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Public document

2026-2028 MULTI-YEAR DIGITAL ACCESSIBILITY PLAN EDENRED SE

Edenred is the digital services and payments platform that supports professionals in the workplace daily. Across 44 countries, it connects more than 60 million users to over 2 million partner merchants through nearly 1 million corporate clients.

Edenred offers digital solutions dedicated to employees (meal vouchers, commuting, gift cards, wellness, rewards, and preferential offers), fleet managers (multi-energy solutions including EV charging, maintenance services, tolls, and parking), and corporate payments (virtual cards).

Guided by the Group's purpose, "Enrich connections. For good.", these solutions enhance employees' well-being and purchasing power and simplify the lives of professional drivers. They promote access to healthier food, more environmentally friendly products, and more sustainable mobility. Finally, they improve the attractiveness and efficiency of businesses while vitalizing the employment market and local economies. Edenred's 12,000 employees are committed to making the world of work a connected ecosystem that is safer, more efficient and more responsible every day.

► CONTEXT

Edenred's solutions for the employee benefits market and for employee engagement and motivation platforms at its client companies are now overwhelmingly digital (~96%). Edenred has therefore launched a digital accessibility program to meet regulatory requirements and, in the interest of inclusivity, to enable as many people as possible to enjoy full access to its digital platforms, whether via the web or mobile apps.

In EU member states, the "European Accessibility Act," which came into effect locally on June 28, 2025, defines the products and services subject to digital accessibility requirements and mandates that an accessibility audit be conducted for these products and services, as well as the publication of a digital accessibility statement, which must be made public and accessible from the relevant website or mobile app. The technical requirements for digital accessibility are governed by the European standard EN 301 549. This standard aligns with the international benchmark standards for digital accessibility, WCAG 2.1 (Web Content Accessibility Guidelines).

Edenred develops and provides tailored solutions to meet the needs of the workplace. The societal changes resulting from digitalization present risks and potential negative impacts related to the accessibility of solutions, but also an opportunity to positively impact the lives of Edenred solution users. It is also an opportunity to comply with new regulations while adhering to emerging standards in the various countries where Edenred operates.

GROUP POLICY & GOVERNANCE

Edenred is committed to promoting responsible, inclusive, and sustainable digital practices. Against the backdrop of rapidly evolving international regulations, digital accessibility is becoming a strategic driver of innovation, compliance, and performance.

By digitizing its solutions, Edenred is committed to improving the accessibility of all its products starting from the design phase to facilitate cognitive accessibility, ensuring compatibility with assistive technologies and mobile accessibility.

The digital accessibility policy for these solutions is led by the compliance department of the Benefits & Engagement business line, with the goal of going beyond regulatory requirements by developing an inclusive digital strategy in collaboration with the CSR, product, and technology teams. This policy consists of three components:

- Phase 1: Conduct a comprehensive inventory of all the Group's existing solutions;
- Phase 2: Conduct accessibility audits, publish the results, and implement a remediation plan if necessary;
- Phase 3: Establish guidelines for all new Group solutions, in Europe and beyond.

As a first step, the Group conducted a survey of the various web platforms and mobile applications intended for its end users, as well as a survey of those that had undergone an accessibility audit. Priority was given to subsidiaries in European Union countries, as this issue is covered by the European Accessibility Act (EEA) and given that this geographic region has the largest number of subsidiaries.

In a second phase, Edenred will expand its efforts to cover other web and mobile solutions that fall outside the scope of the Digital Accessibility Act.

Edenred has also developed innovations to make its products accessible beyond the digital realm, for example, by including Braille on certain cards or by establishing call centers adapted to the needs of people with specific disabilities.

SCOPE OF THIS PLAN

This multi-year plan was developed by Edenred SE, the headquarters of the Edenred Group.

Its scope covers exclusively:

- The corporate website, which is managed at the headquarters (edenred.com),
- Internal tools shared across the Group and managed at the headquarters (such as the internal social network),
- Training and awareness initiatives conducted for the entity's employees.

STEERING

Digital accessibility is addressed jointly by various departments within the Edenred Group. These departments embody the synergy between strategy, support, and technical implementation.

- Technology: Integrating accessibility into the design and development practices of the Business Units (BUs), as well as into continuous integration and deployment tools.
- Human Resources and CSR: Integrating accessibility into the Group's Ideal policy and implementing ad hoc training initiatives.
- Communications: Ensuring the accessibility and compliance of corporate materials and publications.
- Legal and Compliance: Ensuring that actions are taken align with local and international regulatory frameworks.

These exchanges will ensure internal monitoring, coordination, and the sharing of best practices.

Any critical non-compliance will be addressed through a remediation plan developed and approved by all of these departments until the issue is fully resolved.

These departments will meet at least once a year to update the multi-year plan.

▮ VISION AND STRATEGIC ROLL-OUT 2026-2028

The Group's approach is based on three complementary pillars:

1. Structure,
2. Raise awareness and provide tools,
3. Implement and improve.

▮ PILLAR 1 - STRUCTURE

As Edenred digitalizes its solutions, it must improve the accessibility of all its products starting from the design phase to facilitate cognitive accessibility, ensuring compatibility with assistive technologies and mobile accessibility.

This policy is organized into three parts:

- Conduct an inventory of all the Group's existing solutions,
- Conduct accessibility audits, publish the results, and implement a remediation plan, if necessary,
- Establish guidelines for all new Group solutions, in Europe and beyond.

This structure is designed to:

- Ensure the sustainability of the approach, beyond individual projects or organizational changes;
- Promote international consistency while respecting the autonomy of local business units;
- Involve all relevant departments;
- Provide a consolidated view of actions, results, and progress made.

This approach aims to ensure consistency in initiatives at the international level, encourage collective responsibility for responsible digital practices, and establish accessibility as a criterion for quality and sustainable performance.

Furthermore, Edenred expects its suppliers to demonstrate compliance upon request and to commit to a remediation plan if any violations are identified. Digital accessibility requirements constitute a contractual obligation, and failure to comply may constitute a breach of contract.

Action Areas for 2026–2028

These drivers shape Edenred SE's roadmap for the 2026–2028 period:

- Gradual implementation of the approach across the Group.
- Establishment of a network of accessibility liaisons within the business units.
- Development of a Group-wide digital accessibility policy that could be integrated into the CSR policy (Ideal Progress component).
- Integration of accessibility requirements into internal processes (procurement, design, communication, development).
- Definition of a common monitoring and reporting framework to track progress.

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- Engaging the network of BU accessibility liaisons in pilot units.
- Consulting with the Procurement and Legal teams to incorporate accessibility clauses into the responsible procurement charter, standard contracts, and requests for proposals.

▮ PILLAR 2 - RAISE AWARENESS AND PROVIDE TOOLS

Fostering a shared culture of digital accessibility is a fundamental driver of transformation.

Beyond technical compliance, the goal is to change everyday practices, deepen understanding of the subject, and empower employees to act.

Accessibility can only achieve sustainable progress if it becomes a shared reflex—understood by all and integrated from the very outset of digital service design.

This pillar therefore aims to instill a culture of accessibility among all stakeholders, including communications, marketing, design, development, human resources, and management teams—through a gradual and practical awareness-building process. This will enable everyone to understand the human and societal issues related to accessibility and equip teams with the tools, resources, and methods they need to design accessible products and content.

By supporting this skill development, Edenred aims to make accessibility an integral part of responsible digital transformation, in line with the Group's Ideal Progress initiative.

The long-term goal is to create an ecosystem of skills capable of sustaining this initiative over the long term, beyond one-off training initiatives.

Action Areas for 2026–2028

These drivers shape the Group's roadmap for the 2026–2028 period:

- Launching a policy of ongoing training and awareness-raising on digital accessibility.
- Defining skill-building pathways tailored to different job roles.
- Establishment of internal processes for sharing knowledge and best practices regarding accessibility.
- Organization of communication campaigns and awareness-raising events.

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- Rollout of an e-learning course on digital accessibility designed to introduce and raise awareness among all employees.
- Rollout of training programs for teams responsible for the design and development of web and mobile interfaces.

PILLAR 3 – IMPLEMENT AND IMPROVE

The third step involves embedding these practices sustainably into operational processes. Accessibility can only become a true standard through concrete, measurable, and continuous implementation at every stage of the lifecycle of digital products and services.

This pillar aims to make compliance a driver of product quality. The goal is to shift from an ad hoc audit approach to an integrated approach, where accessibility verification is an integral part of development, validation, and deployment.

The challenge is not only to correct issues but also to prevent them through appropriate tools, processes, and technical governance. This approach also involves the Group's partners and service providers: software vendors, system integrators, and digital solution providers.

Edenred thus seeks to extend its culture of accessibility to its ecosystem by promoting transparency and shared responsibility. By focusing on measurement and continuous improvement, the Group reinforces its commitment to quality while ensuring a seamless and inclusive experience for all its users.

Action Areas for 2026–2028

These drivers shape the Group's approach for the 2026–2028 period:

- Providing shared tools for assessing and monitoring compliance (design system, automated tests, checklists).
- Integrating document accessibility into production, communication, and document creation training processes.
- Collaborating with strategic suppliers to strengthen the compliance of solutions purchased by Edenred.

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- Following the audit of the edenred.com corporate website (the results of which can be found on [this page](#)) and the publication of the accessibility statement (2025), implementation of corrective actions, follow-up audits, and an update to the accessibility statement.

- Integration of accessibility into continuous integration practices.
- Evaluate opportunities to improve the accessibility of PDFs.

▶ 2027-2028 PERSPECTIVES

This first multi-year digital accessibility plan from Edenred SE marks a new step toward responsible, inclusive, and sustainable digital transformation. The year 2026 will be focused on establishing the framework, and the years 2027–2028 will build on this momentum: scaling up and measuring, by integrating accessibility into global tools and processes; and consolidating and promoting, by firmly establishing accessibility as an indicator of the quality and performance of Edenred's digital products.

The approach put in place will enable us to assess progress, adjust priorities, and share success stories on an international scale.

▶ REPORTING PROCEDURES AND REMEDIES

Accessibility Liaison: The Disability & Caregivers Liaison at the Group's headquarter, who is responsible for Diversity & Inclusion initiatives at Group level, also serves as the Accessibility Liaison and can be reached at this email address: contact-csr@edenred.com

If you have identified one or more violations of digital accessibility regulations (such as accessibility issues or failure to meet reporting requirements, etc.), and you have contacted the address provided but have not received a satisfactory response, here are your options for seeking redress:

▶ CONTACT THE ARCOM

To report one or more breaches of digital accessibility regulations, go to the "[Report a digital service accessibility issue](#)" page on the Arcom website.

▶ REFER THE MATTER TO THE FRENCH DÉFENSEUR DES DROITS (OMBUDSMAN)

To assert your rights regarding accessibility issues you have encountered:

- Either contact the representative for your region using the [directory of representatives](#) of the representative of the French Défenseur des droits
- Or fill out [the Défenseur des droits's complaint form](#) by selecting the topics "I'm a victim of discrimination," then "Private goods and services," and finally "Disability."
- Or send a letter (free of post) to:
Défenseur des droits
Libre réponse 71120
75342 Paris CEDEX 07

Version History

Version	Date	Author	Validation	Confidentiality level
1	07/15/2026	COM, CSR, IT departments	Flore Cholley	Public document for internal and external use