Multi-year plan 2024-2026

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1. Introduction

1.1. Digital Accessibility

Disability is defined as "any limitation of activity or restriction of participation in social life experienced in one's environment by a person due to a substantial, lasting, or definitive 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 Code of Social Action and Families).
Digital accessibility involves making online public communication services accessible to all individuals with disabilities, which means ensuring they are:

- **Perceptible:**
Facilitate the user's visual and auditory perception of the content; offer text equivalents to any non-text content; create content that can be presented in different ways without loss of information or structure (e.g. with a simplified layout);

- **Usable:**
Provide the user with orientation elements for navigating and finding content; make all functionalities keyboard-accessible; allow the user sufficient time to read and use content; do not design content likely to provoke epileptic seizures;

- **Understandable :**
Ensure that pages function predictably; help users correct input errors.

- **Robust:**
Optimize compatibility with current and future uses, including assistive technologies.

Essential for people with disabilities, digital accessibility benefits everyone: the elderly, people with temporary disabilities, people who are not at ease with the Internet, people with medical constraints.

Digital accessibility is part of an approach based on equality and inclusion, and represents a fundamental political and social challenge to guarantee equal access to information and online services for all, without discrimination.

Digital accessibility is a cross-cutting issue that affects everyone involved in the creation, maintenance and use of digital devices: decision-makers, project managers, graphic designers, developers and content producers.

1.2. The decree law

Decree no. 2019-768 of July 24, 2019, on the accessibility of online public communication services1 to people with disabilities, published on July 25, 2019, sets out accessibility obligations for all companies with sales in excess of 250 million euros.

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1 Online public communication services are defined as any provision to the public or categories of the public, by an electronic communication process, of signs, signals, writings, images, sounds or messages of any kind which do not have the character of private correspondence (article 1 of law no. 2004-575 of June 21, 2004 for confidence in the digital economy).

The government has set up a General Framework for the Improvement of Digital Accessibility (Référentiel Général de l'Amélioration de l'Accessibilité - RGAA), the latest version of which, V4.1.2, was released in April 2023.
Orano is affected by this decree, and is therefore naturally obliged to comply with the RGAA.

As part of our commitment to digital accessibility, we are also integrating the principles of the European Accessibility Act (EAA). This European legal framework, applicable from June 2025, reinforces accessibility obligations for digital products and services, guaranteeing equitable inclusion within the whole of Europe.

At Orano, we are convinced that diversity is an asset and a performance driver. The percentage of disabled employees in Orano's teams has risen from 4.58% in 2020 to 5.67% by the end of 2023.

1.3. Orano's commitment to digital accessibility

Officially committed since 2008 to the employment, inclusion and retention of people with disabilities, Orano is pursuing its approach by making its digital content accessible to everyone, in all its environments.
As Orano committed to in the 2024/2027 company agreement, signed on December 18, 2023 by all the trade unions, digital accessibility is taken into account within the Group: "To ensure proper application, Orano is implementing a second multi-year plan over three years (2024 - 2026) incorporating an action plan to bring digital media into compliance with the RGAA. Orano is also integrating the RGAA into its purchasing, diversity, training, communication, IS and other business processes.

In this context, a project organization has been set up from 2021 to acculturate employees, train and support the teams concerned. A project manager has been appointed within the People & Communications Department, and a cross-functional management committee has been set up, comprising the head of the Group's Handicap mission, and the heads of Digital Communications, Digital Transformation and Information Systems.
This organization has developed and is managing the 2024-2026 multi-year plan.

2. Review of the first multi-year plan

An initial multi-year plan for 2021-2023 has been drawn up and published, implementing all the structuring actions needed to make digital accessibility accessible and sustainable.

Notable achievements include:

- Integration of accessibility processes within the purchasing department

- The implementation of a strategic tool to assess the accessibility priority of projects and determine the resulting actions,

- The publication of almost 23 accessibility audits and declarations,

- Training of 70 employees according to their specific job profile,

- The provision of practical guides to support teams,

- The development of an innovative simulator for Orano, reinforcing communication and awareness of accessibility and disability in-house,

- Compliance rates have improved significantly, reaching 82.81% for the website (orano.group) and 87% for the intranet. This progress underlines Orano's commitment to digital accessibility. In particular, by taking accessibility into account right from the initial phases of the intranet redesign project, the compliance rate rose from 33% to a remarkable 87%.

Six projects were identified and formalized in the first plan and are being continued:

- 2 digital media projects
  - Compliance
  - Auditing and certification
- 4 organizational projects
  - Information
  - Tooling
  - Training
  - Managing

In the remainder of this document, we will explain these 6 projects and detail the actions they entail.

3. Digital media projects
3.1. To ensure compliance

The aim of this project is to ensure that digital media eligible for RGAA compliance are prioritized. It takes into account all digital media covered by the decree, i.e.: internet/extranet sites, intranet, software packages including business and mobile applications, publications and videos.

3.1.1. Internet/extranet websites

Site mapping was carried out as part of the first multi-year plan.
Compliance is ongoing, and is planned for the 2024/2026 multi-year plan:
- Support for the creation of new websites every year
- Support for continuous improvement of websites
- Compliance of 10 existing sites: OranoBox, Trihom, Orano Batteries, Orano US, Orano Canada, Orano Innovation PME, LEA , CIME, Cominak redevelopment, OranoJobs.

3.1.2. Intranet site

The intranet site currently has an 87% accessibility rate, and the challenge is to maintain it. To guarantee this level, good accessibility practices have been integrated into the contributors' guide.

3.1.3. Business, mobile and street furniture applications

In order to define the scope, a mapping of the applications to be taken into account was carried out as part of the 2021-2023 multi-year plan.

This mapping was based on the internal repository of all the Group's applications.

It is now based on the WYNA internal strategy tool, which enables us to assess the accessibility priority of projects.

- Support for the creation of new business applications
- Support for the continuous improvement of business applications
- Compliance of 11 existing business applications: O'Quotidien, Anaïs, Orano Box, FTD Events, Quarks, Orano Directory, DIP, SORB, Tabora, RAM RAC, Melox JGFH, SDMS Tricastin, Experiential Module

3.1.4. External software packages

As Orano has no say in the compliance of these software packages, it was decided to inform the publishers of all software packages of Orano's new obligations (see "Information").

As part of its proactive approach to digital accessibility, Orano sent 50 letters to software publishers requesting information on their commitments to meeting accessibility criteria for digital services. The aim of these initiatives is to assess and encourage the inclusion of accessibility in the development and management of the digital tools offered.

The results of this initiative are as follows:

- 10% of letters received detailed feedback on publishers' commitments, demonstrating the start of a dialogue and an interest in the issue of digital accessibility within partner companies.
- 80% of the responses received expressed a positive commitment to digital accessibility, including the transmission of accessibility declarations, the highlighting of efforts already undertaken to improve accessibility, and the level of compliance achieved in terms of compliance with current standards.

These results illustrate the importance of maintaining an ongoing, transparent relationship with publishers, and underline Orano's commitment to continuing its efforts to guarantee the accessibility of digital services throughout the value chain, in collaboration with its partners.

It was also decided that the RGAA would be one of the imperative clauses for the award of new contracts (see "Tools" project).

3.1.5. Publications

Mapping of publications eligible for compliance was carried out during the first multi-year plan.

From now on, the aim is to ensure that all publications put online are compliant each year.
The accessibility of publications is guaranteed via an external solution specialized in PDF remediation ("Compliance" project), but also via the training of the public concerned in the creation of accessible documents (see "Training").

3.1.6. Videos

The mapping of videos eligible for compliance was carried out during the first multi-year plan with the various departments. We now need to ensure that all the year's videos are accessible when they go online.

Video accessibility requires the addition of 2 elements:

- **Synchronized subtitles**

Synchronized subtitles present the text of the video's audio information (a character's words, noise important for understanding the action, etc.) and are displayed synchronously with the video stream.

- **Text transcription**

A text transcript is textual content associated with a video, either in HTML-encoded text, or in a text file that can be found on the same page or accessed via a link. This content gives the user access (independently of video viewing) to:

- All that is expressed orally;

- All the descriptive information necessary for an equivalent understanding of the action.

This textual information must be presented in the chronological order in which it appears in the video.

> Nb: The implementation of audio description has not been retained in view of the cost it would entail in relation to the benefit.
> Audio description is a narration added (via a sound file) to a soundtrack to describe important visual details that cannot be understood from the main soundtrack alone.

3.2. Auditing and certification

The aim of this project is to ensure compliance with the RGAA and meet the transparency requirements defined in the decree.
The audit and certification must follow the compliance of Internet sites, intranets and business applications.
The following audits and certifications have been decided as part of the multi-year plan:

- Audit and certification of new sites, business or mobile applications from 2024 onwards
- Audit and certification at renewal date (every 3 years) for those already audited

4. The organizational projects

The organizational projects are the foundation for ensuring that digital accessibility is taken into account, on a long-term basis within the Orano Group.

4.1. Information

The aim of this project is to inform the various internal and external players concerned of Orano's obligations in terms of digital accessibility, and at the same time to inform themselves.
Articles related to accessibility are planned both internally and for the public to demonstrate Orano's commitment. These publications will highlight the actions put in place to perpetuate accessibility and will underline the positive impact on people with disabilities and Orano employees in particular. They will also promote the importance of digital accessibility more widely. In this way, Orano is affirming its role as a defender of an inclusive digital environment.

4.2. Tooling

The aim of this project is to provide those involved in a digital project with all the information, knowledge and tools they need to implement the RGAA.

- **A framework for publisher solutions and a resource framework for specific projects**
  - By drawing up a reference framework for integrating accessibility criteria into calls for tender (RFP) and SaaS solutions. This includes accessibility clauses in solution selection matrices, and sending a letter to publishers asking them about their commitments in terms of digital accessibility.
  - By creating and setting up a wiki database of guides, verification tools and best practices for project managers and teams, in order to focus on skills and verify the need for skills upgrading.

- **Implementing tools for capitalizing on, verifying and implementing accessibility**
  - Creation of a wiki database of best practices
  - Use of code verification and validation tools for technical teams
  - The integration of WYNA (What you need for accessibility), a questionnaire that qualifies the level of priority to be respected by project managers. This tool defines a compliance objective corresponding to the level of digital accessibility to be achieved for the final platform, following an audit.

4.3. Training

The aim of this project is to train all Orano teams in the RGAA and give them the knowledge they need to implement digital accessibility in their projects.

Training is at the heart of Orano's digital accessibility strategy. It is crucial to continue this training on an ongoing basis, in particular by validating the knowledge acquired by employees who have already received training and by new arrivals. This underlines the need to constantly adapt our training efforts and to identify quantitative needs among our teams.

A survey of needs carried out with the departments has enabled us to define an awareness-raising module and 7 training modules included in the Orano training catalog:

- **Raising awareness of digital accessibility**
  - This awareness-raising program, available in-class or via an e-learning module, should enable each participant to master the digital accessibility approach professionally.

- **Accessible design**
  - This training module for web and mobile design teams (project managers, UX/UI designers, POs, etc.) enables participants to integrate digital accessibility criteria right from the design stage, and work more effectively with developers.

- **Accessible development**
  - This training module for development teams (back-end, front-end, full stack, integration, etc.) enables you to master the development of accessible internet/intranet sites and assimilate accessibility issues (use of Aria, compliance with RGAA techniques, etc.).

- **Accessible contribution**
  - This training module, designed for all audiences, enables participants to master the creation of accessible content.

- **Accessible contribution with articulate**
  - This training module for e-learning designers enables participants to integrate accessibility best practices throughout the creation of an e-learning module with the articulate tool.

- **Creating accessible Word and PowerPoint**
  - This training module is designed for anyone who wants to master the process of creating PDFs using Microsoft's Word and PowerPoint tools.

- **Manage the accessibility of your projects**
  - This training module is designed for anyone in charge of managing a digital project, and enables them to master how to take digital accessibility into account in a project, and to plan, monitor and evaluate how digital accessibility is taken into account throughout the project.

- **Managing digital accessibility: project manager**
  - This training module for the group's accessibility referent provides an overview of the legal context, the creation and implementation of a multi-year plan, and the acculturation and change management required to integrate accessibility within the Orano group.

For each module, annual planning is based on needs identified during annual appraisals and the integration of new employees.

4.4. Managing

The aim of this project is to ensure that the processes required to take accessibility into account are established, implemented and maintained, and that the action plan set out in the multi-year plan is respected and monitored.

This project aims to
- Manage the current multi-year plan in conjunction with the business lines concerned
- Produce annual reports
- Facilitate feedback and adjust actions
- Leading the management committee

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5. The budget allocated to digital accessibility

A budget estimate has been drawn up for each project, spread over the three years of the new multi-year plan. This specific budget is managed by the accessibility coordinator, and is intended to cover the costs of bringing liabilities into line with requirements, change management and the training needed to enhance the skills of the people involved.
Accessibility-related costs are included in project costs.

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7. The 2024 action plan

	2024
Information	➢ Continuation of the presentation of the Orano commitment to digital accessibility
Tooling	➢ Setting up tools for capitalizing on, verifying and implementing accessibility ➢ Integration of the RGAA in the documents of the functional departments concerned ➢ Adaptation of reference systems to RGAA (digital, print and IS) ➢ Adapting the media library ➢ Streamlike adaptation
Training	➢ Accessible contribution - 1 session ➢ Creating accessible Word/PPT - 1 session ➢ Manage the accessibility of your projects - 1 session
Ensure compliance	➢ 2024 publications compliance ➢ Compliance of all videos 2021 (estimate based on 2,200 hours per year)
Audit Certify	➢ Audit and certify newly created websites ➢ Audit and certify the year's new business and mobile applications
Management	➢ Assessment of the 2021-2023 multi-year plan ➢ Assessment 2023