



MULTI-YEAR PLAN

Multi-Year Accessibility Plan

Rothschild Martin Maurel

I. Introduction

Pursuant to the provisions of:

- Article 47 of Law No. 2005-102 of 11 February 2005 on equal rights and opportunities, participation and citizenship for persons with disabilities;
- Decree No. 2019-768 of 24 July 2019 on the accessibility of online public communication services for persons with disabilities;
- Ordinance No. 2023-859 of 6 September 2023 amending the aforementioned Article 47 and inserting Article 47-1;
- The Référentiel général d'amélioration de l'accessibilité (RGAA – French General Accessibility Improvement Framework), in its current version, based on WCAG 2.1 Level AA;

This document constitutes the Multi-Year Accessibility Plan of Rothschild & Co Martin Maurel.

This Plan sets out the strategy, governance and roadmap for progressively bringing into compliance the digital services operated by the institution, including in particular:

- Online banking platforms (Espace Privé);
- Mobile applications;
- More broadly, any online public communication service falling within the applicable regulatory scope.

This Plan covers the period 2025–2030 and forms part of a process of continuous improvement.

This approach is intended to ensure equitable access to digital services for all users, particularly persons with disabilities, and to embed accessibility requirements on a lasting basis in the processes used to design, develop, maintain and enhance the institution's digital services.

II. Accessibility Policy

2.1 Guiding principles

Rothschild & Co Martin Maurel's accessibility policy is primarily based on an approach focused on compliance with the applicable legal and regulatory requirements governing digital accessibility, at both national and European level.



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This approach is intended to:

- Progressively bring the digital services concerned into compliance;
- Promote an inclusive user experience aligned with the quality standards expected of a private banking business.

Digital accessibility therefore forms part of the institution's overall risk management framework and its commitment to ensuring equitable and sustainable access to its services.

2.2 Governance and responsibilities

A Digital Accessibility Officer has been appointed to oversee the implementation of this Multi-Year Plan. In this capacity, the Officer:

- Coordinates accessibility audits;
- Oversees the preparation and updating of accessibility statements;
- Monitors corrective action plans;
- Centralises and handles accessibility-related reports.

The approach is implemented in coordination with a dedicated multidisciplinary team in order to ensure consistent, cross-functional and documented oversight of the measures undertaken.

2.3 Integration into operational processes

Accessibility requirements are progressively being integrated:

- From the design and enhancement stages of digital services;
- Into validation, production deployment and maintenance processes.

Where external service providers are involved in designing or developing digital services, specific accessibility requirements are incorporated into the contractual arrangements and into the relevant control and monitoring mechanisms.

2.4 Monitoring and continuous improvement

Compliance is subject to multi-year planning, implemented through annual action plans.

Issues identified during audits are monitored, prioritised and addressed in order to ensure controlled progress towards compliance, in accordance with the principle of proportionality in the allocation of resources, having regard to the institution's size, organisation and activities.



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III. Inventory and Assessment of Digital Services

3.1 Inventory of digital services

This Plan covers all public-facing digital services operated by Rothschild & Co Martin Maurel.

As at the date on which the Plan was prepared, the services identified include in particular:

- The online client area;
- The client mobile application.

This inventory is based on an internal mapping of digital assets and may be updated if the scope changes or new services are launched.

3.2 Classification and prioritisation

Each digital service is analysed in order to determine its priority level, having regard in particular to:

- The nature of the service provided;
- Its public reach;
- Its functional criticality and its life cycle and expected future development.

This classification enables audits and compliance measures to be scheduled in a manner proportionate to the issues identified, taking account of the technical and organisational constraints specific to each service.

3.3 Accessibility assessments

An accessibility audit has been conducted on the online banking website (Espace Privé), making it possible to identify the principal areas of non-compliance with the RGAA requirements and to define areas for remediation.

The other services falling within the scope of the Plan will be assessed progressively. These assessments may take the form of:

- Full audits;
- Targeted assessments of specific features;
- Preliminary reviews intended to assess the complexity of the work required.

IV. Organisation and Human Resources

As part of its compliance with the requirements of the European Accessibility Act (EAA – Directive (EU) 2019/882), Rothschild & Co Martin Maurel is implementing a structured approach intended to embed digital accessibility across all its services on a lasting basis.



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The human resources deployed comprise both internal resources involved in operational implementation and external expertise engaged as required, particularly to conduct audits, provide methodological support or deliver training.

This organisational structure is intended to evolve progressively in order to increase the autonomy of internal teams and embed accessibility in day-to-day digital service design and management practices.

V. User Feedback and Corrective Action

Rothschild & Co Martin Maurel has implemented a mechanism enabling users to report any difficulty in accessing its digital services.

Feedback may be submitted:

- To their usual contacts at the institution;
- Via the following email address: *ReferentAccessibilité@rothschildandco.com*

All reports are centralised and forwarded to the Digital Accessibility Officer, who analyses them, coordinates the response provided to the user and, where appropriate, defines, prioritises and monitors the necessary corrective action in conjunction with the relevant teams.

This mechanism forms part of a continuous improvement process and helps prevent instances of non-compliance or accessibility regression.

In addition, the applicable enforcement procedures are available on the institutional website's dedicated Accessibility page.

VI. Training and Awareness-Raising Initiatives

From 2026, Rothschild & Co Martin Maurel will roll out a structured accessibility training and awareness-raising programme, tailored to the degree of staff involvement in bringing services into compliance and their level of contact with clients.

6.1 Training

The roles most directly concerned with accessibility within the Digital, Legal, Compliance, Communications and Business Support teams have been identified in order to define appropriate training pathways.

The objective is to equip the staff concerned with the knowledge and skills required to fully integrate accessibility requirements into the performance of their duties.



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6.2 Awareness raising

In addition to the training programme, accessibility awareness-raising initiatives are being rolled out to a broader audience, particularly teams in direct contact with clients.

These initiatives are intended to:

- Promote a consistent understanding of accessibility issues;
- Facilitate the identification of situations requiring particular attention;
- Direct clients effectively towards appropriate solutions.

Awareness-raising materials are made available on the Group intranet to ensure ongoing access to the information and allow staff to consult it as required.

VII. Annual Plan

Rothschild & Co Martin Maurel's Multi-Year Plan may be updated as part of the annual review of the corresponding action plan.