

Multi-Annual Digital Accessibility Plan 2025 – 2027

Indosuez Wealth Management Group

1. INLEIDING

This plan outlines the commitments and multi-annual approach adopted by the Indosuez Wealth Management Group to progressively ensure the digital accessibility of our online services, in accordance with Article 47 of French Law No. 2005-102 of 11 February 2005, French Law No. 2023-171 of 9 March 2023, and Directive (EU) 2019/882 on accessibility requirements for products and services dated 17 April 2019.

2. GENERAL ACCESSIBILITY POLICY

Our bank is actively committed to digital accessibility, as part of a strong inclusion initiative. Accessibility is a strategic pillar of our CSR policy.

The Accessibility Lead, appointed in December 2024 (Head of Digital Transformation), was replaced by the Head of Marketing in December 2025.

3. OBJECTIVES OF THE MULTI-ANNUAL PLAN (2025–2027)

- Conduct regular audits of digital services
- Achieve a progressive level of compliance
- Train and raise awareness among teams
- Implement a process for handling user feedback
- Integrate accessibility into internal processes
- Ensure regular monitoring of actions undertaken.

4. INTERNAL ORGANISATION AND HUMAN RESOURCES

The accessibility lead oversees the programme's actions for Indosuez and its subsidiaries: audits, training, updates, and network coordination. Local teams work closely with this lead for operational implementation.

Consideration of skills and recruitment

Internal upskilling is an essential lever for the sustainable integration of digital accessibility.

To this end:

- Job descriptions for relevant roles (designers, developers, UX/UI designers, editorial contributors, digital project managers) will gradually include accessibility skills as a recruitment or evaluation criterion.
- The accessibility lead will ensure that HR frameworks include training modules from onboarding for the relevant populations.
- Training sessions will be renewed annually to ensure a common and up-to-date foundation for all contributors to digital journeys and services.

5. FINANCIAL RESOURCES

Each entity finances its own annual action plan, based on audit results and priorities defined with the accessibility lead.

6. METHODS USED

Digital accessibility audits have been conducted since 2025 on an initial scope chosen according to site traffic, accessible to clients.

Training includes:

- Internal communication via the intranet, videos, and articles
- A global webinar
- Targeted training for digital content and product producers (developers, designers).

Additionally, **user tests** integrated into digital projects will now, where relevant, **include the participation of people with disabilities**. This approach aims to validate real accessibility and actual user experience, complementing technical audits.

7. INTEGRATION INTO INTERNAL PROCESSES

Accessibility is integrated from the design stage (“by design”), within specifications, design, and development. Integration into procurement processes is planned by 2027. Preparatory work is underway to define requirements and incorporate them into future tenders.

8. HANDLING USER FEEDBACK

A contact form is available on all relevant sites, supplemented by a dedicated telephone line for support in using digital services. These channels are intended to enable a process of continuous improvement.

Corrective measures and prioritisation

Following audits, correction plans are established for each site or application.

These plans include:

- A classification of non-compliances (blocking, major, minor),
- Prioritisation of corrections based on usage (traffic, frequency of use, user impact),
- A progressive implementation schedule, aligned with product roadmaps.

The most strategic content and the most frequently used interfaces are prioritised within six months following the audit. Monitoring is ensured via the annual action plan.

9. CONTROL AND VALIDATION PROCESS

The central coordinator ensures monthly monitoring, annual reporting, and organises internal or external audits.

The plan is reviewed annually based on an assessment, and plans are adjusted according to the results obtained.

Non-mandatory accessibility measures

Our accessibility approach goes beyond legal obligations where relevant for our target audiences.

Measures planned for 2025–2027 include:

- **Adding subtitles and text transcripts** to our strategic video content,
- **Editorial simplification** for certain complex information journeys (product sheets, administrative procedures),
- Gradual consideration of **certain AAA-level WCAG** criteria, as part of a continuous improvement approach

10. ANNUAL ACTION PLAN

This multi-annual plan is accompanied by annual action plans detailing the operations implemented to address all accessibility needs (links provided in the accessibility statement).

Each annual plan results in a **structured report** including:

- Actions undertaken (completed, ongoing, upcoming),
- Difficulties encountered or points of attention,
- Assessment of benefits (in coverage, compliance, user satisfaction),
- Reassessment of priorities for the following year.

These reports are consolidated at group level and help to adjust this multi-annual plan each year.