



# Multiannual Digital Accessibility Scheme TotalEnergies

2021-2023

First publication date : JULY 2021



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## I. Digital accessibility

Digital accessibility means that websites, tools and technologies are designed and developed so that everyone can use them, regardless of how they access them and regardless of their disability.

As provided for in article 47 of Law No. 2005-102 of 11<sup>th</sup> February 2005 on equal rights and opportunities, participation and citizenship of people with disabilities, TotalEnergies is concerned by the obligation to make its online public communication services accessible<sup>1</sup>.

According to Article 1 of Law No. 2004-575 of 21<sup>th</sup> June 2004 on confidence in the digital economy, online public communication services are defined as "any provision to the public or categories of the public, by means of an electronic communication process, of signs, signals, writings, images, sounds or messages of any kind which do not have the character of private correspondence".

In accordance with II of Article 47 of the a forementioned law of 11<sup>th</sup> February 2005, they notably include:

- Internet, intranet and extranet sites; software packages, as long as they constitute applications used through a web browser or a mobile application;
- Mobile applications, which are defined as any application software designed and developed for use on mobile devices, such as smartphones and tablets, without an operating system or hardware;
- Digital urban furniture.

This document sets out TotalEnergies' commitment to the digital accessibility of its online public communication services for all users, with or without disabilities.

## II. The challenges of digital accessibility

TotalEnergies' ambition is to improve digital accessibility everywhere and for everyone.

In this context, a collective and cross-functional approach has been put into place to meet three main challenges: human, societal and legal.

TotalEnergies is committed to:

- Improve the digital inclusion of users of its applications;
- Respect its commitments to the integration of people with disabilities;
- Comply with the regulations on digital accessibility, based on the French General Accessibility Improvement Guidelines, published by the French inter-ministerial digital department.

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<sup>1</sup> In the case of a company whose annual turnover exceeds the threshold of 250.000 euros provided for in Article 2 of Decree No ; 2019-768 of 24th July 2019 on the accessibility of online public communication services for persons with disabilities.

### III. The digital accessibility actors

The Head of Strategy and Human Resources Policy and the Chief Digital Officer support this approach.

The steering committee is composed of:

- The digital accessibility Lead, attached to the Digital department;
- The Head of the “Mission Handicap”, attached to the Human Resources;
- The Digital Governance team, attached to the External Communication.

This steering committee is responsible for drawing up, monitoring and updating this multi-year plan and the associated annual action plans. The members of this committee help to ensure that digital accessibility is taken into consideration in new projects.

The digital accessibility Lead is responsible for the approach, centralizing and steering the project, accompanied by the “Mission Handicap”, which shares users' needs and helps to prioritize actions.

The digital Governance pays particular attention to the accessibility of the websites of its "website factory" and applications, by systematically raising awareness of websites' managers and by reinforcing the accessibility of the technical base with the partnership of the TMA (Third-party Application Maintenance).

### IV. A dedicated channel

If you have any specific need or want to know more about TotalEnergies' digital accessibility approach, a dedicated channel is available:

[digital.accessibility@totalenergies.com](mailto:digital.accessibility@totalenergies.com)

### V. An action plan

The approach is based on a three-lines action plan: acculturation, training and integration.

It is a continuous improvement approach, which is not fixed. Ideas and feedbacks from employees are essential to progress in the most possible agile way.

#### a. Acculturation

In order to acculturate its employees, TotalEnergies has set up several general awareness-raising initiatives on digital accessibility (webinars, sharing of communication documents, etc.), led by members of the steering committee or

volunteers from the digital accessibility working group. They are targeted primarily at TotalEnergies employees, whatever their job or entity.

The working group relies on the other thematic working groups that have also been set up to provide rapid and sustainable solutions for users with hearing or visual disabilities, etc., identified within TotalEnergies.

The digital Governance team supports website managers and contributors when creating a new website/application. The following Integration paragraph describes the important points on which TotalEnergies will rely to improve the digital accessibility of all its websites and external applications.

## b. Training

To train its employees, TotalEnergies is establishing several actions:

- An e-learning module dedicated to digital accessibility at all stages of a project, available on the internal training platform, in French and English versions. It is shared internally by those involved in the approach as well as by the Diversity/Disability points of contact in the subsidiaries.
- Face-to-face or distance-learning training courses open to all to introduce accessibility with the ergonomic options available on the digital tools used;
- Training courses dedicated to employees with disabilities;
- Dedicated training for employees likely to be affected by digital accessibility in their jobs.

TotalEnergies is aware that the continuity of the actions put into place requires the development of internal skills/knowledge in terms of digital accessibility.

## c. Integration

To integrate this topic into the tools, TotalEnergies is establishing several actions:

- Technical update

The integration of digital accessibility is an iterative process. This subject must be taken into account as far as possible at the design stage, during the development phase and during the production of applications.

The priority is to propose reasonable accommodations for people with disabilities who are unable to navigate properly in order to ensure their ability to use digital tools.

The “Mission Handicap”, its team of branch coordinators and all users likely to be confronted with this issue are particularly involved in reporting needs.

Actions have been put in place to ensure that we have an accessible base for future TotalEnergies digital tools and to limit the accessibility debt in the future.

- Regulatory update

The digital Governance manages the compliance of websites and applications. It optimizes the management of tools thanks to the players responsible for a given perimeter. TotalEnergies prioritizes accessibility measures under the A and AA criteria but does not exclude non-mandatory AAA criteria.

To facilitate the consideration of accessibility requirements, there is an internal "Demonstrator" site aiming at communicating good practices on the accessibility of content for employees. The site is updated regularly.

A digital accessibility expert is involved in certain website content creation projects and carries out both technical and functional tests in order to alert stakeholders for any corrections needed to be made and the best practices to be adopted. It intervenes as early as possible to optimize the compliance rate of the content concerned.

Since 2019, TotalEnergies has undertaken digital accessibility projects aiming at establishing an inventory of digital content (via accessibility tests and full audits). The audits carried out to assess the compliance of online communication services are organized with an external service provider specializing in the subject.

- Insertion of an annex in contracts

Standard models of statements to be included in the appendices of service contracts in order to select service providers able to meet the requirements determined by the the French General Accessibility Improvement Guidelines are drafted and shared. They are useful as criteria for selecting service providers.

The Purchasing department is made aware of digital accessibility and their responsibilities in the context of compliance of new digital tools.

## VI. Annual action plans assessment

This multiannual scheme is accompanied by annual action plans that describe in more detail the activities to meet the digital accessibility needs of stakeholders.

TotalEnergies is committed to calling on external contributors if necessary in order to provide the best possible support for this digital accessibility initiative, which accompanies the ongoing digital transformation. A necessity to be turned into an opportunity.