

# Accessibility Statement

Mario Zunino & C. S.r.l.

Official statement pursuant to EU Directive 2019/882 (EAA)

TECHNICAL CERTIFICATION CODE

**CERT - EAA - 1778848676745**

Keep for future verification • Uniquely identifies this assessment

Publication date: 15/05/2026 • Standard: WCAG 2.1/AA • Validity: 12 months

Conformity status:

**PARTIALLY COMPLIANT**

• Pages analyzed: 15

• Last verification: 15/05/2026

## Important information for reading

- **Nature of the evaluation:** This document constitutes a <strong>technical certification</strong> based on automated analysis tools. It does not replace a legal certification of regulatory compliance, which requires additional manual verifications by qualified experts and accredited auditors
- **Continuous evaluation:** This document represents the current state in the ongoing process of accessibility improvement
- **Indicative timelines:** All timelines are indicative and subject to resource availability and technical constraints
- **Best effort principle:** The organization operates according to standards of reasonableness and proportionality of interventions
- **Methodological limitations:** Automated evaluations require integration with manual testing and user feedback for completeness
- **Dynamic updates:** Substantial changes to the site will result in corresponding updates to the statement

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## Official Conformity Statement

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This website is **partially compliant** with the accessibility requirements set forth in WCAG 2.1 Level AA Guidelines. Specific areas for improvement have been identified and are subject to gradual optimization according to a sustainable implementation strategy.

**Statement date:**

15/05/2026

**Last technical verification:**

15/05/2026

**Statement validity:**

12 months from issue date

**Next update:**

Within 12 months or upon substantial changes

## Executive Summary and Key Metrics

**Strategic Overview:** This section provides an immediate overview of the website's accessibility status, actions taken, and improvement roadmap. The data presented reflects the organization's commitment to the systematic process of digital accessibility improvement, highlighting both the progress already achieved and the optimization areas identified to ensure an increasingly inclusive user experience.

### CONFORMITY STATUS

**PARTIAL**

Continuous improvement active

### APPLIED STANDARD

**WCAG 2.1**

Level AA + EAA

### ANALYZED SAMPLE

**15**

representative pages

### METHODOLOGY

**Integrated**

Automatic + Manual

### Positive aspects identified

The analysis highlighted **7 unique WCAG test types passed**, demonstrating that the site has already implemented various accessibility best practices. Overall, 73 checks were passed across all analyzed pages.

The success rate of 63.0% indicates an established commitment to digital accessibility.

### PRINCIPALE

**35**

**UNIQUE IMPROVEMENT  
AREAS**

Types of intervention needed ( total occurrences)

**10**

**CRITICAL VIOLATIONS**

Total accessibility blocks

**63.0%**

**WCAG COMPLIANCE SCORE**

Formula: 7 unique tests / (7 unique tests + 35 unique issues)

**3**

**CONTRASTS**

Chromatic improvements

**2**

**IMAGES**

Text alternatives

**7**

**UNIQUE TESTS  
PASSED**

73 total with repetitions

**32**

**HIGH PRIORITY**

Priority interventions for user impact

## Technical Evaluation Summary

**Methodological approach applied:** Automated technical evaluation on 15 representative pages, using an integrated suite of recognized tools for WCAG compliance verification

**Analysis tools used:** Multiple scanners with complementary technologies to maximize coverage and accuracy of the evaluation

**Evaluation results:**

- **7 UNIQUE WCAG test types passed (distinct criteria actually compliant)**
- Overall total: 73 tests passed out of 73 total checks (includes repetitions for each analyzed page)
- **35 unique problem types identified ( total instances)**
- Distribution by severity: 10 critical, 22 high priority, 3 medium priority
- WCAG coverage: 15 criteria out of 50 verified (30%)

**Implementation strategy:** Gradual and sustainable approach to interventions, prioritized by user impact and technical feasibility

**Data transparency:** All technical details, quantitative metrics and verification logs are available upon request for support, audit and continuous improvement purposes

## Organization Identification Data

### Organization and website identification information

FIELD	VALUE
Name	Mario Zunino & C. S.r.l.
Website Evaluated	<a href="https://esterel.it/it/">https://esterel.it/it/</a>
Accessibility Manager	Mario Zunino & C. S.r.l.
Institutional Contacts	<a href="mailto:info@esterel.it">info@esterel.it</a> Phone: +39 011 9828811
Reference Regulations	EU Directive 2019/882 (EAA), WCAG 2.1 AA, EN 301 549

## Technical Evaluation Metadata

The following metadata ensure complete traceability, unique identification, and verifiability of the evaluation process conducted, ensuring compliance with international standards for digital accessibility auditing.

## Complete accessibility evaluation metadata

TECHNICAL FIELD	VALUE
Certification Code	CERT-EAA-1778848676745
Verification Date and Time	15/05/2026
Conformity Standard	WCAG 2.1 Level AA, EN 301 549 v3.2.1
Sample Pages	15 representative pages
Temporal Validity	12 months from verification
Technology Stack	Standard web stack • CMS: PrestaShop
Publication Mode	"Accessibility" link from homepage (AgID Guidelines)
Update Frequency	Annual or upon substantial changes
Technical Contact	Principi S.r.l.

## Methodology and Analysis Tools

This section describes the systematic and rigorous methodological approach adopted for the digital accessibility evaluation. The methodology combines automated analysis using internationally recognized tools with specialized manual verifications, ensuring broad coverage and accuracy in identifying areas for improvement.

### Integrated methodological framework

#### Characteristics of the evaluation conducted:

- **Automated tools used:** WAVE (WebAIM), axe-core (Deque Systems), Lighthouse (Google), Pa11y, complementary specialized scanners
- **Sampling criteria:** Homepage, main informative sections, critical interactive functions, essential user paths, multimedia content, forms and online services
- **Evaluation coverage:** Automated analysis (30% WCAG criteria covered) with 4 specialized scanners
- **Check periodicity:** Complete annual verification, semi-annual monitoring, immediate testing after significant updates
- **Conformity standards:** WCAG 2.1 Level AA, EN 301 549, EAA Directive 2019/882

## Tool Suite Used

The evaluation was conducted using a coordinated combination of complementary automated tools to maximize the coverage of compliance tests:

- **Pa11y:** HTML5 and ARIA validation, WCAG compliance criteria verification through advanced structural analysis engine
- **axe-core (Deque Systems):** Industry-leading testing engine, used by developers and international organizations for automated accessibility verification
- **Lighthouse (Google):** Integrated performance, SEO and accessibility audit with standardized metrics and specific recommendations
- **QualWeb:** Advanced automated validation suite implementing ACT Rules and WCAG Techniques, providing complete and detailed coverage of accessibility guidelines

## Data Processing and Normalization Process

### Processing phases:

1. **Multi-tool acquisition:** Parallel execution of complementary scanners on representative sample
2. **Format normalization:** Output standardization for homogeneity and comparability of results
3. **Intelligent deduplication:** Duplicate elimination by WCAG criterion for accurate counting
4. **Severity classification:** Ordering by user experience impact and intervention priority
5. **P.O.U.R. mapping:** Organization according to WCAG principles (Perceivable, Operable, Understandable, Robust)

## Sample Analyzed and Representativeness

### Evaluation sample structure:

Main URL: <https://esterel.it/it/>

Processed pages: 15 representative pages of user experience

### Specific detail of included pages:

- Page: <https://esterel.it/it/>
- Page: <https://esterel.it/it/content/4-dal-1961>
- Page: <https://esterel.it/it/222-i-fondamentali>
- Page: <https://esterel.it/it/12-prodotti-per-capelli>
- Page: <https://esterel.it/it/18-trattamenti-cura-dei-capelli>
- Page: <https://esterel.it/it/50-prodotti-anticaduta>
- Page: <https://esterel.it/it/176-anticaduta-androgenetica-alopecia-androgenetica-femminile-maschile>
- Page: <https://esterel.it/it/177-anticaduta-post-parto>
- Page: <https://esterel.it/it/178-anticaduta-stagionale>
- Page: <https://esterel.it/it/179-anticaduta-areata-da-stress>
- Page: <https://esterel.it/it/180-anticaduta-anti-eta>
- Page: <https://esterel.it/it/151-soin-hydratant>
- Page: <https://esterel.it/it/28-linee-capelli>
- Page: <https://esterel.it/it/90-olio-di-argan-per-capelli>
- Page: <https://esterel.it/it/181-solari-per-capelli>

**Representativeness criteria:** The sample is designed to cover the most common navigation paths, critical functionalities and typical user interaction patterns on the site.

## Methodological Limitations and Necessary Integrations

### Transparency about automated evaluation limits:

It is essential to recognize that automated tests, while constituting a solid and objective foundation, cover approximately 30-40% of total WCAG criteria. The following areas necessarily require specialized manual verifications:

- **Contextual perception:** Contrast evaluation in real-use conditions and complex visual contexts
- **Cognitive comprehension:** Content clarity for users with cognitive or learning difficulties
- **Complex navigation:** Keyboard usability in advanced interactive scenarios and multi-step workflows
- **Assistive compatibility:** Actual functioning with various assistive technologies in real scenarios
- **Integrated user experience:** Holistic evaluation of perceived accessibility by users with disabilities

**Recommendation:** This automated evaluation must be integrated with specialized manual tests and, ideally, with testing sessions conducted directly by users with various types of disabilities for a complete evaluation of actual accessibility.

## Detailed Evaluation Results

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The analysis of results is structured by thematic areas to facilitate understanding of intervention priorities and optimize improvement planning. Each area represents a key domain of web accessibility and aggregates related WCAG criteria to identify systemic patterns and streamline interventions.


### General Results Overview

**Data presentation approach:** Results are presented according to a constructive logic that highlights improvement opportunities rather than criticalities. Each "identified element" represents a specific opportunity to optimize user experience and increase the inclusivity of the digital service.

**Note on calculation methodology:** The numbers reported represent the **unique types** of problems identified, not the total number of occurrences. For example, a contrast problem present in the footer will appear on all pages, but is counted only once since it requires a single correction intervention that will resolve all instances.

In this analysis: **35 unique problems** correspond to **total instances** across all analyzed pages.

Detailed analysis by accessibility thematic areas

THEMATIC AREA	ELEMENTS	PRIORITY	WCAG CRITERION	INTERVENTION STRATEGY
<b>Chromatic Contrasts</b> Optimization of contrast ratios for universal readability	<b>3</b> elements	High	<b>WCAG 1.4.3</b> <i>Minimum contrast</i>	<b>Gradual color palette optimization</b> Systematic adjustment of chromatic ratios to ensure optimal readability on all devices
<b>Alternative Texts</b> Implementation of alternative descriptions for multimedia content	<b>2</b> elements	Medium	<b>WCAG 1.1.1</b> <i>Non-text content</i>	<b>Alternative description integration</b> Creation of descriptive and meaningful alternative texts for all informative images
<b>Form Labels</b> Enhancement of label-input associations for greater clarity	<b>5</b> elements	High	<b>WCAG 1.3.1</b> <i>Info and relationships</i>	<b>Semantic association improvement</b> Optimization of programmatic relationships between labels and input fields
<b>Keyboard Navigation</b> Refinement of accessibility through keyboard controls	<b>0</b> elements		<b>WCAG 2.1.1</b> <i>Keyboard accessibility</i>	<b>Tab order optimization</b> Improvement of sequential navigation flow and focus indicators
<b>Links and Connections</b> Link optimization for clarity and comprehensibility	<b>4</b> elements	Medium	<b>WCAG 2.4.4</b> <i>Link purpose</i>	<b>Link text improvement</b> Descriptive texts for links, avoid "click here" or generic links
<b>Semantic Structure</b> Improvement of content hierarchy and structure	<b>3</b> elements	Medium	<b>WCAG 1.3.1</b> <i>Information and relationships</i>	<b>Heading hierarchy correction</b> Correct structure of H1-H6 titles and ARIA landmarks
<b>Other Elements</b> Various improvements for complete compliance	<b>26</b> elements	Low	<b>Various WCAG</b> <i>Multiple criteria</i>	<b>Various optimizations</b> Minor improvements for accessibility completeness

Tests Passed by Thematic Area

Analysis of accessibility checks that are compliant with WCAG 2.1 standards.

Detail of tests passed by accessibility category

THEMATIC AREA	TESTS PASSED	PERCENTAGE	DESCRIPTION
Chromatic Contrasts	1	1.4%	Tests passed for minimum text/background contrast and graphic elements
Alternative Texts	3	4.1%	Tests passed for alternative texts and image descriptions
Form Labels	5	6.8%	Tests passed for form labels and input associations
Keyboard Navigation	5	6.8%	Tests passed for keyboard accessibility and tab order
Links and Connections	2	2.7%	Tests passed for descriptive links and navigation context
Semantic Structure	11	15.1%	Tests passed for headings, ARIA landmarks and document structure
<b>TOTAL TESTS PASSED</b>	<b>73</b>	<b>100%</b>	<b>Overall total of conformity tests passed</b>

Quantitative Distribution by Priority



Applied Prioritization Methodology

**Priority Classification Criteria:**

- **User Impact:** Severity of barriers for people with different types of disabilities
- **Occurrence Frequency:** Problem prevalence in the navigation experience
- **Ease of Correction:** Technical complexity and resources required for intervention
- **Regulatory Compliance:** Relevance for WCAG and EAA standards compliance
- **Incremental Benefit:** Added value for overall user experience

**Important Methodological Note:** The numbers presented represent "technical elements identified for optimization" rather than "errors" or "violations". This terminology reflects the constructive approach to continuous improvement, where each identified element constitutes a specific opportunity to improve inclusivity and usability of the digital service. Quantification facilitates intervention prioritization and progress measurement over time.

## Improvement Plan and Timeline

**Continuous Improvement Strategy:** The organization has adopted a systematic strategy for digital accessibility improvement through a gradual, sustainable and technically grounded approach. Interventions are planned, prioritized and implemented according to objective user impact criteria, compatible with available resources and in compliance with regulatory timelines.

### Regulatory Temporal Framework

**EAA Reference:** According to Article 32 of EU Directive 2019/882 (European Accessibility Act), for existing digital services not subject to substantial modifications, the deadline for full compliance is set to **June 28, 2030**.

**Note on Timelines:** Substantial modifications to the site, significant technological updates or regulatory developments may result in earlier compliance timelines than the general deadline.

## Planned Interventions Roadmap

Detailed timeline of improvement phases

PHASE	TIMELINE	MAIN OBJECTIVES	SPECIFIC INTERVENTIONS
<b>Phase 1 - Quick Wins</b>	0-6 months	Immediate high-impact optimizations (8 priority interventions)	<ul style="list-style-type: none"> <li>Color contrast adjustments (3 types)</li> <li>Alt text integration for images (2 types)</li> <li>Form labeling corrections (5 types)</li> </ul>
<b>Phase 2 - Structural</b>	6-18 months	Systemic architectural improvements (3 interventions)	<ul style="list-style-type: none"> <li>Keyboard navigation optimization (0 types)</li> <li>HTML semantic structure enhancement (3 types)</li> <li>Advanced ARIA implementation (26 types)</li> </ul>
<b>Phase 3 - Advanced</b>	18-36 months	Advanced features and thorough testing (32 critical interventions)	<ul style="list-style-type: none"> <li>Resolution of 10 critical accessibility issues</li> <li>Resolution of 22 high priority issues</li> <li>Testing with real users and compliance validation</li> </ul>
<b>Phase 4 - Maintenance</b>	Ongoing	Continuous monitoring and improvement	<ul style="list-style-type: none"> <li>Periodic automated audits</li> <li>Updates for regulatory developments</li> <li>Internal team training</li> </ul>

## Implementation Strategy by Priority Areas

### Immediate Focus (0-6 months) - 3 contrast types:

- Systematic analysis of existing color palette
- Implementation of an accessible design system
- Continuous automated contrast ratio testing
- Validation with visually impaired users

### Intermediate Phase (6-12 months) - 2 multimedia types:

- Complete audit of all informative images
- Creation of guidelines for effective alt text
- Team training for accessible content production
- Quality control workflow implementation

### Operational Safeguard Clauses:

- **Implementation Flexibility:** Timelines are indicative and may require adjustments to ensure technical quality and sustainability of interventions
- **System Compatibility:** Some interventions may require extended timelines for compatibility with legacy architectures and third-party integrations
- **Resource Availability:** Implementation proceeds in accordance with actually allocable technical, human and economic resources
- **Technical Constraints:** Architectural limitations or external dependencies may affect the timing of specific interventions
- **Dynamic Prioritization:** The order of interventions may be adjusted based on user feedback or regulatory developments

**Guiding Principle:** The organization operates according to the principle of "best technically and economically sustainable effort", committing to progressive accessibility improvement through a methodologically rigorous, gradual approach oriented towards concrete results for end users.

## Disproportionate Burden Assessment

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The European Accessibility Act (EU Directive 2019/882) allows organizations to declare disproportionate burden when compliance would entail costs, technical complexity or organizational efforts that are unreasonable relative to the organization's size and expected benefits. Such assessment must be objective, documented, periodically reviewed and transparently communicated.

### Burden Assessment Methodology

#### Applied Assessment Criteria:

- **Organizational Size:** Actually available human, technical and financial resources
- **Intervention Cost Estimate:** Detailed technical-economic analysis of required adaptations
- **Expected Benefits:** Assessment of positive impact for users with disabilities
- **Technical Alternatives:** Availability of less costly alternative solutions
- **Operational Sustainability:** Impact on continuity of essential services
- **Proportionality:** Balance between costs and benefits in the specific context

**Current Assessment Status:** Currently, no burdens have been identified that could be qualified as disproportionate according to applicable regulatory and methodological criteria. The organization commits to pursuing gradual compliance on all accessibility criteria, in accordance with available resources and the outlined sustainable implementation strategy.

## Identified Technical and Operational Limitations

### Managed Operational Limitations:

- **Third-Party Services:** Widgets, plugins or integrated external services that may not fully comply with standards. Active commitment to urge suppliers towards more accessible solutions
- **Legacy Systems in Transition:** Digital infrastructure components undergoing gradual migration to modern technologies compliant with current standards
- **Historical Content Archives:** Multimedia and documentary materials produced before current standards adoption, undergoing progressive review
- **Complex Advanced Features:** Elements requiring significant architectural redesign, planned for subsequent development phases
- **Critical Dependencies:** Essential services integrated with external systems for which accessibility improvement negotiations are ongoing

**Management Approach:** All limitations are subject to continuous monitoring and will be addressed according to defined priorities, availability of sustainable technical solutions and gradual resource allocation. Alternative access methods are provided for each limitation where technically possible.

## Periodic Review Process

**Periodic Review Process:** The organization annually reviews the disproportionate burden assessment considering: technological developments, resource variations, user feedback, regulatory changes, new market solutions available.

## Alternative Accessible Solutions

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In compliance with EAA (European Accessibility Act) principles, the organization provides effective alternative solutions to ensure equitable access to information and services even in the presence of residual barriers. These alternatives are free, functionally equivalent and available within reasonable timeframes.

## Alternative Solutions Principles

### Guaranteed Equivalence Criteria:

- **Functional Equivalence:** Same informational content and same functionalities as the digital service
- **Total Gratuity:** No additional cost to the user for accessing alternatives
- **Timeliness:** Delivery within indicated timeframes or timely communication of any delays
- **Service Quality:** Quality standards equivalent to the main digital service
- **Information Completeness:** No reduction or omission of essential content

## Available Alternative Services Catalog

Alternative solutions for universal access to content and services			
SERVICE TYPE	ALTERNATIVE METHOD	REQUEST METHOD	TIMELINE
<b>General Information and Content</b>	Personalized email assistance with detailed responses and customized documents	<a href="mailto:info@esterel.it">info@esterel.it</a>	≤ 5 working days
<b>Non-Accessible Documents</b>	Simplified HTML version, accessible Word or requested alternative format	<a href="mailto:info@esterel.it">info@esterel.it</a>	≤ 7 working days
<b>Online Forms and Procedures</b>	Personalized guided assistance for completing paperwork and procedures	<a href="mailto:info@esterel.it">info@esterel.it</a>	Appointment ≤ 48h
<b>Multimedia Content</b>	Complete text transcriptions, detailed audio descriptions, alternative formats	<a href="mailto:info@esterel.it">info@esterel.it</a>	≤ 10 working days
<b>Complex Interactive Services</b>	Dedicated telephone support or video-assistance for guided navigation	+39 011 9828811 <a href="mailto:info@esterel.it">info@esterel.it</a>	By appointment

## Request and Management Process

### Optimized Request Method:

1. **Submit Request:** Detailed email specifying the service, content or functionality of interest
2. **Useful Information to Include:**
  - Specific URL of problematic page or section
  - Clear description of difficulty encountered
  - Preferred alternative format (if applicable)
  - Assistive technologies used
  - Preferred contact method for response
3. **Automatic Confirmation:** Confirmation receipt within 24 hours with case number
4. **Processing:** Assignment and processing start within 48 working hours
5. **Solution Delivery:** Sending alternative solution within specified timeframes
6. **Feedback and Follow-up:** Opportunity to provide feedback for continuous improvement

**Operational Conditions:** Alternative solutions are provided in accordance with actually available resources. Particularly complex requests may require additional time that will be communicated promptly. The organization commits to providing equivalent solutions within technical and organizational possibilities, always prioritizing the best possible user experience.

## User Involvement and Feedback

Active involvement of users with disabilities is a fundamental pillar for comprehensive digital accessibility assessment. While automated tests and technical verifications identify objective non-conformities, only testing with real users evaluates actual usability and solution adequacy in daily use contexts.

### Multi-Channel Engagement Strategy

#### Structured Engagement Approach:

- **Continuous Feedback Collection:** Always-active system for reports, suggestions and experiential evaluations
- **Constructive Dialogue:** Collaborative approach to identify practicable and sustainable solutions
- **Participatory Prioritization:** Systematic consideration of feedback in intervention planning
- **Progress Transparency:** Communication of interventions implemented in response to received reports
- **Methodological Inclusivity:** Involvement of users with different types of disabilities and technological skills

### Active Participation Channels and Methods

#### Engagement and improvement contribution opportunities

ACTIVITY	METHOD	STATUS	CONTACT
Spontaneous Reports	Dedicated email with personalized response, case tracking and progress updates	Active	<a href="mailto:info@esterel.it">info@esterel.it</a>
Correction Validation	Personalized follow-up with reporters to verify effectiveness of implemented interventions	On Request	<a href="mailto:info@esterel.it">info@esterel.it</a>
Collaborative Testing Sessions	Structured involvement for evaluation of significant improvements and new features	In Planning	<a href="mailto:info@esterel.it">info@esterel.it</a>
Periodic Surveys	Structured evaluations on user experience, alternative services and improvement priorities	Under Evaluation	<a href="mailto:info@esterel.it">info@esterel.it</a>
Project Consultations	Involvement in design phases of new features or significant redesigns	For Future Projects	<a href="mailto:info@esterel.it">info@esterel.it</a>

## Effective Reporting Guide

**Your feedback is valuable!** Every report concretely contributes to accessibility improvement. To help us provide you with the most effective response possible, consider including:

### Location

- Specific problematic URL
- Specific section or element
- Path to reach it

### Technical Context

- Browser and version used
- Operating system
- Assistive technologies employed

### Description

- Problem encountered
- Expected behavior
- Impact on usage

### Suggestions

- Proposed solutions
- Workarounds used
- Contact preferences

## Structured Management Process

**Our commitment to every report:**

1. **Receipt (≤ 24 hours):** Automatic confirmation with unique case number
2. **Evaluation (≤ 5 days):** In-depth technical analysis and priority classification
3. **Initial Response (≤ 7 days):** Acknowledgment communication with estimated timelines
4. **Implementation:** Interventions according to priority, complexity and available resources
5. **Final Feedback:** Communication of completed intervention or status update
6. **Follow-up (optional):** Satisfaction verification and effectiveness feedback collection

## Contacts and Appeal Procedure

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This section provides all necessary information to contact the organization on accessibility matters, request assistance, report issues or activate appeal procedures according to current regulations.

## Institutional Accessibility References

Complete information for accessibility contacts	
REFERENCE	DETAILS
Accessibility Manager	Mario Zunino & C. S.r.l.
Main Email	<a href="mailto:info@esterel.it">info@esterel.it</a>
Phone Contact	+39 011 9828811 For urgent matters or immediate clarifications
Standard Response Time	Within 5 working days For complete written reports
Communication Language	English (EN) Primary language for official communications
Preferred Methods	<ul style="list-style-type: none"> <li>• <b>Email:</b> For detailed reports and documentation</li> <li>• <b>Phone:</b> For urgent matters or immediate clarifications</li> </ul>

## Official AgID Appeal Procedure

### Regulatory Appeal Right

**When to Activate:** In case of unsatisfactory, inadequate or no response from the organization within **30 days** from the initial report, a formal complaint can be submitted to **AgID (Agency for Digital Italy)** according to art. 3-quinquies of Law January 9, 2004, n. 4.

### Submission Methods

- **Official Channel:** AgID website or dedicated PEC
- **Required Documentation:** Original report and received response
- **Required Information:** Detailed description, evidence, service impact

### AgID Timelines

- **Investigation:** Response within 30 days of receipt
- **Inspection Powers:** Activation of procedures if necessary
- **Measures:** Adoption of measures to ensure compliance

## Organization's Commitments to Users

### Our Service Principles:

#### Active Listening

Every report is carefully evaluated and considered for continuous improvement

#### Transparency

Clear communication on timelines, methods and intervention progress status

#### Improvement

Systematic use of feedback to progressively optimize accessibility

#### Rights Protection

Recognition of universal right to digital service access

#### Alternative Solutions

Provision of alternative methods when necessary to ensure access

#### Compliance

Constant commitment to regulatory compliance and industry best practices

**Validity and Updates:** This statement is subject to periodic updates based on actually implemented and verified progress. Information reflects current status and is subject to change without notice due to operational, regulatory or technological developments. The organization constantly operates according to principles of continuous improvement, transparency and "best possible effort" compatible with available resources.

## Document Revision History

This section ensures complete traceability of all changes made to the statement, ensuring transparency in document evolution and accountability for updates made.

Complete chronological record of document changes

DATE	RESPONSIBLE	CHANGE TYPE	VERSION	DETAILED DESCRIPTION
15/05/2026	Mario Zunino & C. S.r.l.	First Release	1.0	Initial publication of accessibility statement compliant with EAA regulations and AgID Guidelines

**Versioning System:** Each substantial update involves version number increment and detailed change recording. Minor updates (editorial corrections, date updates) maintain the main version with decimal increment (e.g., 1.1, 1.2).

## Glossary and FAQ

This section provides clear definitions of technical terms and answers to common accessibility questions, making the document understandable to all readers and facilitating communication between technicians, decision-makers and users.

## Essential Definitions

### Digital Accessibility

Ability of websites, apps and digital documents to be effectively used by people with different physical, sensory, cognitive or technological abilities. Includes full compatibility with assistive technologies such as screen readers, magnification software, voice commands and alternative control devices.

### EAA (European Accessibility Act)

EU Directive 2019/882 establishing mandatory accessibility requirements for digital products and services in the European Union. Progressively effective from 2025, it requires compliance with defined standards to ensure universal access to digital services.

### WCAG (Web Content Accessibility Guidelines)

W3C international standard defining detailed web accessibility criteria. Structured in 3 levels: A (basic), AA (standard for most contexts), AAA (advanced). Version 2.1 includes improvements for mobile devices and cognitive accessibility.

### P.O.U.R. (WCAG Principles)

The four fundamental WCAG principles: Perceivable (content presentable in different ways), Operable (interface usable by everyone), Understandable (clear information and operation), Robust (compatibility with different and future assistive technologies).

### Assistive Technologies

Hardware and software devices used by people with disabilities to access digital content. Include screen readers (NVDA, JAWS, VoiceOver), braille displays, magnification software, voice recognition, alternative keyboards and control switches.

### Compliance

State of adherence to established regulatory and technical requirements. For web accessibility, it implies satisfying applicable WCAG criteria and current national/European regulations. Compliance can be total, partial or absent.

### Screen Reader

Software that converts digital content into voice or braille output, allowing blind or visually impaired people to navigate and interact with websites and applications. Requires content to be properly structured and coded.

### WCAG Success Criterion

A specific, testable and verifiable requirement of the WCAG guidelines. Each criterion has an identification code (e.g., 1.4.3 for color contrast) and belongs to the 4 P.O.U.R. principles: Perceivable, Operable, Understandable, Robust.

### **Disproportionate Burden**

EAA regulatory exception when financial, technical or organizational costs significantly exceed expected benefits, considering the organization's size and resources. Requires objective documentation and does not exempt from providing equivalent alternatives.

### **Accessibility Audit**

Systematic compliance evaluation against standards through automated testing (~30-40% of criteria), specialist manual checks (navigation, comprehensibility, interactions) and ideally testing with real users with various disabilities.

### **Color Contrast**

Mathematical ratio between text and background luminosity. WCAG requires minimum 4.5:1 for normal text, 3:1 for large text (18pt+ or 14pt+ bold). Essential for visually impaired users, those with color deficiencies or in difficult lighting conditions.

### **Alt Text (Alternative Text)**

Concise textual description of images accessible to screen readers and displayed if images don't load. Must convey the same meaning as the visual element. For decorative images it should be empty (`alt=""`).

### **Focus Indicator**

Visual highlighting that shows which element is active during keyboard navigation. Must have minimum 3:1 contrast against background, always be visible and clearly distinguishable. Critical for mouse-free navigation.

### **Semantic Structure**

HTML organization that uses appropriate elements for meaning (header, nav, main, section, article) as well as appearance. Facilitates page structure understanding by assistive technologies and search engines.

### **ARIA (Accessible Rich Internet Applications)**

Set of HTML attributes that provide additional information about dynamic/interactive elements for assistive technologies. Includes roles (role), properties (aria-label, aria-describedby) and states (aria-expanded, aria-selected).

## Frequently Asked Questions

### **Why has digital accessibility become mandatory?**

Accessibility is a fundamental right that guarantees equal opportunities for the 15% of the European population with disabilities. The EAA legislation (2025) makes this principle legally binding, with possible penalties for non-compliance, but the primary goal remains social inclusion and equality of opportunity in accessing digital services.

### **How much does it cost to implement digital accessibility?**

Costs vary significantly: considering accessibility from design, the increase is typically 5-10% of the budget. For adaptations to existing sites, it can reach 20-50%. The investment pays off through wider audience, better SEO, reduced legal risk and overall usability improvement.

### **Do automated tests guarantee complete accessibility?**

No, they only detect 30-40% of issues. Also essential are: specialist manual tests for keyboard navigation, content comprehensibility, complex interactions; testing with different assistive technologies; validation with real users with disabilities to verify actual accessibility and perceived usability.

### **What happens if an organization is not fully compliant?**

The regulations promote continuous improvement rather than immediate penalties. Important to demonstrate concrete commitment: documented improvement plans, gradual implementation, transparency about limitations, effective alternative solutions, constructive dialogue with users.

### **How can I report an accessibility problem?**

By sending an email to the address indicated in the contacts section, describing the problem encountered, the affected page, the browser used and any assistive technologies employed.

### **Are alternative solutions truly equivalent?**

Yes, by law they must be functionally equivalent: same content, same quality, same completeness, free. They may require more delivery time but must not limit access to information or services. Quality and completeness are guaranteed.

### **What are the regulatory timelines for compliance?**

According to EAA, for existing digital services not substantially modified, the deadline is June 28, 2030. Substantial modifications to the site result in earlier deadlines. The approach is gradual and sustainable improvement rather than immediate adaptation.

This glossary is periodically expanded. For specific questions or additional clarifications, contact the accessibility manager using the references in the contacts section.

## Regulatory and Technical References

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This section lists all regulatory, technical and methodological references used for the preparation of this statement, providing the complete legal and technical basis for the evaluation conducted.

### European and national regulations

- EU Directive 2019/882 of 17 April 2019 on accessibility requirements for products and services (European Accessibility Act - EAA)
- EU Directive 2016/2102 of 26 October 2016 on the accessibility of websites and mobile applications of public sector bodies
- Law 9 January 2004, n. 4 "Provisions to facilitate access for disabled persons to IT tools" (Stanca Law) and subsequent amendments
- Legislative Decree 10 August 2018, n. 106 "Implementation of EU Directive 2016/2102 on the accessibility of websites and mobile applications of public sector bodies"
- Ministerial Decree 20 March 2013 "Amendments to Annex A of the Decree of 8 July 2005 of the Minister for Innovation and Technologies"

### International technical standards

- WCAG 2.1 (Web Content Accessibility Guidelines) - W3C Guidelines for Web Content Accessibility, version 2.1, level AA
- EN 301 549 V3.2.1 (2021-03) - "Accessibility requirements for ICT products and services" - European standard for ICT accessibility
- ISO/IEC 40500:2012 - International standard corresponding to WCAG 2.0
- ISO 14289-1:2014 - Document management applications - Electronic document file format enhancement for accessibility - Part 1: Use of ISO 32000-1 (PDF/UA-1)
- WAI-ARIA 1.1 Specification - Accessible Rich Internet Applications (WAI-ARIA) 1.1

### Guidelines and methodological documents

- AgID Guidelines on accessibility of IT tools - Agency for Digital Italy
- Accessibility monitoring methodology - Commission Implementing Decision EU 2018/1524
- Understanding WCAG 2.1 and Techniques for WCAG 2.1 - W3C Web Accessibility Initiative
- ARIA Authoring Practices Guide (APG) - W3C WAI
- European Disability Forum (EDF) - Recommendations for EAA implementation

## Testing tools and methodologies used

Testing and evaluation tools used in this analysis

TOOL	DEVELOPER	TYPE	SPECIFIC PURPOSE
Pa11y	Team Pa11y	CLI/API Scanner	HTML5, ARIA validation and WCAG compliance via advanced engine
axe-core	Deque Systems	Automated engine	Industry-leading accessibility testing with extensive WCAG criteria coverage
Lighthouse	Google	Integrated audit	Performance, SEO and accessibility evaluation with standardized metrics
QualWeb	Universidade de Lisboa	Complete evaluation suite	Complete WCAG, ACT Rules and accessibility best practices evaluation

## Support resources and best practices

### W3C Resources

- Web Accessibility Initiative (WAI)
- WCAG 2.1 Understanding Documents
- ARIA Specifications and Practices
- Accessibility Testing Resources

### Institutions and Organizations

- AgID - Agency for Digital Italy
- European Disability Forum (EDF)
- European Commission - Digital Single Market
- ETSI - European Telecommunications Standards Institute

### Specialized Technical Resources

- WebAIM - Articles and practical guides
- A11Y Project - Community-driven resources
- Inclusive Design Principles
- Color Contrast Analyzers and Testing Tools

## Available technical documentation

### Additional documentation available on motivated request:

#### Technical Reports

- Detailed testing tool logs
- Raw data in JSON/CSV format
- Complete quantitative metrics

#### Methodologies

- Manual evaluation checklists
- Applied testing plans
- Sampling criteria used

#### In-depth Analysis

- Breakdown by WCAG criterion
- Temporal comparative analysis
- Impact and prioritization studies

**Request method:** Technical documentation available for audits, research, technical support or inspections through contacts indicated in the dedicated section.

## Validity and updates of references

**Validity and updates of references:** All regulatory and technical references are current as of the publication date of this statement. The organization monitors regulatory developments and technical standards for timely document updates in case of substantial changes to the reference regulations.

## Accessibility Audit Metadata

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The following metadata ensure complete traceability, unique identification and verifiability of the evaluation process conducted, ensuring compliance with international standards for digital accessibility auditing.

## Complete accessibility evaluation metadata

TECHNICAL FIELD	VALUE
Technical Certification Code	<b>CERT - EAA - 1778848676745</b>
Audit Conducting Entity	Principi S.r.l.
Technical Manager	Andrea Vadacchino
Assessment Date	15/05/2026
Reference Standard	WCAG 2.1 Level AA - EN 301 549 v3.2.1
Applied Methodology	WCAG-EM + Multi-Scanner Automated Testing
Automated Assessment Tools	pa11y, axe-core, lighthouse, qualweb
Accessibility Statement Manager	Mario Zunino & C. S.r.l.
Accessibility Email Contact	<a href="mailto:info@esterel.it">info@esterel.it</a>
Total Pages Analyzed	15
Overall Compliance Rate	<b>63.0%</b> - Partially Compliant

**Audit conduct information**

**Evaluated organization:** Mario Zunino & C. S.r.l.

**Evaluated website:** <https://esterel.it/>

**Conducted by:** Andrea Vadacchino - Principi S.r.l.

**Validation method:** Multi-scanner automated testing with expert review of results

**Accuracy level:** Assessment compliant with international standards with extensive WCAG criteria coverage

**Additional notes:** Audit conducted according to international best practices to ensure maximum accuracy and completeness

## Official Document - Accessibility Statement

**Drafted in conformity with EU Directive 2019/882 (European Accessibility Act)**

**Reference standard: WCAG 2.1 level AA, EN 301 549 v3.2.1**

**Publication date: 15/05/2026**

**Statement validity: 12 months from issue date**

This document constitutes an official statement pursuant to applicable regulations  
The organization operates according to the principle of best possible effort compatible with available resources

**Organization:**

Mario Zunino & C. S.r.l.

**Last update:**

15/05/2026

**Next review:**

Within 12 months

**Certification Code:**

CERT - EAA - 1778848676745

### LEGAL CLAUSES:

This statement is subject to periodic review and may be updated without notice due to operational, regulatory or technological changes.

The information reflects the state at the time of publication. The organization reserves the right to modify timelines and procedures in accordance with available resources and regulatory constraints that may arise.

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Accessibility Statement compliant with EAA regulations (European Accessibility Act)

For information and assistance: [info@esterel.it](mailto:info@esterel.it) • +39 011 9828811