

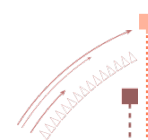
Inclusive Reporting:

A Business Guide to Disability and the European Sustainability Reporting Standards



Table of contents

Executive summary	3
I. Introduction.....	7
II. Background.....	10
a) The value of sustainability reporting.....	10
b) What are the European Sustainability Reporting Standards (ESRS)?.....	11
c) Disability in the CSRD and ESRS: an overview	12
d) A shifting regulatory landscape.....	14
III. Double Materiality and Disability in the ESRS	17
a) Double Materiality in the ESRS.....	17
b) IROs and persons with disabilities	19
IV. Disability in the ESRS – what are the specific disclosure requirements?	22
a) Disclosures not subject to materiality assessment	23
b) Disclosures subject to materiality assessment.....	23
ESRS S1 – Own Workforce.....	24
S1-1 Policies related to own workforce	25
S1-2 Process for engaging with own workforce and workers' representatives about impacts	26
S1-11 Social protection.....	27
S1-12 Persons with disabilities.....	28
S1-17 Incidents, complaints and severe human rights impacts.....	29
Connection with ESRS 2 – “General Disclosures” on interests and views of stakeholders (SBM-2) and material IROs and their interaction with its strategy and business model (SBM-3).....	29
ESRS S2 – Workers in the Value Chain	30
S2-2 Processes for engaging with value chain workers about impacts.....	30
.....	30
ESRS S4 – Consumers and end users.....	31
S4-2 Processes for engaging with consumers and end-users about impacts	31
V. Conclusions.....	33
VI. Annexes	35
Acknowledgments	38
About Disability Hub Europe.....	38



Executive summary

The adoption and subsequent entry into force of Directive (EU) 2022/2464 on corporate sustainability reporting (the so-called Corporate Sustainability Reporting Directive, CSRD) marked a major milestone for the inclusion of persons with disabilities as an integral part of corporate sustainability strategies.

For the first time since EU legislation regulated corporate reporting, thanks to the CSRD and its accompanying European Sustainability Reporting Standards (ESRS), companies subject to reporting must evaluate – based on a 'double materiality' assessment – and eventually disclose not only financial risks and opportunities, but also their broader environmental, governance and societal impacts, including those affecting persons with disabilities.

Inclusive Reporting: A Business Guide to Disability and the ESRS was developed by Disability Hub Europe (DHub, a project of the ONCE Foundation) in partnership with European National Business and Disability Networks that are members of the ILO Global Business and Disability Network (ILO GBDN).

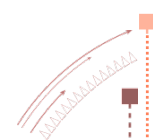
While providing an analysis of the specific measures and requirements as regards persons with disabilities both in the CSRD and the ESRS, the Guide also draws from previous DHub analysis on disability and sustainability reporting, notably previous guidance documents developed in partnership with the Global Reporting Initiative (GRI) as well as guidance documents on disability inclusion and ESG reporting (including under the ESRS) published by the ILO GBDN.

The aim of this Guide is to help companies align disability inclusion with ESRS requirements across strategy, governance, operations, and disclosures.

This Guide acknowledges the purpose of the Omnibus proposals about future simplification of the CSRD and the effect that this will have for the ESRS. However, this Guide also embraces the premises that burden reduction and simplification is also achieved by providing clarity to practitioners and interested stakeholders. The authors of this guide hope that this guidance will help illustrate what disability means and how to assess it by the companies that are either reporting under ESRS or working on sustainability reporting.

Why does this matter?

- **Legal requirements:** disability is now embedded in EU sustainability legislation through the Corporate Sustainability Reporting Directive (CSRD) and in the ESRS.



- **Strategic opportunities:** inclusive reporting enhances brand reputation, attracts investors, allows for greater access to untapped talent pools, and helps mitigate legal and reputational risks.

Key Actions & Recommendations for Companies

1. Integrate Disability in Materiality Assessments

- **Action:** Include "employment and inclusion of persons with disabilities" in your double materiality assessments.
- **Recommendation:** Engage directly with persons with disabilities and their representative organizations during stakeholder consultations.
- Use this approach to **identify Impacts, Risks, and Opportunities (IROs) related to disability** across your operations and value chains.

2. Strengthen policies to support companies' strategies

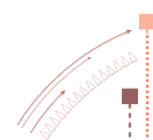
- **Action:** adopt or revise workplace non-discrimination, accessibility, and inclusion policies.
- **Recommendation:** ensure that company's policies:
 - Cover disability explicitly as a discrimination ground.
 - Include affirmative action commitments.
 - Are linked to procedures for implementation, monitoring, and mitigate/remediate negative impacts.
- **Align with international frameworks** like the United Nations Convention on the Rights of Persons with Disabilities (CRPD), ILO labour standards, and the European Accessibility Act.

3. Report on Disability across the ESRS Standards

Under the ESRS, companies are required to disclose disability-related information when the employment and inclusion of persons with disabilities are deemed material through the double materiality assessment.

ESRS 2 – General Disclosures (Mandatory)

- **Action:** include percentage by gender and other aspects of diversity for the members of the company's administrative, management and supervisory bodies/board that the company considers. Disability may be recognised as a fundamental dimension of diversity.



- **Recommendation:** describe how top leadership incorporates disability perspectives in strategy and risk oversight.

ESRS S1 – Own Workforce

- **Action:** disclose on Policies, Actions and Targets (PAT) plus some disability-specific metrics when disability is a material sustainability matter:
 - S1-1 on policies.
 - S1-2 on engagement with workers' representation.
 - S1-4 on actions related to material impacts, risks and opportunities.
 - S1-5 on targets related to material impacts, risks and opportunities.
 - S1-11 on social protection.
 - S1-12 on persons with disabilities.
 - S1-17 on human rights impacts.
- **Recommendation:**
 - Set SMART targets (e.g. % of employees with disabilities, % of accessible facilities).
 - Train managers on inclusion and accessibility.
 - Implement and publicize inclusive hiring practices.

ESRS S2 – Workers in the Value Chain

- **Action:** assess how value chain practices affect workers with disabilities.
- **Recommendation:** promote accessible procurement and supplier diversity.

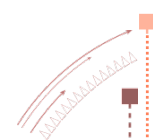
ESRS S4 – Consumers and End Users

- **Action:** report on policies related to consumers and end-users, including processes for assessing impacts, risks and opportunities concerning consumers as well as remediation mechanisms. Disability considerations should be integrated across all these aspects.
- **Recommendation:** use the European Accessibility Act as a benchmark for product design and digital access.

4. Additional practical steps as supplementary Guidance beyond the ESRS framework

Data Collection

- Develop lawful and culturally sensitive methods to collect data on disability.



- Disclose contextual information about data collection methodologies and definitions used.

Accessible Reporting

- Ensure that sustainability reports themselves are accessible to readers with disabilities (e.g., screen reader compatibility, accessible PDFs, plain language summaries).

Continuous Review

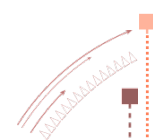
- Reassess materiality and update disability inclusion strategies regularly, reflecting stakeholder feedback and evolving legal standards.

The ESRS may serve as a strategic framework for responsible and sustainable business practices. By embedding disability in their operations and reporting, companies can:

- Future-proof their practices (Strengthen long-term resilience)
- Showcase leadership in inclusion, fostering an inclusive and equitable workplace environment.
- Drive innovation and unlock new markets through accessibility and diversity

Early adopters will not only comply with upcoming regulations but also gain reputational, operational, and market advantages. The ESRS is more than a compliance exercise: **it is a strategic tool.**

Companies that embed disability in sustainability governance, operations, and reporting will not only meet regulatory requirements but also demonstrate leadership, unlock innovation, and drive long-term value.

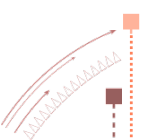


"We welcome this joint publication from ILO, Disability Hub and the ONCE Foundation, which sheds further light on what disability means and how to assess it for sustainability reporting purposes.

Persons with disabilities are a particular group of vulnerable affected stakeholders; therefore, providing illustrations on how to understand the impact on this group together with risks and opportunities that can arise is critical for reporting transparency on the ESRS S1-S4 Social standards.

Congratulations on this complementary piece of guidance that will help ESRS reporters."

Gemma Sánchez Danes
EFRAG Leadership – Social Lead



I. Introduction

The last five years have marked significant regulatory progress in advancing the inclusion of persons with disabilities in corporate sustainability legislation.

Among several regulatory frameworks adopted at the level of the European Union (EU) to strengthen the protection of people and the environment across companies, EU legislators adopted in 2022 Directive 2022/2464, known as the Corporate Sustainability Reporting Directive (CSRD)¹. The Directive sets new reporting obligations for companies operating in the EU and expanded the definition of "sustainability matters" to include environmental, social and human rights, and governance factors. To ensure regulatory coherence, this aligned with the broader definition of "sustainability factors" outlined in Regulation (EU) 2019/2088 (the Sustainability Financial Disclosure Regulation)².

Thus, the CSRD goes beyond financial reporting, as it integrates Environmental, Social and Governance (ESG) matters as part of the mandatory disclosures that companies within its remit must provide on an annual basis. Such reporting is enabled through the Directive's European Sustainability Reporting Standards (ESRS) – a secondary piece of legislation laying out the technical requirements for the CSRD to be implemented by companies³. Among a wide range of contents regarding the three pillars of sustainability (ESG) and following the provisions of the CSRD, the current ESRS incorporate multiple references addressing the employment and inclusion of persons with disabilities, reinforcing commitments to accessibility and equitable workforce participation.

The development of the ESRS drew on several existing frameworks, most notably the Global Reporting Initiative (GRI), a voluntary sustainability reporting framework extensively developed and adopted by a diverse group of stakeholders worldwide⁴. GRI-ESRS interoperability agreements have been substantiated to consolidate alignment between EU and global Standards.

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- ¹ <Directive (EU) 2022/2464 of the European Parliament and of the Council of 14 December 2022 amending Regulation (EU) No 537/2014, Directive 2004/109/EC, Directive 2006/43/EC and Directive 2013/34/EU, as regards corporate sustainability reporting (Text with EEA relevance)>
 - ² <Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability-related disclosures in the financial services sector (Text with EEA relevance)> which includes environmental, social, and employee matters, respect for human rights, and anti-corruption and anti-bribery concerns.
 - ³ <Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards>
 - ⁴ GRI, The global standards for sustainability impacts. See: <<https://www.globalreporting.org/standards/>>

Back in 2015, GRI and the ONCE Foundation - in the context of *Disability Hub Europe* project - collaborated to create the “*Disability in Sustainability Reporting*” guide⁵ (subsequently updated in 2019 and 2023). Since its first versions, the guide supported the inclusion of disability-related disclosures in line with GRI Standards and informed the discussions and processes that lead to the inclusion of disability within the CSRD and the ESRS.

Additionally, the International Labour Organisation (ILO)’s Global Business and Disability Network (GBDN) has provided comprehensive guidance on the intersection of disability inclusion and sustainability practices, including in ESG frameworks and the ESRS⁶. In 2024, the ILO GBDN launched its “*Business Leaders’ Pledge on Disability-Inclusive Sustainability Practices*”, signed by leaders from ten ILO GBDN company members that pioneer making disability inclusion an integral part of corporate ESG practices⁷.

The Austrian *myAbility* Business Forum, a member of both Disability Hub Europe and the ILO GBDN, also launched guidance on measuring disability inclusion and ESG reporting, including under the ESRS⁸.

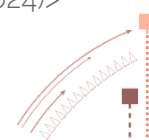
These and other relevant existing initiatives demonstrate the growing interest and progress in policy and regulation, standard-setting frameworks, business practices, and broader stakeholder engagement to integrate disability inclusion into sustainability strategies and therefore reporting.

⁵ <Global Reporting Initiative and Fundación ONCE, *Disability in Sustainability Reporting* (2023) >

⁶ International Labour Organisation, <Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors/ (2024)>

⁷ ILO GBDN <Sustainability and ESG efforts | ILO Global Business and Disability Network (2025)>

⁸ MyAbility, <Quantifying Progress: Inclusion of People with Disabilities in the Workplace (2024)>



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As it is discussed in [Section II\(d\)](#), 'A shifting regulatory landscape,' both the CSRD and the ESRS are currently subject to revision and simplification, with no definitive changes to existing legislation expected before 2026. In the meantime, the CSRD has been transposed in 20 EU countries, and multiple companies have already issued their sustainability reports in accordance with the ESRS.

Regarding disability-inclusive sustainability reporting, the current approach of the CSRD and ESRS is of a fundamental importance for companies committed to social sustainability, as it takes into consideration key aspects of diversity, equal opportunities, non-discrimination, and human rights — including disability and accessibility — from a comprehensive business value chain perspective.

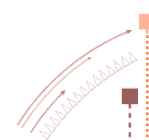
The content of this guide remains both important and relevant, especially considering that the existing rules continue to serve as the foundation for legal compliance, as well as the ongoing interest and proactive efforts by many businesses to improve and communicate their disability-inclusive strategies and practices.

II. Background

a) The value of sustainability reporting

Sustainability reporting has become a strategic imperative for companies operating in today's regulatory and stakeholder-driven landscape. Beyond compliance, sustainability reporting enables companies to systematically track and communicate how they manage environmental, social or governance impacts, risks and opportunities, and how they align their practices with evolving policy frameworks.

From a strategic perspective, sustainability reporting brings tangible external benefits. It enhances investor relations by attracting capital from sustainable investors who are prioritising transparency and ESG performance. At the same time, it builds trust with customers, employees, and communities by showcasing that reporting companies live up to their governance, social and environmental responsibilities. Transparency through sustainability reporting also strengthens corporate reputation and brand value, creating a competitive edge in markets where sustainability performance is a key differentiator. Internally, it promotes a culture of accountability and continuous improvement by embedding sustainability considerations across business functions.



"Sustainability reporting" must be a representation of "sustainability strategy" — as a means of communication, accountability, and transparency. Sustainability reporting cannot replace strategy itself.

Sustainability reporting, including through frameworks such as the CSRD and the ESRS, helps companies gain a deeper understanding of the environmental, social, and governance (ESG) implications of their business. In doing so, sustainability reporting supports a process that lays the foundation for more forward-looking and resilient business strategies over the medium and long term.

b) What are the European Sustainability Reporting Standards (ESRS)?

The European Commission entrusted the European Financial Reporting Advisory Group (EFRAG) to develop the ESRS, which contain the disclosure requirements and guidance essential for companies reporting under the CSRD.

The first set of Standards officially entered into force with the publication of European Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023⁹, applying to companies regardless of their sector – i.e. sector agnostic. There are a total of 12 Standards, organised in two 'cross-cutting' Standards and ten 'topical' Standards. ESRS 1 establishes the general principles for sustainability reporting under the CSRD. ESRS 2 outlines mandatory disclosure requirements, ensuring consistency across sustainability topics. Both must be applied regardless of materiality analysis.

⁹ <Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council as regards sustainability reporting standards>



Figure I. A visualisation of the ESRS (Disability Hub Europe).

c) Disability in the CSRD and ESRS: an overview

Prior to the CSRD and the ESRS, the EU's reporting framework was limited to Directive 2014/95/EU on the disclosure of non-financial and diversity information¹⁰ (the so-called Non-Financial Reporting Directive (NFRD)), which did not include any references on how all in-scope entities should account for disability inclusion in their reports. Since the adoption of the CSRD and ESRS, companies are guided through the disclosure of information on the inclusion of persons with disabilities in their workforce, as well as in their policies on inclusion, diversity, accessibility and non-discrimination, by providing both qualitative and quantitative data.

The CSRD marked a major milestone in the recognition of disability in the Sustainability agenda and sustainability corporate reporting regulation:

- The CSRD considers disability by referencing the United Nations Convention on the Rights of Persons with Disabilities (UNCPRD) - a binding human rights treaty signed and ratified by the EU itself and all its Member States - that aims to promote and protect the rights and dignity of persons with disabilities. As such, the UNCPRD is referenced in the CSRD as regards companies' respect for human rights, fundamental freedoms, democratic principles and standards

¹⁰ <Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014 amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups>

established in international frameworks (Recital 43 and Article 29b).

- It includes disability as a factor for the description of the diversity policy applied in relation to the company's administrative, management and supervisory bodies (Article 20(1)).
- It requires sustainability reporting standards to specify the information that undertakings are to disclose about social and human rights factors, including the employment and inclusion of persons with disabilities, diversity, and respect for the human rights and principles established in the UNCRPD, among other Conventions (Article 29b).
- It states that disability-related reporting standards should also specify information about accessibility measures realised by the undertaking (Recital 43).

By setting this legislative context, the CSRD enables businesses to bridge data gaps on employment and inclusion of persons with disabilities, as a relevant matter pertaining “social” sustainability. As a reflection of these aspects in the CSRD, inclusion and employment of persons with disabilities has been included in the ESRS as part of the “sustainability matters” with various references through the different Standards.

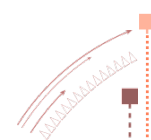
The ESRS explicitly refer to the UN Convention on the Rights of Persons with Disabilities (UNCRPD) as the overarching framework for disability matters, adding to the international and European human rights instruments, including the eight *ILO Fundamental Conventions*¹¹ and the *European Pillar of Social Rights* (with its principle 17 on “inclusion of people with disabilities”)¹².

Furthermore, through the ESRS Disclosure Requirements, persons with disabilities and accessibility are referred in relation to areas such as:

- Recognition of persons with disabilities as part of vulnerable groups and diversity, concerning own workforce, supply chain, consumers and end-users, as well as regarding the management and supervisory bodies.

¹¹ The eight ILO Fundamental Conventions are: <Forced Labour Convention, 1930 (No. 29), the Abolition of Forced Labour Convention, 1957 (No. 105), the Freedom of Association and Protection of the Right to Organise Convention, 1948 (No. 87), the Right to Organise and Collective Bargaining Convention, 1949 (No. 98), the Equal Remuneration Convention, 1951 (No. 100), the Discrimination (Employment and Occupation) Convention, 1958 (No. 111), the Minimum Age Convention, 1973 (No. 138), and the Worst Forms of Child Labour Convention, 1999 (No. 182)>

¹² Principle 17: “People with disabilities have the right to income support that ensures living in dignity, services that enable them to participate in the labour market and in society, and a work environment adapted to their needs”.



- Disability perspective in workplace representation processes.
- Reference to acquired disability in connection with social protection coverage.
- Specific indicator on the percentage of employees with disabilities.
- Consideration of disability with respect to incidents and complaints regarding severe impacts on human rights.
- Integration of disability in the definitions of equal opportunities, equal treatment, harassment.
- Examples of actions, good practices, and objectives that companies can adopt to promote disability inclusion and accessibility.

Detailed information can be found in Section IV of this guide, focusing on each of the ESRS including disability content.

Furthermore, "Terms defined in the ESRS" (as described in the ESRS themselves) particularly related to persons with disabilities can be found in Annex I.

d) A shifting regulatory landscape

On 14 April 2025, the European institutions involved in the legislative process (European Commission, European Parliament and Council of the EU) agreed to adjust the original timeline set out in the 2022 CSRD. With the adoption of the "Stop-the-Clock" proposal (part of the Omnibus package), the reporting obligations under the CSRD are delayed. In general terms, it delays by two years the entry into application of the CSRD for large companies that have not yet started reporting, as well as listed SMEs.

In this context, on 11 July 2025, the European Commission adopted a targeted "quick fix" amendment to ESRS Set 1 (by means of a delegated act), aimed at easing the reporting burden for companies already required to disclose sustainability information for the 2024 financial year ("wave one" companies). The amendment extends the application of phased-in provisions previously limited to companies with fewer than 750 employees, now allowing larger "wave one" companies to omit certain disclosures (including S1-12 related to employment of persons with disabilities) through financial years 2025 and 2026.¹³ This adjustment aims at levelling the reporting grounds between the different "waves" of reporting companies under the Omnibus I proposal.

Regardless of these changes, many companies in the so-called "wave one" (those

¹³ Commission Delegated Regulation (EU) .../... of 11.7.2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings: < https://ec.europa.eu/finance/docs/level-2-measures/csrd-delegated-act-2025-4812_en.pdf>.

expected to report in 2025 according to the CSRD) have already published their sustainability reports based on the ESRS. Indeed, the CSRD has been transposed into national legislations in most EU countries (the deadline was July 2024). In other countries where transposition has not yet occurred, national authorities have recommended that companies that would have been part of “wave one” according to the CSRD, follow the ESRS in their 2025 sustainability reports.

In addition to the delayed transposition and implementation timeline detailed above, the European Commission is proposing changes to the CSRD that could potentially affect the CSRD scope and the application of the ESRS. All these proposed modifications will be discussed and negotiated by the EU institutions during 2025, and as such they are still subject to change before there is clarity on a final version of the revised legislation.

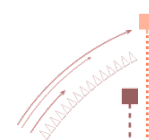
Annex II includes a summary of the main changes proposed by the European Commission in terms of timelines for the implementation of the CSRD (the “Stop the Clock” Directive) and proposals to amend other aspects of the CSRD. In the meantime, whilst no direct changes to the ESRS are agreed to date, the European Commission has mandated EFRAG to develop technical advice with the aim of significantly reducing and simplifying the ESRS content which could, ultimately, affect disclosures related to persons with disabilities.

However, as highlighted in the Introduction, this guide focuses on disseminating the value of the disability-related content included in the current ESRS, as an extremely useful tool to guide companies in disclosing their commitment to disability in their sustainability reporting, while remaining the legal reporting framework in force.

‘Accessibility’: the United Nations Convention on the Rights of Persons with Disabilities and the European Accessibility Act

Accessibility is a foundational concept in disability inclusion, ensuring that persons with disabilities can fully and independently participate in society. In the context of corporate sustainability, accessibility spans physical spaces, digital services, and information systems, directly impacting how equitable and inclusive an organisation is. As companies increasingly adopt sustainability reporting, understanding the meaning and scope of accessibility becomes fundamental, not only to comply with regulation, but also to identify barriers that may exclude or disadvantage people with disabilities in employment, service use, product access or broader societal participation.

The entry into force of Directive (EU) 2019/882 (the European Accessibility Act



(EAA)¹⁴ on 28 June 2025 is particularly relevant¹⁵. The EAA is a Directive designed to enhance the functioning of the internal market for accessible products and services by eliminating barriers resulting from inconsistent national regulations across EU Member States.

The EAA introduces specific functional criteria for the accessibility of products and services, detailed in its Annex I. For example, products must present essential information (such as instructions or warnings) through more than one sensory channel (e.g., visual and auditory), using legible fonts, sufficient contrast, and formats that are perceivable and understandable by a wide range of users. As for services, websites and mobile applications must be designed to be perceivable, operable, understandable, and robust, ensuring that users with disabilities can navigate and interact with them effectively, including with assistive technologies.

These can serve as a valuable reference point for companies seeking to align their reporting with concrete legal expectations regarding accessibility of products and services.

Additionally, Article 9 of the UN Convention on the Rights of Persons with Disabilities (UN CRPD)¹⁶, to which the EU and all its Member States are party and therefore subject to it, offers a comprehensive articulation of accessibility. It defines it as *"the right of persons with disabilities to access, on an equal basis with others, physical environments, transportation, information, and communications (including technologies and emergency services), and other public facilities"*. It mandates the elimination of barriers and the promotion of access across urban and rural settings.

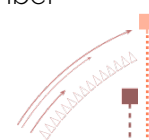
Drawing on both the UNCRPD and the EAA can thus provide companies with a more robust, internationally aligned approach to understanding and reporting on accessibility as part of their sustainability strategies.

As regards the accessibility of the sustainability reports themselves, it is worth noting that the CSRD establishes in its Article 6 on "Review and reporting" that the European Commission shall submit a report to the European Parliament and to the Council on the implementation of the Directive, including, inter alia: *"(e) an assessment of whether and how to ensure the accessibility for persons with disabilities to the sustainability reports published by undertakings"*.

¹⁴ <Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (Text with EEA relevance)>

¹⁵ AccessibleEU, The EAA comes into effect in June 2025. Are you ready? See: <https://accessible-eu-centre.ec.europa.eu/content-corner/news/ea-comes-effect-june-2025-are-you-ready-2025-01-31_en>

¹⁶ United Nations, <Convention on the Rights of Persons with Disabilities. Adopted, 12 December 2006. By: Sixty-first session of the General Assembly by resolution A/RES/61/106>



III. Double Materiality and Disability in the ESRS

a) Double Materiality in the ESRS

The ESRS are based on the concept of 'double materiality', which prescribes companies not only to assess their financial risks and opportunities, but also their impacts on people or the environment. In line with the CSRD and ESRS, this publication defines it as follows:

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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 responsibilities¹⁷.

International Labour Organisation, 'Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors' (November 2024)

Applying the double materiality principle enables companies to identify relevant (or "material") Impacts, Risks and Opportunities (IROs) pertaining to their operations and report on related governance processes, strategies, policies, actions, metrics and targets.

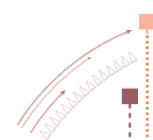
During the materiality assessment exercise, companies are required by ESRS 1 to consider a table listing "sustainability matters"¹⁸. These matters are organised into three levels: "topics" (corresponding to each topical ESRS), "sub-topics", and "sub-sub-topics".¹⁹

If one of the "sustainability matters" is material (meaning that relevant IROs are

¹⁷ International Labour Organisation, <Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors (2024) >

¹⁸ ESRS 1 Appendix A "Application Requirements", AR 16.

¹⁹ On 1 August 2025, EFRAG published 12 Exposure Drafts of their ESRS, subject to Public Consultation until the 29 September 2025. In this new set of proposed Standards, the AR.16 table is modified: it is located in the "Appendix A: List of topics" of the new exposure draft of ESRS 1. Although the category of sub-sub topics has been deleted, the "employment and inclusion of people with disabilities" remains visible in the category of sub-topics.



identified), it shall be reported on in accordance with the Disclosure Requirements of the relevant topical ESRS. The proposed listing of “sustainability matters”, however, should not be seen as a substitute of the overall materiality assessment process, but rather as a support tool. Moreover, the company still needs to consider entity-specific circumstances and other potential material matters.

These “sustainability matters” in the ESRS include “*employment and inclusion of persons with disabilities*” as a sub-sub-topic, under the sub-topic of “*equal treatment and opportunities for all*”, within the topics of “*own workforce*” and “*workers in the value chain*”. Therefore, “employment and inclusion of persons with disabilities” is to be considered in the double materiality analysis.

When it comes to the ESRS, if the “employment and inclusion of persons with disabilities” is deemed as a material (either in terms of *impact* or *financial* materiality) companies are required to report on it as a sustainability matter. The *impact materiality* approach allows companies to disclose how they *positively* or *negatively*, *currently* or *potentially*, impact persons with disabilities; the *financial materiality* allows companies to disclose how disability-related factors affect their financial performance in terms of risks and/or opportunities.

The application of the double materiality principle therefore contributes to greater assessment, transparency and corporate accountability on matters pertaining to the inclusion of people with disabilities by companies, while also leveraging opportunities for growth.

Furthermore, under the CSRD and ESRS, to conduct a double materiality analysis, companies need to connect with their stakeholders to understand their concerns and expectations, taking into consideration the entire business' value chain and enabling the identification and assessment of material IROs. The double materiality principle requires that the exercise is regularly re-assessed, to ensure that it reflects business realities.

From a disability-inclusion perspective, considering persons with disabilities and their representative organisations in stakeholder engagement and consultation would be a key step to properly assess possible IROs related to the matter of “employment and inclusion of persons with disabilities”. Section III.b provides examples of IROs with respect to business and disability inclusion.

In this regard, it is worth noting that EFRAG's document 'Mapping of sustainability matters to topical disclosures (Q&A ID 177)²⁰ provides very useful guidance for the

²⁰ EFRAG <Question ID 177 – Mapping of sustainability matters to topical disclosures (Q&A ID 177>

integration of persons with disabilities in companies' materiality assessments. In fact, in its document EFRAG states that *"when mapping the disclosures to report, the sub-sub-topics and/or metrics related to fundamental rights [n.b. which include 'employment and inclusion of persons with disabilities] should be considered for materiality assessment when the topic Own Workforce is considered material (...), as they cover different aspects of the matter own workforce and as such, they all relate to own workforce as a topic"*.

b) IROs and persons with disabilities

Globally, approximately 1.3 billion people - or 16% of the population - have one or multiple disabilities²¹. In the EU, more than 100 million people have a disability²². Persons with disabilities represent a diverse and cross-cutting group, yet they continue to face disproportionate barriers to employment, education, and participation in society or access to products and services due to accessibility barriers.

With only three in ten people with disabilities active in the labour market globally, their overall labour market participation rate is very low. Persons with disabilities who are working are paid 12% less per hour than other employees, on average, and three-quarters of this gap – 9% – cannot be explained by differences in education, age and type of work. In low and lower middle-income countries this disability wage gap is much larger, at 26%, and almost half cannot be explained by socio-demographic differences²³.

In the EU, the average employment rate for persons with disabilities is 29% - compared to 60% for persons without disabilities²⁴. This gap of over 30 percentage points has remained relatively stable over the past decade, indicating persistent inequalities²⁵. These figures reflect not only a failure of social inclusion but also a missed opportunity for companies to access a vast and often overlooked talent pool.

The concepts of Impacts, Risks, and Opportunities (IROs) are central to how companies must approach sustainability reporting under the CSRD and ESRS, including in terms of employment and inclusion of persons with disabilities.

²¹ <World Health Organization, World Report on Disability (2011) >

²² European Commission, <Union of Equality: Strategy for the Rights of Persons with Disabilities 2021-2030>

²³ ILO, <A study on the employment and wage outcomes of people with disabilities (2024)>

²⁴ <Eurostat, 'Disability Statistics – Labour Market Access'>

²⁵ Within the EU, specific initiatives focused on analyzing data in this field include ODISMET, the Spanish Observatory on Disability and Labour Market in Spain.

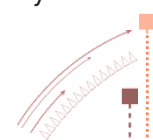
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In line with the perspective of the ESRS and also with the “Disability 360°” approach (a term coined by Disability Hub Europe), a comprehensive view of persons with disabilities as business stakeholders should take in to account their possible different roles in relation to companies: they can be employees, clients or consumers of the companies’ products and services, providers and part of the value chain, and members of the communities in which business operate. Often, persons with disabilities fall within more than one category simultaneously.

Taking into consideration persons with disabilities and their realities in double materiality assessments, and identifying related IROs, companies should consider a range of positive and negative impacts that their operations could have on persons with disabilities (in the case of negative impacts, these are particularly connected with due diligence processes), as well as *risks and opportunities* inherent to disability-inclusive strategies.

Based on current practices, companies could consider the following (non-exhaustive) list of possible IROs:

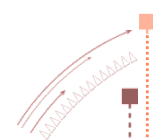
- **Positive impacts** occur when companies implement inclusive policies, create employment for a disadvantaged group (such as persons with disabilities), invest in accessible infrastructure, foster disability inclusion through procurement, or engage with persons with disabilities to co-create equitable solutions.
- **Negative impacts** may arise when recruitment processes are inaccessible, when physical or digital environments are not adapted for diverse needs, or when customers with disabilities are excluded from full participation or access to services and products due to inadequate design, leading to possible discrimination, or unequal treatment.
- **Risks** may come with the results of possible discrimination based on disabilities, lack of accessibility, and any potential legal or reputational consequences that these might entail if they fail to meet inclusion standards. From a legal perspective, country measures such as employment quotas or legislation regarding accessibility are an ever-present factor that companies must comply with. At the EU-level, frameworks, such as Directive 2019/882 on the accessibility requirements for products and services (the European Accessibility Act, EEA, referred in Section II d), should also be recognised by



companies so as to avoid non-compliance risks. Reputational risk is also a growing concern: companies that are perceived as exclusionary may lose public trust or face social backlash. Operationally, exclusionary practices can contribute to high employee turnover, low engagement, and loss of productivity.

- Finally, companies that embrace disability inclusion are well-positioned to benefit from a range of strategic **opportunities**. For example, companies with strong disability inclusion measures are better suited to tap into a broader talent pool, enhancing innovation, and improving market reach by making products and services more accessible. Streamlining accessibility in business strategies and product and service design can help companies expand their own presence in untapped markets: besides the over 100 million persons with disabilities – and potential customers – in the EU, accessibility of products and services is a growing need not only for persons with disabilities and their families, but also for the growing share of older persons that reflect current demographic changes. In the same way, companies that excel in disability inclusion can benefit from improved reputation, increased employee engagement, and access to new customer segments. Lastly, transparent reporting on disability inclusion can attract investors interested in social impact and long-term sustainability.

Further practical examples of how IROs can be interpreted may be found in the ILO GBDN's guide *"Putting the I in ESG: Inclusion of Persons with Disabilities as Strategic Advantage of Sustainability Practices for Corporates and Investors by the ILO"*.



IV. Disability in the ESRS – what are the specific disclosure requirements?

In practice, reporting on disability inclusion through the ESRS may be done via a number of Disclosure Requirements related to the cross-cutting ESRS (ESRS 2 'General Disclosures') as well as under topical Social ESRS concerning 'Own Workforce' (ESRS S1), 'Workers in the Value Chain' (ESRS S2), and 'Consumers and End-users' (ESRS S4).

As established by the ESRS (pending adoption of possible legislative changes mentioned in Section II d) undertakings with less than 750 employees may omit disclosure requirements regarding 'Own workforce' (ESRS S1, including S1-12 on the employment of persons with disabilities) in the first year of reporting; and on 'Value-chain workers' (ESRS S2), affected communities (ESRS S3) and end-users (ESRS S4) in the first two years.

In addition, all undertakings can omit certain information under ESRS S1 ('Own Workforce') in the first year of reporting, including the percentage of persons with disabilities²⁶.

This matter has been recently updated with the "quick fix" adopted by the European Commission on 11 July 2025, as mentioned in previous sections. This is a targeted amendment to ESRS Set 1 (by means of a delegated act) will extend the application of phased-in provisions previously limited to companies with fewer than 750 employees. It will allow larger "wave one" companies to omit certain disclosures (including S1-12) through financial years 2025 and 2026.²⁷ This adjustment aims at levelling the reporting grounds between the different "waves" of reporting companies under the Omnibus I proposal.

As a general structure, the different ESRS contain an objective, a list of Disclosure Requirements, as well as various appendices which support the reporting process by equipping companies with specific qualitative guidance and examples, including on disability reporting.

²⁶ ESRS 1 "General Requirements", Appendix C: List of phased-in Disclosure Requirements.

²⁷ Commission Delegated Regulation (EU) .../... of 11.7.2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings: < https://ec.europa.eu/finance/docs/level-2-measures/csrd-delegated-act-2025-4812_en.pdf>

a) Disclosures not subject to materiality assessment

As per the ESRS, the cross-cutting ESRS 2 'General Disclosures' is not subject to materiality assessment – therefore all companies subject to the CSRD are obliged to report information relating to the Standard.

Under ESRS 2, amongst others, companies are called upon to report on the role of their administrative, management and supervisory bodies (ESRS 2, Disclosure Requirement GOV-1).

i

Specifically, companies must disclose the composition and diversity of their administrative management and supervisory bodies, their roles, responsibilities and access to expertise and skills regarding sustainability matters, including the percentage by gender and other aspects of diversity that the undertaking considers.

These other aspects could entail disability.

Furthermore, under ESRS 2 'General Disclosures' companies need to report on the following issues with respect to its Strategy and business model:

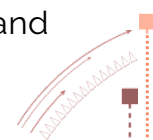
- How the interests and views of their stakeholders are taken into account (Disclosure Requirement SBM-2).
- Material impacts, risks and opportunities and their interaction with strategy and business model (Disclosure Requirement SBM-3).

As a cross-cutting Standard, ESRS 2 'General Disclosures' works in connection with the rest of the topical Standards, including the Social ESRS. This connection will be further explained in the sections below, with a focus on disability inclusion and reporting.

In practice, this requires integrating disability considerations at the top management level, fostering market representation, prioritising the inclusion of persons with disabilities, addressing systemic barriers, and attracting diverse talent.

b) Disclosures subject to materiality assessment

Given that "employment and inclusion of persons with disabilities" is determined as a material sustainability matter (with related IROs identified in the double materiality assessment, see [Section III](#)), companies reporting under the CSRD and the ESRS will find various Disclosure Requirements in the topical Standards, guiding reporting on disability inclusion. If the double materiality assessment identifies 'employment and



inclusion of persons with disabilities' as a material sustainability matter, companies reporting under ESRS will be subject to various disclosure requirements to ensure transparency and accountability in addressing this issue. The sections below offer a detailed overview of what contents related to employment and inclusion of persons with disabilities are reflected in the ESRS, to be considered by business in addressing these aspects when deemed material:

- ESRS S1 "Own workforce".
- ESRS S2 "Workers in the value chain".
- ESRS S4 "Consumers and end users".

The Disclosure Requirements detailed below apply in coherence with the results of the double materiality assessments, and the identified material sustainability matters and related IROs.



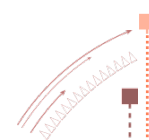
ESRS S1 – Own Workforce

The objective of this Standard is to ensure that companies can provide an explanation of the approach taken to identify and manage IROs on its own workforce in relation to social and human rights factors, and in particular with regards to *working conditions, equal treatment and opportunities for all* (with explicit reference to the inclusion and employment of persons with disabilities), and *other work-related rights*.

The Standard is developed in alignment with several European and international frameworks, including the UN Convention on the Rights of Persons with Disabilities (UNCRPD), as well as other international instruments such as the ILO Declaration on Fundamental Principles and Rights at Work and the eight ILO Fundamental Conventions, the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises, the European Convention of Human Rights, the revised European Social Charter, the Charter of Fundamental Rights of the European Union, the EU policy priorities as set out by the European Pillar of Social Rights, and Union legislation, including the EU labour law acquis.

Detailed disability content can be found in the following tables **regarding ESRS S1 Disclosure Requirements**, particularly:

- S1-1 on policies.
- S1-2 on engagement with workers' representation.
- S1-4 on actions related to material impacts, risks and opportunities.
- S1-5 on targets related to material impacts, risks and opportunities.



- S1-11 on social protection.
- S1-12 on persons with disabilities.
- S1-17 on human rights impacts.
- Connection with ESRS 2 “General Disclosures” regarding stakeholder views and material IROS.

The sections below offer a detailed overview of what contents related to employment and inclusion of persons with disabilities are reflected in the ESRS, to be considered by business:

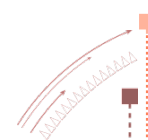
S1-1 Policies related to own workforce

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose:</p> <ul style="list-style-type: none"> • whether they have specific policies aimed at the elimination of discrimination, including harassment, promoting equal opportunities and other ways to advance diversity and inclusion. • whether the following grounds for discrimination are specifically covered in the policy: racial and ethnic origin, colour, sex, sexual orientation, gender identity, disability, age, religion, political opinion, national extraction or social origin, other forms of discrimination covered by EU regulation and national law. • whether the undertaking has specific policy commitments related to inclusion or positive action for people from groups at particular risk of vulnerability in its own workforce and, if so, what these commitments are. • whether and how these policies are implemented through specific procedures to ensure discrimination is prevented, mitigated and acted upon once detected, as well as to 	<p>Companies may also disclose whether:</p> <ul style="list-style-type: none"> • They make adjustments to the physical environment to ensure health and safety for workers, customers and other visitors with disabilities²⁸. • They evaluate if there is a risk that job requirements have been defined in a way that would systematically disadvantage certain groups²⁹. <p>Examples of policies on employment and inclusion of people with disabilities are referred, such as:</p> <ul style="list-style-type: none"> • Policies for making workplaces accessible to persons with disabilities³⁰. <p>As mentioned in <u>Section II d)</u> of this publication, regarding ‘accessibility’, companies can be further guided by the EU Accessibility Act and the UN Convention on the Rights of Persons with Disabilities.</p>

²⁸ ESRS S1 Appendix A “Application Requirements”, AR 17 d).

²⁹ ESRS S1 Appendix A “Application Requirements”, AR 17 e).

³⁰ ESRS S1 Appendix A.2. “Application Requirements for ESRS S1-1 Policies related to own workforce”.



advance diversity and inclusion in general.	
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S1-2 Process for engaging with own workforce and workers' representatives about impacts

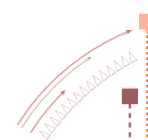
Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies must disclose the general processes for engaging with own workers and their representatives about actual and potential impacts on the workforce. This includes disclosing if and how the perspectives of the workers inform the company's decisions and activities.</p> <p>Moreover, where applicable, the companies shall disclose the processes to account for the perspectives of vulnerable workers in the own workforce, including people with disabilities.</p> <p>In cases where companies cannot disclose such processes because they have not established any, they must disclose this to be the case.</p>	<p>Companies may also disclose additional information such as³¹:</p> <ul style="list-style-type: none"> How they engage with at-risk or persons in vulnerable situations (for example whether they specific approaches and gives special attention to potential barriers). How they provide people in its workforce with information that is understandable and accessible through appropriate communication channels.

S1-4 Taking action on material impacts on own workforce, and approaches to mitigating material risks and pursuing material opportunities related to own workforce, and effectiveness of those actions

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Within this Disclosure Requirement, businesses need to disclose information on action plans and resources to manage material sustainability matters (material IROs).</p>	<p>Examples of specific actions to promote the employment and inclusion of people with disabilities include³²:</p> <p>Increasing accessibility measures.</p> <p>In addition, other examples of measures against violence and harassment in the workplace and diversity include:</p> <p>Improving complaint mechanisms, increasing sanctions against violence and harassment, providing training for prevention to management.</p>

³¹ ESRS S1 Appendix A "Application Requirements, AR 25.a), c).

³² ESRS S1 Appendix A.3 "Application Requirements for ESRS S1-4", examples of actions on Social and human rights matters.



	<p>Training on diversity and inclusion.</p> <p>Targeted recruitment of underrepresented groups.</p>
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S1-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose time-bound and out-come oriented targets related to reducing negative impacts, advancing positive impacts and managing material risks and opportunities related to its own workforce.</p>	<p>Examples of specific targets for advancing the employment and inclusion of people with disabilities include³³:</p> <p>Increasing the % of persons with disabilities in own workforce</p> <p>Other examples of diversity targets are:</p> <p>Increasing the % of underrepresented groups in top management.</p>

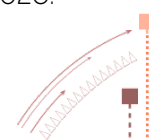
S1-11 Social protection

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose whether their employees are covered by social protection, through public programs or through benefits offered by the company, against loss of income due to major life events, including employment injury and acquired disability.</p> <p>Companies may also disclose this with</p>	<p>Phased-in: Companies can omit reporting on this disclosure for the first year of preparation of their sustainability statement^{34 35}.</p>

³³ ESRS S1 Appendix A.4 "Application Requirements for ESRS S1-5", examples of targets on Social and human rights matters.

³⁴ ESRS 1 "General Requirements", Appendix C: List of phased-in Disclosure Requirements.

³⁵ As mentioned in section 2-d) of this Guide, on July 2025, the European Commission adopted a targeted "quick fix" amendment to ESRS Set 1 (by means of a delegated act) for "wave-one" companies. This amendment extends the application of phased-in provisions previously limited to companies with fewer than 750 employees, now allowing larger "wave one" companies to omit certain disclosures (including S1-12) through financial years 2025 and 2026. These new provisions should enter into force in September 2025.



regards to non-employees in their own workforce.	
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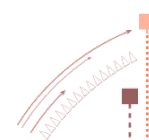
S1-12 Persons with disabilities

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose the percentage of its own employees with disabilities.</p> <p>The objective of this Disclosure Requirement is to enable an understanding of the extent to which persons with disabilities are included amongst the company's employees.</p> <p>When companies are disclosing the percentage of persons with disabilities: They shall disclose the percentage of persons with disability subject to legal restrictions on the collection of data.</p> <p>They may also disclose the percentage of employees with disabilities with a breakdown of gender.</p>	<p>Companies shall also provide contextual information necessary to understand the breakdown of data and how it has been collected (methodology), for example, information about the impact of different legal definitions of persons with disabilities in the different countries in which they operate³⁶.</p> <p>Phased-in: Companies can omit reporting on this disclosure for the first year of preparation of their sustainability statement^{37 38}.</p>

³⁶ ESRS S1 Appendix A "Application Requirements, AR 76.

³⁷ ESRS 1 "General Requirements", Appendix C: List of phased-in Disclosure Requirements.

³⁸ As mentioned in section 2-d) of this Guide, on July 2025, the European Commission adopted a targeted "quick fix" amendment to ESRS Set 1 (by means of a delegated act) for "wave-one" companies. This amendment extends the application of phased-in provisions previously limited to companies with fewer than 750 employees, now allowing larger "wave one" companies to omit certain disclosures (including S1-12) through financial years 2025 and 2026. At the time of publication of this Guide such decision was pending formal entry into force.



S1-17 Incidents, complaints and severe human rights impacts

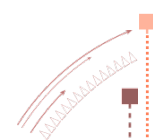
Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose the number of work-related incidents and/or complaints and severe human rights impacts within its own workforce, and any related material fines, sanctions or compensation for the reporting period.</p> <p>The disclosure shall include, subject to the relevant privacy regulations, work-related incidents of discrimination on the grounds of gender, racial or ethnic origin, nationality, religion or belief, disability, age, sexual orientation, or other relevant forms of discrimination involving internal and/or external stakeholders across operations in the reporting period. This includes incidents of harassment as a specific form of discrimination.</p>	<p>Companies may disclose the number of severe human rights incidents where they played a role securing remedy for those affected during the reporting period³⁹.</p>

Connection with ESRS 2 – “General Disclosures” on interests and views of stakeholders (SBM-2) and material IROS and their interaction with its strategy and business model (SBM-3)⁴⁰

Social and human rights matters	Factors to consider the Materiality Assessment
Employment and inclusion of people with disabilities	% employment and accessibility measures for employees with disabilities.
Diversity	Percentage of persons with disabilities within the own workforce.

³⁹ ESRS S1 Appendix A “Application Requirements, AR 106.

⁴⁰ ESRS S1 Appendix A.1 “Application Requirements for ESRS 2 related disclosures”.





ESRS S2 – Workers in the Value Chain

This Standard helps companies to report on how they identify and manage their material actual and potential impacts on value chain workers. This means both upstream and downstream workers who may be significantly affected by the company's operations, products, services or business relationships. In other words, it covers all workers falling outside of the definition of 'own workforce' of ESRS S1.

ESRS S2 primarily relates to *working conditions, equal treatment and opportunities for all* (with explicit reference to the inclusion and employment of persons with disabilities), and *other work-related rights* (for example, housing).

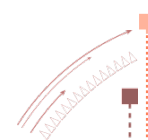
Phase-in: the ESRS allow for gradual reporting under this Standard for companies not exceeding the average number of 750 employees during the financial year (on a consolidated basis where applicable). They may omit the information specified in the disclosure requirements of ESRS S2 for the first 2 years of preparation of their sustainability statement. Detailed disability content can be found in the following tables regarding **ESRS S2 Disclosure Requirements**, particularly:

S2-2 Processes for engaging with value chain workers about impacts

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose whether and how the perspectives of value chain workers inform its decisions or activities aimed at managing the actual and potential impacts on value chain workers.</p> <p>Where applicable, they shall disclose the steps they take to gain insight into the perspectives of workers that may be particularly vulnerable to impacts and/or marginalised (for example, women workers, migrant workers, workers with disabilities).</p>	-

More disability-specific guidance can be found in the ILO GBDN's "*Disability-Inclusive Supply Chains: A Guide for Business*"⁴¹.

⁴¹ ILO GBDN, Disability Inclusive Supply Chains: A Guide for Business (2025)





ESRS S4 – Consumers and end users

The objective of this Standard is to specify disclosure requirements which will enable *users* of the *sustainability statement* to understand material *impacts* on *consumers* and *end-users* connected with the undertaking's own operations and *value chain*, including through its products or services, as well as through its *business relationships*, and its related material *risks* and *opportunities*

Disability inclusion and accessibility related matters are part of ESRS S4 in various ways as presented below. Worth noting is the relevant implications of this Standard in relation to the accessibility provisions in the UN Convention on the Rights of Persons with Disabilities and the European Accessibility Act (EEA).

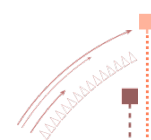
Phase-in on this Standard exists, applying to companies not exceeding the average number of 750 employees during the financial year (on a consolidated basis where applicable): they may omit the information specified in ESRS S4 for the first 2 years of preparation of their sustainability statement.

Detailed disability content can be found in the following tables **regarding ESRS S4 Disclosure Requirements**, particularly:

- S4-2 on engaging consumers and end-users.
- S4-5 on targets.
- Connection with ESRS 2 “General Disclosure”, regarding stakeholder views and material IROS.

S4-2 Processes for engaging with consumers and end-users about impacts

Disclosure Requirement content	Further practical guidance in the ESRS
<p>Companies shall disclose whether and how the perspectives of consumers and/or end-users inform its decisions or activities aimed at managing actual and potential impacts on them.</p> <p>Where applicable, companies must disclose the steps they take to gain insight into the perspectives of consumers and/or end-users that may be particularly vulnerable to impacts and/or marginalised (for example, people with disabilities, children, etc.).</p>	-



S4-5 Targets related to managing material negative impacts, advancing positive impacts, and managing material risks and opportunities

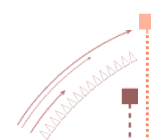
Disclosure Requirement content	Further practical guidance in the ESRS
<p>This Disclosure Requirement aims to enable an understanding of whether companies are using time-bound and outcome-oriented targets to drive and measure progress in addressing impacts on consumers/end-users and/or managing material risks and opportunities.</p>	<p>Companies may distinguish between short-term, mid-term and long-term targets for their commitments.</p> <p>As an illustrative example, companies may have as a main objective to make its online services accessible to people with disabilities, with the long-term goal of having adapted 100% of its online services, and with the short-term objective of adding a number of accessible features every year⁴².</p>

Connection with ESRS 2 - “General Disclosures” on material IROS and their interaction with its strategy and business model (SBM-3)⁴³

Disclosure Requirement content	Further practical guidance in the ESRS
<p>When fulfilling the requirements of ESRS 2, SBM-3– Material impacts, risks and opportunities and their interaction with strategy and business- companies shall disclose whether all consumers and/or end- users who are likely to be materially impacted (through own operations and value chain, including its products or services, and business relationships) are included in the scope of its disclosure.</p> <p>In addition, companies must disclose the following information (amongst other points):</p> <p>In the case of material positive impacts, a brief description of the activities that result in the positive impacts (for example, product design that improves its accessibility for persons with disabilities) and the types of consumers and/or end-users that are positively affected or could be positively affected.</p>	<p>–</p>

⁴² ESRS S4, Appendix A “Application Requirements”, AR 44.

⁴³ ESRS S4, Appendix A “Application Requirements”, AR 44



V. Conclusions

The CSRD and its accompanying ESRS represent a milestone towards the employment and inclusion of persons with disabilities within the EU sustainability reporting landscape, by integrating reporting not just on the percentage of persons with disabilities in the own workforce, but on other aspects of a business operation that may entail positive or negative impacts, risks and opportunities related to persons with disabilities.

The ESRS establishes a framework for businesses to assess progress both quantitatively and qualitatively across their own operations and value chain. This approach encourages organisations to strengthen accessibility and promote equal employment opportunities for persons with disabilities, fostering a more inclusive and equitable workforce.

As highlighted throughout this guide, disability-specific disclosures within the ESRS extend beyond administrative and reporting compliance. Integrating persons with disabilities into sustainability strategies and reporting enables companies to unlock opportunities—ranging from internal workforce development to external market expansion—while mitigating risks, such as non-compliance with anti-discrimination measures or reputational concerns. Most importantly, it fosters a positive societal impact, driving inclusion and equity across business practices.

Whilst many aspects of the CSRD and the ESRS might still be subject to changes in the near future, the value of what they represent as at today is clear. With most of the EU Member States having transposed the CSRD, many companies have already embraced the ESRS as the guiding principles for their own reporting, even well before they were legally bound by it. Those reporting under the current ESRS are trailblazers and proof that reporting under the current ESRS is not only feasible, but also that there is a great value in upscaling how companies go about their own reporting. At this point in time, while future legislative changes are being discussed and the ESRS are being revised, it is important to highlight that the disability-related disclosures under the current ESRS constitute a reliable framework which companies can already implement proactively, to ensure both regulatory compliance in the future, but also to reap the competitive advantage offered by following an inclusive approach in corporate sustainability reporting.

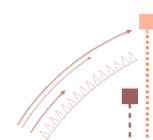
Looking ahead, the next steps for the ESRS include the issuing of Standards, focusing on SMEs, which are increasingly employing people with disabilities, as highlighted in the ILO GBDN's publication *Disability Inclusion in Small and Medium-Sized Enterprises*⁴⁴.

⁴⁴ ILO Global Business and Disability Network, *Disability Inclusion in Small and Medium-Sized*

In sum, while uncertainty remains about the implications of future ESRS simplification, including its effects on disability-related disclosures, it is to be hoped that EFRAG and the European Commission will remain aligned with the general text of the CSRD, which in many parts and provisions underscores the need for persons with disabilities to be included in sustainability reporting.

By recognizing the precedence set by other global frameworks, e.g. GRI, and ensuring alignment across legislative instruments, the implementation of the ESRS can operate as an amplifier of positive efforts to increase disability inclusion across value chains, closing data gaps and measuring inclusion, strengthening the social dimension of sustainability.

Enterprises: Analysis of a Survey among National Business and Disability Networks (ILO, Geneva 2023) <https://www.ilo.org/publications/disability-inclusion-small-and-medium-sized-enterprises>



VI. Annexes

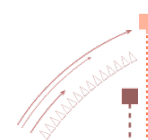
I. Terms defined in the ESRS related to disability

Persons with disabilities	Persons who have long-term physical, mental, intellectual or sensory impairments which in interaction with various barriers may hinder their full and effective participation in society on an equal basis with others.
Equal opportunities	The equal and non-discriminatory access to, among individuals, of opportunities for education, training, employment, career development and the exercise of power without their being disadvantaged based on criteria such as gender, racial or ethnic origin, nationality, religion or belief, disability, age or sexual orientation.
Equal treatment	The principle of equal treatment requires that individuals in comparable situations be treated equally, without direct or indirect discrimination based on protected characteristics such as gender, ethnicity, nationality, religion, disability, age, or sexual orientation. Under the ESRS, this applies to the undertaking's own workforce, ensuring equal rights and protection from discrimination.
Harassment	A situation where an unwanted conduct related to a protected ground of discrimination (for example, gender under Directive 2006/54/EC of the European Parliament and of the Council ⁽¹⁵⁾ , or religion or belief, disability, age or sexual orientation under Council Directive 2000/78/EC ⁽¹⁶⁾) occurs with the purpose or effect of violating the dignity of a person, and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

II. Details on the shifting regulatory landscape

ORIGINAL TIMELINE ACCORDING TO THE DIRECTIVE (EU) 2022/2464 (CSRD)

1 January 2024	1 January 2025	1 January 2026	2028
Large, listed companies with over 500 employees reporting under the Non-Financial Reporting Directive (NFRD), with reports to be issued in 2025.	Large companies covered by the CSRD, with reports to be issued in 2026.	SMEs and other small and non-complex institutions must implement the CSRD and align with the ESRS, but they can opt out until 1 January 2028.	Non-EU companies with €150 million turnover in the EU and at least one subsidiary or branch in the EU will be required to report.



NEW TIMELINE ACCORDING TO THE “STOP THE CLOCK” PROPOSAL

1 January 2024	1 January 2027	1 January 2028	2028
Remains as per stated in Directive 2022/1760. ‘Wave one’ Companies have already stated reporting in 2025 under this framework.	‘Wave two’ companies reporting obligation delayed by 2 years, with reports to be issued in 2028.	‘Wave three’ companies reporting obligation delayed by 2 years, with reports to be issued in 2029.	Non-EU companies will report from the 2028 financial year if they meet the new criteria.

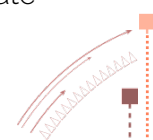
It is to be noted that, as stated in section 2-d) of this Guide, on July 2025, the European Commission adopted a targeted “quick fix” amendment to ESRS Set 1 (by means of a delegated act), aimed at easing the reporting burden for “wave one” companies. The amendment extends the application of phased-in provisions previously limited to companies with fewer than 750 employees, now allowing larger “wave one” companies to omit certain disclosures (including S1-12) through financial years 2025 and 2026⁴⁵.

CHANGES TO THE CSRD ACCORDING TO EUROPEAN COMMISSION PROPOSAL OF FEBRUARY 2025⁴⁶

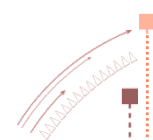
Current rules under Directive 2022/2464	Proposed changes in the Omnibus proposal
<p>Scope</p> <p>Large undertakings and parent undertakings of a large group that are Public Interest Entities (PIEs) exceeding:</p> <p>average number of 500 employees and</p> <p>balance sheet total: € 25 million and/or</p>	<p>Proposed reduced scope</p> <p>Only companies with more than 1000 employees and either a turnover of above EUR 50 million or a balance sheet above EUR 25 million would be required to report. This means that large companies with up to 1000 employees and listed SMEs will be out of scope.</p> <p>Only companies with more than 1000</p>

⁴⁵ Commission Delegated Regulation (EU) .../... of 11.7.2025 amending Delegated Regulation (EU) 2023/2772 as regards the postponement of the date of application of the disclosure requirements for certain undertakings: < https://ec.europa.eu/finance/docs/level-2-measures/csrd-delegated-act-2025-4812_en.pdf>

⁴⁶ <Proposal for a Directive of the European Parliament and of the Council Amending Directives 2006/43/EC, 2013/34/EU, (EU) 2022/2464 and (EU) 2024/1760 as regards certain corporate sustainability reporting and due diligence requirements>



<p>net turnover: € 50 million</p> <p>SMEs and other small and non-complex institutions</p> <p>Non-EU companies with €150 million turnover in the EU and at least one subsidiary or branch in the EU</p> <p>Non-EU companies with €150 million turnover in the EU and at least one of: subsidiary or branch in the EU with > 40m turnover will be required to report</p>	<p>employees and either a turnover of above EUR 50 million or a balance sheet above EUR 25 million would be required to report. This means that large companies with up to 1000 employees and listed SMEs will be out of scope.</p> <p>Non-EU companies EUR 450m turnover generated in the EU, and at least one of: large EU subsidiary; or EU branch with > EUR 50m turnover</p>
<p>ESRS in force</p> <p>The adopted sector-agnostic ESRS already apply for companies ready to report in 2025. Sector-specific Standards must legally be adopted in 2026.</p>	<p>Proposed changes to the ESRS</p> <p>Only companies in the new scope are to report under the sector-agnostic ESRS. For out-of-scope companies, the Commission will adopt a voluntary Standard based on the EFRAG's Voluntary Standard for non-listed SMEs (VSME)⁴² Standard of EFRAG</p> <p>Six months after the adoption of the proposed amendments to the CSRD, the Commission would also seek to amend the existing sector-agnostic ESRS, to provide clarity and streamline the existing datapoints to further simplify reporting.</p>
<p>Sector-specific Standards</p> <p>Sector-specific ESRS are to be adopted in 2026.</p>	<p>Sector-specific Standards</p> <p>Sector-Specific Standards are deleted.</p>



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The leading team behind this publication includes:

- Fundación ONCE: Carla Bonino
- Weber Shandwick Brussels acting as Technical Secretariat of Disability Hub Europe: Luis Cervilla & Jaime Bacariza Morillas

About Disability Hub Europe

Disability Hub Europe (DHub) is a multi-stakeholder initiative led by the ONCE Foundation, focused on the potential of the binomial Sustainability & Disability to create more inclusive businesses and to foster social and labour inclusion of people with disabilities in Europe and beyond in a just transition context. DHub brings together a group of diverse partners representing different actors, including relevant Sustainability platforms and standards setters, multinational companies, the social economy, the social movement of persons with disabilities and business and disability networks. The mission of DHub is to serve as reference collaborating framework that supports the advancement of global sustainability and business strategies, as well as public sustainability agendas, through a social and disability-inclusive lens. For its creation and consolidation, DHub has counted with the support of the European Social Fund.

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