

Accessibility Conformance Report

ADA/WCAG/UNI-EN301549/Section 508
(based on [VPAT®](#))

Client: Gravyty

URL: <https://securityaudit2.manual.graduway.com/home>

Date: 9/18/2025

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oo. Introduction

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, including all the standards.

This document is based on the WCAG edition of the VPAT. It includes the following standards/guidelines:

- Web Content Accessibility Guidelines 2.0
- Web Content Accessibility Guidelines 2.1

For [more information 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 with 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 (latest version)
- Microsoft Windows (latest version)
- Apple Ios (latest version)
- Google Android (latest 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

To achieve the most standard evaluation **we test everything with no adaptation.**

To make the most realistic evaluation **we also make some adaptations:**

- 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

02.

Accessibility Conformance Report

02.1 – General information

Company: Gravyty

Name of Product/Version: <https://securityaudit2.manual.graduway.com/home>

Report Date: 9/18/2025

Product Description: Engage alumni anytime, anywhere with a dynamic, fully branded platform that fosters lasting connections. By streamlining mentorship, networking, and interactive content, Graduway empowers organizations to strengthen relationships, drive participation, and deliver measurable impact—ensuring alumni stay engaged and connected.

Contact Information: compliance@gravyty.com

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

Applicable Standards/Guidelines covered in this document

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)
Revised Section 508 standards published January 18, 2017 and corrected January 22, 2018	YES

EN 301 549 Accessibility requirements for ICT products and services – V3.1.1 (2019-11) AND EN 301 549 Accessibility requirements for ICT products and services – V3.2.1 (2021-03)	YES
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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 2.2**

Report

Note: When reporting on conformance with the WCAG 2.2 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.2 Conformance Requirements](#).

03.1 – Success Criteria, Level A

Success Criteria	Conformance Level	Remarks and explanations
1.1.1 Non-text Content	Partially supports	<p>Exceptions include:</p> <p>Homepage > Icons/Images: There are decorative elements that are not correctly ignored by assistive technologies.</p> <p>Events > Calendar icon: The element is not correctly ignored by assistive technologies.</p> <p>Engagement > "Growing your network" section > Network Growth: The chart does not provide a sufficient text alternative to be understood by assistive technologies. Although the bars have aria-label attributes, no overall description of the represented data or alternative summary is provided to allow users to access the main information.</p> <p>Jobs Analytics > "Jobs Analytics" section > Total Jobs/ Main page visit (for the last 30 days) > Images: Some decorative images are not properly marked to be ignored by assistive technologies.</p> <p>Jobs Analytics > "Jobs Analytics" section > Application funnel: The application funnel component does not provide an adequate text alternative. While individual steps display numbers and labels visually, there is no overall</p>

		<p>description or summary to allow users of assistive technologies to understand the main flow of applications.</p> <p>Badges and Recognition > "Badges and Recognition" section: Some decorative images are not properly marked to be ignored by assistive technologies.</p>
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: Homepage > Headings: Some text elements visually resemble headings (for example, the title "Ready to boost engagement?" in the modal), but they are not semantically coded as headings.
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	<p>Exceptions include:</p> <p>Jobs > "Filter by" section > Reset: The "Reset" element is implemented as a <code></code> with styling classes but is not interactive for assistive technologies and cannot be reached or activated using the keyboard.</p> <p>Photos > "Photos" section: The "Create Album" control does not receive keyboard focus, nor can it be activated using the keyboard. Users who rely on keyboard navigation or assistive technologies cannot trigger the photo upload functionality. Additionally, the elements "All", "Your Photos", and "Add Photos", as well as the "Delete" and "Add to Album" elements when a photo is selected, are not keyboard-accessible.</p> <p>Messages > "Direct Messages" section > Message list items: The elements are not keyboard-navigable. Users who rely on the keyboard cannot select or interact with them, preventing access to chat functionality.</p>
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	Supports	
2.3.1 Three Flashes or Below Threshold	Supports	

2.4.1 Bypass Blocks	Supports	
2.4.2 Page Titled	Supports	
2.4.3 Focus Order	Supports	
2.4.4 Link Purpose (In Context)	Partially supports	<p>Exceptions include:</p> <p>Jobs > "Jobs" section > Job opportunities results: Both the company logo and the job title link to the same destination. For users of assistive technologies, this creates duplicate links with identical functionality and no added value, which can be confusing.</p> <p>- General > Header > Messages icon link: The link does not have a descriptive name, so its purpose may not be conveyed to users who rely on assistive technologies.</p>
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	Supports	
3.3.7 Redundant Entry	Supports	
4.1.1 Parsing	Supports	
4.1.2 Name Role Value	Partially supports	<p>Exceptions include:</p> <p>Homepage > Update Profile, More Posts, User names (Recent feed posts), Go to groups: Some elements are implemented as buttons but function as links. This mismatch between the perceived role and the actual action can cause confusion for users of assistive technologies.</p> <p>Badges and Recognition > Sidebar > graduway > Dropdowns: The submenu toggle buttons are not provided with an accessible name and do not expose the correct ARIA attributes (e.g., aria-expanded, aria-controls). As a result, assistive technologies may not correctly identify their role or state.</p> <p>Jobs Analytics > Sidebar > graduway > Dropdowns: The submenu toggle buttons are not provided with an accessible name and do not expose the correct ARIA attributes (e.g., aria-expanded, aria-controls). As a result, assistive technologies may not correctly identify their role or state.</p> <p>Engagement > Sidebar > graduway > Dropdowns: The submenu toggle buttons are not provided with an accessible name and do not expose the correct ARIA attributes (e.g.,</p>

		aria-expanded, aria-controls). As a result, assistive technologies may not correctly identify their role or state.
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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: Homepage > "My groups" section > text elements: The text element with color (#808080) does not have sufficient color contrast against the background (#F7F7F7).
1.4.4 Resize text	Supports	
1.4.5 Images of Text	Partially	Exceptions include:

	supports	Homepage > "Ready to boost engagement?" modal > Image: In the modal, there is an image containing relevant textual information (e.g., the names and roles of the speakers). This content is not provided as actual text within the page and is only available as part of the image.
1.4.10 Reflow	Partially supports	<p>Exceptions include:</p> <p>Mentoring > Settings > "Chat With Google" and "Add Facebook Messenger" cards: The "Chat With Google" and "Add Facebook Messenger" cards are hidden from the interface at smaller viewport sizes. As a result, when users zoom or resize the window to 320px width (or 400% zoom), essential content disappears.</p> <p>Events > Interactive elements: The Calendar, "Post Event" button, and the "Search by location" form (with map) are hidden on smaller screens. When users zoom or resize the window to a width of 320px (or 400% zoom), these interface elements disappear. This results in a loss of functionality and prevents users from accessing important content.</p> <p>Engagement > Hamburger menu > graduway > Badges and Recognition: At 1280 px resolution with 400% zoom (viewport width of 320 CSS pixels), the menu item "Badges and Recognition" is no longer available. This prevents users from accessing essential functionality, failing the reflow requirement.</p>
1.4.11 Non-text Contrast	Partially supports	<p>Exceptions include:</p> <p>Homepage > "Ready to boost engagement?" modal > Close button: The color of the</p>

		<p>interactive element (#9a9ca5) does not meet the minimum required contrast ratio with the background color (#FFFFFF).</p> <p>Photos > "Photos" section > "Photos" tab: The checkboxes used to select photos, as well as the contract menu when the photo mode is open, do not have sufficient color contrast against their backgrounds. This affects both default and selected states, making it difficult for users with visual impairments to perceive and interact with these elements.</p>
1.4.12 Text-spacing	Supports	
1.4.13 Content on Hover or Focus	Supports	
2.4.5 Multiple Ways	Supports	
2.4.6 Headings and Labels	Supports	
2.4.7 Focus Visible	Supports	
2.4.11 Focus Not Obscured (Minimum)	Supports	
2.5.7 Dragging Movements	Supports	
2.5.8 Target Size (Minimum)	Supports	
3.1.2 Language of Parts	Supports	
3.2.3 Consistent	Supports	

Navigation		
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	<p>Exceptions include:</p> <p>Directory > "Filter by" section > Form: When the user applies filters to sort the comments, the comment list updates dynamically, but screen readers do not receive any notification of the changes. Users of assistive technologies may not realize that the displayed comments have been modified or filtered.</p> <p>Jobs > "Filter by" section > Form: When the user applies filters to sort the job opportunities, the comment list updates dynamically, but screen readers do not receive any notification of the changes. Users of assistive technologies may not realize that the displayed comments have been modified or filtered.</p>

04. Revised Section 508 Report

04.1 Chapter 3: Functional

Performance Criteria (FPC)

Criteria	Conformance Level	Remarks and explanations
302.1 Without Vision	Partially Supports	See WCAG/EN301549 issues
302.2 With Limited Vision	Partially Supports	See WCAG/EN301549 issues
302.3 Without Perception of Color	Partially Supports	See WCAG/EN301549 issues
302.4 Without Hearing	Partially Supports	See WCAG/EN301549 issues
302.5 With Limited Hearing	Partially Supports	See WCAG/EN301549 issues
302.6 Without Speech	Not applicable	
302.7 With Limited Manipulation	Not applicable	
302.8 With Limited Reach and Strength	Not applicable	
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	See WCAG/EN301549 issues

04.2 Chapter 4: Hardware

Criteria	Conformance Level	Remarks and explanations
402 Closed Functionality	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
402.1 General	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
402.2 Speech-Output Enabled	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
402.2.1 Information Displayed On-Screen	Not Applicable	
402.2.2 Transactional Outputs	Not Applicable	
402.2.3 Speech Delivery Type and Coordination	Not Applicable	
402.2.4 User Control	Not Applicable	
402.2.5 Braille Instructions	Not Applicable	
402.3 Volume	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
402.3.1 Private Listening	Not Applicable	
402.3.2 Non-private Listening	Not Applicable	
402.4 Characters on Display Screens	Not Applicable	
402.5 Characters on Variable Message Signs	Not Applicable	
403 Biometrics	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
403.1 General	Not Applicable	
404 Preservation of Information	<i>Heading cell – no</i>	<i>Heading cell – no response</i>

Criteria	Conformance Level	Remarks and explanations
Provided for Accessibility	response required	required
404.1 General	Not Applicable	
405 Privacy	Heading cell – no response required	Heading cell – no response required
405.1 General	Not Applicable	
406 Standard Connections	Heading cell – no response required	Heading cell – no response required
406.1 General	Not Applicable	
407 Operable Parts	Heading cell – no response required	Heading cell – no response required
407.2 Contrast	Not Applicable	
407.3 Input Controls	Heading cell – no response required	Heading cell – no response required
407.3.1 Tactilely Discernible	Not Applicable	
407.3.2 Alphabetic Keys	Not Applicable	
407.3.3 Numeric Keys	Not Applicable	
407.4 Key Repeat	Not Applicable	
407.5 Timed Response	Not Applicable	
407.6 Operation	Not Applicable	
407.7 Tickets, Fare Cards, and Keycards	Not Applicable	
407.8 Reach Height and Depth	Heading cell – no response required	Heading cell – no response required
407.8.1 Vertical Reference Plane	Not Applicable	
407.8.1.1 Vertical Plane for Side Reach	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
407.8.1.2 Vertical Plane for Forward Reach	Not Applicable	
407.8.2 Side Reach	Not Applicable	
407.8.2.1 Unobstructed Side Reach	Not Applicable	
407.8.2.2 Obstructed Side Reach	Not Applicable	
407.8.3 Forward Reach	Not Applicable	
407.8.3.1 Unobstructed Forward Reach	Not Applicable	
407.8.3.2 Obstructed Forward Reach	Not Applicable	
407.8.3.2.1 Operable Part Height for ICT with Obstructed Forward Reach	Not Applicable	
407.8.3.2.2 Knee and Toe Space under ICT with Obstructed Forward Reach	Not Applicable	
408 Display Screens	Heading cell – no response required	Heading cell – no response required
408.2 Visibility	Not Applicable	
408.3 Flashing	Not Applicable	
409 Status Indicators	Heading cell – no response required	Heading cell – no response required
409.1 General	Not Applicable	
410 Color Coding	Heading cell – no response required	Heading cell – no response required
410.1 General	Not Applicable	
411 Audible Signals	Heading cell – no response required	Heading cell – no response required
411.1 General	Not Applicable	
412 ICT with Two-Way Voice	Heading cell – no	Heading cell – no response

Criteria	Conformance Level	Remarks and explanations
Communication	response required	required
412.2 Volume Gain	Heading cell – no response required	Heading cell – no response required
412.2.1 Volume Gain for Wireline Telephones	Not Applicable	
412.2.2 Volume Gain for Non-Wireline ICT	Not Applicable	
412.3 Interference Reduction and Magnetic Coupling	Heading cell – no response required	Heading cell – no response required
412.3.1 Wireless Handsets	Not Applicable	
412.3.2 Wireline Handsets	Not Applicable	
412.4 Digital Encoding of Speech	Not Applicable	
412.5 Real-Time Text Functionality	Reserved for future	Reserved for future
412.6 Caller ID	Not Applicable	
412.7 Video Communication	Not Applicable	
412.8 Legacy TTY Support	Heading cell – no response required	Heading cell – no response required
412.8.1 TTY Connectability	Not Applicable	
412.8.2 Voice and Hearing Carry Over	Not Applicable	
412.8.3 Signal Compatibility	Not Applicable	
412.8.4 Voice Mail and Other Messaging Systems	Not Applicable	
413 Closed Caption Processing Technologies	Heading cell – no response required	Heading cell – no response required
413.1.1 Decoding and Display of Closed Captions	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
413.1.2 Pass-Through of Closed Caption Data	Not Applicable	
414 Audio Description Processing Technologies	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
414.1.1 Digital Television Tuners	Not Applicable	
414.1.2 Other ICT	Not Applicable	
415 User Controls for Captions and Audio Descriptions	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
415.1.1 Caption Controls	Not Applicable	
415.1.2 Audio Description Controls	Not Applicable	

04.3 Chapter 5: Software

Criteria	Conformance Level	Remarks and explanations
501.1 Scope – Incorporation of WCAG 2.0 AA	See WCAG 2.2 section	See <i>information in WCAG 2.2 section</i>
502 Interoperability with Assistive Technology	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
502.2.1 User Control of Accessibility Features	Not Applicable	
502.2.2 No Disruption of Accessibility Features	Not Applicable	
502.3 Accessibility Services	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
502.3.1 Object Information	Not Applicable	
502.3.2 Modification of Object	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
Information		
502.3.3 Row, Column, and Headers	Not Applicable	
502.3.4 Values	Not Applicable	
502.3.5 Modification of Values	Not Applicable	
502.3.6 Label Relationships	Not Applicable	
502.3.7 Hierarchical Relationships	Not Applicable	
502.3.8 Text	Not Applicable	
502.3.9 Modification of Text	Not Applicable	
502.3.10 List of Actions	Not Applicable	
502.3.11 Actions on Objects	Not Applicable	
502.3.12 Focus Cursor	Not Applicable	
502.3.13 Modification of Focus Cursor	Not Applicable	
502.3.14 Event Notification	Not Applicable	
502.4 Platform Accessibility Features	Not Applicable	
503 Applications	Heading cell – no response required	Heading cell – no response required
503.2 User Preferences	Not Applicable	
503.3 Alternative User Interfaces	Not Applicable	
503.4 User Controls for Captions and Audio Description	Heading cell – no response required	Heading cell – no response required
503.4.1 Caption Controls	Not Applicable	
503.4.2 Audio Description Controls	Not Applicable	
504 Authoring Tools	Heading cell – no response required	Heading cell – no response required

Criteria	Conformance Level	Remarks and explanations
504.2 Content Creation or Editing (if not authoring tool, enter "not applicable")	See WCAG 2.2 section	<i>See information in WCAG 2.2 section</i>
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Not Applicable	
504.2.2 PDF Export	Not Applicable	
504.3 Prompts	Not Applicable	
504.4 Templates	Not Applicable	

04.4 Chapter 6: Support

Documentation and Services

Criteria	Conformance Level	Remarks and explanations
601.1 Scope	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
602 Support Documentation	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>
602.2 Accessibility and Compatibility Features	Not Applicable	
602.3 Electronic Support Documentation	See WCAG 2.2 section	<i>See information in WCAG 2.2 section</i>
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	
603 Support Services	<i>Heading cell – no response required</i>	<i>Heading cell – no response required</i>

Criteria	Conformance Level	Remarks and explanations
603.2 Information on Accessibility and Compatibility Features	Not Applicable	
603.3 Accommodation of Communication Needs	Not Applicable	

05. EN 301 549

Report

Note: When reporting on conformance with the WCAG 2.2 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.

05.1 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 color	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	

05.2 Chapter 5: Generic Requirements

Criteria	Conformance Level	Remarks and explanations
5.1 Closed functionality	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
5.1.2 General	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
5.1.2.1 Closed functionality	<i>See 5.2 through 13</i>	<i>See information in 5.2 through 13</i>
5.1.2.2 Assistive technology	<i>See 5.1.3 through 5.1.6</i>	<i>See information in 5.1.3 through 5.1.6</i>
5.1.3 Non-visual access	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	

Criteria	Conformance Level	Remarks and explanations
5.1.3.9 Private access to personal data	Not Applicable	
5.1.3.10 Non-interfering audio output	Not Applicable	
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

Criteria	Conformance Level	Remarks and explanations
5.5.1 Means of operation	Not Applicable	
5.5.2 Operable parts discernibility	Not Applicable	
5.6 Locking or toggle controls	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
5.6.1 Tactile or auditory status	Not Applicable	
5.6.2 Visual status	Not Applicable	
5.7 Key repeat	Not Applicable	
5.8 Double-strike key acceptance	Not Applicable	
5.9 Simultaneous user actions	Not Applicable	

05.3 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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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		

Criteria	Conformance Level	Remarks and explanations
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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
6.5.1 General (informative)	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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)	<i>Advisory no response required</i>	<i>Advisory no response required</i>

05.4 Chapter 7: ICT with Video Capabilities

Criteria	Conformance Level	Remarks and explanations
7.1 Caption processing technology	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	
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	

05.5 Chapter 8: Hardware

Criteria	Conformance Level	Remarks and explanations
8.1.1 Generic requirements	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>

Criteria	Conformance Level	Remarks and explanations
8.1.2 Standard connections	Not Applicable	
8.1.3 Colour	Not Applicable	
8.2 Hardware products with speech output	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	
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	Not Applicable	

Criteria	Conformance Level	Remarks and explanations
reach		
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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	

05.6 Chapter 9: Web (see WCAG 2.2 section)

05.7 Chapter 10: Non-Web Documents

Criteria	Conformance Level	Remarks and explanations
10.0 General (informative)	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
10.1.1.1 through 10.4.1.3	See WCAG 2.2 section	See information in WCAG 2.2 section
10.5 Caption positioning	Not Applicable	
10.6 Audio description timing	Not Applicable	

05.8 Chapter 11: Software

Criteria	Conformance Level	Remarks and explanations
11.0 General (informative)	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.1.1.1 through 11.4.1.3	See WCAG 2.2 section	See information in WCAG 2.2 section
11.5 Interoperability with assistive technology	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.5.1 Closed functionality	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.5.2 Accessibility services	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.5.2.1 Platform accessibility service	See 11.5.2.5 through	See information in 11.5.2.5

Criteria	Conformance Level	Remarks and explanations
support for software that provides a user interface	11.5.2.17	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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>

Criteria	Conformance Level	Remarks and explanations
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	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.8.1 Content technology	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
11.8.2 Accessible content creation	See WCAG 2.2 section (If not authoring tool, enter "Not Applicable")	See information in WCAG 2.2 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	

05.9 Chapter 12:

Documentation and Support Services

Criteria	Conformance Level	Remarks and explanations
12.1 Product documentation	<i>Heading cell no</i>	<i>Heading cell no response</i>

Criteria	Conformance Level	Remarks and explanations
	<i>response required</i>	<i>required</i>
12.1.1 Accessibility and compatibility features	Not Applicable	
12.1.2 Accessible documentation	See WCAG 2.2 section	See information in WCAG 2.2 section
12.2 Support Services	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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 2.2 section	See information in WCAG 2.2 section

05.10 Chapter 13: ICT Providing Relay or Emergency Service Access

Criteria	Conformance Level	Remarks and explanations
13.1 Relay services requirements	<i>Heading cell no response required</i>	<i>Heading cell no response required</i>
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	

Criteria	Conformance Level	Remarks and explanations
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	

06. Annexes

06.1 – 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.

06.2 - 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.

06.3 – 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 2.2) 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 2.2 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.ally.com/Contrast/>

Automatic and semi-automatic tools for checking accessibility

Some online validators used as samples on the pages:

- Accescan <https://accessibe.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 as 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.