

# ATOS GROUP ACCESSIBILITY & DIGITAL INCLUSION POLICY

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## 1. Accessibility & Digital Inclusion Policy

The World Health Organization estimates that “an estimated 1.3 billion people – or 1 in 6 people worldwide – experience significant disability”; therefore, technology has the potential to greatly improve quality of life if it is designed in such a way as to be inclusive.

Accessibility is the degree to which a product, device, service, physical, digital, or cultural environment is available to as many people as possible.

Our aim is to ensure ease of use by people with varying capabilities, including, but not limited to, users of a range of assistive technologies.

Assistive technology (AT) is a generic term that includes assistive, adaptive, and rehabilitative devices for people with disabilities and includes the processes used in selecting, locating, and utilizing them. AT enables people with disabilities to undertake tasks that would otherwise be difficult or impossible to accomplish. Without assistive technology, disabled people are largely excluded from work, financial services, computer-based entertainment, social networking, and the wide variety of products and services made available via the internet.

Technology has the power to include people; the outcomes are primarily decided at the design stage. The companies’ role is to foster the usage of technologies in a way that reinforces and unlocks positive culture change reducing exclusion. Aim is to move from insertion of people with disabilities to their full inclusion and the break-down of technical barriers allowing culture change to occur.

### 1.1 Scope

Our commitment applies to all ICT products, services and systems purchased, developed, supplied, or otherwise procured by us, or on our behalf.

This policy applies equally to products and services that we supply to customers, and those that we supply for our employees. In this regard it recognizes that despite commonality of some toolsets the approaches to delivering accessible experiences will differ depending on context and that different standards may be applicable.

This policy requires that the processes enabled by those products, services, and systems and to materials supporting them are equally accessible. e.g., error messages, system help tutorials, help desks and user guides.

## 2. Our commitment

### 2.1 Embedding Accessibility

Aligned with our Raison d’Être, Atos is determined to position accessibility as a fundamental and integral aspect of all our ICT systems and related services; we are therefore making accessibility, and accessibility competence, a mandatory consideration in the specifications of all ICT products and services we purchase and deliver (See 5.)

Atos will provide ICT systems that not only comply with relevant accessibility standards and enable us to meet our legal obligations, but more importantly also enable our clients and us to:

- Attract & retain talent from the widest possible pool.
- Enhance efficiency.
- Act as a trusted resource to enable access for millions of customers worldwide.

Our aim is to ensure ease of use by people with varying capabilities, including, but not limited to, users of a range of assistive technologies.

Furthermore, we commit to ensuring within our scope the ongoing accessibility of products & services after they have launched and been deployed through continuous engagement.

Where products procured are not fully accessible, we commit to negotiating reasonable steps towards accessibility compliance together with the suppliers and partners.

In all cases accessibility standards compliance and enhancements must be included in the product lifecycle process and roadmaps. This means that it must be ensured by accountable managers that relevant acceptance criteria related to accessibility & digital inclusion appliance (Section 3 Measure of Accessibility: Acceptance Criteria) are defined and assessed for any product or system developed by or supplied to Atos.

### 2.2 Providing Assistive Technology & Adjustments for Employees

Adjustments will be made for workers with a disability wherever possible, to ensure that employees are able to access their workplace and gain access to facilities on company premises. If a worker is disabled, becomes disabled in the course of their employment, or whilst working on the company premises, they are encouraged to inform us of their condition so that the Company can support the individual. These Adjustments may include the provision of Assistive Technologies (AT). Wherever possible, Assistive Technologies will be provided from a standard catalogue of commonly used AT.

## 3. Policy Intent

The intent of this policy is to support the commitments made by the company towards accessibility and digital inclusion. As members of the International Labour Organization Global Business Disability Network, the Business Disability Forum & Valuable 500, Atos has made a commitment on accessibility for the inclusion of people with disabilities in the workplace.

New technology design must be mindful of the fact that it is intended to serve humans. It is easy to be carried away by the technical capabilities of new technology and to forget that we need to all be able to use it effectively.

### 3.1 Strategy

Atos recognizes the significant business potential for accessibility & digital inclusion as well as moral and regulatory drivers. Therefore, accessibility must be part of Business-as-Usual offerings and processes.

Accessibility has many touch points across the business and requires a structured approach to measure the existing state of accessibility, identify gaps and plan to improve accessibility. We use the Business Disability Forum Accessibility Maturity Model as the basis for this.

## 4. Measure of Accessibility: Acceptance Criteria

All products and systems developed by or supplied to us must have interfaces and generate content that can be tested and demonstrated to have the core characteristics of accessibility defined by the W3C (World Wide Web Consortium) as the POUR principles:

- **Perceivable** - Information and user interface components must be presentable to users in ways they can perceive.
- **Operable** - User interface components and navigation must be operable.
- **Understandable** - Information and the operation of user interface must be understandable.
- **Robust** - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

This means that users must be able to access the content as technologies advance (as technologies and user agents evolve, the content should remain accessible).

If any of these are not true, users with disabilities may not be able to use ICT. We realize that mere standards compliance is unlikely to deliver real accessibility and will seek to embed best and improving practice in our use of technology. We will ensure user consultation and testing including persons with disabilities is recognized as a critical enabler of real-world accessibility.

Different technologies and scenarios create different contexts for accessibility, therefore specific acceptance criteria must be applicable. We commit to including model acceptance criteria for each area where accessibility applies, including but not limited to procurement, HR tools and documentation, customer projects, internal systems and training, mobile applications, desktop operating systems telephony, building access technology, marketing and communication materials.

Applying a weighting in favour of accessibility (Example for new vendors evaluation in section 5 Appendix 1 – New Vendor Accessibility Evaluation) sends a clear indication to potential partners and suppliers that Atos takes accessibility seriously and ensures to respect similar requirements and policies of key partners and clients requesting all along the supply and value chain.

### 4.1 Legislation Regulations & Conventions

Atos operates in many countries around the world, and each country will have specific legislation relating to disability inclusion and ICT. We are striving for compliance in the legal accessibility field by applying all regulations, standards, and best practises.

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.

## 4.2 Standards & Guidelines

All applicable International Standards in their latest version in force, namely stated, but not limited to:

WCAG 2.2, to comply with at least AA standards.

- ISO 9241-171.
- ISO 13066-1.
- EN 301549 V3.2.1 (2021-03).
- Local Standards like for France: RGAA 4.1 (18th February 2021), Germany BITV 2.0.
- Section 508 of the Rehabilitation Act of 1973.

## 5. Appendix 1 – New Vendor Accessibility Evaluation

"ICT Accessibility Vendor Questionnaire – Standard" and "ICT Accessibility Vendor Questionnaire - Small Enterprise" are available internally and define questions during RFP/RFI processes for new vendors for relevant purchasing.

The questionnaire for small enterprise is applied to micro and small enterprises with:

- A Micro enterprise having fewer than 10 employees and an annual turnover (the total income made by a business over a year) or balance sheet (a statement of a company's assets and liabilities) below €2 million.
- A Small enterprise having fewer than 50 employees and an annual turnover or balance sheet below €10 million.

To distinguish on how mature a new vendor is in accessibility terms and what is the linked recommendation, the following evaluation got developed. The maturity level is defined in a linear approach of number/percentage of points reached, with the vendors being the more mature the more points have been reached in the questionnaire.

Based on the scores, a maturity classification (either red, amber, or green) is proposed with each category having related recommendations, including to contact the Accessibility team for more detailed guidance on the accessibility acceptance criteria and roadmap via a dedicated support process. Relevant differentiated contract clauses are to be considered for vendors in different purchasing categories aligned with their identified maturity classification.

The questionnaires and purchasing categories identified here may be subject to review from time to time in line with regulations and company policy.

For critical applications for which the providers score in amber or red, test product versions for the purpose of Accessibility testing should ideally be provided, as document-based evidence of third-party audits still represents an accessibility compliance risk for the company. The testing should be documented in the form of an Accessibility Conformance Report. Thus, a process systematizing accessibility testing for critical purchased products and services will be defined.



This document meets high standards of accessibility