



MULTI-YEAR DIGITAL ACCESSIBILITY PLAN 2023-2025

Framework of the multi-year plan

Article 47 of French law n° 2005-102 of February 11, 2005, on equal rights and opportunities, participation, and citizenship of people with disabilities, requires that all digital services of ENGIE must be accessible to everyone. The compliance to this obligation can be measured using the French accessibility guidelines called ("*Référentiel Général d'Amélioration de l'Accessibilité*", hereinafter "RGAA").

Digital accessibility aims to ensure that ENGIE's digital services are usable by everyone, regardless of their situation, including disabilities.

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

- A digital accessibility declaration for each service, based on an RGAA audit that certifies its compliance status;
- A multi-year plan (maximum 3 years), presenting ENGIE's digital accessibility policy, aimed at informing the public about the actions and resources implemented to make services accessible to all and compliant with the RGAA;
- An action plan for the current year, including the assessment of actions carried out the previous year.

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



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1. ENGIE Group's commitments

Long committed to the inclusion of individuals in their diversity, ENGIE Group implements an ambitious Diversity, Equity, and Inclusion (DEI) policy. A true strategic lever for the Group's performance, it aims 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;
- Offer each employee an environment that allows for the sharing and mutual enrichment of viewpoints.

Digital accessibility is fully integrated into this ambition for ENGIE employees.

For its customers, ENGIE aims for equity in access and use of its digital services, taking into account diverse situations.

2. Definition of digital accessibility

According to the RGAA, disability is defined as: "any limitation of activity or restriction of participation in social life suffered in one's environment by a person due to a substantial, lasting, or permanent alteration of one or more physical, sensory, mental, cognitive, or psychological functions, multiple disabilities, or a disabling health condition" (article L. 114 of the French Social Action and Family Code).

Digital accessibility consists of making digital services accessible to all, which means:

- **Perceptible:** for example, facilitating the visual, auditory, and tactile perception of content by the user, providing text equivalents for all non-text content, creating content that can be presented in different ways without loss of information or structure;
- **Usable:** for example, providing the user with orientation elements to navigate, find content, making all functionalities accessible via the keyboard, giving the user enough time to read and use the content, not designing content that could trigger epileptic seizures;
- **Understandable:** for example, ensuring pages function predictably, helping the user correct input errors;
- **Robust:** for example, optimizing compatibility with current and future uses, including 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 outlined over 3 years in the multi-year digital accessibility plan.

The digital accessibility policy is accessible via the following:

<https://accessibilite.numerique.gouv.fr/obligations/schema-pluriannuel/>

4. Human and financial resources allocated to Digital Accessibility

A dedicated committee for digital accessibility (the inter-departmental “Digital Accessibility” Working Group) was established in 2021 to complete the multi-year plan, identify priority cases, and implement associated action plans.

Each compliance project identifies and implements the necessary resources to achieve its objectives, notably through assistance from specialized companies.

An internal offer has been created to support the implementation of digital accessibility within the ENGIE Group. For example, a training program has been developed to raise employee awareness of digital accessibility and good web accessibility practices. In addition, specific tools have been provided to help teams make digital content more accessible to all

5. Organization of the implementation of digital accessibility

The following bodies ensure the consideration of digital accessibility within the Group:

- A Diversity, Equity, and Inclusion (DEI) steering committee, involving the Group’s Deputy Director Generals (“*Directors Généraux Adjoints*”) in charge of IT & Digital and Human Resources;
- An operational Digital Accessibility Committee, involving the Group’s Digital Accessibility Referent and the DEI Manager;
- A Digital Accessibility Community, bringing together a referent for each domain, responsible for implementing digital accessibility within their scope, with the help of IT & Digital and DEI experts.

The following elements describe the points on which ENGIE will work on in order to improve the digital accessibility of all its websites and apps.

5.1 Recruitment

Digital Accessibility skills will be highlighted in the job offers’ descriptions where necessary. Adjustments are still needed in recruitment processes to ensure the topic is taken into consideration.



The most recent implementation projects, such as the new Group HR solution, already aim to meet digital accessibility needs.

5.2 ENGIE employees training and awareness actions

A training plan for relevant professionals is being implemented.

Awareness sessions are currently organized, notably during the European disability employment weeks.

5.3 Use of external expertise

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

5.4 Digital accessibility & contracts

Digital accessibility and RGAA compliance must be a binding clause and contribute to evaluating the quality of providers' application in calls for tenders, or more generally, their proposal/cotation.

RGAA compliance requirements must be considered throughout the purchasing process (from the drafting of specifications to the drafting of contract). Regarding calls for tenders, this includes adapting the process and the rules (e.g. criteria of notation and selection of the service providers, acceptance process etc) to make sure of their compliance to the RGAA requirements.

5.5 Consideration of digital accessibility in new projects

Awareness-raising of the relevant actors within the Group's entities is ongoing.

These players can rely on ENGIE Digital and GBS-IT's support for their new projects.

When user tests were being held, it was found that people with disabilities were only taken into consideration partially. It is currently being systematized and in the future, it will partially rely on external providers so that people with disabilities will be fully taken into consideration.

5.6 Handling user requests

A follow-up of user requests and their status will be carried out on behalf of ENGIE mediator by the Digital Accessibility Referent, who will ensure their processing.

6. Functional scope

The list of non-accessible content (e.g. websites/apps, etc.) and their handling schedule are currently being defined and will provide a global vision of the implementation of corrective actions. The schedule takes into account the priority nature of the most frequently consulted content and the most frequently used services. But it has to be noted that mandatory accessibility measures remain a priority at this stage, given the remaining work on digital accessibility. Non-mandatory accessibility measures will be considered at a later stage.

Moreover, each site owner remains responsible for the detailed identification and implementation of the required actions and resources. To date, joint work within the inter-departmental “Digital Accessibility” Working Group has enabled an initial inventory on whether the content is accessible or not, through RGAA compliance audits.

The RGAA compliance audits listed in the table below have been carried out. Finally, new audits may be commissioned based on the results of the inventory.

For the four regulated entities of the ENGIE Group (GRT Gaz, GRDF, Storengy, and Elengy), regular exchanges take place to ensure people’s skill development on this topic, and the absence of risk, in compliance with the code of conduct of these entities. They are marked with an asterisk in the table below.

Site	URL	Date of completion of the RGAA audit (MM/DD/YY) or (MM/YY)	Status of the RGAA audit
GrDF*	https://www.grdf.fr	12/06/2020	Completed
MyPortal	Plateforme interne	05/2021	Completed
GRT Gaz*	https://www.grtgaz.com	05/24/2021	Completed
ENGIE DIGITAL	https://digital.engie.com/	07/08/2021	Completed
Storengy*	https://www.storengy.com/	10/22/2021	Completed
eCare Monitoring	Plateforme interne	02/01/2022	Completed

Gaz Tarif Réglementé	https://gaz-tarif-reglemente.fr/	02/21/2022	Completed
ENGIE Green	https://www.engie-green.fr/	07/04/2022	Completed
ENGIE Entreprises et Collectivités	https://entreprises-collectivites.engie.fr/	08/25/2022	Completed
ENGIE Particuliers	https://particuliers.engie.fr	09/22/2022	Completed
ENGIE.COM	https://www.engie.com	07/29/2022	Completed
Digiplace	Plateforme interne	11/2022	Completed
ENGIE.design	https://engie.design/	01/2023	Completed
RH Hub	https://entreprises-collectivites.engie.fr/	In progress	In progress
Intranet Groupe ENGIE	https://engie.sharepoint.com/sites/ENGIEIntranet	04/11/2023	Completed
Sites Carrières ENGIE	https://jobs.engie.com/	05/30/2023	Completed
Site d'accès aux services	https://engiegbg.livingat.bymyportal.com/fr/login	01/03/2023	Completed
Immobilier Living@	Plateformes internes	In progress	In progress
Intranets Storengy (SAS et France)	Plateformes internes	In progress	In progress



MyITContract Plateforme juridique	Plateforme interne	In progress	In progress
ENGIE SOLUTION	https://www.engie-solutions.com/fr	25/07/2024	Completed

7. Annual plans

This multi-year plan is accompanied by annual action plans that detail the operations implemented to address all of ENGIE's digital accessibility needs.

The annual action plans from 2023 to 2025 are published each year. They are updated as actions progress. They are available on the same web page as the multi-year plan.

	Status	Update Date
Annual Plan 2023	Coming soon	Coming soon