

Accessibility Policy





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1. Objective

This Accessibility Policy outlines Athos Commerce's commitment to designing and delivering inclusive digital experiences in alignment with global accessibility standards. It establishes our priorities and procedures to ensure that the digital products we provide support equitable access for all users, including individuals with disabilities.

2. Liability

Athos Commerce is committed to providing accessible digital experiences in accordance with applicable accessibility standards and regulations. This commitment applies to all digital properties that we own, operate, and host, including our websites, applications, and hosted components.

However, Athos Commerce is not responsible or liable for the accessibility compliance of our customers' digital properties, including those that integrate with our technology. Responsibility for the accessibility of a customer's digital properties — including website design, content, navigation structure, and third-party systems — rests solely with the customer.

Customers are encouraged to independently evaluate their digital properties for accessibility and ensure that any integrations with Athos Commerce products are implemented in an accessible manner.

3. Background

Athos Commerce is committed to creating accessible digital experiences in accordance with international accessibility laws and best practices. Our policy is informed by a broad spectrum of global legislation and standards that require digital products and services to be inclusive and usable by people with disabilities. These include:

- European Accessibility Act (EAA) – Enforces accessibility for a wide range of digital products and services — including eCommerce platforms, mobile apps, and self-service terminals — across the EU. Applies to both private and public sectors. Compliance deadline: June 28, 2025.
- Americans with Disabilities Act (ADA), Title III (USA) – Prohibits discrimination on the basis of disability by public-facing businesses, including their digital services. While not prescriptive, courts have increasingly interpreted ADA to require Web Content Accessibility Guidelines (WCAG) conformance for websites and applications.



- Accessibility for Ontarians with Disabilities Act (AODA) – Requires organizations operating in Ontario, Canada to make websites and web content accessible per WCAG 2.0 Level AA. Public sector organizations and large private companies must meet compliance requirements and file accessibility reports.
- Brazilian Inclusion Law (Lei Brasileira de Inclusão) – Mandates accessibility for digital systems and services, aligning with WCAG principles. Covers both public and private sectors and includes penalties for non-compliance.
- Rights of Persons with Disabilities Act (India) – Requires that all government websites and Information and Communication Technology (ICT) systems be accessible per WCAG 2.0. Encourages private sector adoption but enforcement is stronger in the public domain.
- UN Convention on the Rights of Persons with Disabilities (UN CRPD) – A treaty ratified by over 180 countries, recognizing access to ICT as a human right. It serves as a guiding framework for national accessibility laws but is not directly enforceable.

By aligning with these regulations and adopting the Web Content Accessibility Guidelines (WCAG) 2.1 Level AA as our standard, Athos Commerce affirms its responsibility to deliver inclusive digital experiences and actively reduce access barriers across our properties.

4. Priorities

Athos Commerce is actively undergoing a brand and platform transformation following the 2025 merger of Searchspring and Klevu. As part of this transformation, several new digital properties are being launched under the Athos Commerce brand, while legacy systems and interfaces are being phased out or replaced.

Given the breadth of our existing digital footprint and the considerable effort required to bring legacy systems into full accessibility compliance, we have chosen to focus our accessibility efforts on the highest-impact areas, those that directly affect our clients' digital properties and the core user experience across Athos Commerce.



The following digital properties are prioritized for accessibility evaluation, remediation, and ongoing compliance:

- Klevu hosted templates
- Snap templates
- Athos Console
- Intelligent Reach app
- Asklo hub
- Asklo website
- Athos Commerce marketing website

These platforms and components are central to the digital experience we deliver to our clients and their customers. Our goal is to ensure they are designed and maintained with accessibility in mind, following the principles of inclusive design and aligning with WCAG 2.1 AA standards.

Legacy systems will be reviewed and addressed based on risk, user impact, and available resources.

5. Procurement

As part of our commitment to digital inclusion, Athos Commerce considers accessibility a core criterion when selecting and renewing third-party digital tools and platforms used in customer- and employee-facing services.

Requirements for third-party platforms:

- Accessibility statement: Vendors must provide a publicly available accessibility statement or documentation outlining their commitment to accessibility (e.g., a VPAT or conformance report).
- Conformance to WCAG 2.1 AA: Tools must demonstrate alignment with WCAG 2.1 AA standards, particularly for components directly used by Athos Commerce customers.
- Assistive technology support: Platforms should be compatible with major screen readers, support keyboard navigation, and offer sufficient contrast and scaling features.
- Roadmap for remediation: Vendors with partial accessibility support must document known limitations and provide a clear roadmap for addressing issues.



- Responsiveness to accessibility issues: Vendors must be responsive to accessibility-related issues reported by Athos Commerce or our users and commit to timely remediation where feasible.

By integrating accessibility into our procurement practices, we aim to ensure that both our internal operations and customer experiences are inclusive and aligned with our accessibility objectives.

6. Standards

Athos Commerce is committed to conforming to the [Web Content Accessibility Guidelines \(WCAG\) 2.1 Level AA](#). These guidelines help ensure that digital content is:

- Perceivable = Information must be presented in ways users can perceive
- Operable = Interfaces must be usable by all users
- Understandable = Content and navigation must make sense
- Robust = Content must be compatible with assistive technologies

The table below summarizes key WCAG 2.1 AA requirements we aim to meet:

| Requirement | Explanation |
|-------------------------------|--|
| Text Alternatives | All non-text content (e.g., images, icons) must have meaningful alt text that describes its purpose or function. |
| Captions for Multimedia | Videos must include synchronized captions, and audio-only content must have transcripts. |
| Use of Headings and Landmarks | Structure content with semantic HTML (<h1> , <h2> , etc.) and ARIA landmarks to support screen reader navigation. |
| Language of Page | The language of the page must be declared in HTML (e.g., lang="en"). |
| Contrast Ratio – Text | Text must have at least a 4.5:1 contrast ratio against the background (3:1 for large-scale text). |
| Contrast Ratio – Non-Text | UI components (e.g., icons, buttons, focus outlines) must have at least a 3:1 contrast ratio against adjacent colors. |



| Requirement (cont.) | Explanation |
|--------------------------------|---|
| Reflow | Content must reflow properly at a width of 320 pixels (for mobile) without horizontal scrolling or loss of content/function. |
| Orientation | Content must not restrict display to a single orientation (portrait or landscape) unless essential. |
| Resizable Text | Users must be able to zoom in up to 200% without loss of functionality or content. |
| Keyboard Navigation | All interactive elements must be usable with a keyboard alone — no mouse required. |
| Visible Focus | Interactive elements (e.g., buttons, links) must have a visible focus indicator when selected by keyboard. |
| Pointer Gestures | If functionality requires multi-point gestures (e.g., pinch, swipe), a single-point alternative must be available. |
| Pointer Cancellation | Touch or mouse interactions should not trigger an action on down-event; users must be able to cancel unintended actions. |
| Motion Actuation | If device motion (e.g., shake, tilt) triggers an action, an alternative input method must be provided unless the motion is essential. Motion-based activation must also be able to be disabled. |
| No Time Limits (or Extendable) | Time-limited content must allow users to extend, turn off, or adjust the limit. |
| Flashing Content | Content must not flash more than three times per second unless it is below the general flash and red flash thresholds defined in WCAG 2.1 to avoid triggering seizures. |
| Consistent Navigation | Repeated navigation elements (e.g., menus) must appear in a consistent order across pages. |
| Meaningful Sequence | Content must be presented in a logical DOM order so it is understandable when read by screen readers. |
| Form Labels and Errors | All form fields must have associated labels, and error messages must be descriptive and guide users toward resolution. |



| Requirement (cont.) | Explanation |
|--|--|
| Accessible Error Recovery | When form errors occur, users must be notified of the error and given clear instructions on how to correct them. |
| Accessible Names for Links and Buttons | All links and buttons must have descriptive labels that match the visual text, helping users of screen readers and voice controls. |
| Label in Name | If a component has a visible label, that label should be included in its accessible name for consistency with speech input. |
| Status Messages | Dynamic content changes (e.g., "Campaign successfully deleted.") must be conveyed to screen readers without shifting keyboard focus. |

7. Testing Procedure

To support compliance with WCAG 2.1 AA and ensure an inclusive user experience, Athos Commerce conducts accessibility testing using a consistent, repeatable evaluation process. This includes both automated and manual testing, as each approach detects different types of issues. Testing is performed during design, development, and periodic audits to ensure our digital experiences remain inclusive and compliant as they evolve.

Accessibility Testing Tools

Below are the primary tools used in our testing process:

- [WAVE Accessibility Tool \(Browser Extension\)](#)
- [Axe DevTools \(Browser Extension\)](#)
- [WCAG Contrast Checker](#)
- [NVDA \(Screen Reader for Windows\)](#)
- [VoiceOver \(Built into macOS and iOS\)](#)
- [Keyboard Testing](#)

Approach

1. Automated Scanning (Baseline Detection)

Use tools like WAVE or Axe to quickly detect common WCAG violations such as:

- a. Missing or improper alt text
- b. Missing form labels
- c. Low color contrast
- d. Empty links or buttons



2. Keyboard Navigation (Operability)

Navigate the site using only the keyboard (Tab, Shift+Tab, Enter, etc.). Confirm:

- All interactive elements (e.g., buttons, inputs, menus) are reachable
- Focus order follows a logical and intuitive sequence
- Focus indicators are clearly visible, consistent, and do not disappear on focus
- Skip links and drop-down menus are accessible and functional via keyboard

3. Screen Reader Review (Perception & Understanding)

Test the experience using NVDA (Windows) and VoiceOver (macOS/iOS). Confirm:

- Logical heading structure
- Clear and accurate accessible names and labels for links, buttons, and form fields
- Proper use of ARIA landmarks and region announcements
- Notifications of dynamic changes are announced without shifting focus (e.g., "Synonym successfully created" message is read aloud)

4. Responsive Behavior and Reflow (Adaptability)

Zoom to 200% and 400% on a 1280px-wide screen. Confirm:

- Content reflows properly without requiring horizontal scrolling (except for essential elements like data tables or graphs)
- No functionality or information is lost at higher zoom levels
- Layout remains usable and readable across zoom levels and window sizes

The checklist below outlines detailed tasks performed during manual testing. These checks are organized by issue type and include the tools commonly used to evaluate each.

| Checklist | Description | Tools |
|-------------------------|--|--|
| Page Language | Check that the <html> tag has a correct lang attribute. Also check if content in other languages is properly tagged with language subtags. | Browser DevTools, WAVE or Axe, and Screen Reader |
| Image Alt Text | Ensure all images have alt attributes. Review each alt text for accuracy, brevity, and contextual relevance. Decorative images should have empty alt text. | Browser DevTools, WAVE or Axe, and Screen Reader |
| Empty Links and Buttons | Identify links and buttons with no accessible text. Determine their role and importance on the page. | Browser DevTools, WAVE or Axe, and Screen Reader |



| Checklist (cont.) | Description | Tools |
|------------------------------|---|---|
| Form Labels | Check all form fields for proper associated labels and meaningful error messages. | Browser DevTools, WAVE or Axe, and Screen Reader |
| Low Contrast | Check for low contrast in text, icons, buttons, and focus indicators. Ensure readability for users with low vision or color blindness. | Browser DevTools, WAVE, Axe, or WCAG Contrast Checker |
| Page Title | Check that the page title clearly and concisely communicates the page's purpose and makes sense out of context. | Browser Tab and Screen Reader |
| Animation and Movement | Check for auto-playing or moving elements that last more than five (5) seconds and are presented alongside other content. Ensure users can pause, stop, or hide them. | Manual Scroll and Browser DevTools |
| Keyboard Focus | Tab through the page and ensure all interactive elements have a visible, consistent focus indicator that does not disappear. | Keyboard |
| Keyboard Accessibility | Ensure all functionality is operable via keyboard alone. Verify skip links, logical tab order, and interaction completeness. | Keyboard and Screen Reader |
| Responsive Design and Reflow | Zoom to 200% and 400% on a 1280px-wide screen. Confirm that content reflows without loss of functionality or the need for horizontal scrolling. | Browser Zoom and Resizing Viewport |

8. Training

To support the successful implementation of accessibility practices across our digital properties, we require all team members in Marketing, Product Management, Engineering, Quality Assurance, Implementation, and Professional Services complete one or more accessibility training courses.

Accessibility is a shared responsibility. By equipping our teams with foundational and role-specific knowledge, we ensure that inclusive design and development practices are embedded throughout the product lifecycle.

Training helps team members:

- Understand their role in supporting compliance with WCAG 2.1 AA
- Identify and avoid common accessibility issues
- Apply practical techniques for building and maintaining accessible user experiences



9. User Feedback & Support

Athos Commerce welcomes feedback on the accessibility of our digital properties and is committed to addressing barriers that may prevent equitable access to our services.

Users can report accessibility-related issues through our support ticket form:

[Submit an Accessibility Issue](#)

All accessibility issues submitted through this form are automatically routed to our support team, where they are triaged and escalated to the appropriate internal teams for investigation and resolution.

We aim to respond to accessibility-related inquiries within five (5) business days.

Your feedback helps us improve the usability and accessibility of our products, and we appreciate your partnership in creating inclusive digital experiences.



Version History

| Pg/Section | Description | Date | Name | Version No |
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