

ATOS GROUP ACCESSIBILITY & DIGITAL INCLUSION POLICY

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List of changes

Table 1: Version history

version	Date	Description	Author Functions
1.0	06.02.19	First Policy version.	Head of Accessibility & Digital Inclusion
2.0	12.01.21	Scheduled Review.	Head of Accessibility & Digital Inclusion
3.0	17.02.23	Scheduled Review	Head of Accessibility & Digital Inclusion and Program Manager
3.1	08.06.23	Accessibility remediation and Link corrections	Accessibility program Manager and Accessibility Tester/Auditor
3.2	02.08.23	Adjustments or sourcing and procurement content to operations.	Accessibility Program Manager
3.3	11.09.25	Scheduled Review, rephrasing for better clarity and aligning with the latest organization	Accessibility Program and GRC Manager, Accessibility and Digital Inclusion Regulatory Adviser; Accessibility Quality Manager, Accessibility Auditor

Terms and abbreviations

Table 2: Abbreviation list

Terms / Abbreviations	Description
Accessibility	Accessibility is the degree to which a product, device, service, physical, digital, or cultural environment available and usable by as many people as possible including persons with disabilities. "Accessibility" (with a capital "A") shall be used throughout this document to denote the formal concept as defined within the organization's Accessibility policies, regulatory frameworks and activities.
ACR	Accessibility Conformance Report is a formal report derived from test data used to be filled into a VPAT format to evaluate and certify the Accessibility of a product or service. It is used for external sharing in bids, audits, and client communications.
Procurement law	A law that requires government purchase of accessible goods and services.
AIT	Atos IT
AT	Assistive Technology
ATVisor Console	Internal application that monitors the usage and performance of the Assistive Technology and Accessibility features on the Atos estate
BDF	Business Disability Forum
CSR	Corporate Social Responsibility
Digital Inclusion	The degree to which people have access to digital products and services encompassing disability, Accessibility, social factors, and connectivity.
EAA	European Accessibility Act - is a directive that aims to improve the functioning of the internal market for accessible products and services, by removing barriers created by divergent rules
EN-AU	Australian English
EN-CA	Canadian English
HR	Human Resources
ICT	Information & Communications Technology
ILO	International Labor Organization
ISO	International Standards Organization
Law	A law has completed the legislation process and is put into effect as the law of a country.
Policy	Outlines the goals of a government ministry or agency as well as the methods and principles to achieve those goals. Policies are not laws but can lead to the development of laws.
POUR	Perceivable Operable Understandable & Robust
Public sector	Includes government and government-run or owned entities, and entities that receive government funding.

Terms / Abbreviations	Description
Private sector	Businesses and organizations that are not part of the public sector, including non-profit organizations.
Procurement recommendation	An optional and encouraged goal to purchase accessible goods and services.
Mandatory Policy	Required Accessibility goals or implementation that is not regulated by law.
SEC	SEC is the body representing all European employees of the Group
UN CRPD	United Nations Convention on Rights for Persons with Disabilities
VPAT	Voluntary Product Accessibility Template: A standardized template used by vendors to document how their product or service conforms to accessibility standards such as WCAG, Section 508, or EN 301 549; it serves as the foundation for creating an Accessibility Conformance Report (ACR) used in bids, audits, and client communications.
WCAG	Web Content Accessibility Guidelines: A globally recognized standard developed by the W3C to ensure that web content is perceivable, operable, understandable, and robust for users with disabilities across all devices and platforms
WCAG derivative	A standard list that is based on a version of the Web Content Accessibility Guidelines (WCAG), with some requirements being excluded or modified or additional to the WCAG
W3C	World Wide Web Consortium - the main international standards organization for the World Wide Web

1 Group Accessibility & Digital Inclusion Policy

Atos affirms its commitment to Accessibility and Digital Inclusion as **integral to operational excellence, regulatory compliance,** and **inclusive innovation** to foster an inclusive, respectful, and accessible environment.

All Atos entities, including local subsidiaries and affiliates, are required to adhere to the principles and standards set forth in this Policy.

This Policy is designed to ensure Atos's entities meet their obligations under Accessibility and Digital Inclusion regulations as well as Non-Discrimination regulations and applying for all products, services, technologies, and environments influenced by Atos.

In line with the Preamble of the United Nations Convention on the Rights of Persons with Disabilities (UN CRPD), disability results "from the interaction between persons with impairments and attitudinal and environmental barriers that hinder their full and effective participation in society on an equal basis with others." Atos recognizes the diversity of human ability across sensory, motor, and cognitive domains and the imperative of inclusive design in enabling equal access.

Operating in a **business-to-business (B2B) context**, Atos delivers solutions across sectors including private sector and public services, government, healthcare, and education. This Policy affirms our commitment to Accessibility and Digital Inclusion **for all individuals interacting with Atos services and technologies directly or indirectly** via our customers, including employees, contractors, and end users within client organizations, as well as citizens accessing public services.

Accessibility is both a **legal requirement**, under regulatory frameworks such as the UN CRPD, EAA, EU Web Accessibility Directive and Americans with Disabilities Act, for example Title II, and a **corporate responsibility strategic enabler** of **quality, usability,** and **risk mitigation.**

The World Health Organization¹ estimates that "an estimated 1.3 billion people, or 1 in 6 people worldwide, experience significant disability". Many rely on Assistive Technologies to access digital content, services, and work environments.

Technology designed with **Accessibility** in mind can **transform lives**, **reduce exclusion** and **increase productivity**.

1.1 Purpose

This Policy establishes a unified, enforceable managed framework for Accessibility and Digital Inclusion across all Atos entities and geographies. It affirms Atos's commitment to providing inclusive and respectful environments

¹ Global report on health equity for persons with disabilities, ISBN 978-92-4-006360-0, © World Health Organization 2022

(physical, digital and cultural), via Accessibility and Digital Inclusion and **applies to all individuals interacting with Atos services, technologies, and workplaces.**The Policy is enacted to:

- ▶ Ensure consistent implementation of Accessibility and Digital Inclusion principles across all organizational levels, including leadership, management, workforce, and contractors.
- ▶ Integrate Accessibility and Digital Inclusion into all relevant internal policies and processes, published by Quality, Human Resources, Sales, Procurement, Alliances, Portfolio, Delivery, Risk, Marketing and Communications.
- ▶ Define minimum standards for Accessibility, Digital Inclusion and Disability Inclusion applicable to all individuals in direct interaction with Atos, Atos's products or services, regardless of their location, role, or contractual status.
- ► Ensure compliance with applicable legal and regulatory frameworks, including procurement laws mandating accessible goods and services.

All personnel are expected to uphold Accessibility standards and integrate Accessibility in their daily work, for example communicating in accessible ways.

1.2 Policy Ownership

This Policy is owned by the Global Head of Accessibility & Digital Inclusion.

1.3 Scope

This Group Policy applies to:

- ▶ All Atos entities and business units globally and locally.
- ▶ All Information and Communications Technology (ICT) products, services and systems, including related facilities whether developed, operated, leased or procured by Atos or on Atos's behalf, used internally by our employees and (sub)-contractors or delivered to customers.
- ▶ **All physical environments** owned or leased by Atos must comply with Built Environment Accessibility standards, laws, and regulations.
- ▶ **All business engagements**, from initial qualification through contract execution, handover, and delivery.
- ▶ All processes facilitated by ICT products, services, and systems, as well as all supporting materials (including but not limited to error messages, user guides, help desks, system messages, and tutorials), mandating them to be equally accessible to all users.

The Policy aligns with international and national Accessibility legislation, including:

- ▶ the UN Convention on the Rights of Persons with Disabilities,
- the European Accessibility Act.
- Section 508 of the U.S. Rehabilitation Act,
- Americans with Disabilities Act,

Local entities shall be required to comply with this Policy, all applicable legislation, regulatory frameworks, and binding standards governing Accessibility.

Compliance must extend to all scopes covered by all applicable regulations, ensuring that communications, products, services, systems, and supporting materials are accessible to individuals with disabilities. This includes, but is not limited to, further compliance obligations:

- ▶ **Labor and administrative law:** Ensuring non-discrimination and equal opportunity in employment practices.
- ▶ **Procurement and supply chain due diligence:** Including Accessibility clauses in vendor contracts and ensuring accessible goods and services across the supply chain.
- ▶ **Corporate reporting and ESG regulations:** Requiring transparency on Accessibility performance and diversity, equity, and inclusion (DEI) metrics.
- ▶ Management systems and internal controls: Embedding Accessibility into risk management, portfolio governance, and quality frameworks such as the Atos Integrated Management System (AIMS), Book of Internal Controls, and Rainbow Bidding.
- ▶ Accessibility and Digital Inclusion mandates: Ensuring compliance with relevant standards and legal instruments.

1.4 Our commitment

Atos SE ("Atos" or "the Company") affirms its enduring commitment to Disability Non-Discrimination and Accessibility as fundamental components of its Corporate Social Responsibility strategy and Environmental, Social, and Governance (ESG) reporting. Atos commits to integrating Accessibility Standards as a mandatory requirement in the specification, procurement, and delivery of all ICT systems and services. The organization shall ensure compliance with applicable Accessibility Standards and legal obligations, while also enabling inclusive access and usability for diverse user groups, including those relying on Assistive Technologies. Accessibility Conformance shall be maintained through continuous engagement, trackable remediation efforts, and provision of alternative access where necessary.

All products and services must include Accessibility Acceptance Criteria within their lifecycle, with Quality Acceptance testing documentation ready to provide evidence to internal or external auditors on consistent implementation and accountability for Accessibility Compliance.

Atos prohibits all forms of disability-based discrimination and guarantees reasonable accommodation in accordance with relevant laws and international standards. This also extends to the prohibition of "phantom"-hiring of people with disabilities as part of Atos's workforce.

Aligned with its commitment to foster implementation of the UN CRPD agenda in Atos's operational scope, a Group-wide adoption of the "Atos Disability Language Guide," shall enable an adoption in inclusive culture and communication by established standards for the use of people-first language and other inclusive terminology.

By the commitment of Atos, to provide Accessibility compliant ICT systems, the organization aims not only to meet legal obligations, but beyond to enable positive impact for Atos's clients and workforce by enabling productivity and retention of diverse talent,

2 Measure of Accessibility: Acceptance Criteria

Compliance with recognized Accessibility Standards is expected, but **real-world Accessibility** requires ongoing user engagement and may require user test panels involving people with diverse disabilities.

Thus, all products and systems must:

- Document Accessibility acceptance criteria as Non-Functional Requirements and aligned with applicable Standards (see <u>Chapter 3.1</u>) and World Wide Web Consortium (W3C) **POUR principles—Perceivable, Operable, Understandable, and Robust**—to ensure inclusive access across evolving technologies.
- ► Have a valid **Accessibility Conformance Report (ACR)** in standardized format in US English, and if required in local languages or formats (i.e. RGAA for France in French)
- ▶ Have Roadmaps/ Action Plans in place for remediation of critical Accessibility Compliance failures

In addition, products and systems are recommended to:

- ▶ Have **User Test Results** documented of test panels involving people with disabilities
- ► Have an **Issue and Bug-Tracking** system for Accessibility Failures identified in Tests or reported on in ACRs
- ▶ Have recommendations of certified Accessibility Experts on Accessibility Issue/Failure Remediations tracked/documented

Acceptance Criteria shall be applied:

- ▶ throughout the product life cycle, from requirements over design phase to each change or new release. This means Accessibility Test Results and ACRs must be updated for new released versions.
- across the employee lifecycle, from recruitment and onboarding to training, development, and workplace adjustment—to promote inclusion and equal opportunity.

Model acceptance criteria per discipline or business area are recommended to be developed and applied across relevant domains such as procurement, HR, customer projects, internal systems, training, events and communications.

2.1 Replacement of inaccessible Legacy Systems

Atos acknowledges that certain **legacy ICT systems** and **physical infrastructures** may not meet current Accessibility standards, and that **retrofitting Accessibility** may not always be technically, contractually or financially feasible.

2.1.1 Legacy System Replacement

This Policy requires that **legacy systems that cannot be rendered accessible should be retired and replaced** within a reasonable timeframe as detailed in section 2.1.3.

During the intervening period, Atos **commits to providing alternative means of access**. These may include:

- ▶ **Accessible documents** in lieu of inaccessible web content.
- ▶ Email or phone-based support for inaccessible digital services.
- ▶ Human assistance or mediated access for physical premises.

2.1.2 Governance and Accountability

A centralized governance model shall ensure that Accessibility, Digital Inclusion, and Usability are embedded in:

- Specifications
- Acceptance Criteria
- ▶ Lifecycle Processes

Product owners are responsible for:

- ► Controlling And Validating Accessibility Compliance
- ► Ensuring Equitable Access

2.1.3 Recommended Grace Periods and Conditions for Replacement

To support Accessibility Compliance while recognizing operational constraints, grace periods for improvement or replacement are to be agreed with Group Accessibility function.

Extensions beyond these periods must be **justified** through a documented **disproportionate burden assessment,** as permitted under the **EAA** and **ADA**.

3 Legislation Regulations & Conventions

Atos operates in many countries around the world, and each country has specific legislation relating to disability inclusion and ICT. However, there are several important conventions & pieces of legislation that have an international impact, including but not limited to:

- ▶ United Nations Convention on Human Rights for Persons with Disabilities (UN CRPD)
- ▶ UK Equality Act 2010
- ▶ Web Accessibility Directive (Directive (EU) 2016/2102) and its national implementations
- ▶ European Accessibility Act (EU Directive 2019/882) and its national implementations
- Americans With Disabilities Act (ADA)
- ➤ Section 508 of the US Rehabilitation Act is a federal law that requires federal agencies to make their electronic and information technology accessible to people with disabilities
- ► France Law N° 2005-102 (11 February 2005) also known as the "Loi Handicap," is a comprehensive French focused on ensuring equal rights, opportunities, participation, and citizenship for people with disabilities
- Verordnung zur Schaffung barrierefreier Informationstechnik nach dem Behindertengleichstellungsgesetz (Barrierefreie-Informationstechnik-Verordnung -BITV 2.0) - Germany's federal ordinance on barrier-free information technology

Atos maintains an internal Accessibility **Legal Watch Process** so that it can provide orientation and external information about what Acts, Laws, Policies and Decrees are relevant for Accessibility, Digital Inclusion and Non-Discrimination in the countries the company operates in. ICT crosses borders: therefore, Atos must be able to demonstrate a consistent approach to ensuring Accessibility. The best way to ensure such a consistent approach is to follow the appropriate international standards listed below which are referenced in our various internal guidelines.

3.1 Standards & Guidelines

International Standards, such as the ones below:

- ▶ ISO 40500:2012 (WCAG 2.1), to comply with at least AA standards.
- ▶ WCAG 2.2 (Final version released on 25th October 2023)
- ▶ ISO 9241-171
- ▶ ISO 13066-1
- EN 301549 V3.2.1 (2021-03)
- Local Standards:
- France: RGAA 4.1 (18th February 2021)
- Germany: BITV 2.0 (May 2019),

An exhaustive list is available with Group Accessibility.

3.1.1 Reinforced applicable Accessibility Standards

The infographic, in the figure below, outlines the **layered approach** to Accessibility Standards that Atos applies across hardware, software, documentation, built environment and services.

It emphasizes the use of **EN 301 549 and above as the primary standard**, which consolidates and expands upon other international requirements. Additional standards such as **WCAG 2.2 Level AA**, **Section 508**, **RGAA**, and **UK GDS** are referenced to ensure compliance across national and regional contexts.

Complementary standards—including ISO 9241-171, EN 17210, and EN 17161—support inclusive design, interoperability with Assistive Technologies, and Built Environment Accessibility.

These standards are applied as needed based on client requirements, geographic regulations, and product or service scope. Atos's approach is to use both primary and supplementary standards to ensure Accessibility across all sectors and geographies.

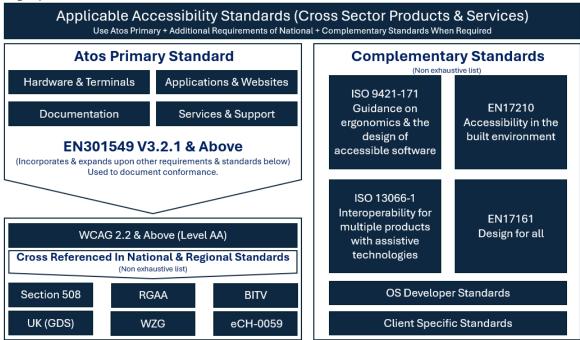


Figure 1:Infographic on Applicable Accessibility Standards Cross Sector for Products and Services

Refer to Accessibility and Digital Inclusion Process documentation for any further guidance or to be informed on eventual updates.

3.1.2 Related Policies & Initiatives

The following non-exhaustive list represents internal policies and initiatives directly or indirectly related to Accessibility and Digital Inclusion:

- ► Group Health & Safety Policy
- ▶ Atos Dignity at Work and Prevention of Sexual Harassment Policy
- Atos Global Disciplinary Policy and Procedure

- ➤ Collective agreement on the employment and integration of people with disabilities within the Atos group in France, signed on 12th December 2022
- ▶ Memorandum of Understanding with European Works Councils (SEC)
- ► Internal Control Policy
- Global Procurement Policy
- ► Global Procurement Sourcing Policy
- ▶ External Supplier Compliance Assessment Policy
- Atos Quality Policy
- ► Atos Continual Improvement Policy

3.1.3 Internal Guidelines

Accessibility Guidelines are published and updated by Group Accessibility on an internal SharePoint named "Atos Accessibility Portal". The following Accessibility Internal Guidelines are to be respected amongst others:

- Atos Disability Language Guide
- Workplace Adjustment End User Guidance
- Writing & Assigning Alternative Text
- Accessible Procurement and Sourcing
- Accessible Branding Guidelines
- ▶ Accessible Learning and Development experiences

The following related internal guidelines are to be respected:

- Atos Internal IT-G. Smart Process and IT SMS Guidance
- Atos Code of Ethics
- Atos Partners' Commitment to Integrity
- ► Atos Internal Control Manual
- Atos Management System Manual (AMSM)
- ▶ Atos Library RAID MyRisks Tool & Guidance

3.1.4 Related Processes

This Policy establishes the framework for Accessibility and Digital Inclusion processes across Atos. These processes have been implemented or adapted in alignment with the Policy's principles and requirements. They are published or referenced by Group Accessibility and are integrated into the Atos Management System Manual, in the section dedicated to Accessibility and Digital Inclusion. This integration supports alignment with Atos's broader ISO-certified governance framework, while acknowledging that Accessibility Management is not yet subject to formal ISO certification. These processes are mapped in RACI formats, with clearly defined roles across Responsible, Accountable, Consulted, and Informed stakeholders. They are reviewed regularly to ensure alignment with this Policy and evolving regulatory and operational requirements.

Some processes related to this Policy are:

3.1.4.1 Governance and Compliance

- ▶ Legal Watch Contractual & Legal Risk Management
- ▶ Atos Accessibility Audits and Accessibility Conformance Evaluation Process
- ▶ Product Compliance Inventory Accessibility Conformance Testing

- User Testing Panels
- Product Documentation Support –Accessibility Remediation Support
- ▶ Internal IT Compliance Management
- Procurement Accessibility Compliance
- ▶ Brand & Communication Compliance (Accessible Design Toolkit) Management
- ▶ Document Compliance Management
- ► Webpage Compliance Management Corporate Data Glossary Accessibility Knowledge Management Portal & SharePoint.

3.1.4.2 Risk, Quality and Audit Management

Processes focused on managing Accessibility-related risks, ensuring compliance, and maintaining quality standards:

- ➤ Accessibility Risk Management Embedding Accessibility into enterprise risk frameworks, including legal obligations and mitigation strategies. Building and enabling Accessibility RAID registers.
- ▶ Management System 4 Accessibility (MS4A) ISO-aligned system for capturing and tracking Accessibility compliance data.
- ▶ Integration of MS4A into Atos Integrated Management System (AIMS) Coordination of MS4A integration into the Atos Integrated Management System.
- ▶ **Internal Controls (BIC)** Controls, Self-Assessment-Questionnaires (SAQs), issue and action plan monitoring, and stakeholder engagement for streamlined risk remediation.
- ► Contractual and Legal Risk Management Maintains a registry of Accessibilityrelated legal risks and ensures appropriate clauses are included in client contracts

3.1.4.3 Monitoring, Data & Reporting

Processes that support monitoring and regulatory reporting for Accessibility by data collection and dashboard development.

- ▶ **Reporting Dashboards** Corporate dashboards supporting workplace adjustments and feeding into MS4A, for example, Atos ATVisor Console monitors the usage and performance of the assistive technology and Accessibility features on the Atos estate.
- ▶ Non-Financial Reporting Collection and integration of Accessibility data for regulatory and corporate reporting, i.e. in Universal Registry Document (URD) and compliant with the Corporate Sustainability Reporting Directive (CSRD).

3.1.4.4 Knowledge & Competencies

Processes that build Accessibility knowledge and skills across the organization.

- ▶ **Mandatory Training (Accessibility)** Inclusion of accessibility in the Code of Ethics and mandatory trainings.
- ➤ Accessibility of Mandatory Training Audit and Accessibility compliance issue remediation of training content of mandatory trainings towards Accessibility compliance.
- ▶ **Professional Accessibility Certifications** IAAP and other external certifications.
- ▶ Internal Certifications (Accessibility Academy) Development of internal curricula for accessibility skill acquisition.
- ➤ **Training Catalogue** Includes Role Specific Accessibility, Disability Inclusion and Digital Inclusion Courses.
- ► Ad-Hoc Role-Based Webinars & Consultancy Targeted training, webinars and consultancy for internal compliance enablement.

3.1.4.5 Workplace Adjustments

Processes that ensure inclusive physical and digital workspaces through accommodations and environmental compliance. Ensures coordination and provision of hardware, software and other so-called soft accommodation for employees, managed jointly by HR, Health & Safety, and Procurement.

- ➤ **Assistive Technologies Software** for example Screen readers, speech recognition, magnifiers.
- ➤ Accessibility as a Service Ergonomic hardware, specialized input devices, and software tools.
- ➤ **Soft Adjustments** Disability leave, flexible hours, quiet rooms, coworking areas, and personal assistance.

3.1.4.6 Built Environment Compliance

Processes that ensure inclusive physical and digital workspaces through accommodations and environmental compliance.

▶ **Built Environment Compliance** – Audits and training to ensure physical spaces meet Accessibility standards.

3.1.4.7 Sales & Presales & Portfolio Compliance

Processes that support sales teams and portfolio development to embed Accessibility into offerings and client engagements:

- ➤ Sales & Presales Compliance Implementation and continuous control of Accessibility compliance in sales workflows (for example: CADP, W2D and Rainbow).
- ► Cross BL Accessibility Portfolio Coordination.
- ▶ Accessible and Accessibility Marketing Events Ensuring captions, transcripts, and physical Accessibility for internal and external events. Coordination of global and local Accessibility events supported by marketing for Global Accessibility Awareness Day and International Day of Persons with Disabilities (Innovation in Disability Inclusion Event)

3.1.5 Related Internal Controls

This Policy establishes the foundation for all Accessibility and Digital Inclusion internal controls aiming to monitor and reduce compliance risks with tracking related issues and management remediation action plans within Atos. These controls operationalize the principles and standards defined herein, ensuring consistent application across environments, technologies, and services. Each control aligns with this Policy, applicable law, and recognized Accessibility Standards.

The following internal Accessibility & Digital Inclusion controls are derived from this framework:

- ► ACY-005 Physical Environment Accessibility Ensures Accessibility of Atos workplaces and facilities.
- ➤ ACY-015 Accessibility Regulations Compliance
 Ensures compliance with Accessibility and disability inclusion regulations.

- ► ACY-020 Accessibility Standards Compliance Ensures conformance with international Accessibility standards for services and products.
- ► ACY-025 Accessibility in Development Embeds Accessibility into the design and development of products and services.
- ACY-030 Public Webpage Accessibility Ensures Accessibility of Atos public-facing digital content.
- ► ACY-035 Internal IT Environment Accessibility Conformance Ensures Accessibility of internal IT systems, tools, and platforms.
- ► ACY-040 Internal IT Workplace Adjustments
 Ensures availability of Assistive Technologies and workplace adjustments.
- ► ACY-045 Accessibility in Client Contract Obligations
 Ensures Accessibility requirements are addressed in client contracts.

Additional internal controls which are related to the framework set by this Policy, and owned by Procurement, Legal, Bidding & Sales, are:

- ▶ P2P-011 Accessibility Clauses Inclusion in Supplier Contracts
 Ensures Accessibility maturity is evaluated, and contractual clauses are included during supplier engagement.
- ► LEG-200 Compliance Protection in Client Contracts
 Ensures client contracts include clauses protecting Atos against compliance risks, especially in public sector engagements.
- ▶ BID-040 Business & Financial Continuity Ensures continuity planning is embedded in business and financial aspects of bids.
- ▶ BID-210 Compliance with Atos Rainbow Bidding Principles
 Ensures bid processes adhere to Atos Rainbow governance and compliance standards.
- ▶ BID-215 Local Sales Process Compliance Checks
 Ensures local sales processes are compliant with internal and external regulations.

