



# **Keolis SA Multi-year Digital Accessibility Plan 2026–2028**

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## 1. Introduction

Digital accessibility is a core concern for Keolis in the development and delivery of its websites and applications, both for the general public and for Group employees.

This multi-year digital accessibility plan, together with annual action plans, aims to support compliance with the French General Accessibility Improvement Framework (RGAA) and to progressively improve the accessibility of the Group's digital services.

## 2. Regulatory framework

Digital accessibility is governed by a set of legislative and regulatory texts. The main applicable texts include:

- Article 47 of the French law of 11 February 2005 on equal rights and opportunities, participation and citizenship of persons with disabilities,
- Article 106 of Law No. 2016-1321 of 7 October 2016 for a Digital Republic (known as the "Lemaire Law"),
- EU Directive 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements applicable to products and services,
- Decree No. 2019-768 of 24 July 2019 on the accessibility of online public communication services for persons with disabilities,
- Order of 20 September 2019 establishing the General Accessibility Improvement Framework (RGAA),
- Ordinance No. 2023-859 of 6 September 2023 adopted pursuant to point 1 of section VII of Article 16 of Law No. 2023-171 of 9 March 2023 on various provisions for adapting French law to European Union law in the fields of the economy, health, labour, transport and agriculture.

These texts define the requirements to be met in terms of digital accessibility for digital tools (websites, mobile applications, interactive terminals, etc.) by organisations such as the Keolis Group.

### 2.1. Key objectives

- Provide digital tools that are understandable and usable by everyone, including people with disabilities,
- Publish an accessibility statement and display the level of compliance from the homepage,
- Establish a three-year multi-year accessibility plan, broken down into annual action plans detailing the measures planned to move towards full accessibility.

Pursuant to the aforementioned Article 47, this document constitutes the Keolis Group's multi-year digital accessibility plan for the period 2026–2028. It sets out the Group's digital accessibility policy.

## 3. Accessibility policy

### 3.1. Accessibility lead

The monitoring and updating of this plan are the responsibility of the Keolis Group's IT Department (DSI) ([communication@keolis.com](mailto:communication@keolis.com)).

Since 2024, the Group has employed a junior digital accessibility lead, integrated within the IT team. Her main responsibilities are to:

- Ensure compliance with the RGAA in digital projects,
- Monitor the correction of non-compliances identified during accessibility audits,
- Raise awareness of digital accessibility among employees,
- Carry out technological monitoring and share best practices.

She is supported by accessibility leads within the Marketing Department.

## 3.2. Training

### 3.2.1. Awareness-raising

Ensuring the long-term sustainability of accessibility requires raising awareness among all stakeholders. The Keolis Group has implemented the following initiatives:

- Quarterly accessibility webinars (around 70 participants per session),
- Accessibility “fresques” workshops in small groups (10 participants),
- International Disability Awareness Days,
- Technical and editorial support,
- An internal accessibility-focused community, currently bringing together 161 employees.

Examples of topics covered include: accessible documents, the RGAA regulatory framework, content contribution best practices, and understanding audit reports.

### 3.2.2. Specific training

For roles involved in interface design, technical development or content creation, specific training courses are planned for 2026–2027 (approximately 30 employees), in collaboration with the company Access42.

## 3.3. Implementation

### 3.3.1. Scope

The Keolis Group does not manage all digital solutions offered to the general public. Subsidiaries have a high level of autonomy: they may either develop their own websites or mobile applications, or use solutions provided by the Group.

Websites managed by the Group:

- <https://www.keolis.com/>
- <https://innovation.keolis.com/>
- <https://voyages.keolis.com/>
- Keolis Web Passenger white-label platform: <https://dksakwpewstatweb.z6.web.core.windows.net/>

### 3.3.2. Integration of digital accessibility into projects

With the support of the accessibility lead, digital accessibility objectives and compliance with the RGAA or RAAM will be reaffirmed from the very start of projects. Accessibility will be considered a key focus and a baseline requirement.

Accessibility checkpoints will be scheduled at various stages of each project to ensure compliance with RGAA criteria. Similarly, the IT Department aims to integrate digital accessibility into contractual clauses (calls for tenders and quotations), provider evaluation and selection criteria, acceptance procedures, and, where applicable, agreements with operators, delegates or partners.

### 3.3.3. Audits

In order to establish RGAA compliance status, accessibility audits are carried out by the company Access42. These audits are currently taking place (first quarter of 2026) within the scope defined above.

### 3.3.4. Remediation

Following each audit, the necessary corrective actions are identified and incorporated into future developments. The components developed are shared across several websites; as a result, accessibility improvements are quickly deployed across other platforms.

The Group's main public-facing websites (see "Scope") are prioritised. Digital services intended for Keolis employees will also be audited and remediated at a later stage..

## 4. Keolis SA action plans

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### 4.1. 2026 – Assessment and initial redesign

- Comprehensive assessment of websites and functionalities (navigation, content, compatibility with assistive technologies),
- Ergonomic redesign: visual contrast, simplified navigation, improved content readability,
- Integration of meta-descriptions for videos and images,
- Training of the accessibility expert within the IT Department.

### 4.2. 2027– Specific modules and user testing

- Reading module for deaf and hard-of-hearing users, tested with relevant users,
- User accessibility testing to gather feedback and adjust websites accordingly,
- Continued training of the accessibility expert.

### 4.3. 2028 – Optimisation and ongoing training

- Monitoring standards and best practices, continuous adaptation of websites, and exploration of new technologies,
- Training and awareness-raising for all teams involved in website management and maintenance,
- Continuous integration of accessibility into development and update processes.

In accordance with regulatory requirements, the Keolis Group will produce annual reviews of its action plans and will thus progressively transform its websites into a more accessible and inclusive platform for people with disabilities.