

## Annual action plan 2025 – Digital Accessibility

### 1. Assessment of actions at the end of the first half of 2025

Action	Detail	Status
Implementation of the annual action plan	Published in July 2025	✓ Completed
List of affected sites/applications	Comprehensive census at group level, partially broken down locally	✓ Completed / 🔄 On going
Appointment of a digital accessibility coordinator	Appointed in December 2024 (Head of Digital Transformation)	✓ Completed
Accessibility audits	Produced on Spectra, Startup Connection, Indosuez France, e/m-banking	✓ Completed
Training and awareness-raising	Actions taken (articles, intranet, video), webinar in preparation	✓ Completed / 🔄 To be continued
Processing user feedback	Start of implementation of an online form and telephone hotline (support)	🔄 On going
Accessibility statements	Non-compliant statements published at the end of June 2024	✓ Completed
Preparing for accessibility integration in procurement	Preparatory actions initiated	🕒 Planned for 2027

## 2. Excerpt from the audits conducted:

**2.1 : CA Indosuez E-banking** does not comply with European standard EN 301549. The non-compliances are listed below.

## TEST RESULTS

The RAWEB 1 compliance audit conducted by Temesis reveals that:

- 27.42% of RAWEB 1 criteria are met.

In details:

- **Number of criteria met: 17**
- **Number of criteria not met: 45**
- **Number of criteria not applicable: 74**

## CONTENT NOT AVAILABLE

The content listed below is not accessible for the following reasons:

### Non compliant

List of non-compliant criteria:

- 1.1 Does each information-carrying image have a textual alternative?
- 1.2 Is each decorative image correctly ignored by assistive technologies?
- 1.8 If no replacement mechanism is available, is each information-carrying text image replaced with styled text whenever possible? Is this rule respected (excluding specific exceptions)?
- 3.1 On each web page, is information not conveyed solely through color? Is this rule respected?
- 3.2 On each web page, is the contrast between the text color and its background color sufficiently high (excluding specific exceptions)?
- 3.3 On each web page, are the colors used in interface components or graphical elements carrying information sufficiently contrasted (excluding specific exceptions)?
- 5.3 For each layout table, does the linearized content remain understandable?
- 5.4 For each data table with a title, is the title properly associated with the data table?

- 6.1 Is each link explicit (excluding specific exceptions)?
- 6.2 On each web page, does each link have a label?
- 7.1 Is each script compatible with assistive technologies, if necessary?
- 7.3 Can each script be controlled via the keyboard and any pointing device (excluding specific exceptions)?
- 7.5 On each web page, are status messages correctly rendered by assistive technologies?
- 8.3 On each web page, is the default language specified?
- 8.4 For each web page with a default language, is the language code accurate?
- 8.6 For each web page with a page title, is the title relevant?
- 8.7 On each web page, is each language change indicated in the source code (excluding specific exceptions)?
- 8.9 On each web page, are tags not used solely for presentation purposes? Is this rule respected?
- 9.1 On each web page, is information structured using appropriate headings?
- 9.2 On each web page, is the document structure consistent (excluding specific exceptions)?
- 9.3 On each web page, is each list properly structured?
- 10.2 On each web page, does visible information remain present when stylesheets are disabled?
- 10.3 On each web page, does the information remain understandable when stylesheets are disabled?
- 10.4 On each web page, is text readable when font size is increased to at least 200% (excluding specific exceptions)?
- 10.7 On each web page, for each element receiving focus, is the focus visually apparent?
- 10.9 On each web page, is information not conveyed solely through shape, size, or position? Is this rule respected?
- 10.11 For each web page, can the content be presented without loss of information or functionality and without requiring vertical scrolling for a window height of 256 px or horizontal scrolling for a window width of 320 px (excluding specific exceptions)?
- 10.12 On each web page, can text spacing properties be redefined by the user without loss of content or functionality (excluding specific exceptions)?
- 10.13 On each web page, are additional contents that appear on focus or hover over an interface component controllable by the user (excluding specific exceptions)?
- 10.14 On each web page, can additional contents that appear via CSS styles only be made visible using the keyboard and any pointing device?
- 11.1 Does each form field have a label?
- 11.2 Is each label associated with a form field relevant (excluding specific exceptions)?
- 11.4 In each form, are each field's label and its associated field adjacent (excluding specific exceptions)?

- 11.5 In each form, are fields of the same type grouped together, if necessary?
- 11.6 In each form, does each grouping of fields of the same type have a legend?
- 11.7 In each form, is each legend associated with a grouping of fields of the same type relevant?
- 11.10 In each form, is input validation used appropriately (excluding specific exceptions)?
- 11.13 Can the purpose of an input field be determined to facilitate autofill with the user's data?
- 12.1 Does each set of pages have at least two navigation systems (excluding specific exceptions)?
- 12.6 Can content grouping areas present on multiple web pages (header, main navigation, main content, footer, and search engine) be accessed or skipped?
- 12.7 On each web page, is there a skip link or quick access link to the main content area (excluding specific exceptions)?
- 12.8 On each web page, is the tab order consistent?
- 12.9 On each web page, does the navigation not contain keyboard traps? Is this rule respected?
- 13.3 On each web page, does each downloadable office document have an accessible version, if necessary (excluding specific exceptions)?
- 13.8 On each web page, is each moving or blinking content controllable by the user?

**2.2 CA Indosuez France (showcase website)** does not comply with the general accessibility improvement guidelines. The non-compliances are listed below.

## TEST RESULTS

The RGAA 4.1.2 compliance audit carried out by Temesis reveals that:

- 34.43% of RGAA criteria are met.

**In details :**

- Number of criteria met : 21
- Number of criteria not met: 40
- Number of criteria not applicable: 45

## CONTENT NOT AVAILABLE

The content listed below is not accessible for the following reasons:

## Non compliant

List of non-compliant criteria:

- 1.3 For each information-carrying image with a textual alternative, is the alternative relevant (excluding specific exceptions)?
- 3.1 On each web page, is information not conveyed solely through color? Is this rule respected?
- 3.2 On each web page, is the contrast between the text color and its background color sufficiently high (excluding specific exceptions)?
- 3.3 On each web page, are the colors used in interface components or graphical elements carrying information sufficiently contrasted (excluding specific exceptions)?
- 5.3 For each layout table, does the linearized content remain understandable?
- 5.4 For each data table with a title, is the title properly associated with the data table?
- 5.6 For each data table, are all column headers and row headers correctly declared?
- 6.1 Is each link explicit (excluding specific exceptions)?
- 6.2 On each web page, does each link have a label?
- 7.1 Is each script compatible with assistive technologies, if necessary?
- 7.3 Can each script be controlled via the keyboard and any pointing device (excluding specific exceptions)?
- 7.4 For each script that initiates a context change, is the user either informed or given control?
- 7.5 On each web page, are status messages correctly rendered by assistive technologies?
- 8.6 For each web page with a page title, is the title relevant?
- 8.7 On each web page, is each language change indicated in the source code (excluding specific exceptions)?
- 8.9 On each web page, are tags not used solely for presentation purposes? Is this rule respected?
- 9.1 On each web page, is information structured using appropriate headings?
- 9.2 On each web page, is the document structure consistent (excluding specific exceptions)?
- 9.3 On each web page, is each list properly structured?
- 9.4 On each web page, is each quote correctly marked?
- 10.1 On the website, are stylesheets used to control the presentation of information?
- 10.2 On each web page, does visible information remain present when stylesheets are disabled?
- 10.3 On each web page, does the information remain understandable when stylesheets are disabled?
- 10.7 On each web page, for each element receiving focus, is the focus visually apparent?
- 10.8 For each web page, are hidden contents intended to be ignored by assistive technologies?
- 10.9 On each web page, is information not conveyed solely through shape, size, or position? Is this rule respected?
- 10.12 On each web page, can text spacing properties be redefined by the user

without loss of content or functionality (excluding specific exceptions)?

- 10.13 On each web page, are additional contents that appear on focus or hover over an interface component controllable by the user (excluding specific exceptions)?
- 10.14 On each web page, can additional contents that appear via CSS styles only be made visible using the keyboard and any pointing device?
- 11.1 Does each form field have a label?
- 11.9 In each form, is the label of each button relevant (excluding specific exceptions)?
- 11.10 In each form, is input validation used appropriately (excluding specific exceptions)?
- 11.11 In each form, is input validation accompanied, if necessary, by suggestions to facilitate error correction?
- 11.13 Can the purpose of an input field be determined to facilitate autofill with the user's data?
- 12.6 Can content grouping areas present on multiple web pages (headers, main navigation, main content, footer, and search engine) be accessed or skipped?
- 12.7 On each web page, is there a skip link or quick access link to the main content area (excluding specific exceptions)?
- 12.8 On each web page, is the tab order consistent?
- 13.3 On each web page, does each downloadable office document have an accessible version, if necessary (excluding specific exceptions)?
- 13.8 On each web page, is each moving or blinking content controllable by the user?
- 13.10 On each web page, are functionalities that require complex gestures also available through simple gestures (excluding specific exceptions)?

**2.3 Spektra** does not comply with European standard EN 301549. The non-compliances are listed below.

## TEST RESULTS

The RAWEB 1 compliance audit carried out by Temesis reveals that:

- 29.85% of RAWEB 1 criteria are met.

In detail:

- Number of criteria met: 20
- Number of criteria not met: 47
- Number of criteria not applicable: 69

## CONTENT NOT AVAILABLE

The content listed below is not accessible for the following reasons:


### Non compliant

List of non-compliant criteria:








- 1.1 Does each information-carrying image have a textual alternative?
- 1.2 Is each decorative image correctly ignored by assistive technologies?
- 1.3 For each information-carrying image with a textual alternative, is the alternative relevant (excluding specific exceptions)?
- 1.6 Does each information-carrying image have a detailed description, if necessary?
- 1.8 If no replacement mechanism is available, is each information-carrying text image replaced with styled text whenever possible? Is this rule respected (excluding specific exceptions)?
- 3.1 On each web page, is information not conveyed solely through color? Is this rule respected?
- 3.2 On each web page, is the contrast between the text color and its background color sufficiently high (excluding specific exceptions)?
- 3.3 On each web page, are the colors used in interface components or graphical elements carrying information sufficiently contrasted (excluding specific exceptions)?
- 4.1 Does each pre-recorded time-based media have a transcript or an audio description, if necessary (excluding specific exceptions)?
- 4.8 Does each non-time-based media have an alternative, if necessary (excluding specific exceptions)?
- 4.12 Can each non-time-based media be controlled via the keyboard and any pointing device?
- 5.4 For each data table with a title, is the title properly associated with the data table?
- 5.6 For each data table, are all column headers and row headers correctly declared?
- 5.7 For each data table, is the appropriate technique used to associate each cell with its headers (excluding specific exceptions)?
- 6.1 Is each link explicit (excluding specific exceptions)?
- 6.2 On each web page, does each link have a label?
- 7.1 Is each script compatible with assistive technologies, if necessary?
- 7.3 Can each script be controlled via the keyboard and any pointing device (excluding specific exceptions)?
- 7.5 On each web page, are status messages correctly rendered by assistive technologies?
- 8.4 For each web page with a default language, is the language code accurate?
- 8.6 For each web page with a page title, is the title relevant?
- 8.7 On each web page, is each language change indicated in the source code (excluding specific exceptions)?
- 8.9 On each web page, are tags not used solely for presentation purposes? Is this rule respected?
- 9.1 On each web page, is information structured using appropriate headings?
- 9.3 On each web page, is each list properly structured?
- 10.3 On each web page, does the information remain understandable when stylesheets are disabled?

- 10.4 On each web page, is text readable when font size is increased to at least 200% (excluding specific exceptions)?
- 10.6 On each web page, is each link whose nature is not obvious visually distinct from the surrounding text?
- 10.7 On each web page, for each element receiving focus, is the focus visually apparent?
- 10.8 For each web page, are hidden contents intended to be ignored by assistive technologies?
- 10.9 On each web page, is information not conveyed solely through shape, size, or position? Is this rule respected?
- 10.11 For each web page, can the content be presented without loss of information or functionality and without requiring vertical scrolling for a window height of 256 px or horizontal scrolling for a window width of 320 px (excluding specific exceptions)?
- 10.13 On each web page, are additional contents that appear on focus or hover over an interface component controllable by the user (excluding specific exceptions)?
- 10.14 On each web page, can additional contents that appear via CSS styles only be made visible using the keyboard and any pointing device?
- 11.1 Does each form field have a label?
- 11.2 Is each label associated with a form field relevant (excluding specific exceptions)?
- 11.5 In each form, are fields of the same type grouped together, if necessary?
- 11.10 In each form, is input validation used appropriately (excluding specific exceptions)?
- 12.1 Does each set of pages have at least two navigation systems (excluding specific exceptions)?
- 12.6 Can content grouping areas present on multiple web pages (headers, main navigation, main content, footer, and search engine) be accessed or skipped?
- 12.7 On each web page, is there a skip link or quick access link to the main content area (excluding specific exceptions)?
- 12.8 On each web page, is the tab order consistent?
- 13.1 For each web page, does the user have control over each time limit that modifies content (excluding specific exceptions)?
- 13.3 On each web page, does each downloadable office document have an accessible version, if necessary (excluding specific exceptions)?
- 13.10 On each web page, are functionalities that require complex gestures also available through simple gestures (excluding specific exceptions)?
- 13.11 On each web page, can actions triggered via a pointing device on a single point of the screen be undone (excluding specific exceptions)?

### 3. Action plan for 2025

Action	Detail	Deadline	Responsable	Status
Continuation of audits	E-banking & m-banking Degroof	S2 2025	Internal/external audit team	 To do



	Petercam audits			
Updating declarations	Publication or update based on audit results	S2 2025	Sites concerned	 To do
Training	Maintaining the offer, adding targeted modules if necessary	All year round	Coordinator + HR	 On going
Awareness	Organization of group webinar + internal communication	All year round	Coordinator + Internal Communications	 On going
Processing user feedback	Full deployment of the form + dedicated channel	S2 2025	Digital support + accessibility	 On going
Monitoring action plans	Support & management of local initiatives	Quarterly	Central coordinator	 On going
Preparation for integration of purchases	Crédit Agricole Group projects	S2 2025	Coordinator + Purchasing	 Preparation for 2027
Continuous compliance	Progressive correction of discrepancies detected during audits	According to prioritization	Entities and sites concerned	 To do

## Appendix: Sites concerned and accessibility statements

Indicative list of sites concerned:

- <https://www.indosuez.com/fr/accessibilite-numerique> (Site institutionnel)
- <https://spektra.indosuez.com> (Spektra)
- <https://startup.indosuez.com> (Startup Connection)
- <https://ebanking.indosuez.com> / <https://mobile.indosuez.com> (e/m-banking Indosuez)

- <https://ebanking.degroofpetercam.com> / <https://mobile.degroofpetercam.com> (e/m-banking Degroof Petercam)

Compliance rates will be updated on an ongoing basis in the compliance statements of the sites concerned, following the audits in 2025. Non-compliant statements were published on June 28, 2025.