VPAT

*ADA/WCAG/UNI-EN301549
accessibility statement*
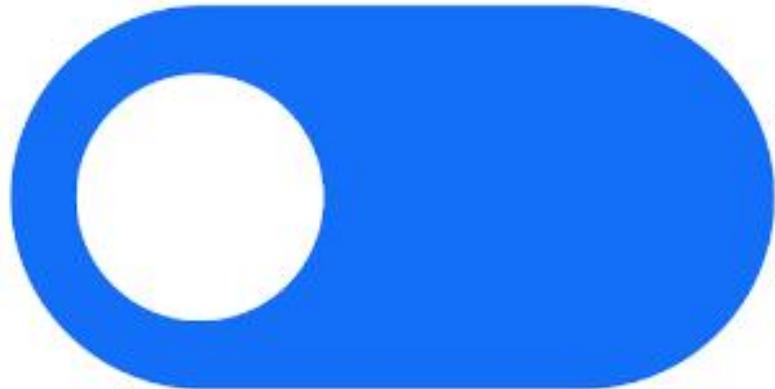
Client:

Clerici S.p.A.

URL:

https://www.clerici.eu/it

Date:

25/11/2025

Table of contents

01. **Introduction**

AccessiWay
the web accessibility solution

VPAT ADA - WCAG - Sec. 508 accessibility statement
CLERICI S.P.A.

01.1 - About

The VPAT is provided in four editions based on the standards/guidelines being evaluated. The editions are WCAG, Revised 508, EN 301 549 and International, which includes all of the standards.

This document is based on WCAG edition of the VPAT. It includes the following standards/guidelines: · Web Content Accessibility Guidelines 2.0 · Web Content Accessibility Guidelines 2.1 · Web Content Accessibility Guidelines 2.2.

For [more informations read ITI web page](#)

PLEASE NOTE: While a VPAT can be an essential aid in assessing the availability of ICT products with accessibility features, it is important to note that, even in cases where a product conforms to relevant standards and technical specifications, an end user may still encounter difficulties utilizing it due to the nature or severity of their disability. On the other hand, a product that may not fully conform to all technical requirements may still be perfectly accessible to an end user who has a disability, but does not need a particular accessibility feature, e.g., a large-button telephone handset for an individual with a hearing disability.

01.2 - Test environments

Operating systems

- Apple Mac Os X (last version)
- Microsoft Windows (last version)
- Apple Ios (last version)
- Google Android (last version)

We have not used Linux as it is currently very uncommon among users with disabilities.

Browsers and user software

 In the latest versions available on the different operating systems:

- Google Chrome
- Windows Edge
- Safari
- Adobe Acrobat Reader / Preview on Mac (for PDFs only)

Screen readers and assistive technologies

In order to achieve the most standard evaluation **we test everything with no adaptation.**

In order to make the most realistic evaluation **we also make some adaptation like:**

- Graphic adaptations present on the different systems (colors, contrasts, subtitles, etc.)
- Mouse emulations, magnifiers and screen keyboards or keyboard improved settings always of the different systems
- Voiceover - Apple systems only
- Talkback - Android only
- NVDA (last version) and Freedom scientific Jaws (second-to-last version) - PC systems only

AccessiWay
the web accessibility solution

02. Accessibility Conformance Report

02.1 - General infos

Company: Clerici S.p.A.

Name of Product/Version: https://www.clerici.eu/it

Report Date: 25/11/2025

Product Description: Corporate website

Contact Information: accessibilita@clerici.eu

Evaluation Methods Used: (see [05.3 - Methodology](#))

Applicable Standards/Guidelines

Web Content Accessibility Guidelines 2.0	Level A (YES) Level AA (YES) Levels AAA (NO)
Web Content Accessibility Guidelines 2.1	Level A (YES) Level AA (YES) Levels AAA (NO)
Web Content Accessibility Guidelines 2.2	Level A (YES) Level AA (YES) Levels AAA (NO)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports**: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support**: The majority of product functionality does not meet the criterion.

- **Not Applicable**: The criterion is not relevant to the product.
- **Not Evaluated**: The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

03. WCAG 2.x Report

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

03.1 – Success Criteria, Level A

Success Criteria	Conformance Level	Remarks and explanations
1.1.1 Non-text Content	Partially supports	Exceptions include: - General > Clerici Logo image: The logo image such as "Clerici" present in the header missing alternative text. As a result, screen readers announced the image link as unlabelled. Home > Logo Images: The informative images such as "Afsi", "Clerici", "Desivero" and so on present in the main content area are implemented with empty alt attributes (alt=""). AS a result, screen readers cannot convey the meaning or purpose of these images to users with visual impairments. Products > Informative Image: There are informative image present in the carousel content missing alternative texts. As a result, screen readers announced the image as unlabelled. Page with images > Informative Image: There are informative image present in the main content area missing alternative texts. As a result, screen readers announced the image as unlabelled. Jobs > Decorative Image: The "alt" attribute are not provided to the decorative images present beside "Posizioni aperte" and "Invia CV" section. As a result, may screen reade users were able to access the decorative image and it was communicated as unlabelled. Blog > Redundant link: There are

		adjacent image and textual links such as "CLERICI: DOPPIA ACQUISIZIONE IN VENETO E NEL LAZIO", "CLERICI PUNTA SULL'INDUSTRIA ED APRE UN NUOVO HUB LOGISTICO" and so on which point to the same destination but are defined in separate <a> tags. Also the alternate text of the image link is same as the text of the textual link. As a result, screen reader users are presented with a repeated information of link which opens the same page.
1.2.1 Audio-only and Video-only (Prerecorded)	Supports	
1.2.2 Captions (Prerecorded)	Supports	
1.2.3 Audio Description or Media Alternative Supports	Supports	
1.3.1 Info and Relationships	Partially supports	Exceptions include: - General > Instagram: In the header section both the Instagram and LinkedIn image links are placed inside a single . Assistive tech announces "list with 1 item" but exposes two separate links within that one item, which misrepresents structure and forces users to navigate multiple controls inside a single list item. - General > Element "|": The decorative content "|" present between Informativa "Privacy", "Dichiarazione di accessibilità" and "Whistleblowing" present in the footer section is exposed to the screen reader. Home > Hidden content: The visually hidden content (empty heading mark-up) heading level 6 is meant to be hidden from all users, but it remains accessible to screen reader users. As a result, it is announced to users even though it is not intended to be visible or perceivable, creating unnecessary noise and potential confusion in the

		reading order.
		Home > List: The content "Afsi", "Clerici", "Desivero" and so on present in the main content area function as a list but do not use list markup.
		A11y > Hidden content: The visually hidden content (empty heading mark-up) heading level 2 is meant to be hidden from all users, but it remains accessible to screen reader users. As a result, it is announced to users even though it is not intended to be visible or perceivable, creating unnecessary noise and potential confusion in the reading order.
		Search "bagno" > Separator: The decorative content "separator" present in the main content area are exposed to the screen reader.
		Jobs > Hidden content: The visually hidden content (empty heading mark-up) heading level 3 is meant to be hidden from all users, but it remains accessible to screen reader users. As a result, it is announced to users even though it is not intended to be visible or perceivable, creating unnecessary noise and potential confusion in the reading order.
		Post > Hidden content: The visually hidden content (empty heading mark-up) heading level 1 is meant to be hidden from all users, but it remains accessible to screen reader users. As a result, it is announced to users even though it is not intended to be visible or perceivable, creating unnecessary noise and potential confusion in the reading order.
		Locator > Opening hour > table: The table has correctly column headers but the ones about the rows are not semantically present as headers, just a simple data cell.
1.3.2 Meaningful Sequence	Supports	

1.3.3 Sensory Characteristics	Supports	
1.4.1 Use of Color	Supports	
1.4.2 Audio Control	Supports	
2.1.1 Keyboard	Partially supports	Exceptions include: Home > Next: The "Next" and "Previous" controls (available when user hover over the carousel) are missing keyboard support. Additionally, the element lacks appropriate role and name information. This made it difficult for keyboard-only and screen reader users to access the functionality associated with mentioned button. Home > Carousel Tab Control: The "Carousel Tab Control" controls (available when user hover over the carousel) are missing keyboard support. Additionally, the element lacks appropriate role and name information. This made it difficult for keyboard-only and screen reader users to access the functionality associated with mentioned button. Products > Next: All carousel slides are receiving keyboard focus. In addition, the "Next" and "Previous" controls are not accessible via keyboard, and their role and name information are missing. This made it difficult for keyboard-only and screen reader users to access the functionality associated with mentioned button. Products > Keyboard: The slide tab controls (carousel controls) are not accessible via keyboard. Additionally, the role, name, and state information are missing. This made it difficult for keyboard-only and screen reader users to access the functionality associated with mentioned button. Page with images > Facebook: The "Facebook", "Twitter", "Email" and so on present in the main content area

		missing keyboard support. However, when users press the Enter or Space key, the dropdown content does not open. This means the interactive functionality is not fully operable through the keyboard, making it difficult for keyboard-only users to access the submenu items. This issue fails to provide equal access for users who cannot use a mouse. Post > Facebook: The "Facebook", "Twitter", "Email" and so on present in the main content area missing keyboard support. However, when users press the Enter or Space key, the dropdown content does not open. This means the interactive functionality is not fully operable through the keyboard, making it difficult for keyboard-only users to access the submenu items. This issue fails to provide equal access for users who cannot use a mouse. - General > Menu and search: When resizing to 1280px + 200%/400% zoom the elements are not reachable and operable with keyboard interaction.
2.1.2 No Keyboard Trap	Supports	
2.1.4 Character Key Shortcuts	Supports	
2.2.1 Timing Adjustable	Supports	
2.2.2 Pause Stop Hide	Partially supports	Exceptions include: Home > Pause, Stop, Hide content: There is carousel content present below the header section that plays automatically without a clear mechanism to pause, stop, or hide it. If there is no method to pause, stop or hide dynamic content it can be distracting to some users with disabilities, and other users with disabilities will not be able to examine the content before it updates. Products > Pause, Stop, Hide content:

		There is carousel content present in the header section that plays automatically without a clear mechanism to pause, stop, or hide it. If there is no method to pause, stop or hide dynamic content it can be distracting to some users with disabilities, and other users with disabilities will not be able to examine the content before it updates.
2.3.1 Three Flashes or Below Threshold	Supports	
2.4.1 Bypass Blocks	Partially supports	Exceptions include: - General > Skip to main Content link: Skip to main content link is missing to bypass the repeated blocks of content. Due to this, navigating the page becomes more time consuming for sighted keyboard-only users.
2.4.2 Page Titled	Supports	
2.4.3 Focus Order	Partially supports	Exceptions include: - General > Focus order: Illogical tabbing order is found on the page after activating search control. The tabbing order does not follow the visual order of the elements. The interactive elements receive the keyboard focus in the following illogical order: 1. Instagram 2. Linkedin 3. Per cercare, scrivi e premi INVIO 4. Close (X) 5. Home 6. Chi siamo This illogical tabbing order will create confusion for keyboard-only users.
2.4.4 Link Purpose (In Context)	Partially supports	Exceptions include: Home > scopri di più: There are "scopri di più" link (present in the main content area) provided with

		identical accessible name, As a result screen reader users cannot distinguish their purpose. Blog > Leggi tutto: Identical link text "Leggi tutto" present in the main content area lead to different destination pages. The links failed to describe the destination they point to. The links fail to convey their purpose when read out of context. As a result, screen reader users had to activate the link to understand which page will be displayed.
2.5.1 Pointer Gestures	Supports	
2.5.2 Pointer Cancellation	Supports	
2.5.3 Label in Name	Supports	
2.5.4 Motion Actuation	Supports	
3.1.1 Language of Page	Supports	
3.2.1 On Focus	Supports	
3.2.2 On Input	Supports	
3.2.6 Consistent Help	Supports	
3.3.1 Error Identification	Supports	
3.3.2 Labels or Instructions	Partially supports	Exceptions include: - General > Search > label: The input field is not provided of an external label which remains visible after the user have added some informations. A placeholder is present but this cannot replace the label. Locator > Search > label: The input field is not provided of an external label which remains visible after the user have added some informations. A placeholder is present but this cannot replace the label.
3.3.7 Redundant Entry	Supports	
4.1.1 Parsing	Supports	

| 4.1.2 Name Role Value | Partially supports | Exceptions include:
- General > Instagram: The image links such as "Instagram" and "Linkedin" present in the header missing textual equivalent. As a result screen readers announced the image link as link.
- General > Prodotti, Sostenibilità, Corporate Governance: When navigating the top menu with the keyboard the "Prodotti", "Sostenibilità" "Corporate Governance", submenus content appear on focus. Additionally, there is no programmatic state exposed.
- General > Search: The search icon and "Close(X)" (available after activating search) present in the header is implemented as a link instead of button. It has no accessible name, so screen readers announce it as an unlabeled control, and when the search panel/field appears there is no programmatic state exposed (no announced "expanded" or "collapsed").
- General > Back to top: The "Back to top" present in the footer section missing accessible name.
Locator > Button: The "location" buttons present in the map section are without appropriate name. As a result, assistive technology users are unable to understand the purpose of the controls.
Locator > Map > pin: The button elements doesn't provide the expanded/collapsed information to the screen reader user. Addtionally, they don't have an accessible name which must be communicated to the user. |

03.2 - Success Criteria, Level AA

Success Criteria	Conformance Level	Remarks and explanations
1.2.4 Captions (Live)	Supports	
1.2.5 Audio Description (Prerecorded)	Supports	
1.3.4 Orientation	Supports	
1.3.5 Identify Input Purpose	Supports	
1.4.3 Contrast (Minimum)	Partially supports	Exceptions include: - General > Per cercare, scrivi e premi INVIO - footer text: The "Per cercare, scrivi e premi INVIO" (available after activating seach control) present in the header section has insufficient color contrast less than 4.50:1. Foreground: #808080 Background: #FFFFFF Ratio: 3.9:1 and also for the footer text with foreground #777 background: #333 ratio: 2.8:1 Minimum required contrast ratio: 4.50:1 Home > Text contrast: There is "Non perderti il nuovo numero! Il Clerici Magazine è qui:" text has insufficient color contrast less that 4.5:1 gradient background. Foreground: #E9E9E9 Background: #6F6F6F ratio: 4.4:1 Minimum contrast ratio: 4.50:1 Locator > Color: There is "CLERICI" and "SEDE" text has insufficient color contrast less that 4.5:1 gradient background. Foreground: #888888 Background: #F7F7F7 ratio: 3.3:1 Minimum contrast ratio: 4.50:1 Products > UNA NUOVA IDEA DI

BAGNO: The "UNA NUOVA IDEA DI BAGNO" and "UNO SGUARDO ALLE NOSTRE SHOWROOM" present in the main content area has insufficient color contrast less than 4.50:1.
Foreground: #FF6600
Background: #FFFFFF
Ratio: 2.9:1
Minimum required contrast ratio: 4.50:1
Page with images > No Poverty: There are image of text such as "No Poverty", "Good health and well being", "Zero hunger" and so on with different background present in the main content area has insufficient color contrast less than 4.50:1.
Foreground: #FFFFFF
Background: #EB1C2C
Ratio: 4.4:1
Minimum required contrast ratio: 4.50:1
Page with images > Email: The "Email" present in the side panel has insufficient color contrast less than 4.50:1.
Foreground: #FFFFFF
Background: #7D7D7D
Ratio: 4.1:1
Minimum required contrast ratio: 4.50:1
Page with images > Condividi: The "Condividi" present in the side panel has insufficient color contrast less than 4.50:1.
Foreground: #FFFFFF
Background: #95D03A
Ratio: 1.8:1
Minimum required contrast ratio: 4.50:1
Blog > 26/6/2025: The "26-06-2025", "10/06/2025" and so on dates present in the main content area has insufficient color contrast less than 4.50:1.
Foreground: #888888
Background: #FFFFFF
Ratio: 3.5:1

		Minimum required contrast ratio: 4.50:1 Post > Email: The "Email" present in the side panel has insufficient color contrast less than 4.50:1. Foreground: #FFFFFF Background: #7D7D7D Ratio: 4.1:1 Minimum required contrast ratio: 4.50:1 Post > Condividi: The "Condividi" present in the side panel has insufficient color contrast less than 4.50:1. Foreground: #FFFFFF Background: #95D03A Ratio: 1.8:1 Minimum required contrast ratio: 4.50:1
1.4.4 Resize text	Partially supports	Exceptions include: - General > Text Resize: When low vision users view the page after zooming in, some content is not available. The social media links "Instagram" and "Linkedin" present in the header section are not available. As a result, low vision users cannot access the mentioned content.
1.4.5 Images of Text	Supports	
1.4.10 Reflow	Partially supports	Exceptions include: - General > Reflow: Web page content failed to reflow when viewed at 320*256 viewport size. The social media links "Instagram" and "Linkedin" present in the header section are not available. As a result, this will result in low vision users finding it difficult to access the content. Home > Reflow: The "Stoem" logo image gets cut off when the page has a viewport width of 320 CSS pixels.

1.4.11 Non-text Contrast	Partially supports	Exceptions include:
		Home > Carousel Tab Control: The carousel tab controls present in the main content area (available on hover) has insufficient color contrast less that 3.0:1 with gradient background.
		Foreground: #FFFFFF Background: #F58752 The contrast ratio is: 2.5:1 Minimum contrast ratio: 3.0:1 Products > Color: The "Next" and "Previous" controls present in the main content area (available on hover) has insufficient color contrast less that 3.0:1 with gradient background.
		Foreground: #FFFFFF Background: #C8C4B8 The contrast ratio is: 1.7:1 Minimum contrast ratio: 3.0:1 Page with images > Share icon: The "Share icon" present in the side panel has insufficient color contrast less that 3.0:1 Foreground: #FFFFFF Background: #95D03A Ratio: 1.8:1 Minimum required contrast ratio: 3.0:1 Page with images > >>: The ">>" present in the side panel has insufficient color contrast less that 3.0:1 Foreground: #FFFFFF Background: #CCCCCC Ratio: 1.6:1 Minimum required contrast ratio: 3.0:1 Post > Share icon: The "Share icon" present in the side panel has insufficient color contrast less that 3.0:1 Foreground: #FFFFFF Background: #95D03A Ratio: 1.8:1 Minimum required contrast ratio: 3.0:1 Post > >>: The ">>" present in the side panel has insufficient color contrast less that 3.0:1

		Foreground: #FFFFFF Background: #CCCCCC Ratio: 1.6:1 Minimum required contrast ratio: 3.0:1
1.4.12 Text-spacing	Supports	
1.4.13 Content on Hover or Focus	Partially supports	Exceptions include: Products > Next: The "Next" and "Previous" controls are only visually available when hovering the mouse over the carousel.
2.4.5 Multiple Ways	Supports	
2.4.6 Headings and Labels	Supports	
2.4.7 Focus Visible	Partially supports	Exceptions include: - General > Search: When navigating the page using the keyboard (Tab key) the focus indicator is not clearly visible for "Seach" icon control present in the header section Without a clear visible focus indicator, keyboard-only users cannot determine which element is currently active, leading to confusion and difficulty completing tasks. - General > Close(X): Focus is not visible for the "Close(X)" (available after activating seach control) . When navigating through these elements using the keyboard, no visible focus indicator is displayed. As a result, users with low vision, mobility impairments, or cognitive disabilities may not be able to determine which element currently has keyboard focus, leading to confusion and navigation difficulties.
2.4.11 Focus Not Obscured (Minimum)	Partially supports	Exceptions include: - General > Search: When interactive elements receive keyboard focus they are completely hidden by the user

		opened panels on the page. As a result sighted keyboard-only users who rely on a keyboard for navigation might not be able to determine the current position of the keyboard focus. For example: • The "Home", "Chi siamo", "Prodotti", "Sostenibilità" and so on interactive element that receives keyboard focus is hidden behind the "search" panel that is opened by the user.
2.5.7 Dragging Movements	Supports	
2.5.8 Target Size (Minimum)	Supports	
3.1.2 Language of Parts	Supports	
3.2.3 Consistent Navigation	Supports	
3.2.4 Consistent Identification	Supports	
3.3.3 Error Suggestion	Supports	
3.3.4 Error Prevention (LFD)	Supports	
3.3.8 Accessible Authentication (Minimum)	Supports	
4.1.3 Status Messages	Partially supports	Exceptions include: Locator > Search suggestions: When the user enters data into the "Trova il punto vendita più vicino a te: inserisci la località, la città o l'indirizzo." search form fields in the main content area, search suggestions appear below the input. However, this information is not conveyed to screen reader users. As a result, users who rely on assistive technologies may be unaware that suggestions are available.

04. EN 301 549 Report

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the WCAG 2.0 Conformance Requirements.

04.1 Chapter 4: Functional Performance Statements (FPS)

Criteria	Conformance Level	Remarks and explanations
4.2.1 Usage without vision	Partially Supports	
4.2.2 Usage with limited vision	Partially Supports	
4.2.3 Usage without perception of colour	Partially Supports	
4.2.4 Usage without hearing	Partially Supports	
4.2.5 Usage with limited hearing	Partially Supports	
4.2.6 Usage with no or limited vocal capability	Partially Supports	
4.2.7 Usage with limited manipulation or strength	Partially Supports	
4.2.8 Usage with limited reach	Partially Supports	
4.2.9 Minimize photosensitive seizure triggers	Partially Supports	
4.2.10 Usage with limited cognition, language or learning	Partially Supports	
4.2.11 Privacy	Partially Supports	

04.2 Chapter 5: Generic Requirements

Criteria	Conformance Level	Remarks and explanations
5.1 Closed functionality	*Heading cell no response required*	*Heading cell no response required*
5.1.2 General	*Heading cell no response required*	*Heading cell no response required*
5.1.2.1 Closed functionality	*See 5.2 through 13*	*See information in 5.2 through 13*
5.1.2.2 Assistive technology	*See 5.1.3 through 5.1.6*	*See information in 5.1.3 through 5.1.6*
5.1.3 Non-visual access	*Heading cell no response required*	*Heading cell no response required*
5.1.3.1 Audio output of visual information	Not Applicable	
5.1.3.2 Auditory output delivery including speech	Not Applicable	
5.1.3.3 Auditory output correlation	Not Applicable	
5.1.3.4 Speech output user control	Not Applicable	
5.1.3.5 Speech output automatic interruption	Not Applicable	
5.1.3.6 Speech output for non-text content	Not Applicable	
5.1.3.7 Speech output for video information	Not Applicable	
5.1.3.8 Masked entry	Not Applicable	
5.1.3.9 Private access to personal data	Not Applicable	
5.1.3.10 Non-interfering audio output	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
5.1.3.11 Private listening volume	Not Applicable	
5.1.3.12 Speaker volume	Not Applicable	
5.1.3.13 Volume reset	Not Applicable	
5.1.3.14 Spoken languages	Not Applicable	
5.1.3.15 Non-visual error identification	Not Applicable	
5.1.3.16 Receipts, tickets, and transactional outputs	Not Applicable	
5.1.4 Functionality closed to text enlargement	Not Applicable	
5.1.5 Visual output for auditory information	Not Applicable	
5.1.6 Operation without keyboard interface	*Heading cell no response required*	*Heading cell no response required*
5.1.6.1 Closed functionality	*See 5.1.3.1 through 5.1.3.16*	*See information in 5.1.3.1 through 5.1.3.16*
5.1.6.2 Input focus	Not Applicable	
5.1.7 Access without speech	Not Applicable	
5.2 Activation of accessibility features	Not Applicable	
5.3 Biometrics	Not Applicable	
5.4 Preservation of accessibility information during conversion	Not Applicable	
5.5 Operable parts	*Heading cell no response required*	*Heading cell no response required*
5.5.1 Means of operation	Not Applicable	
5.5.2 Operable parts discernibility	Not Applicable	
5.6 Locking or toggle controls	*Heading cell no response required*	*Heading cell no response required*
5.6.1 Tactile or auditory status	Not Applicable	
5.6.2 Visual status	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
5.7 Key repeat	Not Applicable	
5.8 Double-strike key acceptance	Not Applicable	
5.9 Simultaneous user actions	Not Applicable	

04.3 Chapter 6: ICT with Two-Way Voice Communication

Criteria	Conformance Level	Remarks and explanations
6.1 Audio bandwidth for speech	*Not Applicable*	
6.2 Real-time text (RTT) functionality	*Heading cell no response required*	*Heading cell no response required*
6.2.1.1 RTT communication	Not Applicable	
6.2.1.2 Concurrent voice and text	Not Applicable	
6.2.2.1 Visually distinguishable display		
6.2.2.2 Programmatically determinable send and receive direction	Not Applicable	
6.2.2.3 Speaker identification	Not Applicable	
6.2.2.4 Visual indicator of Audio with RTT	Not Applicable	
6.2.3 Interoperability	Not Applicable	
6.2.4 RTT responsiveness	Not Applicable	
6.3 Caller ID	Not Applicable	
6.4 Alternatives to voice-based services	Not Applicable	
6.5 Video communication	*Heading cell no response required*	*Heading cell no response required*
6.5.1 General (informative)	*Heading cell no*	*Heading cell no response*

Criteria	Conformance Level	Remarks and explanations
	response required	*required*
6.5.2 Resolution	Not Applicable	
6.5.3 Frame rate	Not Applicable	
6.5.4 Synchronization between audio and video	Not Applicable	
6.5.5 Visual indicator of audio with video	Not Applicable	
6.5.6 Speaker identification with video (sign language) communication	Not Applicable	
6.6 Alternatives to video-based services (advisory only)	*Advisory no response required*	*Advisory no response required*

04.4 Chapter 7: ICT with Video Capabilities

Criteria	Conformance Level	Remarks and explanations
7.1 Caption processing technology	*Heading cell no response required*	*Heading cell no response required*
7.1.1 Captioning playback	Not Applicable	
7.1.2 Captioning synchronization	Not Applicable	
7.1.3 Preservation of captioning	Not Applicable	
7.1.4 Captions characteristics	Not Applicable	
7.1.5 Spoken subtitles	Not Applicable	
7.2.1 Audio description playback	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
7.2.2 Audio description synchronization	Not Applicable	
7.2.3 Preservation of audio description	Not Applicable	
7.3 User controls for captions and audio description	Not Applicable	

04.5 Chapter 8: Hardware

Criteria	Conformance Level	Remarks and explanations
8.1.1 Generic requirements	*Heading cell no response required*	*Heading cell no response required*
8.1.2 Standard connections	Not Applicable	
8.1.3 Colour	Not Applicable	
8.2 Hardware products with speech output	*Heading cell no response required*	*Heading cell no response required*
8.2.1.1 Speech volume range	Not Applicable	
8.2.1.2 Incremental volume control	Not Applicable	
8.2.2.1 Fixed-line devices	Not Applicable	
8.2.2.2 Wireless communication devices	Not Applicable	
8.3 Stationary ICT	*Heading cell no response required*	*Heading cell no response required*
8.3.2.1 Unobstructed high forward reach	Not Applicable	
8.3.2.2 Unobstructed low forward reach	Not Applicable	
8.3.2.3.1 Clear space	Not Applicable	
8.3.2.3.2 Obstructed (< 510 mm) forward reach	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
8.3.2.3.3 Obstructed (< 635 mm) forward reach	Not Applicable	
8.3.2.4 Knee and toe clearance width	Not Applicable	
8.3.2.5 Toe clearance	Not Applicable	
8.3.2.6 Knee clearance	Not Applicable	
8.3.3.1 Unobstructed high side reach	Not Applicable	
8.3.3.2 Unobstructed low side reach	Not Applicable	
8.3.3.3.1 Obstructed (≤ 255 mm) side reach	Not Applicable	
8.3.3.3.2 Obstructed (≤ 610 mm) side reach	Not Applicable	
8.3.4.1 Change in level	Not Applicable	
8.3.4.2 Clear floor or ground space	Not Applicable	
8.3.4.3.2 Forward approach	Not Applicable	
8.3.4.3.3 Parallel approach	Not Applicable	
8.3.5 Visibility	Not Applicable	
8.3.6 Installation instructions	Not Applicable	
8.4 Mechanically Operable parts	*Heading cell no response required*	*Heading cell no response required*
8.4.1 Numeric keys	Not Applicable	
8.4.2.1 Means of operation of mechanical parts	Not Applicable	
8.4.2.2 Force of operation of mechanical parts	Not Applicable	
8.4.3 Keys, tickets and fare cards	Not Applicable	
8.5 Tactile indication of speech mode	Not Applicable	

04.6 Chapter 9: Web (see WCAG 2.x section)

04.7 Chapter 10: Non-Web Documents

Criteria	Conformance Level	Remarks and explanations
10.0 General (informative)	*Heading cell no response required*	*Heading cell no response required*
10.1.1.1 through 10.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section
10.5 Caption positioning	Not Applicable	
10.6 Audio description timing	Not Applicable	

04.8 Chapter 11: Software

Criteria	Conformance Level	Remarks and explanations
11.0 General (informative)	*Heading cell no response required*	*Heading cell no response required*
11.1.1.1 through 11.4.1.3	See WCAG 2.x section	See information in WCAG 2.x section
11.5 Interoperability with assistive technology	*Heading cell no response required*	*Heading cell no response required*

Criteria	Conformance Level	Remarks and explanations
11.5.1 Closed functionality	*Heading cell no response required*	*Heading cell no response required*
11.5.2 Accessibility services	*Heading cell no response required*	*Heading cell no response required*
11.5.2.1 Platform accessibility service support for software that provides a user interface	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.2 Platform accessibility service support for assistive technologies	See 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.3 Use of accessibility services	See information in 11.5.2.5 through 11.5.2.17	See information in 11.5.2.5 through 11.5.2.17
11.5.2.4 Assistive technology	Not Applicable	
11.5.2.5 Object information	Not Applicable	
1.5.2.6 Row, column, and headers	Not Applicable	
11.5.2.7 Values	Not Applicable	
11.5.2.8 Label relationships	Not Applicable	
11.5.2.9 Parent-child relationships	Not Applicable	
11.5.2.10 Text	Not Applicable	
11.5.2.11 List of available actions	Not Applicable	
11.5.2.12 Execution of available actions	Not Applicable	
11.5.2.13 Tracking of focus and selection attributes	Not Applicable	
11.5.2.14 Modification of focus and selection attributes	Not Applicable	
11.5.2.15 Change notification	Not Applicable	
11.5.2.16 Modifications of states and properties	Not Applicable	
11.5.2.17 Modifications of values and text	Not Applicable	
11.6 Documented accessibility usage	*Heading cell no*	*Heading cell no response*

Criteria	Conformance Level	Remarks and explanations
	response required	*required*
11.6.1 User control of accessibility features	Not Applicable	
11.6.2 No disruption of accessibility features	Not Applicable	
11.7 User preferences	Not Applicable	
11.8 Authoring tools	*Heading cell no response required*	*Heading cell no response required*
11.8.1 Content technology	*Heading cell no response required*	*Heading cell no response required*
11.8.2 Accessible content creation	See WCAG 2.x section (If not authoring tool, enter "Not Applicable")	See information in WCAG 2.x section
11.8.3 Preservation of accessibility information in transformations	Not Applicable	
11.8.4 Repair assistance	Not Applicable	
11.8.5 Templates	Not Applicable	

04.9 Chapter 12: Documentation and Support Services

Criteria	Conformance Level	Remarks and explanations
12.1 Product documentation	*Heading cell no response required*	*Heading cell no response required*
12.1.1 Accessibility and compatibility features	Not Applicable	
12.1.2 Accessible documentation	See WCAG 2.x	See information in WCAG 2.x

Criteria	Conformance Level	Remarks and explanations
	section	section
12.2 Support Services	*Heading cell no response required*	*Heading cell no response required*
12.2.2 Information on accessibility and compatibility features	Not Applicable	
12.2.3 Effective communication	Not Applicable	
12.2.4 Accessible documentation	See WCAG 2.x section	See information in WCAG 2.x section

04.10 Chapter 13: ICT Providing Relay or Emergency Service Access

Criteria	Conformance Level	Remarks and explanations
13.1 Relay services requirements	*Heading cell no response required*	*Heading cell no response required*
13.1.2 Text relay services	Not Applicable	
13.1.3 Sign relay services	Not Applicable	
13.1.4 Lip-reading relay services	Not Applicable	
13.1.5 Captioned telephony services	Not Applicable	
13.1.6 Speech to speech relay services	Not Applicable	
13.2 Access to relay services	Not Applicable	
13.3 Access to emergency services	Not Applicable	

05. **Annexes**

05.1 - Web accessibility

Disability is defined as: any activity limitation or participation restriction in society, experienced by a person as a result of a substantial, lasting or definitive alteration of one or more physical, sensory, mental, cognitive, or psychic functions, a multiple disability, or a disabling health condition (article L. 114 of the Social Action and Families Code).

Web accessibility consists of making online public communication services accessible to people with disabilities, and is based on four fundamental principles:

Perceivable: Information and user interface components must be presented to the user in such a way that they can perceive them. For example, providing textual equivalents for all non-textual content that can then be presented in other forms according to the user's needs: large characters, braille, speech synthesis, symbols or simplified language.

Operable: User interface and navigation components must be operable. For example, making all functionality available via keyboard.

Understandable: Information and the use of the user interface must be understandable. Textual content must be made readable and navigation must be consistent.

Robust: Content must be sufficiently robust to be reliably interpreted by a wide variety of user agents, including assistive technologies.

05.2 - WCAG

WCAG overview

The Web Content Accessibility Guidelines, more commonly referred to as WCAG, is a set of guidelines developed with the aim of making web content more accessible to people with disabilities. It is developed by the World Wide Web Consortium (W3C), an international organization that develops open standards to ensure the long-term growth of the Web. The W3C's Web Accessibility Initiative (WAI) specifically handles the development and management of the WCAG.

The WCAG guidelines are globally recognized and adopted as the standard for digital accessibility. They have undergone multiple revisions since the release of WCAG 1.0 in 1999, with WCAG 2.0 being published in 2008, WCAG 2.1 in 2018, and WCAG 2.2 in 2023. These updates aim to account for changes in technology and a better understanding of different accessibility needs.

Levels of Conformance

The WCAG guidelines are divided into three levels of conformance: A (lowest), AA (midrange), and AAA (highest). Each level has specific criteria that must be satisfied to achieve that level of conformance. The guidelines are designed this way to meet the needs of different individuals and situations, with Level A addressing the most severe and limiting accessibility issues, and Level AAA addressing more comprehensive accessibility considerations.

It's important to remember that while WCAG is an excellent guideline and standard, achieving 100% compliance with WCAG does not necessarily mean a website is completely accessible to all users. It's crucial to complement these guidelines with user testing and continual reassessment of your site's accessibility needs.

Accessibility web page

An accessibility page on a website is a place where website owners can detail the measures they have taken to make their website accessible to individuals with disabilities. This is a best-practice in web design and development to enhance digital accessibility. Here are a few components you might often find on an accessibility page:

● Commitment Statement: This is a formal statement where the business or organization expresses its commitment to digital accessibility.

● Standards Compliance: This is where the website indicates the accessibility standards it adheres to, such as WCAG 2.1 Level AA. This may also include information about how the site has been tested for compliance with these standards.

● Accessibility Features: A rundown of the main accessibility features of the site, such as keyboard shortcuts, text size options, color contrast options, etc.

● Instructions for Using Accessibility Features: Detailed instructions on how to use the site's accessibility features, like how to turn on captions or use keyboard navigation.

● Contact and Feedback: Information on how to contact the website team to report accessibility issues, request accommodations, or provide feedback on the site's accessibility.

● Update and Revision Date: The date of the last update to the accessibility page or compliance information.

It's important to remember that the presence of an accessibility page doesn't guarantee in itself that the site is accessible, but it's an indicator of the company's commitment to digital accessibility.

05.3 – Methodology

Objective manual and semi-automatic verification methodology

We analyze content with different automatic and semiautomatic systems and compare the results between tools to obtain the most complete and objective verification. The reference standard, unless specifically requested, that we use is always the latest (WCAG 2.x) so that we can ensure compliance in all countries from which the touchpoint (site, app, etc.) can be accessed.

Our verification is therefore compliant with WCAG 2.x level AA, and the requirements in UNI EN 301549 Guidelines or their declination in the French RGAAs. Each tool produces results that are then analyzed by our experts: it is, therefore, possible that not all tool results appear because they are judged to be false negatives.

Automated tools for syntax checking

● **W3C Markup Validation Service :** used with generated code, because it is the official tool for checking HTML, XHTML,MathHTML, etc.https://validator.w3.org/
● **W3C CSS Validation service :** although the correctness of the CSS does not affect accessibility, it could affect some aspects that still have an impact on it if not correctly interpreted because it is incorrect. The verification is therefore appropriate and done with https://jigsaw.w3.org/css-validator/
● **PAC PDF checker :** https://pdfua.foundation/en/pdf-accessibility-checker-pac/

Automatic and semi-automatic tools for color verification

● **Color Contrast Analyser (CCA) :** used punctually on dubious contrasts https://developer.paciellogroup.com/resources/contrastanalyser/
● **WCAG Color contrast checker :** used as the first check to verify the contrasts of the colors used in the CSS of the pages.
● **Text on background image a11y check :** used to check when text should overlap images https://www.brandwood.com/a11y/
● **Color contrast accessibility evaluator :** used as an additional control for some online pages https://color.a11y.com/Contrast/

Automatic and semi-automatic tools for checking accessibility

Some online validators used as samples on the pages:

● Accescan https://www.accessiway.com/accessscan
● Wave https://wave.webaim.org/

And other local tools:

- **Web developer toolbar**: Used to support manual verification. It allowed us to locate images without alt texts, fields without labels, etc.https://chrispederick.com/work/web-developer/
- **AXE e Lighthouse for Chrome**: they have provided us with precise indications on the defects of the accessibility of the HTML code but also on WAI ARIA attributes, fundamental in the case of web applications and interactive components.
- **Siteimprove for Chrome**: like AX, it provides useful indications for verifying compliance but is a tool evaluated by AgID useful for monitoring public sites.

Terms

The terms used in the Conformance Level information are defined as follows:

Supports: The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
Partially Supports: Some functionality of the product does not meet the criterion.
Does Not Support: The majority of product functionality does not meet the criterion.
Not Applicable: The criterion is not relevant to the product.
Not Evaluated: The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

Compliance levels

To meet the needs of various groups and different contexts, three levels of compliance have been defined: A (lowest), AA, and AAA (highest).

Level A Criterion : Minimum level. Impacts the experience of a wide range of users / often requires simple implementation techniques.
Level AA Criterion : Improved accessibility level. Impacts a smaller group of users / may require more specific implementation techniques.
Level AAA Criterion : Maximum level of accessibility, suitable only for certain contexts.