



ENGIE MULTI-YEAR PLAN ON DIGITAL ACCESSIBILITY 2023-2025

Introduction

Article 47 of French Law No. 2005-102 of February 11, 2005, for equality of rights and opportunities, participation, and citizenship of people with disabilities makes it mandatory for all ENGIE's digital services to be accessible to all, according to the scope defined in the General Accessibility Improvement Framework (RGAA).

Digital accessibility aims at ensuring that the digital services intended for ENGIE's stakeholders are usable by any person, regardless of their situation, including disability.

To comply with the RGAA, ENGIE must publish three documents:

- A digital accessibility statement per service, based on an RGAA audit that attests to its conformance status
- A multi-year plan (maximum 3 years), presenting ENGIE's policy in terms of digital accessibility, which objective is to inform the public of the actions and means put in place to make the services accessible to all and compliant with the RGAA
- An action plan for the current year including the assessment of previous year actions

This document corresponds to ENGIE's 2023-2025 multi-year plan.

Contents Table

Introduction.....	1
1. ENGIE's Commitments.....	2
2. Digital Accessibility Definition	2
3. Digital Accessibility Policy.....	2
4. Human and Financial Resources Allocated to Digital Accessibility	3
5. Organization of The Consideration of Digital Accessibility.....	3
5.1. Recruitment.....	3
5.2. Employee Training and Awareness Actions	4
5.3. Use of External Expertise	4
5.4. Consideration of Digital Accessibility in New Projects	4
5.5. Processing User Requests	4
6. Functional scope.....	4
7. Annual Action Plans.....	7



1. ENGIE's Commitments

ENGIE has long been committed to the inclusion of individuals in all their diversity, and is implementing an ambitious Diversity, Equity, and Inclusion (DEI) policy. This policy is a real strategic lever for the Group's performance and its objectives are to:

- consider the skills of each person, regardless of their personalities, origins, preferences, beliefs, or particularities
- guarantee each Group employee equal opportunities, safe working conditions and an inclusive work environment where discrimination, harassment and violence are not tolerated
- provide each employee with an environment that allows for the sharing and mutual enrichment of points of view

Digital accessibility is fully in line with this ambition for ENGIE's employees.

For its customers, ENGIE aims at fairness in access and use of its digital services, taking the diversity of situations into account.

2. Digital Accessibility Definition

According to the RGAA, disability is defined as: "any limitation of activity or restriction of participation in society endured in their environment by a person because of a substantial, lasting or permanent impairment of one or more physical, sensory, mental, cognitive or psychic functions, a combination of impairments or a disabling health disorder" (Article L. 114 of the Code of Social Action and Families).

Digital accessibility consists in making digital services accessible to all, that is to say:

- **Perceivable:** for example, facilitating the user's visual, auditory and touch perception of content; providing text equivalents to any non-textual content; creating content that can be presented in different ways without loss of information or structure
- **Operable:** for instance, providing the user with guidance for navigating, finding content; making all functionalities accessible by keyboard; allowing the user enough time to read and use the content; not designing content that could cause seizures
- **Understandable:** for example, making pages work in a predictable way; helping the user correct input errors
- **Robust:** for instance, optimizing compatibility with current and future uses, including with assistive technologies.

3. Digital Accessibility Policy

As part of its Diversity, Equity, and Inclusion (DEI) strategy, ENGIE has defined a digital accessibility policy, which is set out over three years in the multi-year digital accessibility plan.

This policy is jointly supported by the Group's Deputy General Managers in charge of IT & Digital and Human Resources.



It is placed under the operational responsibility of the Group's digital accessibility referent, attached to IT & Digital, and the DEI Manager, attached to Human Resources, whose missions are in particular to:

- Take stock of the situation and manage digital accessibility in the organization
- Support internal teams through training activities
- Control and monitor the application of the aforementioned law of February 11, 2005, by carrying out regular audits, directly or through the intermediary of experts, and to ensure that users' requests are taken into account and, in general, that the quality of service provided to users with disabilities is maintained
- Promote digital accessibility by spreading standards and best practices

Accompany the compliance with the RGAA and the progressive improvement of the digital services concerned

4. Human and Financial Resources Allocated to Digital Accessibility

A committee dedicated to digital accessibility (the "Digital Accessibility" Inter-Departmental Working Group) has been set up in 2021 to complete the multi-year plan, identify priority applications and implement the associated action plans.

Each compliance upgrade project identifies and implements the resources needed to achieve its objectives, notably through assistance from expert companies.

An internal offer has been created to support the implementation of digital accessibility within ENGIE's Group.

5. Organization of The Consideration of Digital Accessibility

The following bodies ensure that digital accessibility is considered within the Group:

- A Diversity, Equity, and Inclusion (DEI) steering committee, which includes the Group's Deputy General Managers in charge of IT & Digital and Human Resources
- A Digital Accessibility operational committee, which includes the Group's digital accessibility referent and the DEI Manager
- A Digital Accessibility community, with one representative per domain, in charge of implementing digital accessibility in their area, with the help of IT & Digital and DEI experts

The elements below describe the points on which ENGIE will rely to improve the digital accessibility of all its websites and applications.

5.1. Recruitment

Digital accessibility skills will be highlighted in job descriptions that require them. Adjustments still need to be made to the recruitment process to ensure that the subject is considered.

The most recent application projects, such as the new Group HR solution, are already designed to meet digital accessibility requirements.



5.2. Employee Training and Awareness Actions

A training plan for the professionals concerned is to be put in place.

Awareness-raising sessions are currently being organized, notably as part of the European Week for the Employment of People with Disabilities.

5.3. Use of External Expertise

ENGIE solicits internal and external expertise with the technical means and tools required to test and validate digital accessibility.

5.4. Consideration of Digital Accessibility in New Projects

Digital accessibility and compliance with the RGAA should be a binding clause and should be part of the evaluation of the quality of a service provider's offer when ordering work, particularly through calls for tender.

Contract preparation procedures and bid evaluation rules must be adapted to consider RGAA compliance requirements throughout the purchasing process (from specifications to contract).

5.5. Processing User Requests

A follow-up of the users' requests and their status will be carried out on behalf of ENGIE's mediator by the digital accessibility referent, who will make sure they are processed.

6. Functional scope

The list of applications concerned, and their support schedule is currently being defined and will provide a global view of the implementation of corrective actions.

Each site owner remains responsible for the detailed identification and implementation of the required actions and resources.

To date, joint work within the "Digital Accessibility" Inter-Departmental Working Group has enabled an initial inventory to be made. The RGAA compliance audits listed in the table below have been carried out. New audits will be carried out depending on the results of the inventory of applications.

For the four regulated entities of the ENGIE group (GRT Gaz, GrDF, Storengy and Elengy), regular exchanges take place to make sure of the increase in competences and the absence of risk, this in the respect of the code of good conduct of these entities. They are followed by an asterisk in the table below.

At this stage, mandatory accessibility measures remain the priority, given the remaining work to be done on digital accessibility. Non-mandatory accessibility measures will be considered at a later stage.

Site	URL	RGAA audit Completion Date	RGAA audit Status
GrDF*	https://www.grdf.fr	06/12/2020	Done
MyPortal	Internal Platform	05/2021	Done
GRT Gaz*	https://www.grtgaz.com	24/05/2021	Done
ENGIE DIGITAL	https://digital.engie.com/	08/07/2021	Done
Storengy*	https://www.storengy.com/	22/10/2021	Done
eCare Monitoring	Internal Platform	01/02/2022	Done
Gaz Tarif Réglementé	https://gaz-tarif-reglemente.fr/	21/02/2022	Done
ENGIE Green	https://www.engie-green.fr/	04/07/2022	Done
ENGIE Entreprises et Collectivités	https://entreprises-collectivites.engie.fr/	25/08/2022	Done
ENGIE Particuliers	https://particuliers.engie.fr	22/09/2022	Done
ENGIE.COM	https://www.engie.com	29/07/2022	Done
Digiplace	Internal Platform	11/2022	Done
ENGIE.design	https://engie.design/	01/2023	Done
HR Hub	Internal Platform	In progress	In progress
ENGIE Group Intranet	https://engie.sharepoint.com/sites/ENGIEIntranet	11/04/2023	Done
Job Application website	https://jobs.engie.com/	30/05/2023	Done
Website for building services Living@	https://engiegbs.livingat.bymyportal.com/fr/login	03/01/2023	Done



Storengy Intranets (SAS and France)	Internal platforms	In progress	Done
MyITContract Legal Platform	Internal platforms	In progress	Done



7. Annual Action Plans

This multi-year plan will be accompanied by annual action plans that describe in detail the operations implemented to support all of ENGIE's digital accessibility needs.

The annual action plans from 2023 to 2025 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

	Status	Update Date
2023 Annual Plan	Coming up	Coming up