

Supporting the European Accessibility Act (EAA)

How EAA compliance helps investors *and* investment companies

WHAT IS EAA?

The European Accessibility Act (EAA), enacted in 2019, is a landmark European Union (EU) regulation aimed at ensuring people with disabilities can access goods and services without barriers. Although the penalties and enforcement may vary across member countries, the EAA synchronises accessibility requirements across EU Member States. The compliance date is 2025 June 28.

Digital experiences, including website and document accessibility, are included in the scope of the EAA. EAA compliance can be achieved through conformance to specific technical requirements, including the European digital accessibility standard, EN 301 549, which incorporates the globally recognised Web Content Accessibility Guidelines (WCAG) 2.1 Level AA criteria.

WHY IS EAA IMPORTANT?

As background, globally, at least 2.2 billion people have a vision impairment (World Health Organisation, August 2023). Vision loss can affect people of all ages; however, most people with vision impairment and blindness are over the age of 50. Accordingly, content and document accessibility is more important than ever. As the investor population ages, there has been a dramatic increase in blind, partially sighted and cognitively disabled individuals.

WHAT IS THE ORGANISATIONAL IMPACT?

EAA represents a broad-reaching set of regulations that are intended to elevate the inclusion of all Europeans, regardless of disability, in their daily lives.

One particular area of the regulation related to Web Content Accessibility Guidelines — WCAG 2.1 AA seeks to ensure that content is perceivable, operable and robust, and will demand that all content has the correct attributes applied to client-facing websites and hosted documents.

(Continue to next page)

WHAT IS THE ORGANISATIONAL IMPACT?

(Continued)

Noncompliance may result in country-specific penalties, fines and for some member states, prosecution.

In summary, this means that as of 2025 June 28, the entire range of regulatory and financial disclosure documents viewable by the general public and/or investors requires the following attributes:

- The application of WCAG-compliant metadata tagging to all documents and content
- Mitigated and resolved colour contrast issues and other colour violations
- Screen reader compatibility to enable “read out loud” functionality, with JAWS and NVDA as preferred options and WCAG and PDF/UA standards followed

HOW CAN DFIN HELP?

DFIN's industry-leading EAA tagging process ensures complete EAA compliance across all document types. Through this process, DFIN will:



Ingest

We ingest your documents and content in multiple languages.



Analyse

We undertake analysis of your documents and content for WCAG compliance; provide advice, guidance and feedback on style and format; and create a master set of guidelines.



Tag

We tag underlying metadata to the master set of guidelines.



Verify

We perform quality assurance across all documents and content and carry out 16 independent structural checks and content integrity checks to ensure total compliance prior to delivery.



Deliver

We deliver tagged documents back to you with an accompanying accessibility report.

BENEFITS

Companies that are EAA compliant can realise benefits as a result, and working with DFIN provides additional advantages:

1. Being EAA compliant **removes barriers** to a broader and more extensive investor base.
 2. Access to a broader investor base ultimately leads to a positive **economic outcome** for compliant companies.
 3. DFIN's EAA process can be implemented in a matter of days, ensuring **speed to market** and **speed to compliance**.
 4. DFIN provides unparalleled capacity to **handle the high volume** that EAA tagging will demand.
-

WHY DFIN?

Since 2018, DFIN has been providing accessibility solutions for regulations in Canada and the USA. Producing over 300,000 accessibility-tagged documents annually, with a 20% increase year over year, DFIN is well positioned to solve your document tagging needs and keep you in compliance with the EAA.

Note: This document has been tagged using the DFIN EAA process and is 100% EAA compliant.

About Donnelley Financial Solutions (DFIN)

Donnelley Financial Solutions (DFIN) is the leading provider of innovative software and technology-enabled financial regulatory and compliance solutions.

We provide regulatory filing and data solutions to public and private companies, mutual funds, and other regulated investment firms. We support every stage of our clients' business and investment lifecycles.

Learn about DFIN's end-to-end risk and compliance solutions

Visit DFINsolutions.com | Call us [+1 800 823 5304](tel:+18008235304)