

Multi-Year Digital Accessibility Plan

2026-2028

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Sonepar Group

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Mission

Regulatory publication requirements

Article 47 of French Law No. 2005-102 of February 11, 2005, on equal rights and opportunities, participation, and citizenship for people with disabilities, supplemented in 2016, requires all online communication services to be accessible to everyone.

Pursuant to Section III of the aforementioned Article 47, the multi-year plan, with a maximum duration of three years, sets out the entity's digital accessibility policy.

As such, it contains information on governance, internal organization, training initiatives, project processes, relations with subcontractors, and testing and audit policies.

A co-construction approach

To ensure that this project is coherent and fosters a culture of collective organization involving all internal stakeholders, Sonepar has adopted a collective intelligence approach to develop its multi-year digital accessibility plan.

The workshops held identified the actions and resources to be mobilized and defined the foundations of the project to implement, as soon as possible, its commitment to a proactive digital accessibility policy in line with its social policy on inclusivity.

Sonepar's accessibility policy

Disability and digital accessibility policy: an inclusive approach

Sonepar is implementing a proactive digital accessibility, in line with its core values, particularly in terms of inclusivity and equal rights, to ensure universal access to all of its tools and services

A commitment to inclusion in the context of digitalization

Sonepar's commitment to digital accessibility is one of the pillars of the group's inclusivity policy.

For several years, the group has been developing an internal inclusive work policy to enable all its employees to have a working environment that meets their needs, regardless of their personal situation.

With the increasing digitization of tools and work environments, digital accessibility has become a key issue that must be addressed in order to continue and improve inclusivity in the workplace.

Through its activities, Sonepar must not only address the working conditions of its employees, but also offer the same quality of access to its customers and external users through its digital services.

The digital accessibility project is therefore part of a three-pronged approach to its workplace inclusion policy:

1. Culture of inclusion: The accessibility policy aims to promote inclusion by enabling people with disabilities within the company and the group to use digital tools.
2. Public/social responsibility: Sonepar must guarantee equitable access to its services for all users.
3. Continuous improvement of internal working conditions: The digital accessibility program also benefits internal employees by providing them with more accessible tools and organization, which contributes to greater equality of opportunity and the fight against workplace discrimination.

The challenges of the digital accessibility project

Beyond the project's alignment with the Group's values and corporate purpose, digital accessibility addresses a number of specific social and technical challenges.

Internal organization and scope

The size of the group, particularly its international presence, raises the question of how to apply regulations across the entire scope of its activities. Whether for internal projects and tools or for services offered to customers, all digital systems managed centrally for the group are affected by the digital accessibility project.

Governance challenge

Sonepar's organization also poses a challenge in terms of managing such a project at different levels and, therefore, its governance.

By its very nature, this project is cross-functional and involves departments as diverse as legal, purchasing, and web production. It is not "natural" to find a cross-functional or matrix-based operating model in a decentralized organization in terms of project management with a presence in different countries.

The objective for this particular project is therefore to bring together all stakeholders while equipping ourselves with operational and efficient governance tools, questioning each other's working methods and the levels of arbitration involved.

Project management methodology and quality assurance

Sonepar has already formalized digital project management processes and tools. To ensure that these digital services comply with accessibility rules, they need to be developed further to identify areas for improvement and take accessibility into account. In the early stages of system design, quality control is a key issue in ensuring compliance with accessibility standards.

It is therefore essential to ensure cross-functional supervision and quality control for all digital productions by perpetuating best practices to secure production processes.

Human resources and financial resources

Due to the specific skills it requires, the digital accessibility project raises the issue of training and skills development to ensure consistency across all teams. It also calls into question recruitment policy to ensure that new employees involved in the digital chain are quickly up to speed.

Achieving compliance with regulatory obligations also raises the question of mobilizing financial resources and specific budgets, requiring anticipation and forecasting for future fiscal years.

Outsourcing and legal processes

Due to the use of subcontractors for the development of some of its digital products and services, ensuring that all stakeholders, including external ones, comply with accessibility objectives is a major challenge. Securing contractual relationships and taking these criteria into account in calls for tenders are essential to the group's commercial strategy.

Communication and awareness-raising through inclusive management

As the project affects all employees, either as users of digital tools or as producers of digital services, it is essential to communicate as widely as possible about the benefits of this project and thus raise awareness among all employees.

This raises the implicit question of inclusive management, enabling everyone to benefit from appropriate working conditions and to participate in the collective dynamic of inclusion on the issue of digital accessibility.

Existing initiatives and actions taken

Several actions have already been taken as part of the disability policy and also on digital accessibility itself.

Concrete actions and initial achievements in addressing digital disability with suppliers

For several projects, Sonepar has already committed to a purchasing policy with its suppliers that incorporates digital accessibility criteria in the production of its services to customers or for its own employees (e-learning).

Actions in terms of methods and work tools

The work undertaken on the design system clearly marks Sonepar's first initiatives to address the issue of web quality, integrating accessibility as the foundation of its "technical" base.

Training initiatives

Several training initiatives have already been launched for various internal stakeholders, both to improve employees' skills in their roles within digital processes.

Audiences affected by the digital accessibility policy

Internal audiences:

1. Governance stakeholders: Senior management plays a key role in the strategic sponsorship and implementation of accessibility policies.
2. Managers are also key players who, through their coaching and recruitment policies, must ensure that digital accessibility is integrated as an issue for their teams.
3. Internal employees, particularly those with disabilities, benefit directly from improvements to digital tools and work organization.
4. Sonepar's departments and divisions: all departments, including purchasing, human resources, and IT, are involved in implementing the digital accessibility policy, which requires changes to their internal processes.

External audiences concerned:

1. Users and customers: Customers and professionals who use Sonepar's digital products and services, including future candidates.
2. Associations: Associations for people with disabilities can play an important role in terms of accessibility, either as an alert or as external assistance.
3. External suppliers: Due to the high level of outsourcing of digital projects, it is crucial that service providers comply with accessibility standards and participate in the implementation of corrective actions if necessary.
4. The group's ecosystem is also a directly or indirectly affected audience. Whether they are competitors or partners associated with the group, they have a say in and monitor the group's compliance with standards and production quality.

Sonepar is therefore positioning itself as a player already committed to implementing an accessible digital policy, not only to meet legal obligations, but also as part of a social responsibility and inclusivity approach.

This policy has significant impacts, both internally and externally, by guaranteeing access to rights for all and optimizing working conditions and the digital services offered to its users.

Digital products concerned

The group currently manages around 30 internal and external websites and applications.

A comprehensive survey is currently underway to establish a complete and up-to-date inventory. Each solution will be classified according to several criteria, such as traffic, the importance of the service provided, and the expected life cycle. This analysis will enable effective prioritization of compliance actions and optimization of resource allocation.

The range of compliance solutions available to external users as of January 1, 2026, is as follows:

Solution	Description	Compliance status
sonepar.fr	E-commerce website and mobile application	Non-compliant
sonepar.com	Corporate website	Partially compliant (50%)
brand.sonepar.com	Brand website	Non-compliant
sonepix.sonepar.com	Multimedia library	Non-compliant

Solutions used solely by Sonepar employees are also included in the scope, with a progressive compliance objective to ensure an inclusive experience for all users, whether internal or external.

The regulatory scope applicable to Sonepar products and services

An analysis of Sonepar's inventory of digital products and services identifies the two regulatory frameworks for digital accessibility that apply to Sonepar.

1. Due to its status as a company with a turnover of more than €250 million, Sonepar is subject to the obligations of Article 47 to publish the following information:
 - a. Indication of the level of compliance on the home page of websites and digital objects under its editorial responsibility
 - b. Publication of an accessibility page on each of the websites and digital objects
 - c. Publication of the accessibility plan for the entity

- d. Publication of the annual plan for the entity, updated on each anniversary date of the three years of implementation of the digital accessibility strategy

The publication requirement is immediate and cannot be postponed.

It should be noted that since May 2017, a "class action" (collective action or class action) has been possible via a union or association for non-compliance with these obligations.

2. Sonepar publishes digital services and products for professional customers and partners. However, none of its services are aimed directly at individuals through a "B2C" (Business to Consumer) relationship.

As such, Sonepar is not currently affected by the regulations resulting from the 2023 European directive, which came into force in France in June 2025, concerning the obligation to be "fully compliant," particularly for e-commerce activities.

Governance of digital accessibility

Human and financial resources

Sponsor

The program sponsor provides strategic leadership for digital accessibility. Their responsibilities include:

- Securing the necessary resources (human, financial, and political) to enable the deployment of the action plan;
- Integrating digital accessibility into the company's strategic priorities;
- Publicly supporting the initiative in order to reinforce its legitimacy and facilitate its adoption by all teams.

Digital accessibility advisors

Accessibility advisors are the operational heart of governance. They are responsible for:

- Coordinating projects, ensuring the overall consistency of the program, and steering the annual action plan;
- Prioritizing the platforms to be audited, supervising audits, validating associated budgets, and monitoring compliance in conjunction with Product Owners;
- Providing technical expertise, promoting best practices and accessible design systems, and representing the topic within the Inclusion Council.

Project leaders

For each project, a leader is appointed to ensure operational progress. Their responsibilities include:

- Lead the project and ensure that the actions outlined in the action plan are carried out;
- Working closely with their department and relevant stakeholders to facilitate implementation;
- Disseminate best practices, contribute to the sharing of experience, and strengthen internal skills in digital accessibility;
- Keeping digital accessibility advisors informed of the progress of the project under their responsibility.

The financial resources dedicated to digital accessibility are provided directly by each team, which remains responsible for the budget allocated to its scope.

Organizing the implementation of digital accessibility

Collective interdepartmental discussions have identified projects that will enable Sonepar to embed its digital accessibility policy and, over the course of the multi-year plan, make digital accessibility a systemic policy that meets the needs of internal and external users.

Organization of digital projects

Digital production is organized differently depending on the type of product and is carried out by specific teams.

Business-to-business (B2B) products are mainly managed by the Digital Factory, using a design system for internal developments.

Websites intended for individual users are developed from a common technical base for service offerings in different countries.

E-learning services are based on technical platforms from external publishers.

Taking accessibility into account in digital projects:

Audit and accessibility of existing platforms

Gradually assess the compliance of the current portfolio, prioritizing in particular according to usage volume and platform criticality, then take the necessary corrective action to ensure an inclusive digital experience. This transition phase aims to catch up on accessibility debt before implementing "accessibility by design" processes for new projects.

Evolution of digital production processes

The consideration of accessibility in each of the current processes is carried out in different ways, depending in particular on whether the design and development work is internalized or outsourced. This results in different tools for taking accessibility into account, ranging from a design system based on the RGAA and documented for developers, to web design that

incorporates accessibility audit recommendations, or reference grids for e-learning products that take accessibility into account.

The project to modify and evolve the various processes is based on several types of actions aimed at pooling current practices to improve quality and benefit from feedback between teams and products.

The project dedicated to the evolution of digital production processes aims to integrate the "accessibility" dimension into the stages for which the teams have control over the work.

New projects and modification of digital production schemes to take accessibility into account

The organization of Sonepar's digital production processes allows accessibility to be integrated into new projects or corrections without having to rethink the stages of these processes.

1. **Taking accessibility into account when defining requirements**

While accessibility is now almost systematically taken into account in the design of several products, this is not the case for all Sonepar Group products. Project leaders need to be made aware of accessibility issues as soon as requirements are expressed by asking questions about impact. A list of accessibility questions will now be available to project leaders to help them better define the impacts in terms of development.

2. **Synergizing best design practices**

The work already carried out to take accessibility into account in product design, despite differences in maturity, can be synergized to benefit from best practices and feedback between teams. Whether through the documented design system of the Digital Factory, the work to evolve the web design of corporate websites, or the list of RGAA specifications for e-learning, efforts are underway to improve the quality of accessibility in product design.

3. **The same logic applies to the creation of cross-functional communities**, particularly for development, to share best practices and feedback between products and take advantage of the varied skills of the teams in place.

Based on these developments and the consolidation and generalization of existing best practices, Sonepar can achieve the objectives of a truly effective accessibility strategy within the implementation period of the multi-year plan.

Assistance with content production

The editorial and content production teams contribute to the assessment of the accessibility of Sonepar's digital products, services, and applications. Several mechanisms are already in place to harmonize editorial production, particularly between the e-learning and communications

teams. Several avenues should enable progress to be made in the production of accessible documents distributed to users:

- Provision of production support tools
- Provision of checklists for verifying the quality of editorial and multimedia production
- Developing expertise within teams to help employees in their production work
- Establishment of accessible production templates enabling employees to natively integrate document production accessibility criteria
- Production of guidelines or best practices for editorial writing.

Quality control

Ensuring the quality of digital productions requires a control policy. Despite testing and audit processes that vary depending on the product and are difficult to standardize due to the nature of the products, this policy is based on three pillars:

1. **A user-centered testing policy.**

While it is not possible to share test panels for all products, joint discussions are underway to either hire internal testers or use associations of people with disabilities to form panels by product type.

In addition, the use of personas embodying accessibility issues would make it possible to monitor accessibility issues throughout the user-centered project process.

2. **A regular audit policy:** this will make it possible to "certify" the level of accessibility before projects go live, but above all to check at regular intervals that accessibility objectives are being met.
3. **The tools provided to teams to self-monitor their developments** using checklists (see project 2 process) complement the verification security system for quality control at all stages of digital projects.

Sharing ideas between different teams should enable quality control to be pooled by involving internal staff or associations of people with disabilities in real-life testing.

User relations

Users must be able to report any accessibility issues they encounter during their user journey.

It is therefore necessary to adapt and optimize all user feedback channels across all external sites and services, as well as internal applications.

Two areas of work have been identified to make this user relationship policy effective:

1. Developing points of contact for users and consumers (feedback functions, creation of "accessibility" messaging, etc.).
 - Add an accessible feedback button on all websites/apps
 - Create a dedicated email address managed by an accessibility task force
 - Provide a dedicated email address for feedback on accessibility issues
2. Improve feedback management through traceability tools and feedback loops to integrate suggestions into project roadmaps. It is important to be able to track, consolidate, and report on user requests, particularly in order to meet the objectives of coordinated governance between the various entities of the group.

Projects supporting the digital accessibility program

The scale of the changes, both in terms of developing employee skills and using external service providers to develop Sonepar's digital products and services, requires several actions to support the accessibility program in order to ensure its sustainability and consistency.

Targeted training and recruitment policy

Upskilling employees responsible for implementing accessibility and integrating these skills into new hires are key challenges in making digital accessibility a sustainable policy and ensuring the quality of the teams responsible for developing digital products.

The two components of this policy can be broken down into different types of actions.

In terms of training and skills development:

- implementation of mandatory e-learning training to raise awareness of the issue;
- definition in each entity's training plan of the accessibility training actions that each employee must follow in order to integrate accessibility into their daily work;
- offering specific training courses for each job or role.

For the recruitment policy:

- incorporate best practices for inclusivity into recruitment and management practices;
- draw inspiration from the methodologies of other companies with mature inclusivity policies and evolving management practices

Awareness: internal communication to get employees on board

Getting all teams and employees on board with the accessibility policy requires the long-term and recurring implementation of various types of actions:

- An internal communication policy to communicate regularly and at key moments or to new employees (onboarding)
- Workshops and events to bring the challenges of digital accessibility to life (immersive "in the shoes of" workshops, internal hackathons, role-playing exercises, etc.).
- Concrete testimonials from employees with disabilities or external experience in disability and digital accessibility policy.

Purchasing policy

Ensuring that the accessibility policy is taken into account by external service providers will guarantee that the compliance criteria for products and services developed in the event of subcontracting are applied.

This involves a series of "technical" and legal actions to integrate the issue of digital accessibility into the contractual policy of the various Sonepar entities.

These actions range from revising the general terms and conditions for orders of digital solutions to modifying legal documents (contractual clauses, technical appendices, etc.) to add the objective of delivering 100% accessibility.

It also involves, for example, modifying the selection criteria and the ability to evaluate responses from service providers, and defining a penalty policy in the event of non-compliance with commitments.

This is certainly a new subject, but one that is fully in line with the expertise of the teams in charge of contractual relations with external service providers.