

Mobilize Financial Services

MULTI-YEAR ACCESSIBILITY PLAN 2026–2029

This document is the first version of the multi-year plan. It formalises the launch of the digital accessibility initiative within MFS and sets out the priority actions for the coming months, aimed at structuring governance and defining a detailed action plan.

Table of contents

GROUP MULTI-YEAR DIGITAL ACCESSIBILITY PLAN 2026–2029	1
1. Context and positioning	3
2. Link with the Mobilize Financial Services ESG strategy	3
3. Regulatory framework (reminder)	4
4. Scope covered	4
5. Governance – initial framework elements	5
Current positioning	5
Initial ideas for roles (not final)	5
Monitoring and evaluation indicators	5
6. Current situation and compliance strategy	6
Inventory and evaluation	6
Prioritisation of actions	6
7. Actions undertaken and action plan	7
Actions already implemented:	7
Actions planned for 2026 and	8
8. Processes and methods	9
9. Appendix: Scope of websites and applications	10
9.1 Public websites	10
9.2 Digital publications	10

1. Context and positioning

This multi-year digital accessibility plan serves as the **initial framework** for the strategy of the Mobilize Financial Services Group (MFS) regarding digital accessibility for the years 2026 to 2029.

At present, the initiative is **mainly focused on regulatory compliance**, in line with the applicable requirements, and is part of a **phase of progressive structuring**. The target governance, the medium- and long-term ambitions and the full integration of accessibility into all of the Group's processes have not yet been formalised and will be the subject of future work.

This document therefore makes it possible to:

- Establish a **common foundation** and shared guiding principles;
- Present the **first actions undertaken** and those planned in the near future;
- Prepare the conditions for a **gradual progression** of the initiative.

At this stage, digital accessibility is mainly regarded as a tool for regulatory compliance and social responsibility, consistent with the digital strategy and current ESG commitments of Mobilize Financial Services — notably through the consideration of accessibility requirements in the design of user journeys and the continuous improvement of the user experience.

In line with the objectives set by Renault Group, every upcoming digital project must meet minimum accessibility compliance thresholds. Public websites must achieve the AA standard level of requirements (WCAG).

In the medium term, depending on how the initiative develops, digital accessibility could strengthen the Group's ESG ambitions, in particular by improving inclusion in customer and employee journeys, and by supporting responsible governance of digital transformations.

2. Link with the Mobilize Financial Services ESG strategy

Digital accessibility is fully part of the Social pillar of the Mobilize Financial Services ESG strategy, as presented in the “Being a socially responsible company” focus area.

This focus area highlights the Group's commitment to promoting inclusion, equal treatment and the quality of the experience for all its stakeholders, employees and customers alike.

In this context, digital accessibility contributes directly to several key priorities of the Mobilize Financial Services ESG strategy:

- **Inclusion and non-discrimination**: by ensuring that digital services can be used by everyone, including people with disabilities, digital accessibility extends the Group's commitments to diversity, inclusion and its "zero discrimination" policy.
- **Quality of service and customer satisfaction**: accessibility contributes to the overall improvement of the user experience, the clarity of user journeys and the relationship of trust with customers, consistent with the commitment to proximity and listening displayed by Mobilize Financial Services.
- **Employee inclusion**: the accessibility of internal tools, training platforms and digital materials helps to create a more inclusive working environment, consistent with the Group's commitments to well-being, skills development and the integration of people with disabilities.

3. Regulatory framework (reminder)

The plan falls within the French legal framework, in particular:

- Article 47 of the Law of 11 February 2005;
- The current General Accessibility Improvement Framework (RGAA).

It provides for the publication of:

- Accessibility statements by the department concerned.
- This multi-year plan;
- An annual action plan;

Beyond compliance with regulatory obligations, the Group expresses the intention of embedding digital accessibility in a continuous improvement approach, although no commitments beyond regulatory requirements have been formalised at this stage.

4. Scope covered

The plan covers all of the Group's digital services, including in particular:

- Corporate and commercial websites
- Customer and partner areas
- New digital projects and major redesigns
- Publications and press releases

The exact scope is currently being **inventoried and consolidated** and will be refined progressively.

5. Governance – initial framework elements

Current positioning

The governance of digital accessibility has not been formalised at this stage. This plan proposes **areas for reflection** intended to prepare a target organisation, without defining final operational responsibilities.

The approach adopted aims to:

- Build on existing structures;
- Avoid any premature organisational complexity;
- Encourage progressive ownership by the various departments.

Initial ideas for roles (not final)

On an exploratory basis:

It should be noted that the roles mentioned below are likely to change and adapt progressively, depending on the progress of the project and the governance decisions that will be taken.

- **Communication:** editorial accessibility, publication of regulatory documents;
- **Digital departments / customer journeys:** functional and ergonomic accessibility of interfaces;
- **IT:** technical accessibility of developments, tools and infrastructure;
- **Legal:** integration of regulatory requirements into contractual frameworks;
- **Purchasing:** progressive introduction of accessibility clauses into supplier contracts;
- **Human resources:** training, awareness-raising and accessibility of internal tools.

These roles will be formalised at a later stage, in line with the maturity of the initiative and governance decisions, **including the appointment of one or more leads to coordinate the initiative and the formalisation of the budget needed to implement it.**

Similarly, depending on the needs identified as the work progresses, a specific budget may be considered to support the initiative.

Monitoring and evaluation indicators

As the **initiative is just starting**, the monitoring arrangements and steering indicators for digital accessibility have not yet been fully formalised. The Group nevertheless wishes to progressively put in place monitoring elements that make it possible to measure progress objectively, without committing at this stage to binding quantified targets.

The indicators considered at this stage are intended to be **exploratory**, to evolve over time and to be consolidated according to the maturity of the initiative, the tools available and the organisation that will be put in place.

As an indication, the following monitoring areas may be used:

- **Overall assessment of the level of RGAA compliance** of websites and applications that have been evaluated or audited, with no formal quantified target at this stage;
- **Identification of major or blocking non-conformities** likely to have a significant impact on user journeys;
- **Monitoring of compliance progress** on products supported through improvement or redesign initiatives;
- **Monitoring of awareness and training actions** (number of sessions, groups concerned), with no formal quantitative target at this stage.

The main purpose of these monitoring elements is to **progressively structure the steering of the initiative**, provide tools for decision-making and prepare, where appropriate, the later definition of more stable indicators, in particular in relation to ESG or regulatory issues

6. Current situation and compliance strategy

Inventory and evaluation

The Corporate Customer Journey department currently manages digital products (websites, intranet and extranet) intended for the public and for employees. A comprehensive inventory is under way in order to build a complete and up-to-date list of all these platforms.

Quick evaluations have been or will be carried out on all products that have not undergone an accessibility audit in the last three years.

These preliminary assessments are based on a selection of criteria designed to provide a concise yet meaningful analysis, in particular regarding:

- The degree of obsolescence or technical complexity of the product
- The feasibility of bringing it into compliance with the RGAA
- The potential impact of the non-conformities identified on the user journey and user experience.

They provide a basis for prioritising detailed audits, and are not an exhaustive evaluation.

Prioritisation of actions

Compliance actions are prioritised according to:

- Criticality of the service: priority given to services that are essential to users' procedures.
- Volume of use: priority given to the most visited websites and applications.
- Technical complexity: some work may be brought forward depending on its technical feasibility.
- Product life cycle: for websites and applications due to be redesigned soon, compliance will be built into the project.

This prioritisation will be reviewed regularly based on user feedback and changes to the services.

7. Actions undertaken and 2026 action plan

Actions already implemented:

- Mobilize Financial Services is now included in the scope of the Disability Agreement negotiated at Renault Group level for a period of 3 years (2024-2026)
- Training available to all employees
 - o Eight online modules, available in 12 languages, enable all employees to better understand the different types of disability and adopt inclusive behaviours, with a specific module for managers.
 - o An awareness programme has been rolled out for all Mobilize Financial Services teams, including an e-learning module entitled “The collaboration challenge”.
- Specific training for the France scope:
 - o **Communication actions:** Monthly communication was provided in 2025 through newsletters and events within the France scope, with seven messages sent to all employees to raise awareness of disability. During the SEEPH week (European Week for the Employment of People with Disabilities), an awareness-raising action on invisible disabilities was carried out at all sites through an immersive virtual reality headset experience.
 - o **Disability lead and network of HandiActeurs:** A disability lead has been appointed to drive the disability policy, support employees and managers and coordinate awareness-raising actions. The role of the HandiActeurs is to promote the disability policy across the various sites.
 - o **Managers:** since 2024, training has been dedicated to managers supervising people with disabilities within the France scope (27% of managers trained).
 - o **HR staff:** All HR department employees have been trained since 2023.
- Specific training for the Customer Journey teams:
 - o Understanding the needs of people with disabilities and the related issues, and identifying good UX/UI design practices to create inclusive interfaces
 - o Effectively integrating accessibility into a web project, prioritising it at every stage and carrying out tests to ensure compliance and quality.

This training has provided a comprehensive approach to digital accessibility, from awareness-raising to operational implementation

Actions planned for 2026 and 2027

2026 is dedicated to structuring the digital accessibility initiative within MFS. The objective is to build solid foundations (governance, skills, processes) that will enable us to effectively steer continuous improvement over the duration of the plan.

The action plan is structured around four strategic focus areas:

Focus area 1: Structuring Practices and Evaluation

For the platforms identified as priorities, the following actions will be implemented:

- Production of official documentation based on the lessons learnt from the training completed in 2025.
- Organisation of a training session for the entire extended digital team.
- Definition of an audit protocol applicable to existing and future platforms (those placed under the direct responsibility of the Corporate Customer Journey department).
- Performance of accessibility audits.
- Communication of the critical non-conformities identified to the suppliers concerned.
- Update of the accessibility statements.

The priorities are:

- Structuring practices (documentation, audit protocols);
- Carrying out audits and communicating critical non-conformities for correction;
- Systematic integration of accessibility into new projects.

Focus area 2: Integrating accessibility into new projects

The objective of this focus area is to move from a corrective approach to a preventive approach, by placing accessibility at the heart of our project life cycle, from the design phase onwards.

- Adoption of an accessibility-by-design approach, with requirements integrated into the functional and technical specifications;
- Systematic use of RGAA checklists to guide design and development;
- Writing of accessible user stories to ensure an inclusive experience for all;
- Organisation of usability tests involving people with disabilities, to identify areas for improvement and document the lessons learnt;

- Sharing of feedback and good practices within the teams to strengthen the accessibility culture.

In summary, these actions aim to embed accessibility **upstream** and in an **operational** way in projects (RGAA framework, user stories, tests with users with disabilities), while ensuring the **capitalisation** and **dissemination** of good practices in order to establish a lasting accessibility culture.

Focus area 3: Upskilling of Group employees

The success of our ambition depends on the skills of our employees. The aim of this focus area is to develop in-house expertise and spread a shared knowledge of disability.

The Group has strong ambitions in terms of inclusion, notably through the organisation of dedicated workshops and the development of fun initiatives aimed at strengthening cohesion and togetherness within the teams.

From 2026, within the France scope, all managers and employees will be trained in good practices and tools relating to disability, with a particular focus on mental health through a dedicated support programme. Communication on disability and inclusion will also continue in order to raise lasting awareness among teams and encourage the sharing of information, thereby helping to establish an inclusive culture within the organisation.

Focus area 4: Strategic Integration into Purchasing

To keep control of our digital ecosystem and avoid introducing new non-conformities, it is essential to include accessibility as a decision criterion in our purchasing policy.

- **Draft a standard “accessibility” contract clause** to be included in all new calls for tender for the purchase of digital solutions or services, specifying that the expected compliance rate must be consistent with the accessibility objectives defined by the organisation.
- **Update the supplier evaluation grids** so that accessibility becomes a selection criterion.
- **Define the compliance validation requirements** in the acceptance testing process for new solutions.

8. Processes and methods

Digital accessibility will be integrated into every stage of the digital services development cycle:

- **Design:** integration of accessibility requirements into the functional and technical specifications.
- **Development:** systematic application of good practices for accessible development.

- **Testing:** performance of automated and manual accessibility tests.
- **Deployment:** final check before going live.
- **Maintenance:** continuous monitoring and handling of any regressions.

Usability tests will be organised regularly to assess the actual accessibility of the services.

Wherever possible, the panels will include people with disabilities. These tests aim to identify the difficulties encountered and to prioritise improvements.

The lessons learnt from these sessions will be documented and shared with the teams.

9. Appendix: Scope of websites and applications

This list will be updated progressively as the full inventory progresses. Some platforms may not be made public for security or confidentiality reasons.

Entries marked “NC” (not communicated) are unknown or still being collected and will be updated at a later date.

9.1 Public websites

URL	Compliant statement	Compliance rate	RGAA compliance level
Mobilize-fs.com	Yes	49,28%	Non-compliant
Renaultbank.fr	Yes	35,09%	Non-compliant
insurance.mobilize-fs.fr/	No	NC	NC

9.2 Digital publications

Name of medium	Type of medium	Date put online	RGAA compliance level
Financial reports	pdf	annual	NC
Activity reports	pdf	half-yearly	NC
Green Bond documents	pdf	half-yearly	NC
Financial press releases	pdf	ad hoc	NC