inetum.

Positive digital flow

MULTIANNUAL ACCESSIBILITY PLAN

Period 2022-2024

Contents

1. Introduction

Article 47 of Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship, makes it mandatory for any online public communication service to be accessible to all.

2. Accessibility policy

Digital accessibility is a focal issue in the development or supplying of websites or applications to the public and to Inetum's clients and staff.

This concern is illustrated in the drafting of this multiannual digital accessibility plan that is associated with annual action plans, with the aim to support compliance with the General Repository for Accessibility to Internet services of the French Administration (PGRFA) and the ongoing improvement of the websites and applications concerned, whether they are public, internal to Inetum, or developed specifically for our clients.

The project of developing, monitoring and updating this multiannual plan is the responsibility of the Inetum Group's Mission Handicap, which falls under the Group's Compliance, Quality and Safety Department (mission.handicap@inetum.fr).

Its objective is to promote accessibility by disseminating standards and best practices, support internal teams through training, monitor and ensure the application of Law No. 2005-102 of 11 February 2005 by conducting regular audits, handle user requests, and, in general, ensure the quality of services provided to users with disabilities. Mission Handicap intervenes on services and solutions created for the Group's internal needs as well as those created for our clients.

3. Human and financial resources allocated to digital accessibility

The management and monitoring of compliance with PGRFA is the responsibility of the Compliance, Quality and Security Department of the Inetum Group, which works in collaboration with:

- The User Experience Practice which encompasses a variety of technical skills (auditors, consultants, development, etc.);
- The Group Communication Department, responsible for websites and applications that are general to the Group;
- Subsidiaries of the Group's parent company, which are responsible for their own websites, solutions and applications.

Mission Handicap and the Group's Compliance, Quality and Security Department have a budget and a network of permanent project managers dedicated to digital accessibility.

4. Organization of digital accessibility management

The organization differs depending on whether the websites and applications are set up for the Group's internal needs or as part of the services provided to our clients.

4.1 Training and awareness actions

4.1.1 Institutional and internal websites and applications

For the duration of this plan, training and awareness-raising activities will be organized by the Group's Mission Handicap. These will allow the people working on the websites and applications to develop, publish, and put accessible content on line.

Exploratory work is being done to identify the needs for awareness-raising and training.

4.1.2 Services provided to our clients

The Group's Mission Handicap also aims to train and raise awareness among the sales and operational teams in charge of selling and providing services to Inetum Group clients.

4.2 Digital accessibility in projects

4.2.1 Institutional and internal websites and applications

The Compliance, Quality and Security Department and the User Experience Practice are drawing up technical implementation and compliance guides that are specifically aimed at project managers, architects, designers, developers, and project owners.

Each project team identifies the skills needed to ensure accessibility of the site or application in their skills matrix and, depending on the level of the employees assigned to their projects, identifies and oversees the necessary training and upskilling plans.

4.2.2 Services provided to our clients

To ensure that the services and applications purchased by our clients comply with the accessibility regulations in force, each Inetum project team builds the required accessibility features into the design of an application, website or solution from the outset.

These requirements are defined in collaboration with the client as part of the service contract, with the client acting as project owner and defining their needs and expectations regarding the accessibility of the solution, website, or application they are ordering.

4.3   User tests

4.3.1 Institutional and internal websites and applications

The Group's Mission Handicap is able to contribute to testing by users with disabilities.

4.3.2 Services provided to our clients

In the scope of the service delivered to our clients, the client is responsible for searching for and mobilizing people with disabilities to take part in user tests.

4.4   Including accessibility in tendering procedures

Digital accessibility and compliance with PGRFA must constitute a binding clause and a criterion to assess the quality of a service provider's offer when ordering website or application development services from the latter.

The level of accessibility of the purchased applications is laid down contractually at the tender stage. Non-conformities are managed as part of the anomaly-management process defined with each service provider.

This paragraph does not apply to services provided to clients of the Inetum Group.

4.5   Recruitment

The selection criteria for profiles recruited to work on web projects include an assessment of the accessibility skills and training that may be required, whether for the Inetum Group's internal needs or for assigning an employee to a service contract that has or that will be signed with a client.

4.6   Processing of user feedback

4.6.1 Institutional and internal websites and applications

In accordance with the provisions of PGRFA and the legitimate expectations of users, the latter may report issues to the Group's Mission Handicap: mission.handicap@inetum.fr

4.6.2 Services provided to our clients

Clients are the single point of contact for users with disabilities who want to report accessibility issues.

5. Check and approval process

5.1   Institutional and internal websites and applications

Accessibility obligations are checked before the launch of a project (technical and regulatory requirements and specifications regarding skills and tools are included in the Project Quality Plan), during the execution of the project (regularly checking whether the website or application conforms to the Project Quality Plan), at the final approval stage (checking the project independently of the project team), and then continuously throughout the lifecycle of the website or application in question (monitoring and updating the ongoing improvement plans, and regular updates of the website and application).

Any non-conformity or deviation from PGRFA will only be accepted if it is submitted to Mission Handicap for prior validation, accompanied by a thorough and valid justification, and with a proposal for a reasonable alternative and a dated remedial plan.

5.2   Services provided to our clients

The accessibility requirements that the solution, website or application developed must meet are defined together with the client – who is nevertheless the sole and final decision-maker – and will be included in an appendix to the service contract. A conformity check at the end of the development cycle will confirm if the deliverable meets these requirements.

6. Technical and functional scope

6.1   Inventory

The scope of the websites and applications concerned is described in Appendix 1 of this document.

6.2   Assessments and qualifications

This multiannual plan is accompanied by annual action plans that describe in detail the operations implemented to address all digital accessibility needs.

The details of the planned actions can be found in the annual plan in Appendix 2 of this document.

6.3   Tools selected for internal projects

For its internal sites (i.e. excluding service contracts with our clients) and depending on the context and needs, the Inetum Group uses all or part of the following tools: the PGRFA 4 analysis grid; an internal check list for non-automatable or non-digital controls (e.g. organizational); Lighthouse; Wave; Pa11y; Qualweb; PAC3; Tanaguru engine; Asqatasun + Jenkins; TANAGURU Contrast Finder; DISIC; and W3C Validator.

7. Document tracking sheet

REVISIONS

Version	Date	Subject
0.x	08/2021	Working versions
1.0	09/2021	Initial version
2.0	08/2022	Update

ENDORSEMENTS

	Manager	Date	Endorsements
Draft	Compliance, Quality and Safety Department	08/2022	
Check	User Experience Practice	08/2022	
Approval	Mission Handicap	08/2022	

DISTRIBUTION

Company	Recipient
Inetum France	All staff
Public	Available on the websites published by Inetum France

1. Appendix 1: Scope of websites and applications concerned

Designation	Address	Situation
Corporate website	Inetum.com	Partially compliant
Customer support sites or collaborative project tools	One per solution, address provided to each installed base	Partially compliant
Internal applications	Intranet and repositories Inetum applications Third-party applications	Partially compliant
Software packages and platform	No subject List according to sales catalogue	Partially compliant; updates according to the draft plans of the different solutions

Specific conformity status updates are published in each site's accessibility statement.

2. Appendix 2: Annual action plans

Year	Action	Situation
2021	Inventories (acquisitions / decommissioning / new sites) Formal accessibility of the institutional site Accessibility contact New corporate website on line and progressive decommissioning of existing sites Compliance Window: resources and tools Staggered updates Initial audit of internal applications; contractual developments concerning third-party applications Audit of Inetum software solutions	Completed
2022	Inventories (acquisitions / decommissioning / new sites) Progress plan for inetum.com Regular full audits of external sites Audit of Inetum software solutions	In progress
2023	Progress plan for inetum.com Compliance of internal applications Audit of Inetum software solutions Third-party applications	