

Renault Group

Multi-Year 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 makes it mandatory for any online public communication service to be accessible to all.

1.1. Definition of digital accessibility

Disability is defined as any limitation of activity or restriction of participation in life in society suffered by a person in his or her environment due to a substantial, lasting or permanent alteration of one or more physical, sensory, mental, cognitive or psychological functions, a multiple disability or a disabling health disorder (Article L. 114 of the Code of Social Action and Families).

Digital accessibility is the process of making online public communication services accessible to people with disabilities, by:

- **Perceivable** : for example, to facilitate the visual and auditory perception of content by the user; to provide text equivalents to any non-text content; to create 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 guidance to navigate, finding content; making all features accessible to the keyboard; allowing the user sufficient time to read and use the content; not designing content that may cause epileptic seizures;
- **Understandable** : e.g., making pages work in a predictable way; helping the user correct input errors.
- **Robust** : For example, optimize compatibility with current and future uses, including assistive technologies.

1.2. The content concerned

Online public communication services are defined as any making available to the public or categories of the public, by a means of electronic communication, signs, signals, writings, images, sounds or messages of any kind that do not have the character of private correspondence (Article 1 of Law No. 2004-575 of 21 June 2004 on confidence in the digital economy). In accordance with II of Article 47 of the aforementioned Law of 11 February 2005, they include, in particular:

- Websites, intranets, extranets; software packages, insofar as they constitute applications used through a web browser or a mobile application;
- Mobile applications which are defined as any application software designed and developed for use on mobile devices, such as smartphones and tablets, outside of operating systems or hardware;
- Digital street furniture, for its application or interactive part, excluding operating systems or hardware.

Some content is exempt from the obligation of accessibility and is outside the scope of the legal obligation:

- Files available in office formats published before 23 September 2018, unless they are necessary for the completion of an administrative procedure relating to the tasks carried out by the organisation concerned;

- Pre-recorded audio and video content, including those with interactive components, released before September 23, 2020;
- Live audio and video content, including those with interactive components;
- Maps and online mapping services, provided that, in the case of maps intended to provide a location or route, essential information is provided in an accessible digital form;
- Third-party content that is not funded or developed by the relevant organization and is not under its control;
- Reproductions of pieces from heritage collections that cannot be made fully accessible due to:
 - o Either the incompatibility of the accessibility requirements with the preservation of the piece concerned or the authenticity of the reproduction, particularly in terms of contrast;
 - o Either the unavailability of automated and cost-effective solutions that would make it possible to easily transcribe the text of manuscripts or other pieces of heritage collections and to restore it in the form of content compatible with the obligation of accessibility;
- Intranet and extranet content published before September 23, 2019, until these sites are substantially revised;
- The content of websites and mobile applications that is neither necessary for the completion of an active administrative procedure nor updated or modified after 23 September 2019, in particular archives.

2. Accessibility Policy

Digital accessibility is at the heart of concerns related to the development or provision of digital services (websites, platforms, applications, etc.) both to the public and internally.

2.1. Renault Group's commitment to digital accessibility

Renault Group launched its *Disability Inclusion Policy at the end of March 2024*, the objectives of which are:

1. Develop an inclusive workplace and culture, including for people with disabilities.
2. Encourage more employees to share their disability.
3. To be an employer of choice for everyone, including candidates with disabilities.

2.2. Accessibility

In terms of accessibility, Renault Group has the following objectives:

- 2025: offer an Accessibility page with an up-to-date accessibility statement and this multi-year plan on each of the websites and applications (internal or external).
- 2026: Conduct accessibility audits on our websites and apps.
- 2027: Achieve a compliance rate with the RGAA standard of:
 - o 80% on external communication tools, websites and applications,

- 50% on internal tools.

This desire is illustrated by the development of this multi-year digital accessibility plan associated with annual action plans, with the aim of supporting the compliance with the RGAA (General Accessibility Improvement Framework) and the gradual improvement of the digital services concerned.

2.3. Governance

Renault Group does not have an accessibility referent designated. The governance of accessibility is ensured by the Corporate Digital Communication entity, consisting in particular of:

- To take stock of accessibility in the Renault Group organisation.
- Promote accessibility through acculturation among employees, the dissemination of standards and good practices.
- Supporting internal teams through advice, recommendations, and orientation towards training, both operationally and methodologically,
- To monitor and ensure the application of Law No. 2005-102 of 11 February 2005 and compliance with the General Accessibility Improvement Framework (RGAA) by having regular audits carried out.
- To ensure that user requests are handled and, in general, the quality of the service provided to users with disabilities.

3. The genesis of the multi-year plan

Initiated in 2023, this multi-year plan is the result of a collaboration with the company Ipedis. As a sign of the desire to tackle the issue of digital accessibility head on, it was co-constructed in a collegial manner as follows:

1. A questionnaire was shared, to identify current and future actions concerning accessibility.
2. An inventory of websites and mobile applications was carried out, which made it possible to understand the extent of the work to make them accessible.
3. The drafting gave rise to other exchanges to refine the final result.

3.1. Sites

The completion of the project made it possible to define six projects:

- Making *it accessible*
- Measuring *compliance*
- Inform project
- Tooling site
- Chantier *Former*
- Pilot site

Taking digital accessibility into account requires:

- An adaptation of the internal organization of production and management of the digital services and applications concerned,
- Support for staff,
- A modification of the procurement procedures,
- The care of people with disabilities when they report difficulties.

In the rest of this document, we will detail these six projects and the actions that result from them.

4. Making it accessible

The objective of this project is to ensure that the accessibility of digital media is corrected according to the priorities defined in *the Measuring Compliance* project. It forms the basis of the challenge of making accessible the digital media covered by the decree of law, namely:

- Websites,
- Mobile applications,
- Digital publications,
- Videos.

Defining the perimeter to be taken into account within the framework of this multi-year plan, a map of sites and applications has been produced, provided in the appendix.

4.1. Sites internet

At the time of writing the multi-year plan, 18 websites are concerned by the accessibility work.

4.2. Site intranet

At the time of drafting the multi-year plan, the input is concerned by the accessibility work.

4.3. Mobile Apps

At the time of writing the multi-year plan, 2 mobile applications are concerned by the accessibility work, one of which is being rebuilt.

4.4. Publications

The mapping of publications eligible for compliance has been carried out and is attached. It was decided to:

- Bring existing publications on the Internet and intranet into compliance.
- Ensure that all publications posted online for each year from 2025 onwards are compliant.

The accessibility of publications will be done via external service providers and through the training of public editors involved in the creation of documents.

4.5. Videos

To make videos accessible, two elements must be added:

- Synchronized subtitles: which present the text of the video's audio information (a character's words, important noise to understand the action, etc.) and are displayed synchronously with the video's stream,
- A text transcript that is textual content associated with a video either in HTML-encoded text or in a text file that is on the same page or searchable through a link. This content gives the user access (independently of the viewing of the video) to all that is expressed orally as well as to all the descriptive information necessary to understand the action.

4.6. Consideration of digital accessibility in projects

Accessibility must be considered throughout the project lifecycle. It is not a bonus, a function, or an additional technical overlay, but a continuous concern for quality in order to respect the fundamental rights of people with disabilities and their ability to perceive, understand and use the digital means made available.

Renault Group's accessibility target stipulates minimum compliance rates to be met for all future digital projects.

- 80% minimum for external sites,
- 50% for internal sites.

4.7. Consideration of accessibility in procurement procedures

There are currently no specific clauses in the procurement or purchase procedures for the software.

4.8. User Testing

User tests will be organised, during the acceptance phase of the digital tools with a panel of users made up, as far as possible, of people with disabilities.

4.9. Handling User Feedback

In accordance with the provisions of the RGAA, a means of contact is set up on each site or application allowing users with disabilities to report their difficulties.

Users can send their complaints and questions to the contact.group@renault.com address, managed by a customer relations department whose processing time is between 24 and 48 hours after sending the request. Depending on the nature of the questions, the answers can be provided by this department or transferred internally to the departments concerned.

All emails sent to this address regarding accessibility will be forwarded to vincent.treton@renault.com. This person may then request various internal services depending on the nature of the request.

A personalized response is then written according to the questions or complaints received. We strive to provide answers as quickly and as relevant as possible.

5. Measuring *compliance*

The objective of this project is to ensure the level of compliance with the RGAA of the perimeter of the sites and applications and to meet the transparency issues defined in the decree of law.

To this end, accessibility audits are conducted, giving rise to a public declaration of accessibility on the sites concerned.

The appendix presents the list of sites and mobile applications as well as their level of compliance.

5.1. Control and validation process

Each site or application is subject to a control during the initial online publication, during a substantial update, a redesign or at the end of the compliance operations, in order to establish a declaration of conformity in accordance with the terms of the law.

To ensure the sincerity and independence of the company, this control is carried out internally or through an external partner.

These control operations intended for the establishment or updating of declarations of conformity are carried out in addition to the usual acceptance and intermediate control operations which are organised throughout the life of the projects.

5.2. Continuous monitoring

It consists of measuring the performance of teams by monitoring a number of indicators such as:

- RGAA compliance and its variations (improvements, regressions),
- Published statements and their updates,
- The number of people trained in the teams,
- The number and nature of user feedback,
- etc.

6. Inform project

The objective of this project is to inform the various internal and external stakeholders concerned of the obligations incumbent on Groupe Renault in terms of digital accessibility and at the same time on themselves.

This project mainly consists of:

- Follow-up of audits, posting of declarations and counter-audits online after correction,
- Prioritization of corrections, by pooling in the case of groups of sites with the same structure (Media and Events Sites for example),
- An internal communication plan to ensure a good understanding of accessibility issues as well as the desire to participate in the necessary changes for all employees of the group.
- An external communication plan to publicize the ambitions, requirements and results of the accessibility phases.

7. Tooling site

The objective of this project is to provide Renault Group employees in charge of digital projects with all the tools they need to be operational in the implementation of the RGAA, both for measuring compliance and correcting accessibility.

This project is divided into several areas of work:

7.1. Ticketing platform

A *ticketing* platform will be made available to external and internal stakeholders to:

- Write the necessary corrections regarding digital accessibility,
- monitor the smooth running of the project,
- Trace and keep these corrections over time.

Anomalies reported by tests or by users live will be integrated and processed on this platform.

7.2. Integration of the RGAA into internal documents

These documents include:

- The drafting and integration of a systematic clause in calls for tenders and subcontracts, concerning accessibility, RGAA, required levels of compliance,
- The integration of digital accessibility into the standards and documents of digital projects,
- Adaptation of Renault Group's internal standards to RGAA,
- The implementation of tools for capitalization, verification and implementation of accessibility,
- The creation of a wiki documentary database of good practices,
- The purchase of code verification and validation tools for technical teams,
- The provision of tools to verify that a certain number of RGAA criteria are respected (browser extensions: *WCAG Color contrast checker*, *Headingsmap*, RGAA Assistant, *aXe Accessibility*, etc.),
- The integration of a free free screen reader (NVDA) available in the catalog of software authorized to be installed on workstations.

Adaptation of existing content management tools (PDF and videos):

- Adaptation of the media library to allow the addition of subtitling and transcription files,
- Adaptation of a video streaming tool.

7.3. Recruitment

At present, Renault Group does not systematically integrate accessibility skills into job descriptions.

7.4. Use of external expertise

External skills are provided by several partners specialising in digital accessibility, which provide some of the following services to support teams in their accessibility process, such as Ipedis to:

- Carrying out accessibility audits and declarations of conformity,
- Support in the implementation of the multi-year plan
- Support and help for specific needs.
- Integration throughout the project, from the design phase of the models, to ensure compliance with rules and best practices.

8. Chantier *Former*

The objective of this project is to acculturate all Renault employees to the RGAA and to:

- To give them the knowledge necessary to implement digital accessibility in projects,
- To raise awareness of the importance and benefits of accessibility for Renault, its customers, employees and partners.

It mainly consists of training and awareness-raising actions, throughout the period of application of this scheme, organised in order to enable the staff working on the sites and applications to develop, edit and put accessible content online.

Thus, a training plan is designed for all the professions involved in the chain of creation and maintenance of digital services.

8.1. Formation

In the context of the launch of the disability inclusion policy, Renault Group has organised training sessions to better support employees with disabilities, using *Microsoft tools*.

Duration: 3 hours online (one session in English, one session in French)

Trainer: Philippe Trotin, Director of Inclusion, *Microsoft*

Participants: about 45 people from different profiles. HR, medical, IT, from several countries.

The training recording is available online internally.

8.2. E-learning modules

Renault Group has also developed 8 e-learning modules, available to all Group employees, in 12 languages on *learning@RG*.

Duration of each module: 15 min.

The modules cover 7 types of disability: visual, auditory, mobility disability, ADHD, autism, dyslexia, mental disability.

The objectives are:

- Gain a better understanding of the type of disability involved and its daily challenges,
- Learn to communicate clearly and appropriately with a person with the disability concerned,
- Develop inclusive behaviours.

Each of these modules provides practical advice on digital inclusion in relation to disability situations.

The eighth module is dedicated to managers to learn how to manage a person with a disability.

9. Pilot site

The objective of this project is to ensure that the processes necessary to take accessibility into account are established, implemented and maintained, and to ensure compliance with and monitoring of the current annual action plan provided for in the framework of the multi-year plan.

This project aims to build and manage the accessibility integration strategy.

The stages of this project, which has begun, are:

- Draft a directive setting out digital accessibility objectives.
- Create a strategy to reap real benefits from accessibility:
 - o Define an awareness plan,
 - o Empower the entire hierarchy,
 - o Setting the action plan and a budget,
 - o Explore ways to link accessibility practices to existing control tools.
- To manage the current multi-year plan.
- Implement accessibility governance for existing and future projects:
 - o Integration with existing policies and good practices,
 - o Integration with existing training plans,
 - o Beyond the legal obligations, instil in the whole of Renault Group the care to reduce the accessibility debt.
- Appoint accessibility referents.
- Support the implementation of accessibility referents.
- Assess risks and impact on budgets.
- Define an accessible outsourcing framework.
- Carry out annual reviews of action plans.

10. The budget allocated to digital accessibility

Depending on the audits and projects, a dedicated budget will be allocated. This budget depends solely on the Commitments and Dialogues Department (Communication Department)

The costs of taking accessibility into account in the future will be integrated into the project costs.

11. Action plans

This multi-year plan is accompanied by annual action plans which describe in detail the operations implemented.

These annual action plans are published each year. They are updated as the actions progress. They can be consulted on the same web page as the multi-year plan.

12. Appendix: Scope of sites and applications

The technical and functional scope is organized around these categories of sites or applications:

- Websites open to the public
- Mobile applications.

Indications marked "NC" (not disclosed) are unknown or under collection and will be updated at a later date.

12.1. Public websites

Site Name	URL	Compliant declaration	Compliance rate	RGAA Compliance Level
Renaut Group	Renaultgroup.com	Yes	NC	NC
Mobilize	Mobilize.com	No	NC	Non-compliant
The Future is NEUTRAL	Thefutureisneutral.com	Yes	NC	Non-compliant
Alliance RNM	Alliancernm.com	Yes	31 %	Non-compliant
Average websites	Media.renault.com	Yes	31 %	Non-compliant
	Media.dacia.com	Yes	32 %	Non-compliant
	Media.renaultgroup.com	Yes	31 %	Non-compliant
	Media.alpinecars.com	Yes	31 %	Non-compliant
	Media.mobilize.com	Yes	29 %	Non-compliant
	Media.alliancernm.com	Yes	22 %	Non-compliant
Venues Events	Events.renaultgroup.com	Yes	NC	Non-compliant
	Events.renault.com	Yes	NC	Non-compliant
	Events.dacia.com	Yes	NC	Non-compliant
	Events.alpinecars.com	Yes	NC	Non-compliant
	Events.bwtalpinef1team.com	Not	NC	Non-compliant
	Events.mobilize.com	Yes	NC	Non-compliant
Ampere	Ampere.cars	Yes	51 %	Partially compliant
Click	<i>Non public</i>	NC	NC	NC

12.2. Mobile Apps

App Name	Store available	Compliant declaration	RGAA Compliance Level
Inside'R	Apple & Android	NC	NC
News App	PWA	NC	NC

12.3. Digital publications

Media Name	Media Type	Date Uploaded	RGAA Compliance Level
Universal Registration Document	PDF	03/2024	The digital version of this document complies with the accessibility standards PDF/UA
Press releases	PDF	Every day	NC