

Multi-year accessibility plan 2026-2028

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Introduction

WHAT IS DIGITAL ACCESSIBILITY?

Digital accessibility consists of making online public communication services accessible to people with disabilities, i.e.:

- **Perceivable** : for example, to facilitate the visual and auditory perception of content by the user; to provide text equivalents to any non-text content; to create content that can be presented in different ways without loss of information or structure (for example, with a simplified layout);
- **Usable** : for example, providing the user with guidance to navigate, finding the content; making all features accessible to the keyboard; giving the user sufficient time to read and use the content; not designing content that may cause epileptic seizures;
- **Understandable** : for example, making pages work in a predictable way; helping the user correct input errors.
- **Robust** : For example, optimize compatibility with current and future uses, including assistive technologies.

Digital accessibility is part of an equality approach and is a fundamental political and social issue in order to guarantee everyone, without discrimination, the same access to information and digital services online.

LEGISLATIVE BACKGROUND

Article 47 of the "Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship of people with disabilities" makes it mandatory for all online communication services to be accessible to all for the following organizations:

1. Legal persons governed by public law;
2. Legal persons under private law delegated a public service mission;
3. Legal persons governed by private law constituted by one or more of the persons mentioned in 1° and 2° to specifically meet needs of general interest other than industrial or commercial nature;
4. Companies with a turnover threshold of €250 million calculated for each person on the basis of the average annual turnover achieved in France for the last three accounting years closed prior to the year in question.

Pursuant to Chapter III of the aforementioned Article 47, the multi-year plan, for a maximum period of three years, sets out Renault Trucks' policy on digital accessibility for the years 2026-2028. As such, it contains information on governance, the internal organization put in place, training actions, the consideration of accessibility in new projects, compliance audit policies and associated corrections, etc.

The aim of this multi-year plan is to ensure that Renault Trucks' digital services are gradually brought into compliance, in accordance with legal requirements and in response to the needs of people with disabilities.

This same Article 47 establishes the General Accessibility Improvement Reference Framework (RGAA) as a national reference system, to which all digital media must comply.

The latest version of the RGAA in force (RGAA 4) can be accessed from the following link: <https://accessibilite.numerique.gouv.fr>. The latter is based on the *Web Content Accessibility Guidelines 2.1 level AA*, which will be used in the context of international sites.

We find the same principles at the European level:

- **European Directive 2019/882 (European Accessibility Act – EAA):** entry into force **on 28 June 2025** for new digital services and products, and **2030** for existing ones.
- **Harmonized technical standard: EN 301 549**, also based on **WCAG 2.1 (levels A and AA)**.
- **Common obligations :**
 - Publish an **accessibility statement** for each digital service.
 - Establish a **multi-year plan** and an **annual action plan**.
 - Provide a **user feedback mechanism**.

Taking digital accessibility into account in Renault Trucks' strategy

DISABILITY INCLUSION POLICY

For more than 30 years, Renault Trucks has been working to promote equal opportunities and the professional integration of people with disabilities.

With an employment rate of 8.71% at the end of 2023, well above the legal obligation of 6%, the company confirms its commitment and reinforces it through the signing of the 12th Handi'Accord, concluded with all the trade unions for the period 2025-2027.


This agreement sets out a structuring framework for the recruitment, integration, training, adaptation and retention of people with disabilities.

It marks a further step forward with new concrete measures: financial aid for recognition procedures and the purchase of equipment, paid days of absence for disability-related procedures, 50% coverage of the adaptation of the personal vehicle, adapted hours, exemption from activity before retirement, and the possibility of donating days off between colleagues.

DIGITAL ACCESSIBILITY, A NEW AREA OF COMMITMENT FOR RENAULT TRUCKS

Through the teams in charge of responsible digital technology at Renault Trucks, taking into account the needs of people with disabilities in access to digital technology is a new challenge, in order to ensure that everyone has access to the digital services made available. As such, this multi-year plan aims to define a compliance trajectory for priority digital applications, in accordance with the standards of the General Accessibility Improvement Framework (RGAA), and the *Web Content Accessibility Guidelines* (WCAG).

MULTI-YEAR PLAN



This multi-year digital accessibility plan, for a period of 3 years (2026-2028), aims to inform the public of the means and actions put in place by Renault Trucks to make its priority sites accessible.

It is associated with an annual action plan presented in the appendix.

For example, Renault Trucks has implemented the following actions to improve digital accessibility:

- appoint an accessibility referent to steer and supervise the cross-cutting consideration of this subject;
- Assess existing digital assets by conducting compliance audits on digital services (websites and apps) identified as priorities.
- take digital accessibility into account from the design phase when setting up new projects, or when redesigning existing digital services with the help of experts;
- improve existing services by conducting accessibility audits and implementing corrective measures, as well as monitoring and validation by internal or external experts;
- Raise awareness and train internal teams to take disability and associated standards into account in the design and development of digital projects.

Internal organization and governance

FUNCTIONAL POSITION AND MISSIONS OF THE DIGITAL ACCESSIBILITY REFERENT

Renault Trucks has identified an internal digital accessibility referent. This referent leads a dedicated governance that will be in charge of defining and monitoring the various actions related to this subject.

The missions of this governance will be:

- Monitor the coordination and planning of accessibility audits of online services in order to ensure the application of Law No. 2005-102 of 11 February 2005;
- Monitor the organization of training and awareness sessions for the teams;
- Support and analysis of user requests.

The development, monitoring and updating of this multi-year plan will be placed under the responsibility of the referent and validated by the governance.

GOVERNANCE

Digital accessibility is managed by a steering committee within Renault Trucks made up of representatives of:

- The CIO Department of Renault Trucks;
- the diversity and inclusion team;
- the development and maintenance teams of websites and applications;
- business referents for websites and applications;
- teams from the User Experience competence centre;
- teams related to training;
- the digital accessibility referent.

A purchasing referent is currently being defined.

HUMAN AND FINANCIAL RESOURCES

To ensure the implementation of its digital accessibility policy and support its ambitions, Renault Trucks plans to mobilise the necessary human resources.

The consideration of digital accessibility both for compliance audits and for support on ongoing projects will be made possible thanks to a centralized and dedicated budget.

RECRUITMENT AND SKILLS

In 2026, Renault Trucks will define the roles and skills necessary for the implementation and monitoring of compliance with the various regulations on digital accessibility.

From 2027, a reflection will be carried out to integrate digital accessibility into the tools and frameworks used by the various professions. This work will be carried out in collaboration with the various teams of Volvo Group Digital Technology & Operations, in particular the training and “digital foundations” departments.

DESIGN SYSTEM

Volvo Group incorporates accessibility as a standard for all its digital products. The Volvo Group Design System (VGDS) provides accessible components, checklists and guidelines covering design, development and UX writing. Aligned with international standards (WCAG 2.1 A/AA, EAA, ADA), it enables teams to design experiences that are consistent, inclusive, and usable by all, across web, mobile, and embedded interfaces.

HANDLING USER FEEDBACK

In accordance with its obligations and inclusion policy, Renault Trucks has set up a means of contact to process user feedback: a functional box: digital.accessibility@renault-trucks.com . This means of contact will be indicated in the accessibility statements that will be published shortly.

INTEGRATION OF DIGITAL ACCESSIBILITY INTO CONTRACTUAL CLAUSES

Currently, no specific clause relating to digital accessibility is included in the model contracts and calls for tenders issued by Renault Trucks. Actions will be carried out from 2026 with the departments concerned, and in particular purchasing, in order to integrate this requirement into the contractual clauses on a larger scale.

DIGITAL ACCESSIBILITY TRAINING AND AWARENESS

The Volvo Group has not yet set up a training plan dedicated to digital accessibility. However, awareness sessions on digital accessibility have already been given to employees. Work will be carried out to create a dedicated training plan and specific training by profession will be deployed as part of this multi-year scheme: for *product owners* and *product managers*, UX/UI designers, web developers, etc.

Resource implementation and tooling

USE OF EXPERTS

To assess the level of accessibility of its digital services with regard to the applicable accessibility standard, Renault Trucks relies on internal resources specialized in digital accessibility to carry out compliance audits.

TECHNICAL TOOLS AND MEANS IMPLEMENTED

As the subject of digital accessibility has recently been taken into account, Renault Trucks has not yet put in place methodologies and technical tools to regularly test and evaluate the level of accessibility of its digital services.

Consideration will be given to enabling test profiles to integrate accessibility tests. Also, the possibility of carrying out automated tests via artificial intelligence or dedicated tools is being studied, even if the latter will have to be supplemented by manual tests.

Integrating digital accessibility into projects

CONSIDERATION OF ACCESSIBILITY IN NEW PROJECTS

Renault Trucks wants to integrate digital accessibility from the very first stages of each new project or evolution.

Also, a design system has been set up and has been designed to be accessible through its components. Any new digital project must therefore be built using this design system. Support will be provided to the teams to ensure the proper implementation of this design system. Finally, a formalization will be carried out in the internal tools to take accessibility into account. Meetings to raise awareness of the use of the design system have already been set up.

USER TESTING WITH PEOPLE WITH DISABILITIES

Renault Trucks has not yet integrated people with disabilities into the user testing phases. However, the ambition is to set up a panel of people with disabilities within two years to ensure the relevance of the audits and corrections made.

REGULAR COMPLIANCE ASSESSMENTS AND AUDITS

Through the implementation of this multi-year plan, and the appointment of a digital accessibility referent, Renault Trucks aims to conduct compliance assessments more regularly. These audit operations are intended to continue, in particular:

- On sites and applications that have not been audited to date and identified as priorities;
- To verify the corrective measures put in place through control audits.

In this context, the platforms used trucks (used-renewal-trucks.fr), Corporate site (renewal-trucks.com) and French market site (renewal-trucks.fr) have already been the subject of a WCAG audit.

Corrective actions and timeline for compliance

CORRECTIVE ACTION PLANNING

After each compliance audit carried out on a digital service, Renault Trucks will implement a corrective action plan. This plan aims to correct accessibility issues as quickly as possible, by prioritizing Level A criteria to achieve the best compliance rate on this level. The patches will then be deployed to the Level AA criteria with non-conformities.

The implementation schedule will be specified in the various annual plans.

SCOPE OF APPLICATION

The mapping of Renault Trucks' priority digital assets has made it possible to establish the following scope:

Service	Type	Level of compliance	Comments
used-renault-trucks.fr	Website	A compliance: 46% AA compliance: 43%	WCAG audit conducted in April 2025
renault-trucks.fr	Website	A Compliance: 40% AA Compliance: 45%	WCAG audit carried out in July 2025
renault-trucks.com	Website	A compliance: 53% AA Compliance: 6%	WCAG audit carried out in July 2025

2026 ACTION PLAN

The multi-year plan must be accompanied by an annual action plan that details the operations programmed and implemented for the current year as well as the status of monitoring of these actions.

This document is the 2026 annual plan associated with Renault Trucks' 2026-2028 multi-year plan. It includes a summary table of the actions that were started in 2025 and those that will start in 2026, their expiry date if they are known as well as their progress and implementation.

DEVELOPMENT AND MONITORING OF THE MULTI-YEAR ACCESSIBILITY PLAN

Action	Implementation	Status
Validate the 2026 annual plan	Q1 2026	Things to do
Publish the multi-year plan and action plan for the current year	Q1 2026	Things to do
Designate a digital accessibility referent	Q1 2026	Done

GOVERNANCE AND MANAGEMENT

Action	Implementation	Status
Setting up a means of taking into account and processing user feedback, and the associated organization	Q1 2026	Things to do
Setting up an organization and governance in the management of digital accessibility	Q4 2025/Q1 2026	Done

TRAINING ACTIONS

Action	Implementation	Status
Establish the training plans to be implemented according to the priority audiences	H2 2026	Things to do

COMPLIANCE ASSESSMENT AND AUDITS

Action	Implementation	Status
Carry out the audit of the used-renault-trucks.fr site	Q2 2025	Done
Carry out the audit of the renault-trucks.com site	H2 2025	Done
Carry out the audit of the renault-trucks.fr site	H2 2025	Done
Prioritization of the next sites or applications to be audited	Q1 2026	Things to do

COMPLIANCE

Action	Implementation	Status
Launch the first accessibility patches on the 3 audited sites in 2025	H1 2026	Ongoing