EA: Adapted Company	SFDR: Sustainable Finance Disclosure Regulation
ECAP: Employment Requiring Special Skills	MSDs: Musculoskeletal Disorders
ESAT: Work Assistance Establishments and Services	UNAPEI: National Union of Associations of Parents, People with Mental Disabilities, and Their Friends
ESG: Environmental, Social, and Governance	URSSAF: Union for the Collection of Social Security and Family Allowance Contributions

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SUMMARY AND NON-EXHAUSTIVE LIST OF THE MAIN TYPES OF ASSISTANCE THAT THE CDAPH CAN AWARD

1. Financial benefits:

- **Allowance for Disabled Adults (AAH)**: granted on a means-tested basis to persons with a permanent disability of at least 80%, or at least 50% with a substantial and lasting restriction on access to employment⁸⁸.
- **Disability Compensation Benefit (PCH)**: Assistance to finance additional costs related to disability (human, technical, accommodations, etc.).
- **Disabled Child Education Allowance (AEEH)**: For children under 20, with a supplement depending on needs.
- **Mobility Inclusion Card (CMI): CMI "Disability"**: Priority access to seats on public transport, free parking. - CMI "Parking": Free parking in public spaces. - CMI "Priority": Priority access to queues.
- **Independent Living Allowance (MVA)**: Supplement to the AAH for people living at home who require significant assistance.

2. Employment and training assistance:

- **Recognition of Disabled Worker Status (RQTH):** Access to professional integration measures (subsidized contracts, workplace adjustments, etc.). This makes people with disabilities eligible for the employment obligation (OETH) and gives them access to workplace adjustments and support to help them find, keep, or advance in employment⁸⁹. RQTH status may be temporary or permanent, depending on the degree of disability and its stability.
- **Referral to an Establishment or Service for Assistance through Work (ESAT):** For people whose working capacity is less than one-third of that of an able-bodied worker.
- **Vocational training assistance:** Funding for adapted training, exam accommodations, etc.

3. Assistance for schooling and education:

- **Personalized Education Plan (PPS):** Educational accommodations for students with disabilities
- **Referral to a Medical-Educational Institute (IME)** or a Special Education and Home Care Service
- **Localized Units for School Inclusion (ULIS):** provisions for the schooling of students with disabilities in primary and secondary education

4. Assistance for independence and housing:

- **Housing adaptation assistance:** Funds work to make housing accessible
- **Accommodation assistance:** Partial or total coverage of accommodation costs in an institution
- **Home care assistance:** Remuneration of a caregiver or family caregiver

5. Technical and material assistance:

- **Funding for adapted equipment:** Wheelchairs, prosthetics, technical aids
- **Animal assistance:** Coverage of costs related to a guide dog or assistance dog.

Assistance not directly dependent on the CDAPH (non-exhaustive list):

- **A person with a disability who is the victim of an accident at work or an occupational illness** is automatically recognized as RQTH (recognition of disabled worker status) if their permanent disability is greater than or equal to 10%.
- **Permanent disability pension:** granted to victims of occupational illnesses or accidents at work with a permanent partial disability (IPP) of at least 10%⁹⁰.
- **Disability allowance or pension paid by the State or by a special scheme:** granted to victims of war, workplace accidents, or occupational illnesses.

ESRS RELATED TO DISABILITY

The sub-sub-themes refer to the employment and inclusion of persons with disabilities with several publication requirements as summarized in the table below:

ESRS	PUBLICATION REQUIREMENT	TITLE	ELEMENT EVALUATED
ESRS S1	S1-1 (Art.17 d)	<i>Policies related to company personnel</i>	<i>Adaptations to the physical environment to ensure the health and safety of workers, customers, and other visitors with disabilities;</i>
ESRS S1	S1-11 (Art.74 c, 75)	<i>Social protection</i>	<i>All company employees are covered by social protection, through public programs or benefits offered, against loss of income due to work-related accidents or acquired disabilities.</i> <i>Disclosure of the types of employees who do not benefit from social protection, through public programs or benefits offered, against loss of income due to occupational injury or acquired disability</i>
ESRS S1	S1-12 (Art. 77,78,79,80)	<i>Percentage of employees with disabilities</i>	<i>Disclosure of contextual information necessary to understand the data and how it was compiled (persons with disabilities)</i> <i>Percentage of persons with disabilities among employees subject to legal restrictions on data collection</i> <i>Percentage of employees with disabilities in the company's own workforce, by gender</i>

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