



BUILDING FOR LIFE

Multi-year digital accessibility plan 2026 - 2028

Status: "In progress"

Storage space: Teams BYCN IT - UX Design -> Documents -> General -> Digital Accessibility

Version	Date	Author	Working Group	Approver	Comments
0.8	20/05/2025	E.BASTIEN			
0.9	16/04/26	P.PEREIRA		E.BASTIEN	

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1. Introduction

Article 47 of Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship of individuals makes it mandatory for any online public communication service to be accessible to all and to publish a multi-year accessibility plan, for a maximum period of three years, presenting the policy of the entity concerned in terms of digital accessibility.

1.1. Definition of digital accessibility

Digital accessibility refers to the ability for all people, including those with disabilities, to use digital tools and content independently and effectively.

It concerns all digital products: websites, mobile applications, PDF documents, business software, etc. Its aim is to ensure that no one is excluded from accessing information, services or online interactions, regardless of their physical, sensory, cognitive or technological abilities.

Disability, on the other hand, is defined as any limitation of activity or restriction of participation in life in society suffered by a person in his or her environment due to a substantial, lasting or permanent alteration of one or more physical, sensory, mental, cognitive or psychological functions, a multiple disability or a disabling health disorder (Article L. 114 of the Code of Social Action and Families).

What does digital accessibility mean in concrete terms?

Working on digital accessibility means, for example:

- Ensure that a site is usable only with a keyboard, without a mouse.
- Make texts readable by screen readers.
- To provide sufficient contrast for the visually impaired.
- Avoid content that causes disorders for people with epilepsy or neuroatypical.
- Structure pages correctly for easy navigation

1.2. The 4 pillars of digital accessibility

Digital accessibility must meet its 4 pillars by being:

- **Perceivable** : The user must be able to perceive the information presented as well as the components of the interface
- **Usable** : The user must be able to manipulate the interface components

- **Understandable** : The user must be able to understand the information and use of the interface
- **Robust** : Content must be compatible and reliably interpreted by a wide variety of assistive technologies.

1.3. The importance of digital accessibility

1.3.1. A legal obligation

Digital accessibility is a fundamental right and a regulatory requirement.

To **assess the level of compliance** of a digital service, **several standards** exist:

- Norme internationale : **WCAG 2.2** (Web content accessibility guidelines)
- European standard: **EN 301 549 V3.2.1**
- French reference framework: **RGAA 4.1.2** (General reference framework for improving accessibility)

In France, several laws and decrees concern accessibility and are variations of European decisions:

- **The law of 11 February 2005** requires the accessibility of public digital services.
- **In July 2019**, a decree made compliance with **the General Accessibility Improvement Reference Framework (RGAA)** mandatory, in connection with European Directive (EU) 2016/2102.
- **On March 9, 2023, the DDADUE law** (Provisions for Adaptation to European Union Law), which is the French version of European legislation (European Accessibility Act), will be extended to companies with more than 10 employees and a turnover of 2 million euros
- **From 28 June 2025, Directive (EU) 2019/882 or the European Accessibility Act** (EAA) will apply to private companies for: websites, mobile apps, e-commerce, banking services, transport, digital books, connected equipment, etc.

The objective: to harmonise the rules in Europe and make digital technology more inclusive for all.

1.3.2. A question of inclusion

According to the World Health Organization (WHO), about 16% of the world's population lives with a disability (2023).

In France, this represents about **12 million people, or nearly 1 in 6 French people**, or 18% of the population (source: INSEE, 2021).

Among them:

- 1.5 million have a vision disorder,
- 6 million have motor or cognitive limitations,
- More than 3 million have cognitive or psychological disorders,
- 6 to 8% are affected by "dys" disorders,
- About 500,000 are autistic.

Accessibility also responds to **temporary disabilities** (injuries, fatigue, attention disorders, etc.) **and contextual** (mobile use, noisy environments, weak connections).

Making digital services accessible means allowing everyone to participate fully in social, professional and civic life, without discrimination.

1.3.3. A better experience for all

Accessibility benefits all users, not just people with disabilities.

Concrete benefits:

- Clearer, better structured content
- Smoother navigation (keyboard, mobile, screen readers, etc.)
- Responsive and adaptable interfaces
- Better performance (reduced errors, limited abandonment)
- Best SEO

To remember

71% of users without disabilities regularly use accessibility-related features (Microsoft, 2022).

Inclusive design reduces navigational errors by 35-50% (NN Group).

In 2023, 55% of web traffic in France is on mobile (Médiamétrie).

In summary: Digital accessibility improves the equity, quality and efficiency of services for all. It is not a constraint, but a lever for innovation and performance.

Digital accessibility for customers, employees and partners with disabilities is a pillar of the Bouygues Construction Group's CSR commitment to a responsible and inclusive digital transformation.

1.4. The scope of digital accessibility

Digital accessibility applies to all forms of digital interfaces:

- **Websites:** all websites, extranets, intranets, web page content, browsers and other consultation tools.
- **Mobile applications:** the use of applications on mobile will also be able to benefit from the accessibility options present on iPhone© or Android© environments.
- **Office tools:** many solutions exist, especially at the Windows level or the Microsoft 365 suite.
- **Business applications:** software, software packages, internal developments, SaaS services, office documents, partly voice platforms, connected objects, video games, interactive terminals, etc.

Digital services and information must be accessible and usable by all, regardless of the context (brightness, environment, etc.) and the equipment used (computer, tablet, mobile phone, etc.).

In short, a global approach to digital accessibility focuses on 3 main themes:

- The digital environment,
- Inclusive communication and
- The development of accessible solutions.

2. Accessibility Policy

2.1. The organization's commitment to digital accessibility

Aware of its social responsibility and the importance of inclusive digital technology, Bouygues Construction affirms its commitment to ensuring that all of its digital services are accessible to all people, regardless of their abilities, uses or equipment.

Digital accessibility is therefore a major priority for Bouygues Construction and for the entire Bouygues Group, both in the development and provision of digital services (websites, platforms, applications, etc.) for the public and employees.

In 2019, Martin Bouygues signed the "Manifesto for the inclusion of people with disabilities in economic life" on behalf of the Bouygues group. At the initiative of the government and the Disability Fair, this charter of operational commitments aims to ensure better inclusion of people with disabilities in the group's companies. The Bouygues Group then strengthened its commitment to diversity and the fight against all forms of discrimination by signing the "Diversity Charter" in 2022.

Digital accessibility is an ethical, legal and operational issue. In this sense, we are committed to complying with the requirements of the General Accessibility Improvement Framework (RGAA), in its current version, and to adopting a continuous improvement approach to make its tools, services and digital content accessible to all, especially people with disabilities.

This commitment is part of a global inclusion policy, supported by the general management, and is reflected in:

- The implementation of a **multi-year plan** to bring digital services into compliance;
- **Integration of accessibility best practices** by design and throughout the life cycle of products and services;
- **Training and raising awareness of accessibility** issues for teams (developers, designers, writers, business managers, etc.);
- **Regular follow-up of audits, corrections and corrective actions;**
- **The implementation of procedures allowing users to report the difficulties encountered and to obtain an appropriate response.**

Because digital accessibility is a factor of quality, performance and respect for fundamental rights, Bouygues Construction is committed to making digital technology a lever for equality and autonomy for all.

The development, monitoring and updating of this multi-year plan is the responsibility of: Pauline PEREIRA, accessibility referent, attached to the Information Systems Department (ISD).

The validation of this plan is carried out by Bouygues Construction's digital management committee.

2.2. Objectives and overall strategy

In order to implement these commitments, particular attention is paid to the following areas:

- Digital services exposed by Bouygues Construction on the Internet
- The working environment of Bouygues Construction employees
- Internal application services developed or purchased that are essential to the employee's daily life

A compliance rate of more than 50% (partially compliant) is set for the company's public communication and recruitment sites as well as for applications identified as critical by and for the company's businesses.

This desire to conduct a sustainable accessibility policy is illustrated by the development of this multi-year digital accessibility plan associated with annual action plans, with the aim of supporting the compliance with the RGAA (General Accessibility Improvement Framework) and the gradual improvement of the digital services concerned.

3. Human and financial resources deployed

3.1. Digital Accessibility Referent

The role of the referent is to transmit good practices and ensure the proper application of standards. This is the main point of contact for all accessibility-related topics within the organization.

The missions of the referent are in particular to:

- **To take stock of accessibility** in the Bouygues Construction organisation;
- **Promote accessibility through acculturation** among employees, the dissemination of standards and good practices;
- **Support internal teams** through training actions in particular, but also **advisory and recommendation actions**, both operational and methodological;
- **Monitor and ensure the application of Law** No. 2005-102 of 11 February 2005 (as well as Decree No. 2019-768 of 24 July 2019) and compliance **with** the General Accessibility Improvement Framework (**RGAA**) by carrying out regular audits;
- **To ensure that user requests are handled** and, in general, the quality of the service provided to users with disabilities.
- **Manage and control the proper execution of the defined multi-year plan.**

3.2. Human Resources

The digital accessibility referent interacts with many actors:

- The managers (business and IT) of the various websites and applications
- The BYCN Disability Committee and the Diversity and Inclusion Coordinator, with whom the accessibility referent, monitors improvements to digital tools
- The training department and the human resources department to draw up training plans and set up e-learning courses
- The Information Systems Department for the reporting of key indicators of the company's accessibility approach and the integration of accessibility into the processes.

3.3. Financial Resources

Actions to bring sites and applications into compliance with the RGAA are financed by the functional departments.

A budget has been allocated to raising awareness among Bouygues Construction employees as well as to periodic compliance checks.

4. Organization of the consideration of digital accessibility

Taking digital accessibility into account requires:

- Adaptation of the internal production organization for the management of the digital services and applications concerned throughout their life cycle and this from the design stage.
- Employee support.
- The development of training and acculturation actions for Bouygues Construction staff.
- An evolution of purchasing procedures requiring digital accessibility to be taken into account.
- The handling of requests from people with disabilities when they report difficulties.
- The above elements describe the important points on which Bouygues Construction will rely to improve the digital accessibility of all its digital services and applications.

4.1. Training and awareness

Throughout the period of application of this scheme, training and awareness-raising actions will be organised to enable the people working on the sites and applications to develop, edit and put accessible content online.

For this first multi-year plan, acculturation will be a priority for all Bouygues Construction employees.

These training courses may be part of a broader training plan and a possible module included in the digital academy reserved for the company's employees.

4.2. Use of external expertise

The use of external expertise (e.g. IPEDIS) may be considered in the context of audits or specific actions, with an indication of the partner concerned. Training sessions, as mentioned above, may also be the subject of a contract.

4.3. Consideration of digital accessibility in projects

Accessibility must be taken into account in all projects and lifecycles of digital products.

Accessibility is not a bonus or an additional technical "overlay", but an ongoing concern to respect the fundamental rights of people with disabilities.

To do this, our project management reference framework encourages the integration of digital accessibility and budgeting, in particular through the mobilization of UX/UI skills and the awareness of all the actors directly concerned by the subject: developers, project manager/PO, etc.

4.4. Methodological and operational support

Each team will gradually be made aware of the challenges of disability and digital accessibility, as well as of the digital accessibility approach within Bouygues Construction.

It is planned to provide employees with methodological resources to help them increase their skills in digital accessibility through guides adapted to each type of profession.

All those involved in the creative chain are at least warned, or even sensitized, or better, trained in digital accessibility and its mandatory nature in their work.

4.5. A tooled accessibility approach

Thanks to awareness-raising measures and the increase in skills of the teams following the training sessions, digital accessibility will gradually be taken into account in a natural way in any project related to the design and development of digital services.

Knowledge and tools are available to all actors on the subject:

- Documentation available from a page dedicated to digital accessibility on the Bouygues Construction Intranet
- Online training
- The provision of tools to verify that a certain number of RGAA criteria are met.
- An audit grid and its documentation to assess the compliance rate
- BYCN's design system including digital accessibility
- A list of tools to help with development, conformance testing

4.6. Processing of user requests

In accordance with the provisions of the RGAA, a means of contact is gradually being set up on each site or application allowing users with disabilities to report their difficulties.

A global email address (accessibilite@bouygues-construction.com) has been created to offer users the opportunity to contact us regarding requests or suggestions related to digital accessibility.

Each request will be studied in order to propose an alternative when possible and available. Particular attention will be paid to the contact form in the context of the upcoming work.

4.7. Implementation control and validation process

For the digital products or services that Bouygues Construction is going to purchase (e.g. SaaS services, mobile applications, e-learning modules, etc.), the digital accessibility referent provides a document setting out the accessibility requirements that must be attached to the purchasing procedures or calls for tenders.

The purpose of this document is to give the main principles of design and implementation to be respected by publishers of digital products and services (any type of product or service offering graphical interfaces with users).

For SaaS platforms, an RGAA-WCAG component is now included in the questionnaires sent to publishers (see questionnaire below).

1. GOUVERNANCE EN MATIERE D'ACCESSIBILITE NUMERIQUE DANS LE CADRE DE LA PRESTATION

Avez-vous un schéma pluriannuel et des plans d'action en matière d'accessibilité numérique ?
(Si oui, indiquez l'url publique où les trouver)

Avez-vous désigné un référent en accessibilité numérique au sein de votre organisation ? Avez-vous désigné une ou plusieurs personnes responsables de la mise en conformité avec la réglementation sur l'accessibilité numérique ?

2. AVEZ-VOUS MIS EN PLACE UN DISPOSITIF DE SENSIBILISATION ET DE FORMATION DES COLLABORATEURS A L'ACCESSIBILITE NUMERIQUE ?

3. CONFORMITE RGAA/WCAG DE LA SOLUTION

La solution a-t-elle été auditée au regard du Référentiel Général d'Amélioration de l'Accessibilité (RGAA) ou de la norme internationale WCAG ?

Quelle est la date du dernier audit RGAA / WCAG ?

L'audit a-t-il été pratiqué par un tiers certificateur (si oui, mentionnez le nom de la société) ou en interne ?

La solution dispose-t-elle d'une déclaration de conformité à jour ?

Quel est le taux de conformité RGAA/WCAG de la solution ?

Êtes-vous en mesure de présenter toute justification telle que des rapports d'audit internes/externes périodiques permettant de démontrer le contrôle de la conformité RGAA / WCAG ?

4.8. Control and validation process

Each site or application is subject to a control to establish a declaration of conformity in accordance with the terms of the law, during the initial publication, during a substantial update or an overhaul.

This control is carried out internally by Bouygues Construction's digital accessibility referent or through an external partner.

These control operations intended for the establishment or updating of declarations of conformity are carried out in addition to the usual acceptance and intermediate control operations which are organised throughout the life of the projects. The accessibility referent monitors a number of indicators such as:

- RGAA compliance and its variations (improvements, regressions) through compliance audits,
- The number of people trained in the teams, etc.

5. Technical and functional scope

5.1. Census

The tables below list the websites and internal sites managed by Bouygues SA and concerned by this multi-year plan. They specify for each site or application: the name of the site, the URL, the date of publication and the level of accessibility.

Indications marked "Coming soon" are unknown or in the process of being collected and will be updated at a later date.

The technical and functional scope is organized around three categories of sites or applications:

- Websites open to the public;
- Intranet sites;
- Extranets with limited access.

For privacy reasons, only public sites are listed below.

Site Name	URL	Date Uploaded	Level of accessibility
Bouygues Construction	https://www.bouygues-construction.com/	2026	Coming soon
Bouygues Carrière	https://careers.bouygues-construction.com/?locale=fr_FR	2013	Coming soon

5.2. Planned agenda of interventions

Given the information gathered during the development of this plan, the complexity of the sites, their prioritization and their assessment in terms of feasibility, compliance operations will be spread over the years 2026 - 2028.

5.3. Action Plan 2026

To ensure the concrete implementation of this plan, a detailed action plan defines our interventions annually in a separate document.

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PEREIRA Pauline

Digital Accessibility Referent

pauli.pereira@bouygues-construction.com

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