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# Putting the “I” in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors \*

## Acknowledgments

The ILO Global Business and Disability Network (GBDN) expresses its heartfelt gratitude to Rubeena Singh, who authored this publication with unparalleled commitment and professionalism. Further, we appreciate the financial support for this guide from the German Federal Ministry for Economic Cooperation and Development (BMZ), supported by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) GmbH.

We thank the following experts who provided their valuable feedback on draft versions of this guide: Anna Herzog (myAbility), Carla Bonino (ONCE Foundation), Robert Ludke (Harkin Institute for Public Policy & Citizen Engagement), Susan Scott-Parker (business disability international), Fernando Messineo Libano (ILO), Emily Sims (ILO), Stefan Trömel (ILO), Jürgen Menze (ILO), and Aria Tung (ILO).

In addition, a validation workshop was held with representatives from 17 multinational corporations. The purpose of this workshop was to gather high-level feedback on five key challenges and potential

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solutions regarding disability-inclusive ESG, sub-section 2.1.2., as well as to build consensus on and discuss the Key Performance Indicators (KPIs) that are listed in section 3 of this guide. Participants included representatives from Accenture, Accor, Adecco Group, Atos, Capgemini, HSBC, ISS, LONGi, Merck/MSD, Microsoft, Nestlé, Sandoz, Savola, Schneider Electric, Sodexo, UBS, and Unilever.



Furthermore, special thanks go to the following experts, who took the time to share their insights, research, and experiences through interviews.

1. Alán Bonilla, Director Sustainable Finance, S&P Global Ratings
2. Anna Herzog, Solutions Lead, myAbility
3. Beth Knight, Director Social Sustainability, Lloyds Banking Group
4. Birgit Neu, Senior DEI Advisor, Fimatix
5. Bruce Roch, Global Head Inclusion & Diversity, Adecco
6. Carla Bonino, Sustainability Chief (ESG), ONCE Foundation
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11. Debra Ruh, CEO and Founder, Ruh Global IMPACT
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15. Fides Raffel, Head of Solutions, AX, Forum & Training, myAbility
16. Frédéric Pinglot, Vice President Human Rights, Schneider Electric

17. Griet Cattaert, Head of Labour Rights, United Nations Global Compact
18. Haibin Zhou, CEO and Founder, Easy Inclusion
19. Hani Kamel, Associate Professor of Accounting at College of Business and Economics, Qatar University
20. Hannah Roberts, Labour & Human Rights Methodology Lead, EcoVadis
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26. Maayan Ziv, CEO and Founder, AccessNow
27. Megan Galvin, Manager Labour Rights & Decent Work, United Nations Global Compact
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29. Patricia Richter, Senior Technical Officer in Social Finance Unit, ILO
30. Paula Aitkenhead, Global Disability Inclusion and Accessibility Lead, Schneider Electric
31. Rasak Adekoya, Technical Advisor Economic Empowerment, Sightsavers
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33. Robert Ludke, Senior Fellow, Harkin Institute for Public Policy & Citizen Engagement
34. Stephane Leblois, Chief Community and Programmes Officer, The Valuable 500
35. Susan Scott-Parker, CEO and Founder, business disability international
36. Vibhati Bhatia, Managing Consultant Social Sustainability, Energise
37. Victor Hugo Zannotto, ESG Specialist, GS Inima Environment
38. Wim Bartels, Senior Partner at Deloitte, EFRAG Sustainability Reporting Board Member

Special thanks to Christian Tasso for the layout and ensuring accessibility of this guide.

## Acronyms

Abbreviation	Explanation
AUM	Assets Under Management
CRPD	Convention on the Rights of Persons with Disabilities
CSA	Corporate Sustainability Assessment
CSR	Corporate Social Responsibility
CSRD	Corporate Sustainability Reporting Directive
DEI	Diversity, Equity & Inclusion
ERG	Employee Resource Group
ESG	Environmental, Social, and Governance
ESRS	European Sustainability Reporting Standards
GIZ	Deutsche Gesellschaft für International Zusammenarbeit
GRI	Global Reporting Initiative
HR	Human Resources
ICT	Information and Communications Technology
IFC	International Finance Corporation
ILO GBDN SAT	International Labour Organization Global Business and Disability Network Self-Assessment Tool
ISSB	International Sustainability Standards Board
KPI	Key Performance Indicator
NGO	Non-Government Organization
PRI	Principles for Responsible Investment
SASB	Sustainability Accounting Standards Board
SEC	Securities and Exchange Commission
TCS	Tata Consulting Services
TISFD	Taskforce on Inequality and Social-related Financial Disclosures
UN SDGs	United Nations Sustainable Development Goals



## Executive Summary

This guide delves into the increasingly significant intersection of disability inclusion and Environmental, Social, and Governance (ESG) and sustainable business practices

– thereby underscoring how these dimensions are becoming integral to corporate and investment strategies worldwide. In the context of this guide, ESG encompasses a broad range of topics that investors and companies use to evaluate and enhance their long-term sustainability and ethical impact. The move by investors and companies to incorporate disability inclusion into the ESG ecosystem is still in its early stages. Clearer direction on the „why” and „how” to integrate disability inclusion into their ESG strategies is essential for advancing these efforts and ensuring that disability inclusion becomes a meaningful part of ESG approaches and responsible business conduct.

Section one outlines the origins and evolution of the ESG ecosystem. It further explores how ESG concepts have shifted from niche considerations to mainstream criteria that guide corporate decision-making and investment strategies. As ESG reporting has expanded, disability inclusion has emerged as a crucial, yet often overlooked, aspect within the “S” (social) component. This guide highlights how disability inclusion intersects with other identity dimensions, making it an important factor for companies and investors to consider when addressing diversity, equity, and inclusion (DEI) in their operations. Section one further establishes the foundational concepts, offering an overview of the key ESG ecosystems and their global market relevance. These concepts are vital to understand for companies seeking to not only meet regulatory requirements but also appeal to socially conscious investors and improve their sustainability practices.

Section two shifts the focus to the key stakeholders: companies, investors, and rating providers. For companies, disability inclusion presents numerous benefits, including enhanced innovation, improved employee engagement, and increased access to a broader talent pool. However, challenges remain in conducting comprehensive materiality assessments that capture representative disability data and adequately reflect its business value. Additionally, this guide emphasizes the concept of double materiality – even though not all ESG approaches are aligned with this concept – wherein disability inclusion is both financially material to companies and socially material to stakeholders. In this context, disability inclusion is shown not only as an ethical imperative but as a factor that can directly influence a company’s financial performance and long-term resilience.

While investors are beginning to recognize the financial implications of disability inclusion in companies, there is a need to use more precise and standardized definitions that can be reasonably adapted to industries, sectors, and countries to better reflect varying yet homogenized needs in investment decisions. This guide provides an overview of the drivers behind investments, such as consumer demand, regulatory shifts, and evolving societal expectations. Guidelines for investors are discussed, with methods for assessing disability inclusion within investment portfolios, alongside the financial risks and opportunities it presents. Prominent rating agencies – S&P Global, MSCI, EcoVadis, and FTSE – are reviewed for their role in shaping how disability inclusion is assessed and reported in ESG rankings.

In section three, this guide provides a framework for defining and reporting on corporate practices that

make disability inclusion efforts more comprehensive. For each of the ten areas<sup>1</sup> of this framework, a definition, potential risks of not addressing the area, benefits, 2-8 KPIs, existing corporate examples, as well as the KPIs' alignment with relevant global standards, frameworks, and tools are provided. The appendix provides further details on the standards and frameworks with which the proposed KPIs are aligned – namely, the ILO Global Business and Disability Network's Self-Assessment Tool (ILO GBDN SAT), the European Sustainability Reporting Standards (ESRS), Sustainability Accounting Standards Board (SASB) standards, Global Reporting Initiative (GRI) standards, the United Nations Sustainable Development Goals (SDGs), ISO 26000, and The Valuable 500's KPIs. This alignment ensures that disability-related metrics are not only consistent but also credible and comparable across industries and world regions. By offering a clear and structured approach to measuring disability inclusion, this guide enables stakeholders to set targets, track progress, identify gaps, and drive meaningful outcomes.

This guide concludes with a call to action, urging companies and investors to view disability inclusion not just as a compliance issue, but as a strategic advantage that enhances business performance, resilience, and societal impact. It highlights the need for a holistic approach to ESG that fully incorporates disability inclusion within the broader social agenda. The appendix provides further details on the global standards, frameworks, and tools with which the KPIs this guide proposes are aligned. This ILO GBDN guide makes a compelling case for the integration of disability inclusion within ESG practices and reporting, demonstrating how this alignment can drive double materiality by influencing both financial performance and social outcomes. As global reporting frameworks continue to evolve, disability inclusion is poised to play a more prominent role in shaping sustainable business practices, ensuring that no one is left behind in the pursuit of economic, social, and environmental progress.

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<sup>1</sup> Workforce Diversity, Employee Engagement and Satisfaction, Talent Acquisition, Talent Retention and Turnover Rates, Workplace Accessibility and Accommodations, Supplier Diversity, Customer Satisfaction and Loyalty, Innovation and Product Development, Community Engagement and Partnerships, Policy Advocacy and Government Relations

# 1. Concepts related to disability inclusion in ESG

## 1.1. Origins and Evolution of ESG

The origin of the need to include non-financial aspects in financial and corporate decisions can be traced back to the growing awareness of the broader impacts that businesses have on society and the environment. Historically, corporate success was primarily measured by financial performance metrics such as profitability and shareholder value. However, stakeholders increasingly recognize that this narrow focus often overlooked significant social and environmental consequences. This realization sparked a movement toward integrating non-financial considerations into business practices, emphasizing the importance of sustainability, ethical governance, and social responsibility<sup>2</sup>.

Over time, this movement evolved into various forms, often referred to as Environmental, Social, and Governance (ESG) as an umbrella term. For the purpose of this guide, ESG encompasses a broad range of topics that investors and companies use to evaluate and enhance their long-term sustainability and ethical impact. Environmental criteria consider how a company performs as a steward of nature; social criteria examine how it manages relationships with employees, suppliers, customers, and the communities where it operates; and governance deals with a company’s leadership, executive pay, audits, internal controls, and shareholder rights.

The definition and application of ESG remain fluid and context-dependent. Different stakeholders – including investors, corporations, and regulatory bodies – may emphasize varying aspects of ESG, depending on their specific goals and values.

The evolving nature of ESG reflects the dynamic interplay between emerging global challenges and the ongoing quest for sustainable development. As new issues arise, such as digital privacy and climate resilience, the scope of ESG continues to expand, underscoring its relevance and adaptability in guiding responsible corporate behavior and investment strategies. Box 1 highlights the similarities and differences between sustainable finance and ESG.

ESG reporting can enhance transparency and communication with various stakeholders, including investors, customers, employees, regulators, and the broader community. It can also help identify and manage risks that could affect the company’s reputation, operational efficiency, and regulatory compliance. This proactive risk management approach can lead to more sustainable and profitable business practices. ESG reporting can provide the data needed for these evaluations, influencing investment decisions. Companies with strong ESG practices can differentiate themselves in the market, attracting customers, employees, and investors who prioritize sustainable business practices, inclusive value creation, and ethical behavior.

<sup>2</sup> Zumente I and Bistrova J. 2021. ESG Importance for Long-Term Shareholder Value Creation: Literature vs. Practice.

## Box 1. Sustainable finance and ESG: overlaps and distinctions

Sustainable finance involves directing financial flows towards projects and activities that contribute to sustainable development. Sustainable finance instruments include green bonds, social bonds, and other financial instruments that can promote inclusivity and diversity. In the realm of disability inclusion, sustainable finance can support investments in companies or projects providing accessible infrastructure, assistive technologies, and inclusive business practices promoting the full participation of persons with disabilities in the economy.

ESG focuses on the performance and practices of individual companies. The two concepts of ESG and sustainable finance intersect significantly in promoting disability inclusion. Companies with strong ESG credentials often become attractive targets for investors adopting a sustainable finance approach. By integrating disability inclusion into their ESG strategies, companies can improve their ESG scores if rating agencies are taking this information into account, and potentially position themselves to receive funding from sustainable finance instruments, if such instruments also consider these factors. This dual focus ensures that businesses are not only complying with ethical and regulatory standards but also contributing to a more inclusive and sustainable economic system.

**Source:** Santander. 2023. [What are sustainable finance and ESG?](#)

The criticism surrounding ESG practices<sup>3,4,5</sup> can be summarized in two key points. First, there is a lack of standard definitions, which leaves room for „sustainability-washing,” where companies claim to be sustainable without concrete action or accountability. Establishing a standardized definition and reporting framework for ESG, however, can be challenging due to the diverse nature of industries, regions, and regulatory environments. Different sectors face unique environmental and social issues, and varying global priorities make it challenging to create a one-size-fits-all approach. Additionally, the evolving nature of sustainability goals further complicates efforts to agree on universal standards.

Second, ESG, as a risk-management framework, focuses on managing environmental, social, and governance risks to enhance a company’s financial performance, which means it may overlook the negative consequences a company may have on other stakeholders. These impacts are only considered if they pose a financial risk to the company, such as fines, reputational damage, or other monetary losses. This narrow focus may lead companies and investors to view or promote ESG as „good enough” or as equivalent to sustainability, which it is not.

## 1.2. ESG Frameworks and Market Size

While there is a lack of a globally unified governing or regulatory body for ESG at this time, numerous frameworks – created by international organizations, Non-Governmental Organizations (NGOs), and

<sup>3</sup> Fraser Institute. 2023. The Impracticality of Standardizing ESG Reporting.

<sup>4</sup> Singh J. 2023. ESG Is Not Impact.

<sup>5</sup> Foroughi J. 2022. ESG Is Not Impact Investing and Impact Investing Is Not ESG.

commercial data providers – target diverse users and audiences across markets. However, the many competing frameworks can make it difficult for organizations to manage and disclose ESG performance in a consistent manner, including on disability inclusion practices. Collaboration among many of the bodies responsible for currently existing frameworks, standards, and ratings is critical to ensure increased accuracy in ESG reporting in the future.

Despite recent macroeconomic and geopolitical challenges, the ESG market continues to mature and establish its presence in capital markets overall. ESG has come to the forefront in North America, Europe, and Asia. The ESG market accounts for over 25% of projected global assets under management (AUM). One of the reasons for this sizable projection is an increase in ESG market credibility, brought on by enhanced inspection through the role of regulations. As such, global ESG assets – which surpassed USD 30 trillion in 2022 – are projected to exceed USD 40 trillion by 2030, out of an anticipated USD 140 trillion total AUM. A regional analysis of this projected growth reveals important findings. By 2030, Europe’s ESG market share is expected to reach over USD 18 trillion, or 45% of the projected global ESG AUM. The United States’ ESG market share is expected to decelerate, totaling USD 9.5 trillion. Japan, Canada, and Australia are experiencing growing markets, and Japan had USD 4.3 trillion in ESG AUM in 2020–2022<sup>6</sup>.

Alongside the increase in ESG market size overall, it has been well researched that leading companies committed to upholding human rights within their operations and across their supply chains reap significant financial rewards. For instance, companies listed in the Ethisphere’s 2023 Ethics Index – which ranks publicly traded companies as the World’s Most Ethical Companies – demonstrated stronger performance, compared to a similar index of large-capital companies. Over a span of five years, these companies outperformed their peers by 13.6 percentage points<sup>7</sup>. The 2023 Ethics Quotient includes updated questions reflecting current priorities, such as board and C-suite diversity, ESG materiality and reporting, as well as human rights. Viewing disability inclusion through the lens of upholding human rights can help companies ensure they are reporting on meaningful company practices.

In this vein, a [2024 report by the UN Working Group on Business and Human Rights](#) aims to raise investor awareness of human rights responsibilities, to clarify their obligations under the UN Guiding Principles on Business and Human Rights, and to provide recommendations for aligning ESG approaches with these principles, including in business relationships<sup>8</sup>.

As part of the growth in the ESG market, disability inclusion has started to become a factor in

<sup>6</sup> Bloomberg. 2024. [Global ESG Assets Predicted to Hit \\$40 Trillion by 2030 Despite Challenging Environment Forecasts: Bloomberg Intelligence](#).

<sup>7</sup> Based on Ethisphere’s exclusive Ethics Quotient®, the evaluation process for the World’s Most Ethical Companies incorporates over 200 data points covering various aspects such as culture, environmental and social practices, ethics and compliance efforts, governance, diversity, equity, and inclusion. Additionally, it includes initiatives aimed at strengthening the value chain. This process acts as a structured framework to identify and document the good practices of organizations worldwide across different sectors. Source: Ethisphere. 2023. [Ethisphere Announces the 2023 World’s Most Ethical Companies](#).

<sup>8</sup> OHCHR. 2024. Investors, ESG and Human Rights.

investment decisions, as international investors start considering disability-related factors when building their portfolios. This shift underscores the growing recognition of the importance of disability inclusion in both investment strategies and corporate practices<sup>9,10</sup>.

ESG controversies related to disability inclusion have also caused significant issues for companies. For example, in 2013, G4S, a global security company, was embroiled in a controversy when it was accused of failing to provide reasonable adjustments for an employee with a disability, Mr. Powell, after his role was changed due to his disability. The case escalated to the Employment Appeal Tribunal (EAT), which ruled that G4S's refusal to maintain his original pay in the new role was discriminatory<sup>11,12</sup>. This controversy highlighted the company's failure to adhere to inclusive employment practices, leading to legal challenges and reputational damage. Such incidents underscore the critical importance of disability inclusion within ESG frameworks, where failure to comply can lead to significant financial and reputational consequences. Box 2 showcases the link between ESG controversies and their effect on the stock value of publicly listed companies.



<sup>9</sup> BII (formerly CDC Group). 2021. [Disability Inclusion. ESG Toolkit for Fund Managers.](#)

<sup>10</sup> IFC. 2024. [Investing for Inclusion: Exploring a Disability Lens](#)

<sup>11</sup> Equinet Working Group on Equality Law in Practice. 2021. [Case law compendium on reasonable accommodation or persons with disabilities.](#)

<sup>12</sup> Employment Cases Update. 2016. [G4S Cash Solutions \(UK\) Ltd v Powell UKEAT/0243/15/RN.](#)

## Box 2: ESG and controversies affect the stock market value of a company

Moody’s Analytics used controversies from Moody’s ESG Solutions<sup>13</sup> and ESG data from RepRisk and found an effect of controversies on company’s market value.

Moody’s Analytics research found that ESG controversies often lead to significant and lasting decreases in a company’s stock market value in the short term and long term. For example, moderate to severe ESG events can cause stock market losses of -1.3% to -7.5% over a year, which could mean a loss of around USD 400 million for an average-sized company in their study.

**Short-term effects:** Moody’s research shows that when ESG controversies happen, companies tend to experience negative returns in the short term. For instance, on average, if any ESG event occurs, companies see a decrease in their stock value of around 0.37% over two months. This trend becomes more pronounced as more events occur, with a 0.73% decrease for two or more events, and a 1.40% decrease for four or more events. E and G events cause relatively small and statistically insignificant declines in stock value, while S events have a significant impact. When there are three or more S controversies in a month, there can be an average stock loss of -2.11%.

**Long-term effects:** Although a company’s stock may initially decline due to an ESG controversy, in the long term, this effect might diminish or become negligible compared to other factors affecting the company’s value.

However, when multiple ESG controversies occur, the negative effects on stock valuation tend to persist. For example, if three or more controversies happen in a month, companies experience an average decrease in stock value of -1.18% over a year. This loss increases to -6.47% for five or more controversies. Events in the G and S categories result in particularly large losses. Controversies selected for their expected financial impact led to even more significant decreases in stock value.

**Source:** Moody’s Analytics. 2022. [The Business Impact of ESG Performance.](#)

## 1.3. Dimensions of Disability and Intersectionalities

Disability is an evolving concept, which includes long-term physical, mental, intellectual, or sensory impairments which, in interaction with various barriers, may hinder full and effective participation in society<sup>14</sup>. Most disabilities are non-apparent<sup>14</sup> and include neurodivergent persons. The identity of disability further intersects with other identity factors, including race, ethnicity, gender, age, sexual orientation, nationality, religion, etc. These intersectionalities highlight the need for multifaceted approaches to addressing the diverse experiences and needs of people with disabilities. By understanding and acting on these intersectionalities, organizations can better support all employees, improve overall organizational performance, and enhance their reputation for social responsibility.

<sup>13</sup> Moody’s ESG Solutions is a part of Moody’s Corporation that helps meet the growing demand worldwide for understanding ESG and climate issues. They investigate whether companies are involved in ESG controversies. These controversies are situations where there’s public information or different opinions from reliable sources that blame or accuse a company of not handling ESG issues well. Each controversy can involve different facts, events, legal matters, or unproven claims. Moody’s checks over 10,000 companies every day to see if they’re involved in ESG controversies across 38 different ESG issues. They’ve collected data since 2007 and have over 22,000 records. Moody’s finds controversies through daily news, company reports, and input from stakeholders. They then assess how these controversies affect both the companies and the people involved. Finally, each controversy is rated based on how serious it is and how the company responds to it.

<sup>14</sup> OHCHR. 2016. [Convention on the Rights of Persons with Disabilities.](#)

For instance, women with disabilities face greater economic and social barriers than women without disabilities, leading to unequal parental rights, workplace discrimination, lower earnings, and higher rates of gender-based violence. However, only a quarter of 190 economies explicitly protect the rights of women with disabilities<sup>15</sup>. Women with disabilities also worry more about the negative impacts of remote work, feeling judged for setting boundaries or taking time off for mental health reasons, leading to high levels of burnout and exhaustion<sup>16</sup>. Disaggregated data can reveal unique challenges faced by persons with disabilities with their multifaceted identities. The ILO Department of Statistics provides country-level data on the labour market situation of persons with disabilities, which can be further disaggregated by gender as a reference point<sup>17</sup>. Increased awareness of intersectionalities and available data sources can lead to more effective and inclusive policies, fostering a diverse and equitable workplace.

Furthermore, factors that cause discrimination against people with disabilities can compound the negative impacts of climate change and climate-related disasters. For example, people with disabilities may experience limited mobility, resulting in difficulty in evacuating during emergencies and reliance on equipment sensitive to power outages. The idea of a Just Transition encompasses inclusive social dialogue with underrepresented groups, and integrated accessibility and inclusion standards in green jobs creation and social protection systems<sup>18</sup>. The [ILO Guidelines for a Just Transition](#) offer a policy framework to address environmental change, advance social justice, and promote decent work in an inclusive manner<sup>19</sup>. Companies and governments should recognize these intersectionalities and work towards greater inclusivity of their environmental policies and climate-related response practices.

## 1.4. Disability Inclusion and ESG

Disability inclusion is increasingly gaining importance as a critical aspect of company policies and practices that should be reflected in non-financial or ESG reporting, within each of the three ESG pillars. This approach demonstrates a company's commitment to fostering an inclusive and equitable environment across all its operations.

Within the ESG umbrella term, under the **Environmental** pillar, companies can address and report on how they ensure accessibility and inclusivity in their environmental sustainability efforts. This work can include designing facilities and products that are accessible to people with disabilities, reducing environmental hazards that disproportionately affect them, and involving individuals with disabilities in environmental initiatives.

<sup>15</sup> Braunmiller J. and Dry M. 2022. [The Important of Designing Gender and Disability Inclusive Laws: A Survey of Legislation in 190 Economies.](#)

<sup>16</sup> Thomas R, et al. 2021. [Women in the Workplace 2021.](#)

<sup>17</sup> ILO. [Disability Labour Market Indicators \(DLMI database\).](#)

<sup>18</sup> ILO and Fundación ONCE. 2023. [Making the green transition inclusive for persons with disabilities.](#)

<sup>19</sup> ILO. 2022. ["Nothing about us without us" – Realizing disability rights through a just transition towards environmentally sustainable economies and societies.](#)

For instance, accessible energy-efficient products and services offer dual benefits. Products that consume less energy reduce environmental footprints, and when designed with accessibility features like voice control, they become easier to use for all, including individuals with disabilities. Another example is sustainable packaging, which can use recyclable or biodegradable materials to reduce waste. When this packaging includes clear labeling, easy-to-open features, and braille, it improves accessibility, including for those people with disabilities who may not otherwise be able to open the package with ease. Water conservation initiatives also play a vital role. Technologies like touchless faucets and automated irrigation systems not only conserve water, but also reduce the energy needed for water treatment and distribution, as well as enhancing accessibility and ease of use for persons with disabilities.

Green building certifications like Leadership in Energy and Environmental Design (LEED) not only use sustainable materials and reduce energy consumption, but also emphasize accessibility features<sup>20</sup>. These improvements – such as better indoor air quality, natural lighting, and ergonomic design – significantly enhance the well-being and comfort of all employees, including those with disabilities. The **Social** pillar within the ESG terminology describes a company’s commitment to equity in the workplace and beyond, e.g., in the communities where it operates. Companies can ensure equal opportunities for people with disabilities in employment, professional development, and leadership roles. This pillar includes a broad range of areas such as the accessibility of the workplace, products and services, non-discrimination policies, supplier diversity, and an inclusive corporate culture. Reporting on these practices showcases the company’s dedication to building a workforce that reflects the diversity of the broader society and to ensuring that all employees are empowered to contribute to their fullest professional potential.

Section 3 of this guide offers definitions and a KPI framework to use for companies wishing to improve the social inclusion of employees, customers, and suppliers with disabilities.

Within the **Governance** pillar, disability inclusion is seen through policies and practices that ensure accountability and transparency. This includes having a governance structure that promotes diversity and inclusion at all levels, including board representation. Companies can also report on their compliance with disability-related regulations and standards, as well as the implementation of internal policies that support the rights of people with disabilities.

By embedding disability inclusion into governance, companies not only enhance their social responsibility, but also mitigate risks associated with discrimination and non-compliance.

For instance, denial of reasonable accommodations may constitute an act of discrimination. National laws typically forbid discrimination based on disability, aligning with investor standards like the ones by the IFC, which emphasize non-discrimination and equal employment opportunities<sup>21</sup>.

<sup>20</sup> United States Green Building Council. Universal accessibility.

<sup>21</sup> IFC. 2022. [Inclusive Banking for Persons with Disabilities](#).

## 1.5. Benefits of Disability Inclusion in ESG Reporting

Use of standards such as the European Sustainability Reporting Standards (ESRS), Sustainability Accounting Standards Board (SASB), the Global Reporting Initiative (GRI), and the International Organization for Standardization (ISO), and frameworks such as the Sustainable Development Goals (SDGs), as well as tools such as the ILO GBDN Self-Assessment Tool (ILO GBDN SAT) can reveal several benefits for companies as they report on disability inclusion in ESG reporting, such as:

- 1. Baseline Assessment:** This data can serve as a starting point for companies to identify strengths and areas for improvement in their disability inclusion policies and practices.
- 2. Goal Setting and Target Tracking:** The data gathered can inform the development of specific, measurable, achievable, relevant, and time-bound goals for disability inclusion that can be tracked over time.
- 3. Stakeholder Engagement:** Data can be shared with stakeholders, including investors, customers, employees, and disability advocacy groups, to foster transparency and dialogue.
- 4. Risk Management:** Data can help companies mitigate risks associated with discrimination, legal non-compliance, financial liabilities, including legal disputes and lawsuits, and reputational damage caused by non-compliance or discriminatory practices.

Both quantitative metrics and qualitative narratives are important for meaningful ESG reporting on disability inclusion. For instance, tracking disability representation across various job levels and departments offers quantitative insights into workforce diversity. Also, by monitoring the disability pay gap<sup>22</sup>, an organization can measure disparities in pay between employees with and without disabilities, shedding light on potential structural inequalities and ensuring that all employees, regardless of disability status, are fairly compensated. This equitable compensation can further encourage employee hiring, satisfaction, and retention.

However, a varying qualitative metric, such as employee testimonials, case studies, and descriptions of inclusive practices, can add context and depth to reporting. Case studies and success stories highlight the real-world impact of disability inclusion initiatives, offering stakeholders insights into the challenges faced by employees with disabilities and the effectiveness of the company's efforts. Narrative feedback from disability advocacy groups and customers further demonstrates the company's commitment to incorporating diverse perspectives into its ESG reporting.

In the area of measuring workforce diversity, including disability, age, and LGBTQ+ status, S&P Global found regional and industry differences. Based on the 2021 analysis data of evaluations of 1,863 companies across 11 industry groups and in five geographies, industries such as Information Technology, Utilities, Financials, and Communication Services have higher rates of reporting on disability inclusion, contrasting with Real Estate, which has the lowest percentage of reporting.

<sup>22</sup> ILO. 2024. [A study on the employment and wage outcomes of people with disabilities.](#)

Regionally, Asia Pacific (58%) and Latin America (54%) are prevalent in reporting on disability issues, with progressively decreasing reporting from Africa, Europe, and North America<sup>23</sup>.

According to the Future of Jobs Report 2023, most companies prioritize women (79%), youth under 25 (68%) and people with disabilities (51%) as part of their Diversity, Equity, and Inclusion (DEI) programmes<sup>24</sup>. In the United States, 65% of US Fortune 500 companies include disability in their annual non-financial or integrated reports. Of this number, 10% report on disability in their workforce participation metric<sup>25</sup>. In Europe, 72% of European Fortune 500 companies include disability in their non-financial or integrated reports<sup>26</sup>, of which 30% report disability in their workforce participation metric<sup>27</sup>. In Asia and the Pacific, 56% of 130 C-suite executives rarely or never discuss disability on the leadership agenda<sup>28</sup>.

Despite the extensive research demonstrating the reasons and benefits of disability inclusion in corporations, there remains a gap in the consistency and rigour of company advocacy and reporting of inclusive practices in ESG reporting. This disparity may stem from various factors, including a lack of awareness among stakeholders about the risks and opportunities to deliver best practice in companies, which includes managing the impact of disability inclusion on its business, employees, and customers. While there is a global mix of voluntary and mandatory ESG reporting, it is crucial to recognize the importance of increasing voluntary reporting. Proactive reporting serves as a powerful attraction strategy, signaling to stakeholders that the organization is genuinely committed to addressing and improving its ESG practices. Beyond fulfilling legal obligations, companies that voluntarily report demonstrate a commitment to transparency and continuous improvement. The true value of data lies not only in its collection and reporting but also in the meaningful conversations it initiates, driving further progress and innovation in ESG practices.

## 2. Stakeholders involved in disability-inclusive ESG practices and reporting

This section of the guide explores the role of key stakeholders in ESG practices and reporting, specifically on the topic of disability inclusion. Stakeholders and their roles include:

<sup>23</sup> S&P Global. 2022. [Diversity, Equity & Inclusion Thematic ESG Data Analysis](#).

<sup>24</sup> This survey received 803 unique responses by global companies, representing 11.3 million employees worldwide across 27 industries and 46 economies. Source: World Economic Forum. 2023. [The Future of Jobs 2023](#).

<sup>25</sup> Disability:IN. 2024. [On the verge: disability and sustainability reporting an analysis of sustainability reporting practices in the European Fortune 500, 2021–2023](#).

<sup>26</sup> Non-financial or integrated reports include ESG, CSR, DEI, Impact, Sustainability, and Global Impact reports between 2021–2023.

<sup>27</sup> Disability:IN. 2024. [On the verge: disability and sustainability reporting an analysis of sustainability reporting practices in the European Fortune 500, 2021–2023](#).

<sup>28</sup> EY (Ernst & Young). 2022. [If you don't embrace differences, how will you achieve long-term value?: An Asia-Pacific Perspective on Disability Inclusion](#).

- **Advocacy groups, organizations of persons with disabilities, and governmental bodies** serve as foundational stakeholders, driving policy changes and providing support and resources to advance disability inclusion efforts.
- Their initiatives create an enabling environment for **standard setters**, such as industry associations and regulatory bodies, to create reporting requirements and develop guidelines and frameworks that promote good practices and compliance in disability inclusion.
- These standards then guide **companies** in implementing inclusive practices within their operations, such as accessible workplaces and equitable hiring policies.
- **Investors** leverage their influence to encourage companies to prioritize disability inclusion through investment decisions and engagement activities.
- **Rating agencies** assess publicly listed companies' ESG / sustainability reporting efforts, including their efforts towards disability inclusion, providing valuable insights for investors.

Through this interconnected network, each stakeholder contributes to the advancement of disability inclusion in companies. Different stakeholders develop their approaches to how they use or work on disability-inclusive ESG. For instance, regulators may talk about reporting requirements, companies about their practices, and raters about their methodology through frameworks. The following sub-sections include a description of disability inclusion work within ESG frameworks from three key stakeholder groups: companies, investors, and rating providers.

## 2.1. Companies

The following sub-sections on the role of companies in disability-inclusive ESG practices and reporting first address the use of materiality assessments to determine companies' priority issues when it comes to their ESG work. Subsequently, five key challenges that companies commonly face when working on the inclusion of persons with disabilities generally, including in relation to ESG, are addressed by offering several solutions for each challenge.

### 2.1.1. Materiality Assessments

Materiality in ESG reporting refers to the principle of identifying and focusing on issues that are most significant, or "material", to the organization's ability to create, preserve, or erode economic, environmental, and social value for itself and its stakeholders. Essentially, a materiality assessment in this context helps determine which ESG factors are important to report on, based on their impact on the organization's performance and the interests of its stakeholders.

Materiality is **dynamic** and can change over time due to evolving regulations, stakeholder expectations, and market conditions. Additionally, material issues can vary significantly between **sectors and industries**. For example, water usage might be highly material for a beverage company but less so for a software company. As part of the **materiality assessment**, a company may consider different types of materiality.

- 1. Financial Materiality:** Material issues are those that can significantly affect the financial condition, including revenue, costs, profitability, and access to capital, over the short, medium, or long term. These issues can affect the operational performance or overall strategy of the company.
- 2. Impact Materiality:** The company evaluates the actual or potential positive or negative effects of its activities on stakeholders, including people, communities, and the environment. These, in turn, impact the company’s operations, upstream and downstream value chain, including products and services, business relationships, as well as reputation.
- 3. Double Materiality:** Double materiality encompasses two perspectives: the impact materiality (inside-out) and the financial materiality (outside-in). The inside-out approach focuses on the tangible effects that a company and its operations have across the entire value chain. These effects can be real or potential, positive or negative, and can manifest in the short, medium, or long term. On the other hand, the outside-in approach examines how sustainability-related factors can influence a company’s financial performance. This dual perspective ensures that the company addresses both its own sustainability risks and opportunities, as well as its broader societal and environmental responsibilities.

An example of an ESG issue a company might report on under double materiality is labour practices, specifically working conditions and employee welfare. This issue is crucial because it directly affects the well-being of employees, which in turn impacts the broader community and society. Poor labour practices can lead to negative social outcomes, such as poor health, decreased productivity, and increased inequalities. Therefore, labour practices make it a significant issue for stakeholders who are concerned with the company’s social impact and ethical behavior, as well as its financial performance, given the impact on productivity and retention.

After a company has performed a materiality assessment and created a priority matrix of ESG-related issues that are considered material, the company can set specific targets for the short, medium, and long term to show progress of their actions to address these issues. Box 3 describes a materiality assessment conducted by Atos, an information technology company, which approaches disability exclusion similarly to how one would address a negative externality.

### Box 3: Treating exclusion like pollution: Atos

Atos, a global leader in digital transformation, approaches disability exclusion as a negative externality, akin to environmental impacts. This framing is crucial as it emphasizes that disability exclusion is not merely a social issue but a detrimental factor that can affect a company's overall performance and reputation. By treating disability exclusion with the same seriousness as environmental externalities, Atos integrates it into their risk management and strategic planning processes, highlighting the importance of inclusivity in their overall business model. This perspective drives proactive efforts to create inclusive workplaces, ultimately leading to enhanced employee satisfaction, improved innovation, and better financial outcomes, aligning with broader ESG goals and investor expectations.

Atos takes a Full Ecosystem Accessibility approach, aiming to reduce exclusion by making cumulative improvements across all business areas. The impact on accessibility and digital inclusion is categorized into three scopes:

- Direct impact from its own resources, products, and services.
- Indirect impact from purchased resources, products, and services.
- Influence within the entire value chain, including both upstream and downstream activities.

**Source:** The Valuable 500. [Atos](#).

Currently, disability has not yet emerged as a material topic in materiality analyses of clients of major audit and assurance companies, given their prioritization of other topics. While people with disabilities are recognized as a group, albeit a highly diverse population to consider, the current view from an audit and assurance perspective is that it is unlikely to emerge as a topic posing significant financial risks or opportunities for companies – based on current standards and frameworks. However, the risk is the company's inadequate performance in three key areas: as an employer of individuals with disabilities, as a provider of accessible goods and services, and as a responsible corporate citizen in promoting disability inclusion.

## 2.1.2. Solutions to Five Key Corporate Challenges

This sub-section of the guide highlights five challenges related to corporate disability inclusion efforts and respective solutions identified through desk research and further explored in a validation workshop, as acknowledged in the guide's acknowledgements section.



**Challenge 1:** Companies tend to create homogeneity and assumptions about groups of demographics that inform work culture, employment, accessibility, knowledge, and communication. However, the topic of disability inclusion encompasses a **broad spectrum**, including apparent and non-apparent disabilities as well as intersecting

identities of persons with disabilities (see sub-section 1.3.), making it challenging to group such varied experiences and needs.

## Solutions:

- With more than one billion people with disabilities worldwide, companies need to avoid treating them as a homogenous group. The identities, needs, and sense of community among individuals with disabilities vary widely, including regarding the types and severity of their disabilities. Companies should **respect these differences and create opportunities for employees with disabilities to connect and find commonality**, fostering respect and trust within the community of persons with disabilities.
- Using the **UN Convention on the Rights of Persons with Disabilities (CRPD) definition of disability** is crucial as it provides a global, holistic framework that emphasizes the social model of disability, promoting equality and inclusion. This approach recognizes that barriers faced by people with disabilities are societal, aligning with international human rights standards. It ensures a consistent understanding and application of disability rights, fostering global cooperation and inclusive practices, even if individual countries may still use a medical model at the national level.
- To better understand the needs of persons with disabilities, companies should **engage with organizations of persons with disabilities** and the broader disability community, as well as **industry associations, policymakers, and other stakeholders**, to understand how to include and support employees with disabilities. These partnerships can help companies identify and address gaps in their disability inclusion practices, even in the face of varying country-specific legislation<sup>29</sup>. Country profiles, which offer brief overviews of relevant laws, employment quota legislation, advisory bodies, as well as national business and disability networks, can be found on the ILO GBDN website<sup>30</sup>.



**Challenge 2:** There remain **differences in the level of corporate maturity and prioritization of disability inclusion**, which can lead to significant variations in company performance across industries and sectors. In addition, while **smaller companies** can take a more personalised approach to disability inclusion in the workplace, they often lack relevant resources and may have difficulties in acquiring disability and accessibility expertise. In contrast, **larger companies**, despite potential bureaucratic hurdles, are more likely to have discretionary budgets<sup>31</sup>, comprehensive talent strategies, and dedicated in-house HR functions.

## Solutions:

- **Every company is on a unique journey toward disability inclusion.** Making changes requires time and reflection. However, raising self-awareness, collaborating with the public sector and disability organizations, and setting meaningful, measurable, incremental goals are crucial steps. These efforts should align with a broader objective of integrating disability inclusion into the business strategy. By doing so, companies can gradually build a more inclusive environment, ultimately benefiting from a more diverse workforce and increased productivity.

<sup>29</sup> Ludke R. 2021. [The ESG Imperative of Disability Inclusion](#).

<sup>30</sup> ILO GBDN. [Country profiles](#).

<sup>31</sup> ILO GBDN. 2023. [Disability inclusion in small and medium-sized enterprises](#)

- Secure **leadership buy-in or executive support**, as it is crucial for good governance in disability inclusion initiatives. Support from the top of the organization can ensure long-term commitment, necessary resources, and cultural influence to overcome attitudinal barriers. Increased integration of disability inclusion in ESG frameworks can also help to secure more leadership buy-in, which can support DEI managers. Box 4 provides guidance from the British International Investment (BII) on disability inclusion, including leadership buy-in.
- Conduct an **inclusion and accessibility assessment**, including physical and digital environments, and set measurable goals to fill the gaps. Focus on key factors in this assessment, such as hiring practices and promotion equity, and build a comprehensive assessment from there.
- Create space for **dialogue and feedback**, including employee resource groups, and ensure that mentorship programs are accessible to all. Systematically tie results and feedback from these programs into business policy, and report on their progress at the board level to ensure visibility and guidance<sup>32</sup>.
- **Report on good practice and engage in honest peer-to-peer learning** to create a collective agenda to become more inclusive. Collaborate with disability organizations and like-minded companies, e.g., through national business and disability networks as well as the ILO GBDN, and leverage industry frameworks to drive good practices. During ESG-related materiality assessments, raise disability inclusion as a priority amongst the list of topics, and share targets and progress of inclusion with the investor community.
- Use the **Ten Principles of the United Nations Global Compact** – which cover human rights, labour, environment, and anti-corruption – as they provide a comprehensive framework for responsible business conduct. These principles can promote corporate behaviors that support sustainable development and social equity<sup>33</sup>.

#### Box 4: Guidance on disability inclusion in companies

The BII provides guidance on disability inclusion in a company in four areas.

**Leadership and Governance:** Commitment from a board of directors and senior management can create a supportive and inclusive organisational culture. Senior managers are advocates for disability inclusion and have become champions in their companies.

**Budget:** Implementation and monitoring of adjustments for employees requires a budget, but not as much as many expect. Managing the budget from senior leadership or the board is key, as placing it within the provision of smaller company channels can create a siloed effect of disability inclusive practices.

**Training:** Knowledge of accessibility features can help all employees embrace them, not just people with disabilities. Training can also help address attitudinal barriers that can lead to discrimination across and within a company. It is also important to provide equitable training to people with disabilities to help them progress in their careers.

**Policies and Procedures:** Commitments and actions to address legislative compliance, such as anti-discrimination laws, return-to-work regulations, and accessibility regulations are key. This element also includes disability-inclusive operations, products, services, and communications. It further includes prevention and response

<sup>32</sup> Wool H, et al. 2023. [Your Workforce Includes People with Disabilities. Does Your People Strategy?](#)

<sup>33</sup> The UN Global Compact has over 25,000+ participants from 165+ countries and 60+ country networks, highlighting its significant influence in promoting responsible investment practices globally. More information is available on the United Nations Global Compact [website](#).

to discrimination, violence, and harassment against people with disabilities. Reporting of the implementation of all policies and procedures should go to senior management and the board.

**Source:** BII (formerly CDC Group). 2021. [Disability Inclusion Guidance for Companies](#).



**Challenge 3:** There are **complexities in quantifying and qualifying the business benefits of disability inclusion**, which can vary, depending on the industry, sector, and local context<sup>34</sup>. Another related challenge lies in the complexity of measuring societal change in the near and far future.

#### Solutions:

- To further promote inclusivity, a company should first **reflect on its current practices, identify gaps relative to global inclusion standards, and create a plan to address these gaps**. Adopting industry-wide best practices ensures inclusivity across the entire organization. Additionally, tracking data such as employee retention rates can help measure the business benefits of disability inclusion. This comprehensive approach includes people with disabilities into the company’s operations, making the workplace fairer and more supportive for everyone.
- The [Global Impact Investing Network IRIS+ framework](#) is a comprehensive system that impact investors use to inform their theory of change by providing standardized metrics and methodologies for measuring, managing, and optimizing impact<sup>35</sup>. Companies can leverage this framework to build **evidence-based research** to support their initiatives aimed at employees and customers with disabilities. By adopting IRIS+ metrics, organizations can systematically collect, analyze, and report data on their social and environmental impact, ensuring their efforts are effective and aligned with broader impact goals. This **structured data tracking** can help build a business case for companies with quantitative and qualitative datasets which can otherwise be missed. This structured approach helps in demonstrating commitment to inclusivity, enhancing transparency, and driving continuous improvement in disability support initiatives.



**Challenge 4:** As companies try to capture more information about their employees, **they may face significant challenges in capturing adequate disability related data due to low or inaccurate self-identification rates**. These challenges are compounded if employees must “prove” their disability, e.g., by obtaining written documentation.

As such, people with disabilities may be omitted from broader reporting as well as internal targets.

#### Solutions:

- Companies which have created a **culture of trust** between employees and management tend to see a greater tendency for employees with disabilities to share this information. Box 5 provides

<sup>34</sup> The Valuable 500. 2023. [Let’s Discuss: Disability Inclusion and ESG](#).

<sup>35</sup> Global Impact Investing Network. [IRIS+: Your Source for Impact Measurement & Management](#).

additional insights into the role of trust in getting disability related data.

- **Anonymous surveys** are essential for companies to gain information on the share of employees with disabilities in their workforce and identify specific barriers they face. **This anonymity encourages employees to self-identify as having a disability without fear of negative repercussions.** This approach ensures that feedback is genuine, leading to more effective and targeted interventions<sup>36</sup>.
- While there may be situations in which companies require medical documentation, e.g., when trying to comply with disability employment quota systems that make such documentation mandatory<sup>37</sup>, when it comes to ESG reporting, **companies should not require medical documentation.**

### Box 5. Disability data and trust: building social license to operate

Trust is a fundamental value that underpins the engagement of any employee in companies, including people with disabilities. It can create positive relationships between employers and employees with disabilities. Trust is also a crucial step in ensuring safe, unbiased data collection. Without trust, employees with disabilities may lose motivation, productivity, and loyalty, ultimately impacting the organization's success and reputation<sup>38</sup>, all of which would affect a company's ESG reporting and ESG score.

**Trust promotes loyalty, respect, and psychological safety.** Psychological safety based on trust improves an organization's competitiveness in the marketplace, by leading to increased productivity, job satisfaction, and overall organizational success.

**Trust requires transparency, active listening, and fair treatment.** Employees with disabilities want open and confidential communication, active listening to their concerns, real responses, transparency, and fairness, specifically regarding actions involving their disability.

**Trust requires continuous effort and investment.** Building and maintaining trust with the workforce generally, including employees with disabilities, is an ongoing process that requires continuous effort and investment. Actions that can break trust include a lack of transparency, micromanagement, broken promises, inflexibility, failure to provide fair and effective reasonable accommodations, and other unfair treatment related to people with disabilities.

**Sources:** ILO GBDN. 2023. [Trust and self-identification: Measuring success in changing corporate cultures](#); The Valuable 500. 2024. [Self-ID Resource Guide](#); Untapped Accessibility. 2024. [Starting with trust: how strong relationships create inclusive workplaces](#).



**Challenge 5:** There are also varying legal and regulatory requirements for including people with disabilities in the workforce across countries and regions, complicating the establishment of employment targets. This challenge makes it difficult to compare companies' performance across industries, sectors, and countries.

#### Solutions:

- Global companies can create a unified HR system to effectively capture and standardize disability metrics from companies operating in different legislative environments, as well as leverage the

<sup>36</sup> The Valuable 500. 2024. [Self-ID Resource Guide](#).

<sup>37</sup> ILO. 2019. [Promoting Employment Opportunities for People with Disabilities: Quota Schemes \(Vol.1\)](#).

<sup>38</sup> Bonaccio S, et al. 2019. [The Participation of People with Disabilities in the Workplace Across the Employment Cycle: Employer Concerns and Research Evidence](#).

influence of country champions of disability inclusion, create peer-to-peer exchange and learning opportunities.

- Advocating for the inclusion of disability-related and disability-specific metrics in global ESG reporting frameworks, as well as using adaptable metrics and KPIs that can be catered to national legislative requirements can help achieve more consistent disability inclusion self-identification worldwide.
- Companies should consider adopting a global disability inclusion framework, like the principles outlined in the [ILO GBDN Charter](#). This approach helps navigate differing country-specific legislation while promoting consistent disability inclusion practices worldwide. This approach also shows the importance of reporting in diverse subject areas, which go beyond workforce representation, which is often connected to country-specific regulations.

## 2.2. Investors

While traditional financial and strategic considerations remain primary drivers for investment decisions, the importance of ESG factors, including disability inclusion, is growing. Investors, including individuals and institutions that prioritize sustainability and ethical considerations in their investment decisions, increasingly recognize that companies committed to inclusive practices contribute to social good and perform better financially. For example, a coalition of investors, including Bank of America and TD Bank, who manage over USD 2.8 trillion in assets, recently issued a Joint Investor Statement on Corporate Disability Inclusion. This statement urged companies they invest in to cultivate inclusive workplaces by actively recruiting and supporting individuals with disabilities<sup>39</sup>. As an investor, the World Bank Group’s International Finance Corporation (IFC) is increasing its investment focus on inclusion, guided by its Performance Standards<sup>40</sup> and commitment to the UN SDGs. The IFC emphasizes the concept of “Return on Disability”, suggesting that actively including persons with disabilities can give companies a competitive edge and higher financial returns<sup>41</sup>.

### 2.2.1. Drivers of Investment

**Regulation** plays a crucial role in shaping investors’ decisions, as standards set the stage for transparency, accountability, and ethical practices that companies must follow. Investment regulation around the world increasingly emphasizes ESG considerations, with key frameworks such as the European Union’s **Sustainable Finance Disclosure Regulation (SFDR)** and the **United States Securities and Exchange Commission (SEC)** leading the charge. The SFDR mandates financial market participants

<sup>39</sup> IFC. 2022. [Inclusive Banking for Persons with Disabilities](#).

<sup>40</sup> IFC’s Performance Standards serve as a global benchmark for managing environmental and social risks, providing guidance on issues ranging from labor rights to climate change. Source: IFC (International Finance Corporation). Source: IFC. 2012. [IFC Performance Standards](#).

<sup>41</sup> IFC. 2022. [Inclusive Banking for Persons with Disabilities](#).

to disclose how they integrate ESG factors into their investment decisions, enhancing transparency and promoting sustainable investments. Similarly, the SEC has proposed rules requiring public companies to disclose climate-related risks and non-financial metrics. Other notable regulations include the United Kingdom's **Financial Conduct Authority (FCA)** rules on climate-related disclosures, Japan's **Financial Services Agency (FSA)** guidelines on non-financial investment, and Australia's **Australian Securities and Investments Commission (ASIC)** emphasis on climate risk. While many of these regulators focus heavily on the 'E' and 'G' in ESG, there is growing awareness and consideration of the 'S' pillar<sup>42</sup>.

Investors use several guiding frameworks, mandatory or voluntary, to inform the way they look at non-financial aspects of reporting. One example is the **Principles for Responsible Investment (PRI)**, which was convened by the UN Secretary-General, to make well-informed ESG investment decisions. These principles guide investors to integrate ESG factors into their analysis and ownership practices, aiming for sustainable, long-term returns. By committing to the PRI's six principles, investors pledge to incorporate ESG issues into investment processes, be active owners, and promote transparency.

The PRI has become widely adopted in the investment world, with over 4,000 signatories representing more than USD 120 trillion in AUM, reflecting its significant influence and commitment to responsible investment practices globally<sup>43</sup>.

The **Taskforce on Inequality and Social-related Financial Disclosures (TISFD)** is a global initiative aimed at helping businesses and investors identify, assess, and report on inequality and social-related risks, opportunities, and impacts. Launched in September 2024, the TISFD is driven by a diverse multi-stakeholder working group made up of over 20 organizations, including the ILO<sup>44</sup>.

The Taskforce aims to develop disclosure recommendations that integrate both impact materiality and financial materiality perspectives, and seeks to examine the materiality of inequality as a systemic risk. The goal is to develop a disclosure framework that mitigates financial risks, strengthens economic resilience, and promotes human rights and development, leading to improved well-being for all<sup>45</sup>.

By reducing systemic risks and enhancing financial stability, the TISFD seeks to improve outcomes for all individuals.

## 2.2.2. Approaches and Methods

Investors approach ESG issues through a variety of strategies and methodologies to ensure their investments in companies are responsible, sustainable, and potentially more resilient over the long term. By using these various approaches, investors can address ESG issues in a way that aligns with their values, manages risk, and seeks to create positive environmental and social outcomes alongside financial returns. This sub-section presents some of the ways investors approach ESG issues, with hypothetical and real referenced examples of how they may address investment choices related to disability inclusion.

<sup>42</sup> Sloggett J and Reinboth B. 2017. [ESG Integration: How are Social Issues Influencing Investment Decisions?](#)

<sup>43</sup> PRI. [About the PRI.](#)

<sup>44</sup> The Taskforce on Inequality and Social-related Financial Disclosures. [Working Group Members.](#)

<sup>45</sup> The Taskforce on Inequality and Social-related Financial Disclosures. [TISFD Proposed Scope and Mandate.](#)

**Negative Screening:** Avoiding investments in companies or industries that do not meet specific ESG criteria, such as those related to tobacco, fossil fuels, or weapons. Investors may exclude companies from their investment portfolios if they fail to comply with inclusion standards or have a history of discrimination, including disability-based discrimination at the workplace.

**Positive Screening:** Actively selecting companies or sectors that perform well on ESG criteria, such as renewable energy, social enterprises, or companies with strong governance practices. Investors might choose companies recognized for their inclusive HR practices or for their efforts to create an accessible workplace.

**Thematic Investing:** Investing in themes or sectors specifically related to ESG issues, such as clean energy, sustainable agriculture, or affordable housing. For example, investors may focus on companies developing assistive technologies, like Tobii<sup>46</sup>, which creates eye-tracking devices to help individuals with disabilities communicate and interact with technology.

**Impact Investing:** Investing with the intention to generate a measurable, beneficial social or environmental impact alongside a financial return. The Disability Impact Fund focuses on investing in mission-driven companies within the disability sector.

Through debt financing and management support, the Fund aims to drive both business and impact growth for the companies in which they invest<sup>47</sup>. Another example is the Ford Foundation, which engages in impact investing with a focus on social justice, including disability inclusion through various initiatives and partnerships<sup>48</sup>.

**Socially Responsible Investing (SRI):** Aligning investment choices with personal or institutional values, often overlapping with ESG criteria but driven by ethical considerations. This could involve investing in companies that are leaders in creating inclusive work environments and products.

**ESG Integration:** Integrating ESG factors into the investment decision-making process to identify risks and opportunities related to environmental, social, and governance issues<sup>49</sup>. This could entail integrating disability inclusion metrics into the overall ESG analysis by assessing a company’s policies on hiring, accommodating, and supporting employees with disabilities, for instance.

**Engagement and Stewardship:** Engaging with companies as active shareholders to influence their ESG practices, including voting on shareholder resolutions and engaging in dialogues with management. An asset management firm may engage with companies to enhance their disability inclusion policies, such as advocating for better workplace accommodations and inclusive recruitment practices.

<sup>46</sup> More information about Tobii is available on their [website](#).

<sup>47</sup> Disability Impact Fund. [Our Approach](#).

<sup>48</sup> Ford Foundation. [Disability Rights](#).

<sup>49</sup> BlackRock. [Building more resilient portfolios](#).

### 2.2.3. Disability Inclusion and Financial Implications

Financial performance and market value<sup>50</sup> are critical indicators of a company's success and can influence investor confidence, business decisions, and strategic planning. The impact of disability inclusion initiatives on corporate financial performance indicators, such as revenue growth, profitability, and market share, is emerging, and more research in this area is warranted. In one study, companies embracing disability inclusion practices had 28% higher revenue, double the net income, and 30% higher economic profit margins compared to their peers<sup>51</sup>. While there may be a correlation between these variables presented, the mechanisms of causation are unclear and should be further studied. However, by reporting on disability inclusion practices, companies signal their commitment to sustainable growth, which can be appealing to investors seeking long-term value and positively impacting market perceptions and shareholder confidence. For example, companies in the United States are mentioning disability inclusion-related factors in their 10-K filings<sup>52</sup>, indicating greater transparency on the topic. Employees are also paying attention to companies' disability inclusion efforts, as evidenced by Glassdoor reviews, which are getting twice as many positive reviews on aspects of disability inclusion<sup>53</sup>.

Disability inclusion extends beyond employee representation to a large consumer market for companies to tap into. Despite lower average incomes, people with disabilities' combined disposable income exceeds USD 8 trillion<sup>54</sup>. Including the 3.3 billion friends and family of persons with disabilities expands the potential consumer base to over USD 13 trillion in annual disposable income<sup>55</sup>. This sizable consumer segment, known for brand loyalty, offers opportunities for long-term customer retention and market expansion<sup>56</sup>.

Additionally, the inclusion of individuals with disabilities in advertising and the employment of employees with disabilities contribute to a more favorable perception of companies within the broader consumer market, encompassing both persons with and without disabilities. For instance, the findings of an April 2023 survey of 2,200 United States adults showed that 84% of respondents have a favorable view of companies that include people with disabilities in their advertising. Additionally, 80% of respondents expressed a desire to increase business with such companies<sup>57</sup>.

<sup>50</sup> Financial performance and market value refer to the measures of a company's profitability, efficiency, and overall financial health, as well as its perceived worth in the marketplace. Financial performance indicators include metrics such as revenue, profit margins, return on investment, and cash flow. Market value reflects investors' perceptions of a company's future earnings potential and growth prospects, as evidenced by its stock price and market capitalization.

<sup>51</sup> Accenture. 2023. [The disability inclusion imperative.](#)

<sup>52</sup> A 10-K is an extensive annual filing that public companies submit to the US Securities and Exchange Commission (SEC) detailing their financial performance. This report, mandated by the SEC, provides in-depth information surpassing that found in the standard annual report.

<sup>53</sup> Accenture. 2023. [The disability inclusion imperative.](#)

<sup>54</sup> Caroline C. 2020. [Do Your DI Efforts Include People with Disabilities?](#)

<sup>55</sup> Caroline C. 2023. [Disability Inclusion Means Action.](#)

<sup>56</sup> Nielsen. 2016. [Reaching Prevalent, Diverse Consumers with Disabilities.](#)

<sup>57</sup> Disability:IN. 2024. [2023 DEI Disability Equality Index.](#)

## 2.3. Rating Providers

Rating agencies provide independent assessments of companies’ financial and non-financial performance, resulting in ratings. Investors may use these ratings in their decision-making processes to decide in which companies to reduce, continue, or grow their investment. While there are several categories of information that rating providers may use to derive their ratings, people with disabilities as employees and consumers are rarely featured in these methodologies. Where they are referred to, they are often restricted to the workforce representation metrics, which do not, by themselves, capture the professional experience and growth of people with disabilities within companies. Practices to capture data on persons with disabilities are also inconsistent across rating providers.

The following sub-sections highlight the explicit inclusion of disability-related metrics in selected, publicly available rating methodologies. The purpose of these sub-sections is to present the current landscape of these metrics in selected rating agencies, establishing a baseline for improving both the metrics’ quantity, quality, and weighting. Actions by rating agencies to improve relevant metrics will reflect the value of disability inclusion from a company’s reporting perspective and from an investor’s decision-making perspective.

### 2.3.1. S&P Global

ESG analysts at S&P Global’s Corporate Sustainability Assessment (CSA) identify key global sustainability challenges to shape their assessment criteria across various industries. These criteria, which include Corporate Governance, Human Capital Development, and Risk and Crisis Management, make up 40-50% of the assessment. The rest of the assessment targets industry-specific risks and opportunities linked to economic, environmental, and social trends. S&P Global’s Sustainable1 evaluates companies on their understanding of sustainability issues, strategy implementation, progress, and the quality of their reporting<sup>58</sup>. This assessment, which contributes to the Dow Jones Sustainability Indices, includes questions on tracking workforce demographics and publicly disclosing disability representation. According to S&P Global’s CSA DEI thematic analysis in 2021<sup>59</sup>, the evaluation sheds light on how companies address issues related to people with disabilities. The analysis includes ten questions that explore aspects like board diversity, discrimination and harassment, and gender pay indicators. Specifically, people with disabilities are included in the “workforce breakdown: other minorities” category, where S&P Global examines whether companies monitor workforce diversity by collecting and disclosing data on employees from underrepresented groups, including those with disabilities, LGBTQI+ status, or different age groups. Companies achieve full marks if they publicly report on at least one of these diversity indicators. However, the assessment does not specify job levels or tenure for employees with disabilities.

<sup>58</sup> S&P Global. [ESG CSA Methodology](#).

<sup>59</sup> This analysis is based on assessments of 1,863 companies across 11 industry groups in five regions, covering various ESG topics.

## 2.3.2. MSCI

MSCI Research Products and Services deliver research, ratings, and analysis of ESG practices worldwide. Out of 33 key issues across the ESG pillars, each company is evaluated on two to seven Environmental and Social issues relevant to its exposure to potential ESG risks, driven by industry-specific and market-specific factors. All companies are assessed on the Governance pillar, focusing on Corporate Governance and Corporate Behavior. These ratings also consider a company's alignment with market demand for environmentally and socially beneficial products and services, where applicable. Furthermore, management measures are considered, based on governance structures, policies, performance metrics, and controversies in relation to aggregate ESG risks and opportunities<sup>60</sup>.

Among the 33 key issues, persons with disabilities are explicitly addressed within the 'S' pillar, specifically under human capital and social opportunities.

Within human capital, there are four key issues, one of which is labour management. Here, MSCI examines the extent to which a company's workforce is eligible for significant non-compensation benefits, with the ideal practice being comprehensive coverage for all employees, including employees with disabilities<sup>61</sup>. Within social opportunities, there are three key issues, one of which is access to health care. This reference to people with disabilities applies to a niche set of companies in the pharmaceutical industry. Here, MSCI assesses whether companies publicly endorse the introduction of generic drugs into the market to enhance the affordability of treatments for targeted diseases. This evaluation extends to patented drugs, generics, vaccines, and medical devices<sup>62</sup>.

Another of their methodologies, the MSCI SDG Alignment methodology, assesses how well each company aligns with the 17 Sustainable Development Goals (SDGs), known as SDG Net Alignment, expressed as both a numerical score and a categorical assessment. MSCI provides scores and evaluations for companies' operations and product alignment with each SDG. Specifically, operational alignment factors, including impact on customers, which refer to people with disabilities, are considered when assessing alignment with SDG 3 (health) and SDG 4 (education). As such, controversies related to customers are considered for companies operating within the health and education sectors under these two SDGs<sup>63</sup>.

## 2.3.3. EcoVadis

EcoVadis provides sustainability ratings and is committed to fostering responsible business practices throughout diverse industries and supply chains globally. Specializing in sustainability assessments, EcoVadis evaluates companies on key themes including environment, labour and human rights, ethics, and sustainable procurement. They describe their assessment methodology as involving a comprehensive approach, incorporating questionnaire responses, document reviews, independent

<sup>60</sup> MSCI. 2024. [MSCI ESG Ratings Methodology](#).

<sup>61</sup> MSCI. 2023. [MSCI ESG Ratings Methodology: Labour Management Key Issue](#).

<sup>62</sup> MSCI. 2023. [MSCI ESG Ratings Methodology: Access to Health Care Key Issue](#).

<sup>63</sup> MSCI. 2024. [MSCI SDG Alignment Methodology](#).

third-party input, and direct communication with evaluated companies to provide an in-depth analysis of sustainability performance<sup>64</sup>.

Within labour practices, EcoVadis places a spotlight on DEI. While disability inclusion is a facet of broader DEI considerations, EcoVadis ensures its significance by incorporating both direct disability-related questions and indirect references across all purchasing categories. Companies are given the opportunity to demonstrate their commitment to disability inclusion by showcasing DEI policy frameworks, actions promoting the inclusion of employees with disabilities, and reporting progress, such as the proportion and level of employees of minority groups in companies. By integrating disability inclusion within DEI, EcoVadis aims to ensure that people with disabilities can be a part of its evaluation of a company’s dedication to responsible labour practices<sup>65</sup>.

### **2.3.4. FTSE**

FTSE, through its ESG Ratings, plays a role in promoting disability inclusion within the broader ESG framework. The FTSE ESG Ratings, which guide the selection of companies for the FTSE4Good Index Series, provide a comprehensive evaluation based on an overall ESG Rating, detailed into pillar and thematic scores. These scores are derived from 350 indicators spanning 14 themes that cover key operational issues, including the social aspect of ESG.

FTSE’s methodology includes both qualitative assessments of management practices and quantitative measures of corporate data disclosure. Specifically, within the social supply chain theme, under the ‘S’ pillar, FTSE considers people with disabilities through the indicator “property accessibility: disabled persons, also public transport”<sup>66</sup>.

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<sup>64</sup> EcoVadis. 2023. [What is the EcoVadis methodology?](#)

<sup>65</sup> EcoVadis. 2019. [EcoVadis CSR Rating Methodology: Scoring Principles.](#)

<sup>66</sup> ESG FTSE Publications. [Integrating ESG into investments and stewardship.](#)

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