LA FINANCIÈRE RESPONSABLE
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Inclusion & Disability in the Workplace



Corporate Best Practices Guide for Structuring, Managing and Measuring an Effective Disability Inclusion Strategy

50 + interviews

18 sectors analysis

70 + indicators

Inclusion: A Collective Responsibility and a Long-Term Commitment

The inclusion of people with disabilities invites us to reflect on the place our society gives to each individual, the recognition of differences and, more fundamentally, our understanding of equal opportunities.

It reminds us of a simple reality that is sometimes overlooked: **disability is not a distant issue that affects only other people.** Throughout our lives, any of us may be affected by disability, either directly, as a result of an accident, illness or ageing, or indirectly, by supporting a loved one, a parent, a child or a colleague. Inclusion is therefore not simply a matter of solidarity with a minority. It concerns our shared humanity and the way we choose to live and work together.

In the corporate world, this belief must translate into action. After all, **equal opportunities do not mean treating everyone identically, but enabling everyone to realise their full potential.** This requires recognising barriers, adapting working environments, evolving management practices and ensuring continuity in career paths. The aim is neither to grant preferential treatment nor to systematically shield people from challenges, but to create the conditions for equitable and sustainable participation in economic life.

Naturally, this ambition goes beyond compliance with regulatory requirements. It encompasses corporate governance, culture and responsibility. A truly inclusive organisation is defined not only by its public commitments or its employment rate of people with disabilities, but also by its ability to recruit without excluding, provide support without stigmatising, and retain employees when circumstances in their lives change.

As a **responsible investor, we believe that a company's ability to foster inclusion reveals something fundamental about its quality: how it values human capital, anticipates vulnerabilities and builds sustainable performance.**

It was this conviction that led **La Financière Responsable and Mapfre** to develop, as early as 2018, an investment strategy focused on European equities and dedicated to the **professional inclusion of people with disabilities.** Our approach is grounded in a strong belief: public equity investors can contribute to social progress not only through their investment decisions, but also through demanding and constructive dialogue with companies.

For several years, our **"Disability Inclusion in the Workplace"** questionnaire has enabled us to monitor **the practices of European companies through more than 70 indicators.** To deepen our understanding, we conducted around **50 interviews** across **18 business sectors**, the findings of which have informed this Guide to Best Practices in Inclusion.

These discussions have brought to light an encouraging reality: solutions exist, initiatives are multiplying, and leading companies demonstrate that an effective disability inclusion policy is built on practical measures, committed governance and regular progress monitoring. They have also highlighted persistent challenges, including under-disclosure of disabilities, regulatory disparities, sector-specific constraints and a lack of awareness of invisible disabilities.

Through this **Inclusion and Disability Guide**, our ambition is to **share effective practices, encourage their wider adoption and help companies make sustained progress over time.** Building on this extensive engagement effort, we are already supporting companies seeking to improve their inclusion practices by working with them to define concrete, measurable objectives. We aim to strengthen this support further through an **additionality-driven approach, enabling us to measure the tangible outcomes** of our engagement and its contribution to the progress achieved.

Because impact cannot simply be declared: it must be built, supported and measured. Beyond the indicators, it reflects a fundamental belief: an inclusive society is not one that claims to erase differences, but one that knows how to make room for them without allowing them to become barriers.

This is a human imperative, a corporate responsibility and a long-term investor's conviction.

Steven PRÉVOST
CIO
La Financière Responsable

Table of Contents

Introduction and Objectives of the Guide 6

→ Context, La Financière Responsable's positioning and impact objectives

I. Structuring and Governance of Disability Inclusion Policies 9

→ Legal and regulatory framework, D&I strategies and ESG integration

→ Governance, steering and monitoring KPIs

II. Recruitment, Integration and Job Retention 20

→ Inclusive recruitment and access to employment

→ Onboarding, workplace adjustments and employee pathways

→ Job retention and career-path security

III. Limitations and External Factors 29

→ Awareness-raising and team training

→ Physical and digital accessibility

→ Partnerships and external initiatives

Conclusion 38



Introduction and objectives of the Best Practices Guide

This document has been prepared by **La Financière Responsable**, an asset management company specialising in SRI (socially responsible investments) – a subsidiary of **Mapfre**, the leading insurer group in Spain and Latin America[1].

In 2018, we jointly launched two pioneering equity funds dedicated to promoting the **inclusion of people with disabilities in the workplace**: LFR Inclusion Responsable ISR and MAPFRE Inclusion Responsable ISR.

Each year, we assess companies' commitment to this topic through our "**Questionnaire Inclusion**", which provides a comprehensive overview of their disability policies and related initiatives.



This questionnaire is distributed to companies within our investment universe, enabling us to monitor the evolution of their practices and identify new initiatives implemented by listed companies. Over the years, we have thus built one of the most comprehensive disability databases on the market, structured around more than **70 indicators** covering over **320 European companies** on disability issues.

In 2025, we decided to go further. Our ambition is no longer limited to promoting a **social thematic**; it now consists in developing a robust methodology to **concretely measure the impact**[2] of our investment decisions.

Art. 9 SFDR

Our funds, classified **Article 9 SFDR**[3] and "**Label ISR**"[4] certified, reflect our commitment to sustainable and **impact**-oriented finance. We are convinced that an advanced policy of integration & job retention of employees with disabilities is an essential marker of a company's deep culture.

investissement socialement responsable ISR

[1] **Mapfre**: Spanish insurance group with a global presence, employing more than 30,000 people of 83 nationalities and serving millions of customers worldwide. More information: https://www.mapfre.com/en/we-are-mapfre/

[2] **Impact investing**: an investment strategy that aims to generate, in addition to financial returns, a positive, intentional and measurable social and/or environmental impact

[3] **Article 9 SFDR**: the Sustainable Finance Disclosure Regulation (SFDR) is an EU regulation governing transparency requirements for financial products with regard to sustainability; Article 9 represents the highest level of sustainability ambition under the framework. More information: https://eur-lex.europa.eu/eli/reg/2019/2088/oj

[4] **Label ISR (French SRI Label)**: created in 2016, this is a French government-backed label based on a strict audit and certification process; it certifies the sustainable characteristics of investment funds. More information: https://www.lelabelisr.fr/label-isr/

Why do we believe in impact on listed markets ?

Liquid assets are often contrasted with private equity in terms of impact. However, the impact is not limited to unlisted assets. We firmly believe that investors in listed companies have a key role to play.

The concept of **impact** is based on **three pillars**, as defined by the **GIIN**[5]:

1. **Intentionality: explicit intention to act in favour of inclusion**
2. **Additionality: ability to demonstrate that a change is being achieved**
3. **Mesurability: the ability to concretely monitor progress**

Admittedly, additionality is more intuitive in private markets / unlisted sector.



However, it also clearly exists in **liquid markets**: participating in an IPO, contributing to a capital increase, or holding positions over several years as part of a long-only investment strategy with low portfolio turnover.
All these actions help provide long-term financing to companies committed to making a positive impact.

Above all, as investors in listed markets, we have a powerful lever at our disposal: **dialogue and shareholder engagement**, which enable us to actively influence corporate practices over the long term.

Building true **additionality** in listed equities management is a major challenge, which we are addressing through **three complementary levers**:

- financing companies whose products **directly** contribute to the autonomy of people with disabilities
- supporting the **protected sector**, particularly through donations
- encouraging the most advanced internal policies by **engaging in structured, long-term dialogue** with companies, particularly through dedicated **sharing sessions.**

In addition to the analysis of the "**Questionnaire Inclusion**", the objective of the **sharing sessions** is to better understand disability policies and the concrete actions taken by companies, based on everyday operational examples. It is also a question of better integrating these elements into our analysis process, supporting the most committed companies, promoting structuring initiatives, and finally **identifying the levers and obstacles encountered** in the implementation of disability policies, in order to **strengthen our commitment** to these actors.

[5] **The Global Impact Investing Network (GIIN)**, founded in 2008, is a leading international organisation in impact finance. It promotes investment that generates positive, measurable social and environmental outcomes alongside financial return. More informations : https://thegiin.org/

This guide serves as a tool for **sharing best practices in invested sectors**, with the ambition of accelerating the sustainable inclusion of people with disabilities in the workplace.

It is addressed to companies across all sectors, primarily located in Europe and also operating internationally, that seek to better understand workplace inclusion challenges, develop or strengthen their disability policy, or implement new initiatives to **improve their practices**. The diversity of the interviews conducted as part of this initiative, aimed at deepening the understanding of disability-related challenges in the workplace, has enabled us to engage with a wide range of companies of all sizes, across various sectors of activity.



INTERVIEWS

Our analysis is based on a qualitative methodology based on about **fifty interviews** conducted with companies across diverse industries, covering **18 ICB2 sectors**[6]



ICB2 SECTORS

These discussions were complemented by the analysis of **internal documentation** (disability agreements, diversity & inclusion policies, ESG reports), in order to obtain a comprehensive overview of the existing frameworks.

The **assessment grid d'analyse** used is based on key criteria such as:

- *governance*
- *recruitment*
- *job retention*
- *awareness-raise and training*
- *accessibility*
- *partnerships*

It enables companies to be compared within a common framework, while taking into account local and sectoral specificities.

[6] **ICB2** "Industry Classification Benchmark 2" is an international sector classification framework for companies, corresponding to broad industry super-sectors such as Banks, Insurance, Technology, Healthcare, Telecommunications, Oil & Gas, etc. More information: https://www.lseg.com/

I) Structuring and governance of disability policies

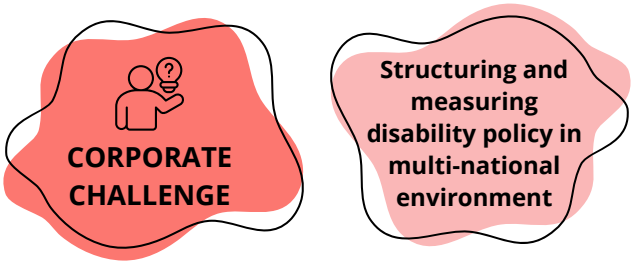
The inclusion of people with disabilities has become a **central issue in companies' social and sustainability policies.**

In France, as internationally, the regulatory framework is evolving rapidly: the 2005 law on equal rights and opportunities, the European Accessibility Act (**EAA**), and the new European standard for non-financial reporting (**CSRD**) all reinforce the need to integrate disability into organizations' overall strategy. Beyond legal obligations, disability inclusion is also a driver of social performance, innovation and attractiveness, just like the other dimensions of diversity.

In this context, companies face **a key challenge**:
How to structure, manage and measure an effective disability policy in an international environment marked by heterogeneous legal and cultural frameworks?

This issue affects both:

- Internal governance – the role of Human Resources, disability inclusion officers and management;
- Operational implementation – recruitment, employee retention and workplace accessibility;
- The ability to measure progress reliably and transparently.



The implementation of disability policies within companies is not solely driven by voluntary or philanthropic initiatives. It is embedded in a **structured governance** framework, shaped by legal obligations, internal diversity and inclusion (D&I) strategies, as well as increasing social and environmental responsibility (ESG-RSE) requirements. Depending on the country, these frameworks may differ, leading to variations in organizational structures and decision-making processes.

Companies, particularly those operating internationally, must therefore navigate national regulatory constraints alongside global strategic priorities, thereby increasing the **complexity** of disability policy **governance**.

1) Legal and strategic framework

Disability policies within companies are first and foremost part of a legal framework that strongly shapes their content and implementation. In many countries, legislation **imposes specific obligations regarding the employment of persons with disabilities**, such as:



- **employment quotas**



- **financial contributions in case of non-compliance with these quotas**



- **reasonable accommodation obligations for workstations**

These elements create a strong incentive for action and often shape the internal organization of disability policies.



However, the legal framework only provides **a minimum base**. Companies are increasingly integrating disability into broader **diversity and inclusion (D&I)** strategies. In this context, disability is understood as a **cross-cutting issue**, on an equal footing with gender, origin or age, rather than solely as a regulatory constraint. This evolution promotes a more holistic approach aimed at **sustainably transforming** managerial practices, recruitment, job retention and skills development processes.

Moreover, disability policies are now closely linked to **corporate social responsibility (CSR) issues and ESG criteria (environmental, social and governance).** Stakeholders are paying increasing attention to how companies address the inclusion of persons with disabilities.
The formalisation, governance and reporting of these policies are thus becoming **strategic drivers of credibility and extra-financial performance.**



Ultimately, disability policies are not driven solely by corporate willingness. They also depend on the legal framework, diversity & inclusion strategies and ESG requirements, all of which shape their governance and explain certain differences across countries and companies.

a) French legal framework

In France, companies' disability policy is governed by **the obligation to employ disabled workers | OETH:**



It requires companies with 20 or more employees to employ 6% of people with disabilities.
If they fail to meet this target, they must pay a financial contribution, reported annually via the OETH declaration.

The contributions thus collected are managed by **l'Agefiph** [l'Association de gestion du fonds pour l'insertion des personnes handicapées] for the private sector and by **FIPHFP** [le Fonds pour l'insertion des personnes handicapées dans la fonction publique] for the French public sector. In particular, they finance recruitment, workplace adaptation and job retention measures.
In addition, **Cap Emploi** supports companies in these processes, assisting with recruitment and workplace adaptations.

Disability Agreements

Some companies implement disability agreements - **approved** or **non-approved** - which make it possible to structure a disability policy over several years, with reinforced governance, dedicated funding and partial exemptions, in exchange for concrete and measurable actions.

Approved disability agreement
Collective agreement approved by the relevant government authority, allowing the company to replace the payment of the OETH contribution with a structured internal programme, funded over a maximum period of three years.

Non-approved agreement
An internal disability action plan or agreement; it does not exempt the company from paying the contribution if the 6% employment quota is not met.

The key difference is therefore that the approved agreement has a legal effect of exemption (under conditions), whereas the non-approved agreement is part of an HR or CSR approach, with no impact on the financial obligation.

In practice, however, **the strongest commitment is the one that goes beyond mere regulatory compliance:** a company that **sustainably meets or exceeds the 6% target** without relying on a formal agreement, allocating its own budget and integrating dedicated indicators into its HR/ESG strategy, can demonstrate a deeper, more structural commitment.

b) European framework

At the European level, the regulatory framework is increasingly shaping companies' disability policies. **The European Accessibility Act (EAA)** introduces accessibility requirements for certain products and services, particularly in the digital area, in order to ensure equal access for persons with disabilities.

Country	Company size	Legal requirement	If the quota is not met
France	≥ 20 employees	**6%**	If the company does not reach 6%, it is required to pay an annual financial contribution. This contribution is collected by URSSAF and transferred to a national organization (AGEFIPH for example) which funds initiatives for the integration and job retention of people with disabilities. Companies may reduce the amount of their due contribution by hiring workers with disabilities, retaining them or subcontracting work to adapted enterprises.
Spain	≥ 50 employees	**2%**	If the company is unable to recruit directly, it may obtain official authorization to implement alternative measures: for example, buying goods or services from companies that mainly employ people with disabilities, or making donations to foundations dedicated to professional integration.
Italy	≥ 50 employees	**7%**	The system is based on targeted placement mechanism: the public employment services identify qualified candidates and connect them with companies, based on their available job opportunities. The employment obligation increases gradually in line with the size of the company.
Germany	≥ 20 employees	**5%**	If the company does not reach 5%, it must pay a monthly contribution for each unfilled position. The amount is higher for companies that employ zero disabled persons. In larger companies, internal representation of disabled employees is mandatory.

Furthermore, the **CSRD Directive** and the **ESRS standards**, in particular the **Social Standards ESRS S1 (Own Workforce)** and **S2 (Workers in the Value Chain)**, require large companies to publish detailed social information. These requirements include a description of policies, actions and indicators related to the inclusion of persons with disabilities. Disability is thus becoming a genuine **extra-financial reporting issue**, but also a governance matter, integrated into companies' management and transparency frameworks.

Even when certain indicators benefit from a transitional phase ("phase-in") or are not immediately mandatory, companies have the option of communicating **voluntarily and in advance** in their *Universal Registration Document (URD)*.

For example, the annual report of
a company in the luxury sector includes:

" 2.1.3.1.14 ***Persons with disabilities*** *(S1-12): In accordance with the possibility offered by the CSRD, this data point will be published within one year of the publication of this sustainability report (phase-in). As a reminder, in France and in the 2024 financial year, XX% of employees have disabilities. »*

This example illustrates that, even in the absence of an immediate obligation, some companies choose to integrate this social data into their communication, reflecting **a commitment to transparency and regulatory anticipation.**

Unlike several European countries, **the United Kingdom and the United States** do not have a legal quota system. The regulatory frameworks are mainly based on the prohibition of discrimination and the obligation to provide reasonable accommodation, with no general obligation to monitor or disclose the number of employees with disabilities.

2) Governance and steering

In the implementation of corporate disability policies, several **best practices** have been identified, as applied within a broader strategic framework or in a more specific context:

Dimension	Best practices identified
Global Policy within the group strategy **GOOD PRACTICES**	• Inclusion of disability in the overall Diversity & Inclusion strategy • Objectives integrated into the multiannual strategic plan • (e.g. 2030/2035) • Alignment with the corporate mission (health, inclusion, customer experience) • "Accessibility by design" approach integrated to products and services • Implementation of a structured accessibility framework covering several dimensions (HR, products, digital, purchasing, communication, etc.)
Formalized Specific policy	• Existence of a disability policy dedicated to or integrated into the Global People Policy / Code of Conduct • Public commitment statement • Disability agreement, approved or not, when the legal framework allows it • Adherence to international charters or initiatives • Integration of accessibility criteria in the Supplier Code of Conduct

- The **Human Resources departments** play a central role, in conjunction with the general management, in defining the disability policy, the objectives, coordinating the actions and monitoring the indicators:
    - In large companies, disability **committees or dedicated disability referents** are often established to oversee the implementation of measures, ensure regulatory compliance and facilitate coordination between the different departments. These bodies make it possible to translate legal obligations and D&I/ESG commitments into **concrete, measurable actions that are monitored** over time. In many companies, **D&I committees** play a key role in disability policy. They validate orientations and priorities, for example on accessibility, recruitment or training
    - Political legitimacy is essential: when disability is brought to the level of the **Executive Committee**, initiatives tend to progress more quickly and in a more structured way.

The steering can also include **external actors**, such as **Cap Emploi** in France or the social partners in Germany, to support recruitment, job retention and awareness-raising actions.

Dimension	Best practices identified
Central steering	• Appointment of a group disability referent / officer attached to the HR Department or the Inclusion & Diversity Department • Existence of a structured disability mission or a dedicated unit • Diversity Committee including members of the Executive Committee/Management Committee • Annual presentation of the results to the representative bodies • Follow-up at the Board of Directors'level
Local representatives	• Network of disability officers at country or regional level • Internal ambassadors • Local working groups • Governance model articulated between group-level oversight and local/national implementation, designating "disability champions" in each country and replicating the model internationally

GOOD PRACTICES

- The most advanced companies have **clear and structured operational processes** in place to ensure that disability situations are treated fairly, confidentially and efficiently. The disclosure is facilitated at several key moments in the employee journey in order to remove the obstacles to self-identification.

Thus, the **onboarding** phase is particularly decisive: once the contract has been signed, it is important to give the new employee confidence and to proactively present the support systems and possible accommodations. This approach **encourages disclosure in a reassuring environment**, preventing candidates from hesitating to discuss their situation beforehand for fear that it will influence the hiring decision.

- Dedicated **communication channels** addressing the needs of persons with disabilities help ensure both **accessibility and confidentiality**, such as:

    - An online guide detailing possible accommodations
    - A specific email address and dedicated hotline
    - Some organisations deploy a "**Working Adjustments Passport**" to formalise needs over time, particularly in case of internal mobility





Procedures are increasingly digitized via **HR tools**, while maintaining individualized and strictly confidential support. Early monitoring is also provided for before the expiry of an administrative recognition, in order to avoid any breach of rights or measures.

- In terms of **reasonable accommodations**, the practices observed are based on a clear budget organization, centralized or decentralized according to the structure of the group. The needs assessment can be carried out by an external service provider and supplemented by regular ergonomic interventions.

    - Some companies facilitate internal mobility through a dedicated passport and provide **concrete** support measures, such as **paid days of absence for medical procedures, more days of teleworking, annual financial aid to cover certain specific costs or a bonus for the first administrative recognition**
    - Also, end-of-career arrangements, such as **adapted part-time work**, contribute to securing careers in the long term.





- The steering **of the disability policy** is based on the monitoring of **quantitative and qualitative indicators.** In particular, companies measure:

Steering / KPIs

- ***Direct and indirect employment rate of persons with disabilities***
- ***Number of RQTH declarations***
- ***Workstation adaptations made***
- ***Training and awareness-raising actions***

Other **HR indicators**, such as workforce turnover, absenteeism or the level of digital & physical accessibility, complete this monitoring.

- However, this steering management comes up against several **difficulties**:

  - **Under-disclosure of disability** remains frequent, which limits the reliability of the data
  - Moreover, the **KPIs** are **not always harmonized** across countries, making comparisons complex for international groups
  - Finally, in some companies, **data** is **not always centralized**, which complicates overall monitoring and strategic management.



Nevertheless, as for the implementation of a relevant monitoring framework, we observed important **effort-based KPIs.**

In this context, some companies are now seeking to structure and give credibility to their approach through more global **certifications** in terms of diversity and inclusion, such as **MOVE+** or **EDGE+ ©**.

These certifications are not specifically dedicated to disability, but they make it possible to evaluate equal opportunities, diversity and inclusion policies within organizations more broadly.

Moreover, some companies can also rely on international benchmarks specifically dedicated to disability, such as the **Disability Equality Index (DEI)** or the **Disability Confident Initiative:**

Disability Equality Index [7]

Developed notably by Disability:IN, the index evaluates companies on several dimensions such as governance, recruitment policies, accessibility and inclusive workplace culture.
It assigns a score ranging from 0 to 100, enabling companies to benchmark their performance against leading practices

Disability Confident Programme [8]

Originally launched in the UK, the programme aims to encourage employers to improve their recruitment, retention and career development practices for people with disabilities

These references and benchmarks are valuable tools for analyzing **governance best practices in disability inclusion**, as they demonstrate a commitment to formalizing internal policies and monitoring progress through measurable outcomes.

[7] **DEI**: more information on this index is available on the Disability:IN website: https://disabilityin.org/

[8] **Disability Confident**: more information about this programme is available at https://www.gov.uk/government/collections/disability-confident-campaign

Disability Policy Performance Indicators

Key Performance Indicators Dashboard : Outcome vs Effort KPIs

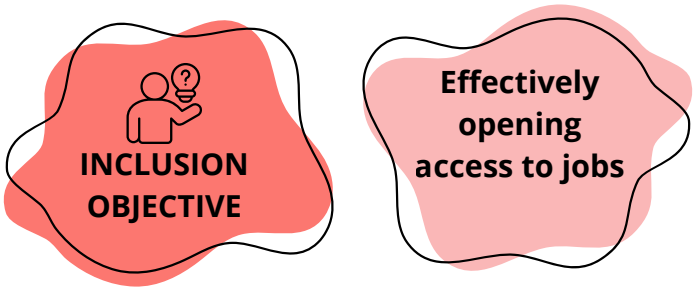
KPI Category	KPI Sub-category	Metrics
Outcome KPIs	**Quantitative KPIs**	• Direct employment rate (% of employees declared) • % of new hires with disabilities • Job retention rate • Turnover rate of employees with disabilities • Number of annual hires with disabilities • Disability status recognition renewal rate (RQTH) • Digital accessibility rate (WCAG) • % of buildings audited / compliant • % of training programmes that are accessible
	Qualitative KPIs	• Inclusion Index (internal employee survey) • Satisfaction rate of employees benefiting from disability support and accommodations • Disability Equality Index (DEI) score • Feedback from ERGs / internal disability networks
Effort KPIs	**Governance & Steering**	• Existence of a disability lead / disability officer (yes/no) • Number of annual disability committee meetings • Frequency of reporting to the Exco / Board • Number of countries covered by the disability policy • % of subsidiaries with a local disability lead
	Budget & Resources	• Annual disability budget (€ per employee) • Budget allocated to workplace accommodations • Budget dedicated to sheltered sector procurement • Training and awareness budget • Digital accessibility investment spend
	Training & Awareness	• % of managers trained on disability inclusion • % of recruiters trained on disability inclusion • Number of annual awareness initiatives • Number of employees participating in internal campaigns • % of D&I modules including disability topics
	Processes & Support	• Average time to implement a workplace accommodation • % of accommodation requests processed • Number of employees supported by the disability support unit • % of employees contacted before RQTH expiry • Post-campaign self-disclosure rate
	Inclusive Recruitment	• Number of active partnerships with specialised organisations • Number of disability-focused job fairs / recruitment events • % of job postings published on specialised platforms • % of interviews adapted to disability needs
	Accessibility	• % of audited sites • Number of IT tools assessed for accessibility • % of applications compliant with WCAG standards • Number of corrective accessibility improvements deployed

Source: LFR - 04 2026

II) Recruitment, onboarding and job retention

1) Inclusive recruitment

Objective : to effectively open access to job opportunities



Three **main levers** emerged from the interviews:

- **Transparency of job postings**
- **Adaptation of recruitment processes**
- **Diversification of sourcing channels**

This flexibility makes hiring more accessible and limits the risk of drop-off linked to stress, material constraints or unsuitable recruitment formats.

On this pillar, **collaboration** with associations, specialised organisations or integration structures also appears to be essential. It makes it possible to increase the visibility of opportunities among people with disabilities, to better understand their needs and to adapt recruitment practices in order to attract and retain these talents.

Inclusive Recruitment Best Practices

GOOD PRACTICES

Category	Best practices identified
Clear job offers	• Non-discrimination clause, mention of possible accommodations and disability contact point from the **application** phase • Some organisations also distribute a **disability brochure presenting their internal systems and support available**, in order to reassure candidates, even before their application
External audit of recruitment processes	• Review of job descriptions, analysis of HR processes and adaptation of recruitment pathways, in order to identify and address **potential biases**
Adapted interviews	• Extra time, questions sent in advance, sign language interpretation, compensation tools or adjusted tests • These practices help to reduce barriers related to the format of interviews and to allow a **more equitable assessment** of candidates' skills
Diversification of recruitment channels	• Participation in specialized fairs, job-dating, dedicated platforms or targeted campaigns • In **France**, several schemes facilitate this connection: Agefiph website, Cap Emploi, Hello Handicap, Tremplin, DuoDay, Handicafés, as well as international initiatives such as the ILO's Diversity Day • Companies can also rely on **partnerships** with organisations active in various fields (sports, arts), which promote professional inclusion
Pre-employment pathways	• Professional immersions, role-playing, discovery internships, dedicated work-study programs or supported employment schemes (tutoring and job coaching) • Some companies set up **comprehensive pathways** combining practical training, mentoring and personalised support. Candidates can start with a training phase in educational environments (school shops, workshops, training centres) in order to develop their professional and social skills, before being directed towards a suitable position • **Managers** are also trained in welcoming and communicating with disabled employees. These initiatives strengthen both the employability and the confidence of candidates, while avoiding symbolic or short-lived recruitment. In some cases, they have made it possible to reduce turnover very sharply, illustrating **their impact on the stability of the employment pathways**
Training of recruiters and managers	• Raising **awareness** on bias-free recruitment, adapting interviews and taking into account invisible disabilities, in order to secure the entire recruitment process

*However, some companies operating in **highly technical sectors** face **specific constraints** that influence their inclusive recruitment processes.*
*In these contexts, the most effective initiatives are generally based on **specialized partnerships** (Agefiph, Arpejeh) as well as on the **training** of recruiters and managers, often via online modules.*

These initiatives make it possible to familiarize teams with the different types of disability and to strengthen internal acceptance. These actions also respond to a reality specific to certain sectors: **the shortage of technical profiles**, which mechanically limits the access of people with disabilities to certain professions, particularly in production or engineering.

*In **industries such as chemicals or energy**, safety requirements can also restrict the possibilities of adapting certain workstations, despite a real desire for openness.*

However, our interviews show that these **constraints** are not isolated: several companies face similar challenges, linked to the technicality of the professions and strong competition to attract qualified profiles.

In this context, the most structured companies apply a similar logic:

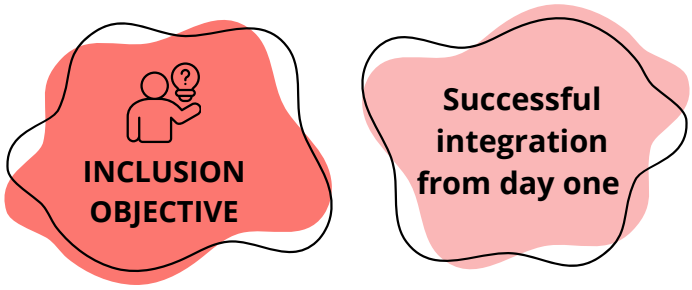
- **clear governance of the disability policy**
- **support from specialised partners**
- **training of teams and**
- **regular monitoring of implemented actions**

In addition to public schemes, many companies rely on specialised firms, territorial partners or local associations to identify candidates, adapt recruitment and secure integration pathways.

The most effective practices therefore combine several dimensions:
Accessible processes (clear job descriptions, adapted interviews),
progressive pathways allowing skills development,
a strong local external ecosystem to broaden the talent pool and secure integration into employment.

2) Job integration and workplace accommodations

Objective: a successful integration from the entry moment



Success is determined in the first few weeks: onboarding, a safe environment for expressing needs, personalised support, ergonomic and technical accommodations and local point-of-contact / referents roles (mentors, sponsors). In many organizations, **under-disclosure remains a major challenge**, often driven by fear of stigmatisation, a lack of clarity on the procedures or concerns about potential career impact.

The most advanced companies therefore aim to create **a safe environment** that enables employees to express their needs in a simple, gradual and confidential manner.

This logic of continuous adjustment contributes directly to the stability of the employment pathways and helps explain the sharp reduction in turnover observed.

Key features	Details of best practices identified
Confidential channel for self-disclosure and request for adjustments	• For example: dedicated email, intranet form or hotline - allowing employees to report their needs in full confidentiality • This system is often supplemented by **a centralised space** bringing together all the useful resources for employees and managers (forms, practical guides, declaration procedures, internal contacts). This avoids the dispersion of information and reduces the perceived complexity of the system
Pre-employment medical check-up	• This allows to anticipate any adaptation **needs** before taking up the role / onboarding

Key features	Details of best practices identified
Dedicated post-hire interview to map fit-up needs	• This allows to analyse the adaptation **needs** • It usually involves HR, occupational medicine and the manager, in order to identify the most appropriate solutions for the individual situation

Modular and individualized accommodation layouts, co-designed with the employee	• These accommodations, regularly reassessed within the company, may include:
	  ◦ **ergonomic** adjustments
	  ▪ specific chairs
	  ▪ adjustable desks...
	  ◦ digital **tools**
	  ▪ speech synthesis
	  ▪ automatic subtitles...
	  ◦ quiet spaces or **organizational** adjustments
	• Some companies also implement an "**adjustment passport**", a portable document used during internal mobility, helping employees avoid repeating the procedures
	• These adaptations are often overseen by **specialized** internal or external experts, such as **Ergosanté**

Digital accessibility « *by design* »	• Integrated **from the conception / design** of internal tools and contents • This includes compliance with **WCAG 2.1 / 2.2 standards**, creation of accessible documents, use of systematic subtitles, adapted contrasts and keyboard navigation etc...
Tutoring or mentoring during onboarding	• Designed to support new employees in taking up their roles: a designated **point of contact** monitors adjustments, facilitates communication with the team and helps gradually adapt tasks, workload or working hours • Some organisations also develop "**buddy**" programmes based on internal or external volunteers, with the aim of forming a structured network of disability referents

GOOD PRACTICES

*The **engineering consulting** sector highlights specific constraints, particularly those linked to project-based **work assignment / missions**: accommodations often need to be **co-designed with client companies.** Certain contractual clauses may also deem a profile as "**not compatible**" with an assignment, making internal mediation necessary.*

These situations show that the effectiveness of internal systems also depends on the company's ability to **onboard its ecosystem.**

Beyond the initiatives themselves, the interviews show that the difference is largely due to the **way in which employees perceive and understand the accommodation process.**

A procedure may be well designed, but remain under-used if it appears unclear or overly complex

The most advanced organizations are able to overcome this barrier by offering **a clear, centralised and secure pathway**, encouraging requests for accommodations when they are needed.
Conversely, when procedures are fragmented across multiple departments, when no contact person is clearly identified, or when teams remain reluctant to address these topics, **requests decline significantly** – even in companies with formally robust frameworks in place.

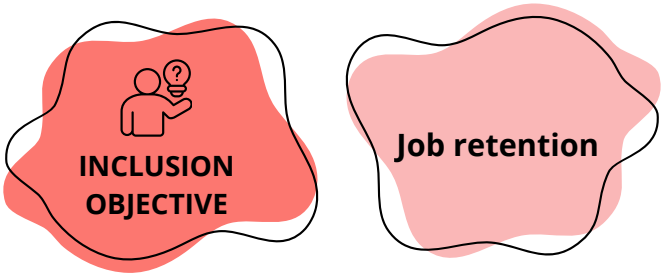
The way accommodations are **designed and implemented in practice** becomes decisive: beyond the structuring of formal mechanisms, the observed practices show **an evolution towards more individualized and proactive approaches to employees' needs**

In **office-based / services environments**, the material layout goes beyond simple regulatory compliance to move towards **a proactive management of comfort and specific needs.** The objective is to reduce fatigue, excessive stimulation or postural constraints, a particularly marked issue for **neurodiversity and some invisible disabilities**, by offering adjustable desks, silent spaces, noise-cancelling headphones and equipment adapted to employees who are deaf, hard of hearing or neurodivergent. These practices show the accommodation is no longer designed as a standard kit, but as **a personalized response integrated** into the human resources management policy.

However, these approaches still face **certain operational limitations.** Budgetary constraints, particularly outside Western Europe, as well as the lack of adaptability of certain industrial items may hinder the homogeneous implementation of planning policies.

All of these practices show that, beyond technical adjustments, integration is largely based on **identifiable and sustainable human support**. These specific, local adaptations create a **framework of trust** for employees so they may express their needs and adjust their position over time, playing a key role in preventing career breaks and stabilizing career paths.

3) Job retention



Maintaining employment is **a cornerstone of disability policies.** It aims to prevent career disruptions, secure professional trajectories and enable continued employment when health conditions change.

The interviews show this dimension relies on a **balance between medical support, work organization and internal dialogue.**

Beyond technical measures, the effectiveness of job retention primarily depends on the company's ability to **quickly identify difficulties** and to propose **tailored, sustainable solutions that are accepted** by all stakeholders.

Work organisation is the primary lever for job retention.

The adjustments mobilized as a priority thus concern:

- **Remote working**
- **Adapted schedules / flexible working hours**
- **Tasks adaptation**
- **Gradual return to work after a long absence**

In **most of the companies** surveyed, these adjustments are implemented on an individual basis, in coordination between HR teams, HSE, occupational health services and management.

Across most companies, the following ***structuring practices*** can therefore be identified:

o Gradual return-to-work after sick leave, administrative support, modulation of schedules & tasks scope, possibility of additional remote working

o Schemes for chronic pathologies and adapted end-of-career pathways; recognition of caregivers'role (dedicated leave, flexibility)



o Multidisciplinary case reviews (HR, occupational health, HSE, line manager) and regular assessment of adjustments



o Internal mobility / redeployment, when workstation adaptation reaches its limits

o Additional paid leave for disability-related procedures and for caregivers

o Creation of an internal solidarity fund, voluntarily contributed by employees, to provide financial support to staff facing serious health conditions

Moreover, some companies are extending these practices to evolving health situations:

For example, a **company in the distribution sector** has introduced a monthly day of absence for **employees with endometriosis**, in addition to paid leave for care, remote working adjusted according to the state of health, reinforced support after a long leave and part-time work adapted for employees over sixty years of age.

This **logic of anticipation** aims to secure employment continuity and reduce terminations related to health-related vulnerabilities. In addition, the group adjusts working pace, schedules or workload from the onboarding stage, in order to **secure long-term career pathways.**

*In the **industrial sector**, job retention challenges are more complex. There is a clear distinction between **production** operators and **managerial** roles:*

- *Accommodations are often implemented quickly on **factory floor workstations** - adaptation of lines, additional breaks, controlled job rotation ...*
- *... but are more difficult to deploy in **skilled trades or engineering roles**, especially when the disability evolves or on-site presence is required, as some positions cannot be performed remotely or require major adaptations.*

These contexts explain a slower pace in job retention than in the sector of **services** and underline the **need for internal mobility and retraining policies**.

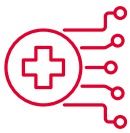
Also, some companies **extend their job retention policy** beyond the **employee** alone, by integrating his or her **family, social and institutional environment.** This approach recognises that health fragility and disability cases go well beyond the strict framework of the workplace and can have a lasting effect on the ability to maintain a professional activity.



The key challenge remains **the early identification of difficulties** and **the implementation of realistic adjustments**, helping to secure the continuity of professional careers.

Job retention is not limited to **one-off adjustments**, but is part of a **structured support for career paths**. It is preferable that the arrangements be systematically defined with the occupational health department and the managers, in order to reach realistic arrangements for the employee and the team.

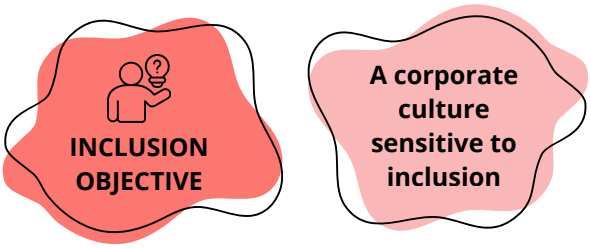
The most advanced companies are approaching job retention in a **holistic way**, **integrating physical health, mental health and chronic diseases.**
Therapeutic part-time work can be paid at 100%, which limits the financial obstacles to recovery and encourages the early expression of needs.



III) Limits and external factors: Awareness, Accessibility and Partnerships

1) Awareness-raising and training

Objective: to raise awareness across the entire organisation



The interviews conducted show that the obstacles encountered by employees with disabilities are rarely linked solely to workplace accommodations or the legal framework
More often, they stem from **cultural factors**: difficulty discussing disability, persistence of preconceived ideas, lack of knowledge on invisible disabilities, or fear of doing the wrong thing.

In this context, **awareness-raising** plays a central role:

- It targets both **employees and managers who interact** with colleagues with disabilities, helping them to better understand individual situations, reduce misunderstandings or apprehensions and foster **a more inclusive and open working environment.**

- It should also reach **the wider workforce**: some employees live with a health condition without realizing that it may qualify as a disability, while others may be reluctant to disclose their situation due to a lack of information about their rights and the support measures available, likely to facilitate their day-to-day professional life.

Without continuous efforts to address these perceptions, operational initiatives (recruitment, workplace accommodations or job retention etc ...) **are likely to remain fragile and may struggle to generate sustainable effects.**

At the French company
Gaztransport & Technigaz,
two webinars organised during **the European Week for the Employment of Persons with Disabilities** in 2024 brought together 150 employees, including 50 managers.
This initiative led five employees **to disclose their disability status and request support.**

This example illustrates the ability of awareness-raising initiatives to remove invisible obstacles and trigger concrete action, sometimes even before a structured disability policy has been put in place.

Ultimately, **organizational culture matters just as much as processes**. The companies that make the greatest progress diversify their awareness-raising formats, embed regular touchpoints and equip managers with tools & knowledge needed to support disability inclusion effectively.



Best practices of awareness-raising

Dimension	Observed best practices

Structuring initiatives over time	• Implementation of an **annual calendar of specific events**, such as:
	  ◦ SEEPH (European Week for the Employment of People with Disabilities)
	  ◦ International Day of Persons with Disabilities...
	• Publication of **recurring and diversified content:**
	  ◦ Webinars,employee testimonials, podcasts
	  ◦ Theatre, forums, immersive workshops, escape games
	  ◦ Annual Inclusion — Disability campaign...
	In order to maintain **a consistent level of awareness**

Strengthening training programmes	• Deployment of **D&I (Diversity & Inclusion) training modules** covering disability inclusion, unconscious bias, inclusive leadership
	• Complemented by **dedicated toolkits for managers and HR teams**—particularly in relation to recruitment and onboarding —as well as accessible resources available on the company intranet:
	  ◦ Q&A, practical guides, procedures
	  ◦ Dedicated points of contact
	• Some organisations also include **completion** of D&I training modules as a criterion within **variable compensation schemes**

Activating internal networks	• Development of **dialogue and exchange channels**: Podcasts, newsletters, discussion groups, employee communities and networks — open to the people concerned as well as to "allies". • Particular attention should be paid to terminology: **"persons with disabilities" / "people in disability situations"**

This diversity of communications and engagement formats fosters a better understanding of lived experiences and contributes to **creating a working environment perceived as supportive and inclusive.**

These formats play a key role: they reassure employees who hesitate to disclose their status, provide managers with concrete examples of possible adjustments and help change the perception of disability, which is no longer seen as a sensitive topic but as a situation the company is able to support.

These initiatives are often complemented by dedicated discussion sessions, enabling teams to ask questions and better understand the needs of the individuals concerned.

However, it is essential to **respect the choice of employees who do not wish to disclose their situations.** In this regard, dialogue and information can still help them to be aware of the existing support schemes and of the benefits of formal recognition through the appropriate interlocutors & channels, so that they can, if they wish, access suitable support.

While most awareness-raising actions target internal teams, **certain sectors** must also **integrate the client relationship and commercial offerings**, in order to ensure that products and solutions are **accessible** from the design stage.

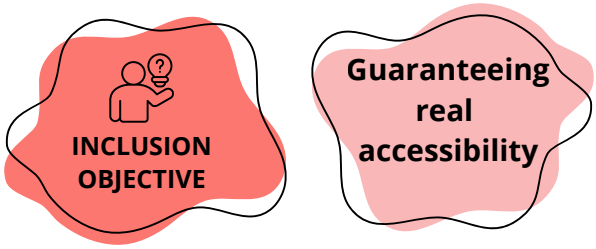


Overall, these initiatives highlight a key point:

awareness-raising and training are essential levers for building an inclusive culture

They clarify expectations, equip managers and create a supportive framework in which employees feel more comfortable expressing their needs.

2) Physical and digital accessibility



Whether **physical, sensory or digital** - accessibility enables employees and external stakeholders (customers, users, visitors) **to be included by default** in users'journeys.

Dimension	Good practices observed

Structural accessibility: physical, sensory and digital	• This notably involves:
	  ◦ personalizing the **display** according to **visual or cognitive needs**
	  ◦ developing so-called "**handi-accessible**" stores
	  ◦ **adapting** booking websites, interactive terminals and digital tools used by customers
	• Solutions such as **artificial intelligence or GPS guidance** can be used to strengthen autonomy
	• The use of **text-to-speech software, adapted fonts** or specific keyboards, together with the **simplification** of internal interfaces, adaptation...

Site accessibility diagnostics	• Analysis of user **journey** • Adaptation of site **signage**, visual contrast levels, Braille buttons, audible signals at access gates, dedicated parking spaces etc ….
"Accessibility by Design" approach	• Integration of accessibility from the **design stage** of new spaces, with **user testing** involving the employees concerned
Digital accessibility compliance	• Alignment of **websites/apps** with **RGAA/WCAG** standards **(Web Content Accessibility Guidelines)** • **Customization** of the display; Accessible documentation and templates
Sensory adjustments	• Implementation of quiet **time slots**, silent zones, dimmed lighting, noise-cancelling equipment, etc.
Useful innovations	• **Guidance** solutions • **Accessible QR codes** for instructions • Real-time transcription tools etc.

Physical accessibility varies depending on building type, age and industry sector. Some companies deploy highly structured approaches, while others make progress mainly in line with renovation cycle or local constraints. In **the most advanced organisations,** accessibility **is integrated from the very design stage** of workspaces.

For example:

An industrial company applies a **"zero-barrier" principle** for its new buildings, which are tested prior to opening by employees with disabilities. Feedback focuses on highly practical aspects such as:

- **circulation flows**
- **equipment placement**
- **signage, meeting rooms...**

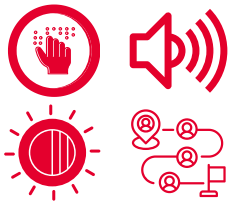
... these insights are then incorporated into the group's **real estate standards**.

This co-construction approach helps avoid later retrofits and firmly embeds **accessibility** as a **structural feature** of the working environment in the long term.

Some companies rely on **in-depth diagnostics** to structure their action. They conduct comprehensive external audits of their offices to **accurately map the barriers** faced by employees and visitors with disabilities.

This approach helps prioritize actions and deploy **targeted improvements**, such as:

- **installation of Braille buttons**
- **audible access gates**
- **enhanced visual contrasts**
- **redesign of internal circulation flows**



Some companies are also expanding their inclusion approach **beyond physical accessibility.**

For example:

A company in the luxury sector takes **the sensory environment** into account by providing **individual offices** or **quiet areas** for noise-sensitive employees.

This practice highlights the fact that accessibility is not limited to **visible constraints**, but also includes **sensory comfort**, a dimension that remains often underestimated in inclusion policies.

Finally, with the increasing digitalization of activities, **digital accessibility is becoming a strategic issue**. It now determines access to HR tools, training, internal procedures and, more broadly, access to everyday life within the company.

It also concerns **websites and digital interfaces** intended for customers, users and suppliers.

The objective is to ensure that everyone can use the tools independently, without exposure or stigmatisation, so that access to digital services is fully inclusive.

In this context, most companies rely on **international accessibility standards**, particularly the **Web Content Accessibility Guidelines (WCAG)**[1], defined by the **World Wide Web Consortium** (W3C), which are now the benchmark for designing accessible digital services.



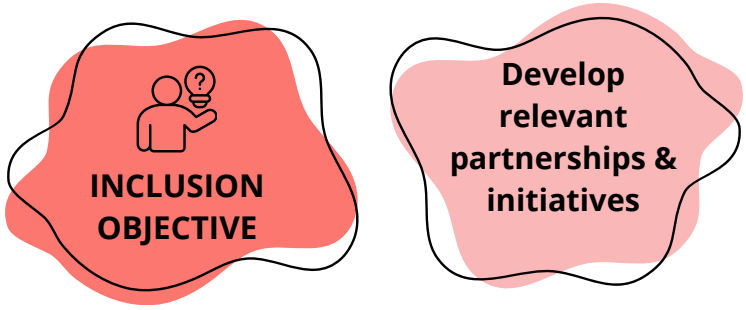
*Some companies do not yet have fully accessible tools, due to a lack of **suitable local solutions**, and must rely on the **standard features** provided by software vendors. These constraints highlight that digital accessibility also depends on the broader **technological ecosystem** in which companies operate.*

Beyond work environments, some companies are **extending their accessibility approach to the external audiences** they serve: customers, users, patients or visitors.

This approach broadens the notion of inclusion by placing it at the heart of the overall experience, rather than limiting it to **the employer-employee relationship**. It requires adapting **spaces, services and digital tools**, as well as evolving **customer-facing practices**, in order to ensure **genuine autonomy** for persons with disabilities.

[9] **WCAG (Web Content Accessibility Guidelines)**: international recommendations published by the **World Wide Web Consortium** (W3C) to make web content accessible to persons with disabilities. Based on four core **principles of content**— *perceivable, operable, understandable and robust* — the WCAG serve as a benchmark for designing accessible websites and applications, with different conformance levels: A, AA, and AAA. More information: https://www.w3.org/WAI/standards-guidelines/wcag

3) External partnerships and initiatives



Partnerships play a central role in disability policies, as they enable companies to rely on expertise that may not always be available internally.

The interviews conducted show that collaboration with specialised stakeholders – including **companies, NGOs or non-profit organisations** – is particularly important for designing and implementing relevant initiatives tailored to different types of disabilities.



Overall, these collaborations can be grouped into four main categories:

- **Institutional partnerships**
- **Engagement with the sheltered & supported employment sector**
- **Educational partnerships aimed at expanding the talent pipeline**
- **Participation in external programmes & initiatives promoting workforce inclusion**

Institutional partnerships:

Relying on specialized organizations helps companies better structure the disability policy and benefit from technical and financial support.

In France, organizations such as **Agefiph** and **Cap Emploi** help fund workplace accommodations, train managers and facilitate recruitment.

These partnerships therefore pursue several **complementary objectives:**



- funding workplace accommodations (ergonomic equipment, specialised software, interpretation services, etc.)
- training managers and recruiters
- supporting career transitions and professional redeployment
- facilitating recruitment and supporting awareness-raising initiatives

Collaborations with specialized associations:

Depending on the type of disability, working with specialised organisations enables companies to benefit from targeted **expertise** and tailored support.

For example, some companies collaborate with **Autisme France, AID, FAGERH, UNADEV, Unicus** or **Auticon** to adapt recruitment processes, promote neuro-inclusion or deliver disability awareness initiatives.



International initiatives and coalitions:

Participation in international initiatives and coalitions enables organisations to share **best practices** and align their inclusion policies across different geographies.

Networks such as **The Valuable 500, Disability:IN, the ILO Global Business** and **Purple Space** provide platforms for companies to exchange experiences, benchmark practices and structure their disability inclusion strategies on a global scale. Some organisations also participate in the **Disability Equality Index (DEI)**, a benchmarking framework that enables companies to assess and compare their disability inclusion policies and practices against global standards.



Educational partnerships:

Educational partnerships help expand **the talent pipeline and facilitate access** to employment for persons with disabilities.

For example, collaborations with **Arpejeh** or with **universities** can support the organisation of workplace immersion programmes, internships, apprenticeships and mentoring initiatives.



Sheltered and supported employment sector:
Supporting indirect employment through partnerships with sheltered workshops and supported employment enterprises [**ESATs and Adapted Enterprises (EAs)** in France]. These collaborations can take various forms — i.e. responsible procurement, service contracts, "off-site/on-site" arrangements that enable ESAT workers to perform activities directly at company premises.
However, this lever remains **highly dependent on the local context**: in many countries, there is no equivalent to the French ESAT model, while in **heavy industry**, health and safety requirements can significantly limit the range of activities that may be outsourced...



Pathways into employment:
Facilitating first professional experiences through initiatives such as **DuoDay**, which allows a person with a disability to discover a profession through a **job-shadowing experience alongside an employee**



Specialised recruitment platforms and events
Improving **connections between candidates and employers** through specialised platforms such as **Hello Handicap**, which facilitate the organisation of **accessible recruitment campaigns**, particularly when travel constraints are significant



Adapting partnerships to the local context:
Tailoring **international partnerships**, where institutional support mechanisms may be less developed. In some countries, companies collaborate with organisations such as **GDI Hub, Asian Development Bank** or **MAC Georgia** to develop accessibility projects and training programmes



Senior leadership engagement:
Ensuring the active involvement of senior leadership in **strategic partnerships** helps secure their long-term sustainability and maximise their impact.



One challenge emerged consistently across the interviews:
the difficulty of identifying and recruiting candidates with disabilities, particularly for certain technical or highly specialised roles,
such as engineering positions

In this context, **partnerships become even more essential.** Collaboration with specialised players — including non-profit organisations, training providers, universities and employment support organisations— enables companies to access **more diverse talent pools** and adapt their recruitment approaches to the specific requirements of their industry and the profiles they seek.
However, the effectiveness of these collaborations remains **highly dependent** on the local context, available resources and the organisation's ability to coordinate stakeholders over the long term.

Conclusion

This guide is the result of many hours of discussions with those who implement disability policies on a daily basis. We met highly advanced companies as well as organizations whose approach is still being developed. This diversity enabled us to understand the success factors but also the concrete difficulties that teams face.

A key lesson emerges: **a disability policy is sustainable over time when it is fully part of the company's culture.** Led by governing bodies, supported by managers and owned by teams, it must translate into clear responsibilities and appropriate resources. Its deployment in subsidiaries requires a common ambition that takes local realities into account. By sharing this guide with the companies in our investment universe, we aim to facilitate the adoption of practices suited to their organization.

As manager of the **LFR Inclusion Responsable ISR** fund, these exchanges enrich our approach as a social impact investor. Since 2018, our methodology, structured around **more than 70 indicators**, has enabled us to monitor the policies of European companies. In autumn 2026, the fund, which is **SRI-labeled and classified Article 9 under SFDR, reached a new milestone with the evaluation of its impact approach against the framework of the Institut de la Finance Durable (IFD).**

This publication supports **our shareholder engagement and progress monitoring**: jointly identifying realistic priorities, encouraging their implementation and monitoring their evolution through regular dialogue. We pay particular attention to input and process KPIs, which reflect resources mobilized and actions taken: manager training, workplace adjustment budgets or request processing times. Complementary to measurable KPIs, particularly those relating to recruitment and job retention, they make it possible to assess the initiatives undertaken before all their effects are measurable. Monitoring them jointly helps us understand how these resources translate into concrete progress. Some initiatives require time or adjustments. Our approach therefore combines attention to the resources mobilized with a requirement for continuous improvement, while seeking to assess the progress to which our engagement can contribute.

It is through this support that **our role as a long-term investor takes on its full meaning: sharing our expertise, challenging practices and contributing to concrete and lasting improvements for people with disabilities.**

Inès SEGUENI
Portfolio Manager - LFR Inclusion Responsable fund
La Financière Responsable

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