



# **Multi-Year Digital Accessibility Plan 2025 – 2027**

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# 1. Introduction

Article 47 of Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship of individuals requires all online public communication services to be accessible to all.

## 1.1. Definition of digital accessibility

Disability is defined as any limitation of activity or restriction of participation in social life experienced by a person in their environment due to a substantial, lasting, or permanent impairment of one or more physical, sensory, mental, cognitive, or psychological functions, a multiple disability, or a disabling health condition (Article L. 114 of the French Social Action and Families Code).

Digital accessibility consists of making online public communication services accessible to people with disabilities, i.e.,:

- **Perceptible:** for example, facilitating the user's visual and auditory perception of content; offering text equivalents for all non-text content; creating content that can be presented in different ways without loss of information or structure (for example, with a simplified layout);
- **Usable:** for example, providing the user with orientation elements to navigate and find content; making all features keyboard-accessible; Allow the user sufficient time to read and use the content; Do not design content that could cause epileptic seizures;
- **Understandable:** For example, ensure that pages function predictably; help the user correct input errors.
- **Robust:** For example, optimize compatibility with current and future uses, including assistive technologies.

Digital accessibility for customers, employees, and partners with disabilities is a pillar of the EDF Group's CSR<sup>1</sup> commitment to a responsible and inclusive digital transformation.

This is reflected in the implementation of a Digital Accessibility policy within EDF SA and the publication of this multi-year Digital Accessibility Plan. The multi-year plan is updated as necessary, and the associated annual action plans are developed and made available on the EDF corporate website ([www.edf.fr](http://www.edf.fr)).

## 2. Accessibility Policy

### 2.1. Organization's commitment to digital accessibility

The breakdown of the Group's purpose into 16 CSR commitments now forms the framework for the CSR policy requirements. Improving digital accessibility supports two of these commitments: "equality, diversity, and inclusion" and "responsible digital technology."

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<sup>1</sup> CSR corporate social responsibility

EDF's Responsible Digital approach, in accordance with the commitments made when the Responsible Digital Technology Charter was signed on October 8, 2020, incorporates digital accessibility through its ambition: "a Responsible Digital Transformation that is low-carbon, energy-efficient, inclusive, ethical, and delivers high environmental added value for its employees and customers."

The EDF SA 2019-2022 Disability Agreement for equal rights and opportunities and the professional integration of people with disabilities continues the steps taken in four areas: training and awareness, accessibility to digital training resources, accessibility of business applications, the inclusion of accessibility clauses in the specifications of new applications as well as in the technical rating grids of offers.

## 2.2. Long term objectives and overall strategy

To implement these commitments, particular attention is being paid to the following areas:

- External digital services (websites, portals, applications, etc.) intended for the Group's customers and partners:
  - Improving digital accessibility, with priority given to high-traffic digital services (websites for the general public), is essential during the construction or redesign phase of these services. Online public communication services are gradually being brought into compliance with the RGAA<sup>2</sup>, with priority given to the functions that pose the greatest challenges from a user perspective, including the publication of accessibility statements and assistance and contact methods, as well as a link to the Multi-Year Plan.
- The operational implementation path for this accessibility policy is defined and managed by each EDF SA department concerned, with priority given to the service construction or redesign phases. The work environment for EDF employees with disabilities who require IT and telecom adaptations (workstation, smartphone, software, hardware, and adapted solutions):
  - The internal Disability IT service provides EDF SA employees with disabilities who require IT adaptations with adapted solutions. These solutions enable them to understand and interact with accessible digital content and services. The offering is maintained at the state of the art in line with market developments. Dedicated training is provided for the use of these devices.
- Internal application services, developed or purchased:
  - At a minimum, all applications considered "essential for the employee's daily life" aim for the RGAA compliance level, which corresponds to the double-A (AA) level of the Web Content Accessibility Guidelines (WCAG). This requirement is implemented to the extent that it does not create a disproportionate burden. When a new project is launched, it's important to systematically consider the digital accessibility

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<sup>2</sup> RGAA : Référentiel Général d'Amélioration de l'Accessibilité - Référentiel Général d'Amélioration de l'Accessibilité

of the service and its inclusion in the list of essential applications for employees' daily lives.

- The content of information widely shared or disseminated internally or externally digitally (emails, newsletters, e-learning, etc.) must always be accessible.

### 3. Digital accessibility governance

The implementation of the Digital Accessibility policy is monitored by EDF's "Responsible Digital" Steering Committee. This governance body oversees the implementation of accessibility improvements within the company.

Digital accessibility representatives are appointed within EDF SA's departments and form a network led by the Group Governance and Digital Strategy Department (D2GSN) to implement the company's policy.

The digital accessibility representative oversees the implementation of digital accessibility principles within their scope and, as such,:

- Proposes a plan to improve the digital accessibility of internal applications within their scope;
- Ensures the proper accessibility declaration of external services in accordance with the General Accessibility Improvement Framework (RGAA), as well as the updating of the annual action plan;
- Ensures the progressive professionalization of teams;
- Ensures the proper use of feedback from employees with disabilities to report potential accessibility issues.

Targeted awareness and training initiatives are conducted for employees who contribute to accessibility.

Accessibility is promoted at all levels of the organization (purchasing, design, development, training, etc.).

#### 3.1. Description of resources allocated to digital accessibility

Each entity of the Group appoints an "accessibility referent", failing which appointment, it will be the "Responsible Digital" referent of the entity. Their responsibilities are defined and outlined in the aforementioned paragraph.

The accessibility referent also ensures that sufficient human and financial resources are mobilized in each Department to implement their action plan.

#### 3.2. Dedicated team

A cross-functional software development team supports accessibility officers by providing expertise in responsible digital technology, particularly in digital accessibility. It can be involved at the outset of projects, as well as throughout all phases of development and testing. It also provides expertise in the selection and use of tools to improve accessibility.

## 4. Organization of taking into account digital accessibility

### 4.1. Training programs for employees

A training program for all employees was implemented in 2023. Among the most significant:

- E-learning training module

This 120-minute training course provides an understanding of the different dimensions of digital accessibility, the impact of non-compliance with its principles, the identification of the roles of each stakeholder, and how to consider accessibility at their level and at each stage of a digital project.

Each learner builds a personalized training program based on their job profile and the six available educational modules.

The introductory module is aimed at everyone, including HR departments, communications officers, and IT managers, while the other five modules are primarily aimed at employees working in the following roles: web project management, purchasing intellectual property services, UX, graphic, and ergonomic design, technical monitoring of web development, editorial animation, and the design of videos, publishing documents, or other digital content.

- Training module dedicated to digital inclusion

A training module dedicated to digital inclusion, jointly developed by the Disability Mission and the EDF Group University, also aims to acculturate Group employees by providing, in particular, a guide to best practices for creating and writing office documents.

- A "Tous Numériques" best practices book

This best practices book, created in 2022 and intended for all employees, reflects so-called general best practice recommendations, in line with the RGAA criteria, including the choice of colors, adjusting contrast, the use of tables, and fonts, as well as a specific focus on certain types of media produced by the company (flyers and brochures, newsletters, videos, etc.).

It outlines the tools and software used by people with visual impairments, the specific features of the various uses identified (automatic reading, click-through reading, color blindness, dyslexia, etc.), and the steps to take to adapt existing materials that have not been designed in an accessible manner: the "by default" approach.

Several other "best practice" materials are available to employees on the EDF SA intranet and are dedicated to internal use. They cover the design rules for articles intended for internal use, with the aim of ensuring that they are accessible to all users, regardless of their access devices or environmental conditions.

### 4.2. Use of external skills

Whenever necessary, EDF SA calls upon qualified external partners to assist in the implementation of its digital accessibility policy.

To date, EDF SA has contracted IPEDIS, ACCENTURE, NEURONES, and CAP GEMINI TECHNOLOGY SERVICES for compliance audits and project management support. It will provide services to support teams in their accessibility efforts, such as:

- Support to ensure accessibility is taken into account in the early stages of: functional or graphic mockups, design systems, and specifications;
- Support during acceptance testing;
- The initial and monitoring RGAA audit of an online public service;
- Testing of an online public service.

### 4.3. Considering accessibility in projects

Our philosophy is to consider digital accessibility from the design phase of a digital project.

Thanks to awareness-raising measures and skills development carried out during training sessions for project managers, digital accessibility will gradually be considered "by design" in all projects related to the design and development of digital services.

Knowledge and tools are made available to all stakeholders on the subject:

- Online training for technical teams;
- A list of development support tools and compliance testing;
- A team of experts in responsible digital technology and digital accessibility.

Conducting tests with users with disabilities.

If user testing is organized during the design, validation, or development phases of a website or application, the user panel will include people with disabilities whenever possible.

Inclusion of accessibility criteria in calls for tenders and contracts.

A set of clauses specific to digital accessibility and, more generally, responsible digital technology are included in the specifications for procurement of IT, software, and SaaS services.

## 5. Technical scope of annual plans

### 5.1. Inventory

Regular joint work between accessibility officers and IT departments has enabled the identification and monitoring of work to improve the accessibility of digital services:

- the 49 websites serving the general public,
- priority applications useful in the daily lives of EDF employees
  - A complete map of these priority services is maintained. Pre-audits (based on DINUM<sup>3</sup> tools) are conducted to identify the efforts required for these internal applications used by the largest number of people.

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<sup>3</sup> DINUM : Direction interministérielle du Numérique - Interministerial Digital Department

## 5.2. Annual plans

### 2025 Action Plan

To implement EDF SA's 2025-2027 Multi-Year Plan, this 2025 action plan focuses on four themes:

#### 1. Internal Organization and Governance

Continuation of the implementation of the governance system.

Dashboard-based digital accessibility management	All year round
Animation of the “digital accessibility” referents of EDF Departments	All year round
Maintaining the availability and level of competence of our resources in audits and expertise in the field of digital accessibility	All year round

#### 2. Training and awareness-raising for stakeholders

Digital accessibility must be integrated into the skills base of all stakeholders involved in the development and enhancement of websites and mobile applications.

Pérennisation des formations disponibles, mise à disposition des articles ou des événements autour de l’accessibilité numérique	Q3
Sensibilisation et formation des équipes projet dans les Directions Métier d’EDF	Q4
Mise à jour et promotion du volet accessibilité numérique dans la boîte à Outils Numérique Responsable de l’intranet d’EDF	Q2

#### 3. Support for employees with disabilities

Maintaining and adapting the IT disability offer	Q3
User evaluation of the IT disability offer (Rating of 7/10 minimum)	Q4

#### 4. Improving the digital accessibility of sites, applications and communications

15 public websites and applications are partially compliant, prioritizing the most critical RGAA criteria from a user perspective. Remediation work continues toward full compliance.	Q4
Finalization and sustainability of audits, accessibility declarations, and continued remediation for 34 public sites and priority mobile applications. Continuation of remediation towards full compliance.	Q4
Complete mapping and pre-audit (based on DINUM tools) to identify the efforts to be made on internal applications used by the greatest number (HR tools, user services, etc.)	Q4