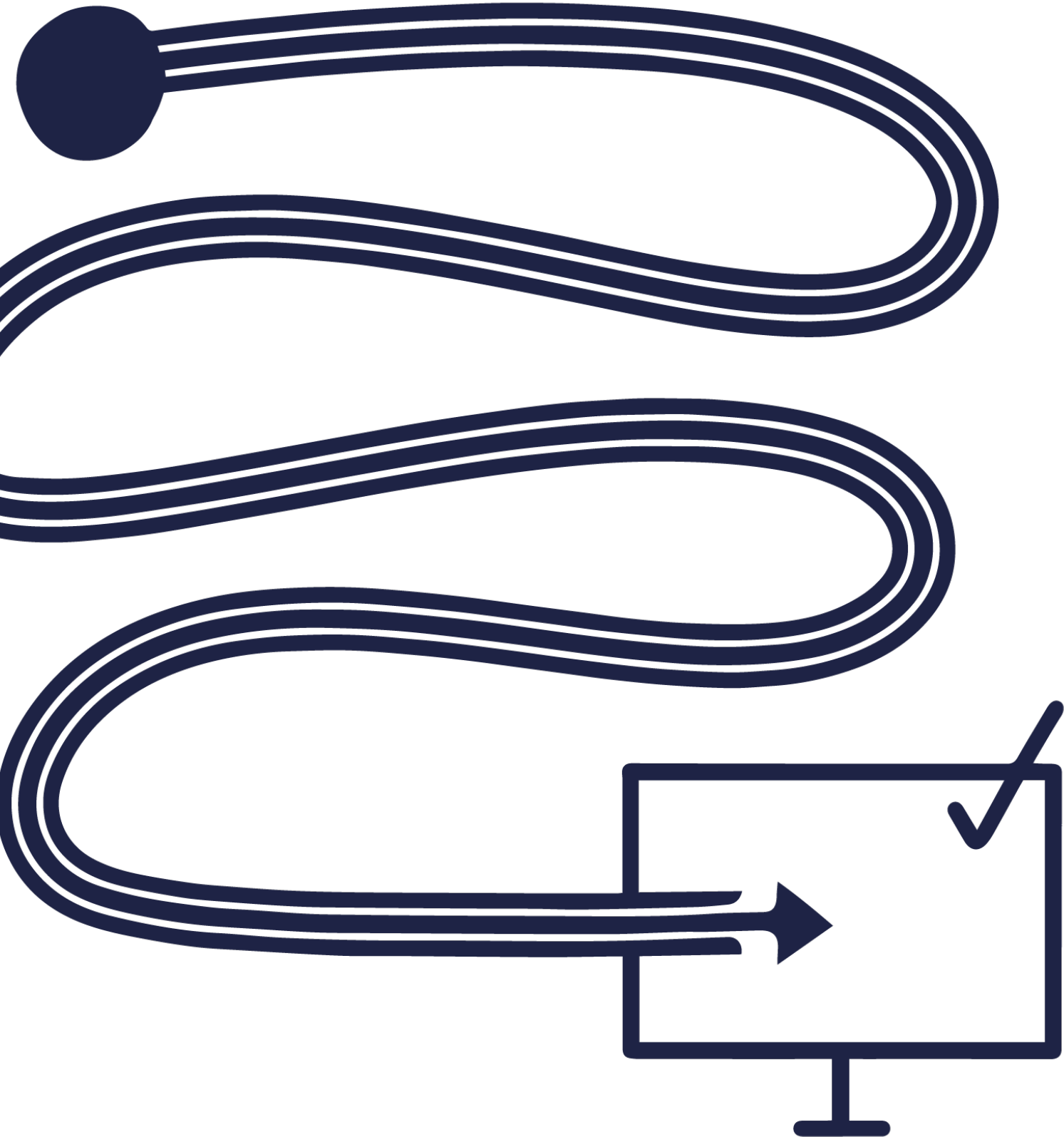
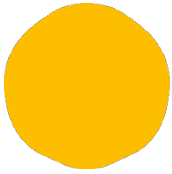




MULTI-YEAR DIGITAL ACCESSIBILITY PLAN
2025-2028





INTRODUCTION

REGULATORY PUBLICATION OBLIGATIONS

Article 47 of Law No. 2005-102 of 11 February 2005 for equal rights and opportunities, participation and citizenship of disabled persons", supplemented in 2016, makes it mandatory for all online communication services to be accessible to all.

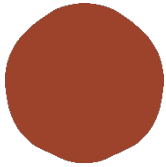
Pursuant to paragraph III of the afore mentioned Article 47, the multi-year plan, with a maximum duration of three years, presents the policy of the entity concerned regarding digital accessibility.

As such, it contains information on governance, the internal organization put in place, training actions, project processes, relations with subcontractors, testing and audit policies.

A CO-CONSTRUCTION APPROACH

To make this project a coherent and unifying project of a collective organizational culture involving all internal stakeholders, a collective intelligence approach was undertaken by Club Med to develop its multi-year digital accessibility plan.

The workshops conducted made it possible to identify the actions and resources to be mobilized, as well as to define the foundations of the project to realize, as soon as possible, its commitment to a proactive digital accessibility policy, in continuity with the societal policy on disability, inclusion and diversity.



THE ACCESSIBILITY POLICY OF CLUB MED

CLUB MED'S POLICY ON DISABILITY AND DIGITAL ACCESSIBILITY

Club Med is implementing a proactive digital accessibility policy. This strategy is deployed in line with its core values, particularly that of inclusion. Non-discrimination and social inclusion are at the heart of the project, and more broadly of the group's social responsibility policy in order to ensure universal access to its services for all its users, without exception.

A commitment already embedded in the group's strategy

The various company agreements relating to the employment of disabled people, the latest of which is in progress (2024-2026), confirm the employer branding strategy based on the values of diversity and inclusion. In concrete terms, this translates into particular attention being paid during the recruitment and career path of the employees concerned, and into their non-discrimination.

The accessibility registers give concrete form to its daily commitments in each of the group's services and entities.

THE CHALLENGES OF DIGITAL ACCESSIBILITY AT CLUB MED

Beyond aligning the project with Club Med's values and corporate purpose, digital accessibility addresses various concrete challenges, both social and technical.

Employer branding and recruitment and training policy:

The group's clients and employees are increasingly sensitive and attentive to the values of entities and companies; employer branding and company



positioning are an increasingly strategic issue.

This positioning particularly influences the recruitment policy for new employees in order to fully meet the expectations of candidates; the group's "careers" site (clubmedjobs.com) is one of the significant examples.

Training policy is therefore a major issue for retaining employees and keeping skills in the long term.

At the project's inception, Club Med lacked dedicated training in digital accessibility. Therefore, one of the primary challenges was to support employees' skills development in this specific area of inclusion.

Welcoming people with disabilities:

For several years, Club Med has been running a specific program to welcome people with disabilities in various resorts around the world.

In order to provide its customers with clear information, the accessibility of Club Med Resorts is assessed for 4 types of disability (visual, auditory, cognitive and motor), then made available from French-language commercial sites. This evaluation was carried out for 100% of Resorts in France and for a list of other Resorts around the world.

This physical reception policy should be extended by bringing digital tools into compliance that can facilitate customer reception and stay, thus extending the customer experience to 360 degrees in the area of accessibility.

Challenges in steering digital policy:

Club Med's organization and its specific presence on different continents make the supervision of digital projects a significant challenge in view of a decentralized operation of digital project management.

The comprehensive mapping of projects and its completeness becomes an increasingly important issue with regard to a strategy of bringing all digital objects, products and services into compliance.

This issue is all the more important as the renewal of each of the teams in the

different countries makes it more difficult to maintain the same level of quality standard for each of the digital products and services.

The group/country dimension:

This multiple geographical positioning raises the question of adapting an accessibility policy in each of the countries where the group is present and therefore of compliance with the national policies of each of the countries of establishment.

It therefore appears essential to consider a structure that allows for a group-wide strategy that can be adapted to the context of each country where the services and products are distributed.

Subcontracting and purchasing:

Due to the use of subcontracting and external publishers for the acquisition and development of some of its digital products and services, the evolution of the purchasing policy represents an important challenge to ensure the consistency of a digital accessibility strategy. Securing contractual relationships and taking these criteria into account in calls for tenders are essential for the group's commercial strategy.

Complementarity with the eco-design approach

Digital accessibility should not be viewed as an isolated project. It must be fully integrated with the ongoing digital eco-design approach to embrace a responsible digital strategy for the group in the years to come.

EXISTING INITIATIVES AND ACTIONS UNDERTAKEN

The topics of disability, inclusion and diversity are not new to Club Med. Several actions to promote better accessibility have already been undertaken, including in the area of digital accessibility.

Managing physical accessibility across the group's various locations

For several years, the process of making Club Med establishments open to the public within the France and Antilles area accessible has been underway, and information on the level of physical accessibility for customers and users is available in the accessibility registers.

Solutions for adapting working conditions and workstations for employees

In the same strategy, several solutions are already in place to facilitate working conditions for employees, in particular by adapting the workstation or teleworking (large screens, specific software...). Using specialized external providers to choose equipment is one of the actions already being taken in the area of physical accessibility.

Concrete actions and initial achievements in addressing digital disabilities

Since January 2024, the first work to bring the Club Med Corporate Foundation website (amisfondationclubmed.com) into compliance has been initiated with the conduct of an audit, and the implementation of initial corrective measures. This project also enabled the first awareness and training actions for employees, particularly for UX and UI designer profiles .

An audit of the websites clubmed.fr and clubmedjobs.com has also been initiated.

THE TARGET AUDIENCES OF THE DIGITAL ACCESSIBILITY POLICY

Internal audiences:

1. The actors in governance: Quentin Briard, CEO of Marketing, Digital & Technologies and member of the Executive Committee, has a key role in the "strategic sponsorship" and monitoring of the implementation of accessibility policies.

2. Internal staff, particularly those with disabilities, directly benefit from improvements made to digital tools and work organization.
3. The various departments and divisions of Club Med, including Purchasing, Human Resources and the Information Systems department and the Commercial Business Units, are involved in the implementation of the digital accessibility policy.

The external audiences concerned:

1. Users and customers: all Club Med customers using digital services and products to organize their stays.
2. All external service providers: Due to the high outsourcing of digital projects, it is crucial that service providers comply with accessibility standards and participate in the implementation of corrective actions if necessary:
 - Software vendors and publishers
 - Digital intellectual and development service providers
 - Communications agencies
 - Freelancers and specific contributors
 - Partner sites offering online sales solutions
 - ...

THE DIGITAL PRODUCTS CONCERNED

Websites & applications:

- Club Med B2C website: Belgium / Canada / Switzerland / Chile / China / Indonesia / Israel / Asia / Japan / South Korea / New Zealand / Thailand / United Kingdom / South Africa / Argentina / Australia / Brazil / Dominican Republic / Hong Kong / Mexico / Malaysia / Peru / Singapore / Turkey / Taiwan / Germany / Denmark / Spain / France / Ireland / Italy / Latin America / Netherlands / Norway / Portugal / Russia / Sweden / Ukraine / United States / Uruguay

- Website development: clubmeddevelopment.com
- US annex site: ideatravel.com/d/150512_23952.htm
- Employer branding website: clubmedjobs.com
- Artist website: clubmedlive.fr
- Foundation website: amisfondationclubmed.com
- Suppliers website: suppliers.clubmed.com
- Corporate website: corporate.clubmed
- My Club Med App (mobile application)

Internal & B2B applications:

- Club Med Travel Agent (partner agency booking system)
- Club Med Information (product information tool)
- Salesforce (B2B Booking Engine)
- HR Applications
- Accounting & Finance Application

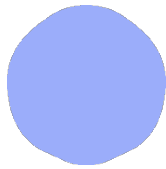
THE REGULATORY SCOPE APPLICABLE TO CLUB MED PRODUCTS AND SERVICES

The analysis of Club Med's inventory of digital products and services makes it possible to identify the two regulatory frameworks for digital accessibility to which Club Med falls.

1. Due to its status as a company with a turnover exceeding 250 million, Club Med is subject to the obligations of Article 47 regarding the publication of the following information:
 - a. Mention of the compliance level on the homepage of websites and digital objects under its publishing responsibility
 - b. Publication of an accessibility statement page on each of the websites and digital objects
 - c. the accessibility plan for the entity

- d. Publication of the annual plan for the entity, updated on each three-year anniversary of the implementation of the digital accessibility strategy.
2. Publishing online services subject to the law of March 7, 2023 transposing the European legislative act for telephone, audiovisual media, e-commerce, banking, and transport services, Club Med is subject to the obligation of respecting the level of 100% accessibility for said services.





THE GOVERNANCE OF DIGITAL ACCESSIBILITY CLUB MED

THE ORGANIZATION OF DIGITAL PRODUCTION

The current organization of digital production within Club Med is based on a highly decentralized model. Each functional entity – whether it is a business service or a geographical region – is autonomous in the conduct of its digital projects, both internal and external. This distributed approach allows for agility and local adaptation, but limits global coordination on cross-cutting issues such as digital accessibility.

Informal exchanges and certain shared practices (in terms of GDPR, security, or purchasing) allow for some homogenization, but no centralized management currently guarantees that accessibility is systematically taken into account in all digital projects.

ORGANIZATION OF POLICY ON DISABILITY AND INCLUSION

To date, the disability policy is led by the CSR and Patronage department, which defines and coordinates the actions of the services, mainly in favor of the integration and support of employees with disabilities within the French scope. It also handles the annual reporting . However, to date, digital accessibility does not fall within its scope of action.

This dissociation between digital production and digital inclusion has led to a reflection on governance, in order to ensure a coherent, effective and cross-cutting consideration of digital accessibility issues throughout the organization.

PROPOSED GOVERNANCE: A COORDINATED MATRIX MODEL

Faced with the limitations of "organic" models based solely on digital or



CSR management, the chosen governance relies on a matrix model. It aims to combine the autonomy of entities with shared strategic coordination.

1. A high-level strategic support

Digital accessibility is sponsored by a member of the Executive Committee, which guarantees its visibility in audit committees and strengthens its strategic legitimacy.

2. A cross-functional reference entity

The Administration / Legal Department is designated as the reference entity for overall management. She asserts:

- Monitoring the multi-year plan and its annual action plan,
- Coordination of committees

3. Operational business liaisons

Digital accessibility liaisons are designated within the business services.

Their role is to:

- Prioritize the projects,
- Ensure projects are compliant (audit, correction, monitoring),
- To be the operational liaison for the referring entity.

4. Local BU relays ("angels")

In each Business Unit, local coordinators (or "angels") ensure the application of digital accessibility rules at their level. They participate in mapping digital projects and report any needs or difficulties encountered.

5. A decision-making body: the Digital Accessibility Committee

This cross-functional committee is the heart of operational governance:

- It meets twice a year, including one meeting one month before the audit committee.
- It includes: the lead entity, the business experts, and the managers of the various project streams

- It deals with monitoring the action plan, compliance, annual prioritizations and defining corrective actions.

6. A community network and structured communication

An internal "Digital Accessibility" network will support this governance by sharing tools, best practices and resources.

An internal communication policy will be developed to:

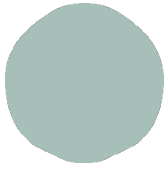
- Raise awareness among teams about digital accessibility,
- To promote the actions undertaken,
- Support the skills development of the designated contacts.

MEANS OF COMMUNICATION AND ASSISTANCE

In the interest of transparency and close contact with both users and staff, a specific email address has been set up to report any problems or shortcomings regarding digital accessibility:

 accessibilite@clubmed.com

This address serves as a single point of entry for collecting feedback, requests for assistance, or suggestions for improvement. It will also help to support the strategy for monitoring and continuous improvement of the multi-year plan.



THE ORGANIZATION OF THE CAPTURE TAKING INTO ACCOUNT DIGITAL ACCESSIBILITY WITHIN CLUB MED

Inter-departmental work has made it possible to identify five projects, in addition to governance, which will allow Club Med to sustainably anchor its digital accessibility policy and systematize it to meet the needs of internal and external users.

THE NEW ORGANIZATION OF DIGITAL PROJECTS

P2. The creation of project repositories and the implementation of tool-based processes as an evolution of digital production processes

Digital service production relies both on the processes of developing digital products, and on the organization of tests and audits to have the ability to measure progress and achieve objectives.

In order to ensure the production of digital products that meet the level of accessibility required by governance, the project to evolve digital production processes aims to integrate accessibility at each stage of production. This integration will be achieved through the development of a strong policy of reference frameworks for business teams, relying on external expertise to ensure the transfer of skills and the autonomy of the teams.

New projects , fixes and modifications to digital production processes , consideration of accessibility

The organization of Club Med's digital production processes makes it possible to integrate accessibility into new projects or fixes without having

to rethink the steps of these processes.

Improving and taking accessibility into account requires, first and foremost, the progressive implementation of frameworks and tools available to different teams to provide common production standards in a decentralized organization.

Several actions support this new strategy:

- Implementation of "toolkits" with prerequisites in digital accessibility during project briefings (support by external agency for a digital project);
- Deployment of UX guidelines ;
- Generalization of the common graphic charter and strengthening of the internal design system as a technical framework for project development;
- Defining the "digital accessibility" validation rules for each development;
- ...

These proposals are based on a consolidation or generalization of practices already in place integrating accessibility for certain productions. It is essential to ensure its generalization and consideration by all teams in all countries where it is implemented.

This implies strong inter-team coordination in digital production.

P3. Validation controls: coordinated management of compliance policy, auditing, and inclusive user testing

In order to guarantee the quality of all its digital products and services, Club Med relies on a strategy of managing and monitoring compliance through a coordinated policy of inclusive audits and tests.

More specifically, four actions are being addressed to implement this new direction:

- The deployment of common control tools allowing each profession to “self-control” its productions and developments;
- The establishment of control processes at key stages of digital processes by instituting specific control rules regarding accessibility;
- The creation of a policy of regular audits to verify the continued compliance of products and services;
- The implementation of inclusive tests for real-world usage tests complements the technical and regulatory checks of audits to ensure a 360° consideration of user needs in terms of accessibility.

These different actions require strengthening the current organizational dimension of coherence in the processes of creation and development of digital products and services.

Taking user feedback into account

The current organization of user feedback already allows for the processing and consideration of specific user requests.

Furthermore, the policy of A/B testing of existing product and service developments also provides an operational framework for integrating digital accessibility criteria into the final choice of developments and fixes.

The use of external expertise to set up a "digital accessibility expertise hub"

To ensure the implementation of its new digital policy, Club Med teams are already supported by external accessibility expertise within the teams.

This expertise allows us to intervene at all key phases of projects:

- Framing and design;

- Development ;
- Tests and recipes.

The clear intention is to invest in skills transfer in order to eventually make the teams autonomous and deploy internal expertise in digital accessibility for future product and service developments.

The prospect of an "accessibility expertise center" is all the more feasible given that the UX center already operates as a cross-functional expertise hub for all digital teams, extending beyond "B2C" products. It can therefore legitimately become the internal reference center for digital accessibility.

PROJECTS SUPPORTING THE DIGITAL ACCESSIBILITY PROGRAM

The importance of the changes, both in terms of the evolution of employee skills and the use of external providers to develop Club Med's digital products and services, implies several actions in support of the accessibility program to guarantee its sustainability and consistency.

P4. Training and awareness-raising: a targeted training plan

Upskilling employees responsible for implementing accessibility and integrating these skills into new recruitment processes are essential challenges.

This will make digital accessibility a sustainable policy and guarantee the quality of the teams responsible for developing digital products.

Three aspects of this policy can be broken down into different types of actions:

P5. Communication and awareness policy through the development of an internal community

Making the group's digital accessibility policy visible, both internally and to external audiences, is also an important issue and an action that follows on

from the work of the teams in charge of implementation.

Positioning the group as committed to digital accessibility policy should help to embed the subject in the daily reality of the teams. This will also help to address the challenge of positioning in a sector where other players are making progress in taking digital accessibility into account in their digital policy.

This mobilization also involves specific actions to raise awareness among all employees.

It will be important to involve employees with disabilities as much as possible to create a network of internal ambassadors.

Five categories of actions can therefore be carried out throughout the implementation period of the multi-year digital accessibility plan:

- The development of an internal network or digital accessibility community
- The inclusion of employees with disabilities (on a voluntary basis) in the implementation and evaluation of progress in digital accessibility
- Recurring awareness campaigns
- An internal communication policy, particularly regarding progress and advancements in bringing the various products and services into compliance.

P6. Purchasing policy and contractual relationships

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

This requires a series of "technical" and legal actions to integrate the issue

of digital accessibility into the contractual policy of the various Club Med entities.

These actions range from sourcing and qualifying service providers to ensuring and verifying compliance with accessibility criteria in the products delivered by the providers.

Two conditions underlie the evolution of this contractual policy:

- Buyer training
- The evolution of the specifications and contractual clauses of the general framework of purchase and sales conditions.

It is therefore necessary to include specific contractual clauses, for example, by making compliance with accessibility rules mandatory. Upstream, mechanisms such as grids or compliance questionnaires can help identify subcontractors able to meet accessibility requirements.