

NETIA

Multi-Year Accessibility Plan 2025-2027



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1. Introduction

In accordance with:

- Article 47 of Law No. 2005-102 of February 11, 2005, on equal rights and opportunities, participation, and citizenship of people with disabilities, which mandates that all online public communication services must be accessible to everyone,
- The General Accessibility Improvement Framework (RGAA) in its version 4, which facilitates the implementation of digital accessibility in companies.

This document presents NETIA's Multi-Year Accessibility Plan. Covering the years 2025 to 2027, it will be updated and expanded over time and with each new release of the group's solutions.

2. NETIA's Digital Accessibility

NETIA is committed to making its digital products and services accessible to all, in compliance with legal requirements and best practices in accessibility. This is part of a broader aim of inclusion and equal access to technology, including for people with disabilities.

To achieve this, the company relies on RGAA standards and applicable regulations to design and improve digital interfaces. This commitment involves:

- Systematic consideration of accessibility from the design phase of key features,
- Staff awareness and training,
- Continuous improvement based on user feedback.

NETIA also promotes accessibility by sharing norms and best practices with its teams and partners. Regular audits will be carried out to assess the compliance level of its solutions and to ensure adherence to the law. NETIA is also committed to effectively handling requests from users with disabilities while ensuring quality service.

3. Inventory of Existing Websites and Applications

As part of its digital accessibility initiative, NETIA has identified the websites and applications to be evaluated for compliance and improvements:

- **NETIA Website:** Evaluation is ongoing. A detailed analysis will identify any non-compliance and suggest corrective actions.
- **RadioAssist:** A first accessibility assessment has been conducted. Improvement points were identified to guide next steps.
- **RadioAssistOnline:** Also under review. The audit results will guide the integration of necessary changes.
- **AirDDO:** Evaluation has not yet started. A review is planned to assess compliance and define an action plan.

This continuous effort aims to ensure inclusive experiences across NETIA's digital tools.

4. Human and Financial Resources Dedicated to Digital Accessibility

NETIA has established an internal structure to address digital accessibility. Each team includes an accessibility referent who **dedicates 10–15%** of their time to accessibility-related aspects:

- A **Product Owner (PO)** oversees accessibility follow-up, tool analysis, and this multi-year plan.
- A **developer** acts as the accessibility referent for RadioAssist.
- A **developer** also ensures accessibility for RadioAssistOnline.

A more detailed evaluation will be conducted to define precise resource and budget requirements.

NETIA also emphasizes training and skill development for accessibility referents to reinforce expertise and continuous improvement capacity.

Furthermore, NETIA collaborates with an expert in accessibility workflows for visually impaired users from a major client, working directly with the PO team. This partnership includes regular testing and annual updates to a shared Quality Plan.

5. Organisation de la prise en compte de l'accessibilité numérique

NETIA's approach is based on the following principles:

- Adapting design and development processes to accessibility standards
- Training and raising awareness among internal teams
- Including accessibility in the acceptance criteria of each user story/ticket (per RGAA/WCAG)

Continuing to support user feedback mechanisms for accessibility issues

5.1. Training and awareness campaigns

Throughout the implementation of the multi-year plan, NETIA plans to organize training and awareness-raising sessions for accessibility referents and the technical teams concerned. The aim is to enable them to integrate accessibility best practices into the development process.

A survey of training needs will be carried out in order to offer support tailored to employees' profiles.

5.2. Recourse to external skills

NETIA will continue its partnership with the expert in workflow for the visually impaired in order to refine its various digital accessibility tools. Means will also be put in place to ensure that several disabled users from other customers are also integrated into this process.

5.3. Taking digital accessibility into account in projects

Accessibility and compliance with current regulations will be integrated from the very first phases of projects or new key functionalities for NETIA solutions. These requirements will also

be taken into account when working with our partners and service providers, ensuring that they respect the same accessibility commitments.

5.4. User testing

User testing is an essential tool for identifying obstacles to accessibility and prioritizing improvements. NETIA relies in particular on a visually impaired user, in contact with the PO team, to test solutions and report needs. A Quality Plan is drawn up on the basis of this feedback to ensure continuous improvement of digital services.

5.5. Integrating accessibility into procurement procedures

Digital accessibility and compliance with standards (notably RGAA) will be included as mandatory criteria in calls for tender for the acquisition or upgrading of the company's solutions. The various documents on the accessibility of NETIA's solutions will be systematically included in responses to calls for tender in order to be as transparent as possible about this approach.

5.6. Handling user feedback

All end-users of NETIA solutions should follow their organization's internal procedure for reporting any difficulties. This is usually done by a contact person, who can either respond to the problem himself or pass it on to the company's support department via the Jira tool. Requests relating to accessibility will be treated with equal importance. This prioritization is based on :

- The difficulty reported causes a tool crash and is treated as a priority.
- The difficulty reported causes a bug in the tool and is dealt with after the crashes

Concrete examples of digital accessibility feedback: If a keyboard shortcut causes a crash, it will be dealt with quickly; if the screen reader reads information twice, it will be dealt with after the crashes.

6. Control and validation process

Each solution is tested by an in-house team before being rolled out to customers. A test plan focusing on digital accessibility will soon be developed and regularly updated to certify that there are no regressions linked to this subject in future solution releases.

7. Technical and functional scope

NETIA's multi-year digital accessibility plan covers all the digital solutions used by the company and made available to its customers. This scope includes :

7.1. Outils et plateformes concernés

The sites and applications identified as priorities in the accessibility process are :

- **The NETIA website**, currently being analyzed to assess its level of compliance with accessibility standards.
- **RadioAssist**, a software solution for which an initial accessibility analysis has been carried out.
- **RadioAssist Online**, also currently being evaluated.
- **AirDDO**, which will be the subject of a future analysis to determine its level of accessibility.

7.2. Technologies and standards applied

The compliance of NETIA's digital tools is based on current standards and regulations, in particular :

- Web Content Accessibility Guidelines (WCAG), which define best practices in digital accessibility.
- The Référentiel Général d'Amélioration de l'Accessibilité (RGAA), applicable to digital services in France.
- The technologies and frameworks used in the development of NETIA solutions, which will be adapted to comply with these standards.

7.3. Key functionalities impacted

Digital accessibility concerns all functionalities enabling optimal use of NETIA tools by all users, including those with disabilities. The main aspects taken into account are :

- User interface: ensuring fluid, intuitive navigation, with optimum compatibility with screen readers and other assistive technologies.
- Content: ensuring clear structuring of information, with text alternatives for visual and multimedia elements.
- Interaction: to enable efficient use of the keyboard and ensure good support for technical aids.
- User assistance: offer solutions adapted to the specific needs of people with disabilities (e.g. contrasts, display customization, etc.).

7.4. Developments and updates

This scope will evolve in line with needs identified during accessibility audits and user feedback. A technological and regulatory watch will also be kept to anticipate changes to be incorporated into NETIA tools.

8. Implementation schedule

Compliance of NETIA's digital solutions with accessibility requirements will be gradual, and structured around several key stages. It will evolve as progress is made internally.

Details of a retro-planning for the year 2025 are available in the document presenting NETIA's accessibility action plan for the same year.