



2021-2023 Multiannual Scheme



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Contents

1. Introduction	3
1.1. Digital Accessibility	3
1.2. Law Decree	3
2. Orano's Accessibility Policy	4
2.1. Orano's Commitment to Digital Accessibility	4
3. Genesis of the Multiannual Scheme	4
4. Digital Media Projects	5
4.1. Compliance	5
4.1.1. Internet/Extranet Websites	5
4.1.2. Intranet Website	5
4.1.3. Business, Mobile and Street Furniture Applications	5
4.1.4. Case of External Software Packages	6
4.1.5. Publications	6
4.1.6. Videos	6
4.2. Audit and Certification	7
5. Organisational Projects	7
5.1. Informing	7
5.2. Equipping	8
5.3. Training	9
5.4. Leading	10
6. Budget allocated to digital accessibility	11
7. April 2021 Action Plan	12



1. Introduction

1.1. Digital Accessibility

Disability is defined as "any limited activity or restriction on participation in life in society affecting a person in his or her environment due to a significant, sustainable or permanent impairment of one or more **physical, sensory, mental, cognitive or psychological functions, a multiple disability or a disabling health disorder**" (*Article L. 114 of the French Social Action and Family Code*).

Digital accessibility consists of making online public communication services accessible to all people with disabilities, i.e.:

- **Visibility:**

Facilitating the user's visual and auditory perception of content; offering text equivalents to any non-text element; creating content that can be displayed in different ways without losing information or structure (e.g. with a simplified layout);

- **Usability:**

Providing the user with some guidance for navigating, finding content; making all functionality available from keyboard; allowing sufficient time for the user to read and use the content; avoiding any content that may trigger seizures;

- **Understandability:**

Ensuring that pages work in a predictable way; helping the user to correct input errors.

- **Robustness:**

Optimising 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 with limited Internet skills, people with medical constraints.

Digital accessibility is part of an approach to equality and inclusion, and constitutes a major political and social issue, with the objective of ensuring information and online services accessibility to all, without any discrimination.

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

1.2. Law Decree

French Decree No. 2019-768 of 24 July 2019 on the accessibility of online public communication services for people with disabilities, published on 25 July 2019, sets out the accessibility obligations for all companies with revenues over 250 million euros.

The government set up a General Framework for Improving Digital Accessibility (RGAA), the latest version of which, V4.1, was released on 16 February 2021.

Orano is concerned by this decree and must therefore, naturally, comply with this RGAA.



2. Orano's Accessibility Policy

At Orano, we view diversity as an asset and a performance factor. In 2020, the rate of employees with disabilities was 4.58%, i.e. 697 employees integrated into Orano teams.

In addition, a manifesto for the inclusion of people with disabilities in economic life was signed on November 13, 2019, by Philippe Knoche, Orano's Chief Executive Officer, with around a hundred executives from large companies, members of the SBF 120.

2.1. Orano's Commitment to Digital Accessibility

Officially committed since 2008 to the employment, inclusion and retention of people with disabilities, Orano is pursuing its strategy aimed at making its digital content accessible everywhere and to everyone.

As Orano committed to in the 2021/2023 company agreement, signed on February 2, 2021, by all the trade unions, digital accessibility is valued in the company: *"To ensure its proper application, Orano is implementing a three-year scheme (2021-2023) including an action plan to bring digital media into compliance with the RGAA. Orano is also integrating the RGAA into its business processes for purchasing, diversity, training, communication and IS, etc."*

In this context, a project organisation was set up to acculturate employees, and to train and support the project teams. A project manager has been appointed within the Social Strategy, School Relations and Diversity Department; and a cross-functional steering committee, comprising the head of the Disability Group mission, the heads of Digital Communication, Digital Transformation and Information Systems, has prepared the multiannual scheme and the action plan, and is monitoring its progress. Six projects have been identified and formalised (compliance / audits / information / tools / training / management), which will be monitored over time.

3. Genesis of the Multiannual Scheme

Launched in September 2020, this multiannual scheme is the result of collaboration between all the Orano Group departments and was collectively developed.

Pursuant to this collaboration, an inventory of the internet sites, intranet, mobile applications, business applications, software packages, publications and videos was carried out, which made it possible to understand the extent of the accessibility work to be undertaken.

The second part of the project defined the means to be implemented within the Orano Group in order to ensure that digital accessibility is taken into account over the long term.

The result was the definition of 6 projects divided into 2 themes:

- Two (2) digital media projects
 - Compliance
 - Audit and certification
- Four (4) organisational projects



- Informing
- Equipping
- Training
- Leading

Throughout this document, we will explain these 6 areas and detail the ensuing actions.

4. Digital Media Projects

4.1. Compliance

This project aims at ensuring that digital media eligible for the RGAA are brought into compliance according to priorities.

It takes into account all the digital media covered by the decree, namely: internet/extranet websites, intranet, software packages including business and mobile applications, publications and videos.

4.1.1. Internet/Extranet Websites

At the time of drafting this multiannual scheme, 8 websites are already operational and 2 are planned for 2021.

These websites are to be brought into compliance in the first year of the multiannual scheme.

The 10 following websites are to be brought into compliance:

- Online websites
 - Orano.group
 - Oranomed.com
 - Orano.group/cime
 - Orano.group/innovation-pme
 - Orano.group/country/china
 - Orano.group/LEA
 - Orano/group/oxilio
 - Orano.group/US
 - Orano.group/reamenagementcominak
 - Orano.group/canada

Compliance was initiated in 2020 with the audit of the orano.group website. This audit made it possible to assess the work required to bring the tool used for all Orano Group websites into compliance: Sitefinity.

Once Sitefinity's brought into compliance on the basis of the work on Orano.group, corrections will be deployed on the 9 remaining online websites.

4.1.2. Intranet Website

In the light of the existing intranet redesign planned for 2022, no compliance work is planned.

The intranet redesign project will take into account, from the design phase and throughout its design and development, compliance with the applicable RGAA.

4.1.3. Business, Mobile and Street Furniture Applications



In order to define the scope to be considered within the framework of the 2021-2023 multiannual scheme, a mapping of the applications was carried out.

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

39 eligible applications were then analysed using a priority matrix based on the following dimensions: value dimension (regulatory criteria, users, external and internal impact) / technical dimension (technical criteria, maintenance, skills and budget)

These 39 applications were then classified according to 4 priorities (1 to 4) as follows:

- **14 first-priority applications**

The first priority applications must be brought into compliance by 2023.

They consist of 11 business applications and 3 mobile applications.

- **10 second and third-priority applications**

The 7 second and third-priority applications and the 3 third-priority applications must be brought into conformity with the RGAA during their next redesign.

These applications must be monitored in order to anticipate the inclusion of the RGAA in their redesign.

- **15 fourth-priority applications**

The 15 fourth-priority applications considered as non-priority will require a study during their next redesign.

These applications must be monitored in anticipation of the study of the RGAA inclusion when they are redesigned.

4.1.4. Case of External Software Packages

During the mapping of the applications, four software packages were identified and considered to be first-priority for compliance.

As Orano is not the decision-maker on the compliance of these software packages, it was decided to inform the publishers of all the software packages of the new obligations incumbent on Orano (see "Informing" Project).

It was also decided that the RGAA would be one of the mandatory clauses for the award of new contracts (see: "Equipping" Project).

4.1.5. Publications

The mapping of publications eligible for compliance was carried out in cooperation with the various departments. At the end of this work, it was decided to:

- Bring into compliance any publication visible on the internet and intranet websites and put online in 2020 and 2021;
- Ensure the compliance of all publications put online for each year from 2022.

Publication accessibility will be achieved through external service providers (see "Compliance" Project) but also through the training of the public concerned in the creation of accessible documents (see "Training" Project).

4.1.6. Videos

The mapping of videos eligible for compliance was carried out in cooperation with the various departments. At the end of this work, it was decided to:



- Bring into compliance any online video under 5 minutes in 2021;
- Ensure that all the videos of the year, from 2022, are accessible when they are put online.

To ensure video accessibility, 2 elements are required:

- **Synchronised subtitles**

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

- **A textual transcript**

A textual 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 the video viewing) to:

- Any spoken word;
- Any descriptive information necessary for an equivalent understanding of the action.

This textual information should be presented in the chronological order of its appearance in the video.

Note: The implementation of audio description has not been retained due to the cost that this would generate in relation to the benefit.

Audio description is a narration added (via a sound file) to an audio track to describe important visual details that cannot be understood from the main audio track alone.

4.2. Audit and Certification

This project aims at ensuring the level of compliance with the RGAA and responding to the transparency issues defined in the decree.

The audit and certification must monitor the compliance of the Internet websites, the intranet after redesign and the applications that have been brought into compliance.

The following audits and certifications have been decided within the framework of this multiannual scheme:

- Audit and certification of 9 existing websites
- Certification of the orano.group website (website audited in 2020)
- Audit and certification of 11 first-priority business applications
- Audit and certification of 3 first-priority mobile applications
- Audit and certification of new websites, business or mobile applications created from 2022 onwards.

5. Organisational Projects

The organisational projects are the basis for the long-term implementation of digital accessibility within the Orano Group.

They require cross-functionality and the participation of all the Orano Group's stakeholders in order to carry out the group's commitments to the consideration and inclusion of people with disabilities.

5.1. Informing

This project aims at informing the various internal and external relevant stakeholders of Orano's obligations in terms of digital accessibility and, at the same time, of their own obligations.



This project consists of:

- The drafting of an email to external partners
 - Software publishers and software maintenance providers
 - PDF publications designers / Video Designers
- The drafting of a memo to internal teams
 - Application functional managers
 - Service providers in charge of business application maintenance
- The presentation of the project and acculturation of stakeholders.

5.2. Equipping

The objective of this project is to provide the stakeholders of a digital project with all the information, knowledge and tools to be operational in the implementation of the RGAA.

This project has been broken down into several areas of work to be carried out during this multiannual scheme:

• **Drafting of operational guidelines**

There are four guidelines to help project stakeholders identify, prioritise, design and develop accessible digital media.

- Guideline on the eligibility of applications for the RGAA

This guideline should enable project managers to identify the websites/applications that fall within the scope of the decree.
- Guideline on the inclusion of the RGAA in digital projects

This guide is intended to provide project managers with all the information they need to frame, plan and evaluate the inclusion of digital accessibility in a digital project.

In accordance with the RGAA, this guideline describes the user feedback handling process.
- Guideline on the standards to be applied in functional design (UX/UI)

This guideline, intended for designers, provides all the best practices and design standards to comply with the RGAA. It aims to translate the criteria based on graphic and editorial themes, while providing some examples of implementation.
- Guideline on the standards to be applied in developments (Technical)

This guideline, intended for developers, gives all the good practices and development standards to comply with the RGAA. It provides illustrated examples of good and bad practices. For each good practice, examples of code are provided to enable optimum consideration of digital accessibility.

• **Integration of the RGAA in Orano's internal documents, including:**

- Integration of a systematic clause in tenders
- Integration of digital accessibility in the standards and documents of digital projects

• **Adaptation of Orano's internal guidelines to the RGAA**

- Adaptation of the digital and print charter
- Modification of the internal IS project database in order to integrate digital accessibility into projects.

• **Implementation of capitalisation, verification and accessibility implementation tools**

- Creation of a wiki documental database of good practices



- Purchase of code verification and validation tools for technical teams
- Purchase of screen reader licences for technical teams
- Purchase of a tool for managing the accessibility of Orano publications
- **Adaptation of existing content management tools (PDF and videos)**
 - Adaptation of the media library to allow the addition of subtitling and transcription files
 - Adaptation of the video streaming tool
 - Integration of a PDF AI plugin accessible in the internal publication creation tool.

5.3. Training

The objective of this project is to acculturate all Orano teams to the RGAA and to give them the knowledge necessary to implement digital accessibility in projects.

Training stands at the heart of Orano's strategy for digital accessibility inclusion.

An inventory of the needs of the departments made it possible to define an awareness module and 7 training modules:

- **Digital accessibility awareness**
 - This awareness module, available in classroom sessions or via an e-learning module, should enable each participant to master the digital accessibility approach in a professional manner.
- **Accessible design**
 - This training module aimed at web and mobile design teams (project managers, UX/UI designers, POs, etc.) enables participants to integrate digital accessibility criteria from the design stage and to work more effectively with developers.
- **Accessible development**
 - This training module aimed at development teams (back-end, front-end, full stack, integration, etc.) enables them to master the development of accessible internet/intranet websites and to assimilate accessibility issues (use of Aria, compliance with RGAA techniques, etc.).
- **Contribution to accessibility**
 - This training module, intended for all audiences, enables participants to master the creation of accessible content.
- **Contribution to accessibility using Articulate**
 - This training module for e-learning designers enables participants to integrate good accessibility practises throughout the creation of an e-learning module with the Articulate tool.
- **Creation of accessible Word and PowerPoint**
 - This training module, aimed at all audiences, enables participants to master the process of creating accessible PDFs using the tools provided by Microsoft: Word and PowerPoint.
- **Project accessibility management**
 - This training module is intended for anyone in charge of managing a digital project and enables them to master digital accessibility integration in a project, and to plan, monitor and evaluate digital accessibility integration throughout the project.
- **Digital accessibility management**
 - This training module intended for the group's accessibility advisor allows them to master the legal context, the creation and implementation of the multiannual scheme, and the



acculturation and change management necessary for the integration of accessibility within the Orano Group

For each module, an estimate of needs has been made for each year of the multiannual scheme and will be reviewed as it progresses.

5.4. Leading

This project aims to ensure that the processes necessary to accessibility integration are established, implemented and maintained, and that compliance with the action plan provided for in the multiannual scheme is met.

This project aims to:

- Frame project management
- Appoint an accessibility referent
- Support the integration of the accessibility referent
- Manage the current multiannual scheme in collaboration with the relevant professions
- Carry out the annual reviews



6. Budget allocated to digital accessibility

For each project, a budget estimate has been drawn up and distributed over the three years of the multiannual scheme.

This budget is administered by the project manager, then by the accessibility referent and must cover liability compliance, change management and the training required to increase the skills of the stakeholders.

The costs of future accessibility integration will be included in the project costs.



7. April 2021 Action Plan

	2021
Informing	<ul style="list-style-type: none"> ➤ Drafting of an email to external partners ➤ Memo to internal teams ➤ Presentation of the project
Equipping	<ul style="list-style-type: none"> ➤ Drafting the guidelines ➤ Integrating the RGAA in the documents of relevant functional departments ➤ Adapting repositories to the RGAA (digital, print and IS) ➤ Adapting the media library ➤ Adapting streamlike
Training	<ul style="list-style-type: none"> ➤ Accessible design – 3 sessions ➤ Contributing to accessibility – 1 session ➤ Contributing to accessibility – 5 sessions ➤ Contributing to accessibility using Articulate – 1 session ➤ Creating accessible Word/PPT – 5 sessions ➤ Managing project accessibility – 5 sessions ➤ Managing digital accessibility – 1 session
Compliance	<ul style="list-style-type: none"> ➤ Compliance of Sitefinity ➤ Compliance of the Orano.group website ➤ Support for intranet accessibility ➤ Audit first-priority business and mobile applications ➤ Compliance of 2020 publications ➤ Compliance of 2021 publications ➤ Compliance of 2020 videos under 5 minutes ➤ Compliance of 2021 videos (on the basis of 2200 hours per year)
Audit and Certification	<ul style="list-style-type: none"> ➤ Audit and certification of the 8 existing internet websites and the 2 created in 2021 ➤ Certification of the intranet website when it's launched
Leading	<ul style="list-style-type: none"> ➤ Frame project management ➤ Appoint an accessibility referent ➤ Support the integration of the accessibility referent(s) within Orano ➤ 2021 review