

Multi year digital accessibility plan 2025 - 2027

1. Introduction

In accordance with the following regulations :

- Article 47 of Act No. 2005-102 of 11 February 2005 on equal rights, opportunities, participation and citizenship for people with disabilities,
- Decree No. 2019-768 of 24 July 2019 on digital accessibility,
- Order No. 2023-859 of 6 September 2023 amending the previous Act,
- General Guidelines for Improving Accessibility(RGAA), version 4.1.2 ,

This plan describes the commitments and the multiyear approach adopted by our organization to gradually guarantee the digital accessibility of our online services.

2. General accessibility policy

Our bank is actively committed to digital accessibility, in a strong inclusion approach.

The Digital Accessibility Officer has been the Head of Digital Transformation since December 2024.

3. Objectives of the multi-year framework (2025-2027)

- Conduct regular audits of digital services
- Achieve a gradual level of compliance
- Train and raise awareness among teams
- Establish a process for processing user feedback
- Integrate accessibility into internal processes
- Ensure regular monitoring of actions undertaken

4. Internal organization and human resources

The Accessibility Referent oversees the actions of the program for Indosuez and its subsidiaries: Audits, training, updates, network management.

Local teams work closely with this referent for operational implementation.

4 bis. Consideration of skills and recruitment

The development of in-house skills is an essential lever for the sustainable integration of digital accessibility. As such:

- The **job sheets** of the business lines concerned (designers, developers, UX/UI designers, editorial contributors, digital project managers) will gradually include **accessibility skills** as a criterion for hiring or evaluating.
- The Accessibility referent will ensure that HR referential incorporate training modules from onboarding for the populations concerned.
- Training sessions will be renewed annually to ensure a common and up to date foundation for all contributors to digital pathways and services.

5. Financial resources

Each entity finances its own annual action plan, based on the audit results and priorities defined with the accessibility referent.

6. Methods used

RGAA audits have been carried out since 2025 on a first perimeter chosen according to site traffic, accessible to customers.

Training includes:

- Internal communication via the intranet, videos and articles
- A global webinar
- Targeted training for content and digital product producers (developers, designers).

In addition, **user tests** integrated into digital projects will now include, where appropriate, **the involvement of people with disabilities**. This approach aims to validate the actual accessibility and experience in use conditions, in addition to technical audits.

7. Integration into internal processes

Accessibility is integrated from the design stage into specifications, design and development.

Integration into purchasing processes is planned for 2027. Preparatory work is under way to define requirements and integrate them into future consultations.

8. Processing of user returns

Implementation of a contact form on all the sites concerned, supplemented by a telephone line dedicated to supporting the use of digital services. These channels must enable a process of continuous improvement.

8 bis. Corrective measures and prioritization

Following the audits, corrective plans are established for each site or application. These plans include:

- A classification of non-conformities (blocking, major, minor),
 - Prioritization of corrections according to usage (traffic, frequency of use, impact on the user),
- A progressive implementation schedule, established in conjunction with product roadmaps.

The most strategic content and the most frequently used interfaces are given priority within six months of the audit. Follow-up is ensured via the annual action plan.

9. Control and validation process

The central coordinator ensures monthly monitoring, annual reporting, and organizes internal or external audits.

The plan is reviewed annually based on an assessment, and plans are adjusted according to the results obtained.

9 bis. Non mandatory accessibility measures

Our accessibility approach goes beyond legal requirements when relevant to our target audiences. Measures planned for 2025–2027 include:

- Adding subtitles and text transcripts to our strategic video content
- Exploring French sign language (LSF) formats for certain institutional or recruitment content
- Simplifying the wording of certain complex information pathways (product sheets, administrative procedures),

- Gradually taking into account certain WCAG AAA level criteria, with a view to continuous improvement.

10. Annual action plan

This multi-year plan is accompanied by annual action plans that describe in detail the operations implemented to address all accessibility needs:

- 2025 annual plan: Consult the 2025 action plan. [Click here](#)
- 2026 annual plan: coming soon.
- 2027 annual plan: coming soon.

Each annual plan gives rise to a structured review covering:

- Actions taken (completed, in progress, upcoming)
- Difficulties encountered or points to monitor,
- Assessment of gains (in coverage, compliance, user satisfaction),
- Reassessment of priorities for the following year.

These reviews are consolidated at group level and contribute to adjusting the current multi-year plan each year.