

Update date: 26.06.2025

# **Accessibility statement**

Free2Move SAS is committed to making its website and app service accessible following the requirements of Regulation (EU) 2019/882 on accessibility requirements for products and services, as well as international standards such as the Web Content Accessibility Guidelines (WCAG), Level AA.

- Actions carried out in 2025 (see below).
- Throughout 2026: Continuous integration of accessibility practices and tooling\*(1)

This accessibility statement applies to the Free2move website and App services.

## **Compliance status**

The Free2move website and app services are **partially compliant** with General international standards such as the Web Content Accessibility Guidelines (WCAG), Level AA, due to the non-conformities and derogations listed below.

## **Test results**

The compliance audit conducted internally by the Digital Accessibility team of the Free2move Product and Tech Department reveals that:

- The average new site\*(2) compliance rate is 87,43%
- The average registration funnel rate is 92%
- The average login funnel rate is 99%
- The average onboarding funnel rate is 89%
- The average driver's license funnel rate is 88%

• The average loyalty funnel rate is 69%

## Content not accessible

Partial compliance:

- Native App
  - TalkBack/Voiceover screen reader compatibility and support (no accessibilityLabel or semantic elements)
  - Accessibility Scanner evaluations
  - Unclear link targets
  - Incomplete or missing form labels
  - Inconsistent heading structures
  - Limited or no keyboard navigation support
  - Automated accessibility testing (Integration tests via the pipeline)
- Registration
  - Image alt text is currently only available in English
  - Some SVG icons don't have alt text, but will be tackled in the scope of Camelot
  - Keyboard navigation for language and country selection in the Registration funnel is not easy
  - The login funnel doesn't have Cypress or ESLint installed and, therefore, was only manually tested.
  - [aria-\*)] attributes do not have valid values (library)
  - Disabling users from zooming in is a common practice on our pages to enable a better experience
  - Loyalty flow
    - HTML element missing lang attribute
    - Heading elements are not in a sequentially descending order

Third Party:

- Missing an ARIA label for an element produced by Google Captcha
- Component library
  - Tests showed that 16 out of 26 components included are compliant. The non-compliance refers to:

- Buttons without text (icon only)
- Missing alternative text for SVG icons
- Some form elements do not have a corresponding label (or labels are not linked properly)

## **Rehabilitation plan**

We ensure the quality of our development by regularly testing our platform with a set of tools that ensure a good accessibility level. To reach this objective, we have put in place the following measures:

#### General

- Throughout 2026: Continuous integration of accessibility practices and tooling\*(1)
  - Starting in 2026, our teams will progressively embed accessibility into the product lifecycle through the integration of automated and semi-automated accessibility testing tools (including AI, contrast checkers, and screen reader simulations) within our development pipelines.
  - Teams will be encouraged to perform self-assessments on new features before release, supported by technical guidelines and checklists aligned with WCAG Accessibility will be explicitly included in code review templates and QA testing protocols.
  - Periodic internal audits will monitor progress and help identify areas for remediation or reinforcement.

### Specific

### Website

Corrections planned by 3/10/2025:

Migration of the remaining legacy part of the website (example of legacy page: <u>https://www.free2move.com/fr-FR/reserver-une-voiture</u>) to the new technical stack\*(2) example of page: <a href="https://www.free2move.com/es/es/park/">https://www.free2move.com/fr-FR/reserver-une-voiture</a>) to the new technical stack\*(2) example of page:

 Most public website pages will reach at least 90% of compliance with WCAG.

Corrections planned by 29/10/2025:

- Correction of step 2 of the booking (presentation of the offer) Corrections planned by 07/01/2026
  - Correction of step 3 of the booking journey payment page (presentation of the extra options bookable)

Corrections scheduled by 28/02/2026:

• Correction of step 4 of the booking journey (payment page)

### Native App

Improvement by 2026

- The onboarding user journey is targeted to continue improving Corrections planned by 21/07/2025:
  - Correction of the launch app "Welcome screen" for iOS and Android

### Component library

Improvement for 2026

- Cover more scenarios in the ally tests
- A new component library version will be released in conformity with ally running tests
- Eslint ally rules are used to cover very basic ally issues (to be enabled)

## Exemptions for disproportionate burden

### PDF documents

• Not all PDF documents available on the site are accessible. Accessible alternatives might be provided on request.

Videos

• The videos on the site do not have subtitles or text transcriptions. Accessible alternatives might be provided on request.

### Exemptions

Third-party content where Free2move SAS has contacted providers to review their accessibility policy.

- Adyen
- Contentful
- Google Captcha (requires no visual interaction)
- Jumio
- Hotjar
- Onfido
- PayPal
- Salesforce
- Typeform
- UserCentrics

## Content not subject to the accessibility requirement

Not applicable

## Drafting of this accessibility statement

This statement was prepared on 26/06/2025.

Technologies used to create the site and apps

- CSS
- Vue XXX
- HTML5
- Headless CMS: Contentful
- JavaScript
- TypeScript
- Kotlin
- Objective-C

- Swift
- XML

### **Testing environment**

Content rendering checks were carried out on the basis of the combination provided by the WCAG reference database, with the following version of user agent, assistive technologies, and tools used to test accessibility:

#### Webviews:

- Firefox XXX
- Chrome XX
- Safari XXX
- VoiceOver Mac OS XX

#### iOS:

- VoiceOver
- Xcode Accessibility Inspector

#### Android:

- TalkBack
- Accessibility Scanner
- Espresso accessibility tests

#### Component library:

- Cypress (using Chrome)
- Cypress-axe (wrapper for axe-core)
- ESLint (to be enabled)

### Tools for assessing accessibility

- Browserstack
- Color contrast analyzer

- Cypress AXE
- Eslint Vue Plugin ARC Toolkit
- Function testing: Keyboard navigation, NVDA XXX
- HeadingsMap
- Jaws
- Lighthouse
- Pally
- PDF PAC 3
- Stylus
- Title Map
- WAVE
- WebDeveloper toolbar
- Automatic testing :
  - Axe core integrated in CI/CD
- Function testing :
  - Wave
  - Lighthouse
  - Keyboard navigation
- Manual screen reader testing

Site pages whose compliance has been verified in the acceptance environment.

Page title	URL	Accessi bility score	Conten t non accessi ble
Car-sha ring Paris	https://www.free2move.com/fr/fr/car-sha ring/	100%	Eg. Videos are not text explana tory

FAQ Car-Sha ring	https://www.free2move.com/fr/fr/faq/car -sharing/	96%	Pdf link
Réserver une voiture	https://www.free2move.com/fr-FR/reserve r-une-voiture	81%	
Rent results list	Dynamic page	94%	
Rent detail page	Dynamic page	82%	
Car on demand offer	https://www.free2move.com/fr-FR/car-on -demand/nos-offres/you-c-3-b-2-b-2-2 -2	83%	
Parking offers	Dynamic page	76%	
Accessi bility stateme nt	https://www.free2move.com/de/en/free2mo ve-accessibility-statement/	100%	

Native App Pages, which have been the subject of compliance verification

• User registration path

Page	Flow	Accessibilit	Content
title		y score	non
			accessible

Registra tion - Locatio n	https://www.free2move.com/custo mer/registration/	94%	All image alt text is in English
			Missing aria label for an element produced from Google Captcha with a class selector g-recaptc ha-respon se
			SVG images require alternative text (Camelot) Changing location is not easy to do with a keyboard

Registra tion - Email	https://www.free2move.com/custo mer/registration/email	92%	
Registra tion - Passwor d	https://www.free2move.com/custo mer/registration/password	94%	
Registra tion - Phone	https://www.free2move.com/custo mer/registration/phone	94%	Selecting the country code for the phone is not easy with a keyboard only
Registra tion - Consen t	https://www.free2move.com/custo mer/registration/consent	92%	
Registra tion - Success	https://www.free2move.com/custo mer/registration/success	91%	
Registra tion - Error	https://www.free2move.com/custo mer/registration/error	90%	
Registra tion - Confirm	https://www.free2move.com/custo mer/registration/confirm	91%	
Registra tion - Validat e	https://www.free2move.com/custo mer/registration/validate	91%	

	https://www.free2move.com/auth/real		
Login -	ms/c2gcustomer/protocol/openid-con		No cypress or
Email	nect/auth	100%	ESLint installed
	https://www.free2move.com/auth/real		
Login -	ms/c2gcustomer/login-actions/authen		
Password	ticate	100%	
Login -	https://www.free2move.com/auth/real		
Reset	ms/c2gcustomer/login-actions/reset-c		
password	redentials	100%	
Login -	https://www.free2move.com/auth/rea		
Reset	Ims/c2gcustomer/login-actions/requi		
password -	red-action?execution=UPDATE_PASSW		
enter new	ORD	100%	
	https://www.free2move.com/auth/real		
Login - SMS	ms/c2gcustomer/login-actions/authen		
verification	ticate	100%	
			[aria-*(3)]
			attributes do
Login -	https://www.free2move.com/auth/real		not have valid
Change	ms/c2gcustomer/login-actions/authen		values
phone	<u>ticate</u>	93%	(library)
Onboardin	https://app.free		
g - Main	2move.com/web/customer/onboardi		
page	ng/web/customer/onboarding/	85%	
Onboardin	https://app.free2move.com/web/cust		
g - Email	omer/onboarding/web/customer/onb		
verification	oarding/email/verification	87%	
Onboardin			
g -	https://app.free2move.com/web/custo		
Personal	mer/onboarding/web/customer/onboa		
data	rding/personal/data	93%	

update			
Onboardin g - Pin update	https://app.free2move.com/web/custo mer/onboarding/web/customer/onboa rding/pin	92%	
Driver's license - Guidelines	https://app.free2move.com/customer /drivers-license-ui/guidelines	89%	
Driver's license - Consents	<u>https://app.free2move.com/customer</u> /drivers-license-ui/consents	90%	
Driver's license - Verification success	<u>https://app.free2move.com/customer/</u> <u>drivers-license-ui/*-verification/succes</u> <u>s</u>	87%	
Driver's license - Check last scan	https://app.free2move.com/customer /drivers-license-ui/check-last-scan	87%	

			Image elements do not have [alt] attributes
			[user-scalable= "no"] is used in the <meta name="viewpor t"&gt; element or the [maximum-scal e] attribute is less than 5.</meta 
Loyalty UI - Onboardin g	<u>https://app.free2move.com/customer/loyalty-ui/onboarding</u>	73%	The <html> element does not have a [lang] attribute</html>
Loyalty UI - Signup	<u>https://app.free2move.com/customer/l</u> <u>oyalty-ui/signup</u>	71%	
Loyalty UI - Loading	https://app.free2move.com/customer/l oyalty-ui/loading	48%	
	https://app.free2move.com/customer/l oyalty-ui/celebration	76%	
Loyalty UI - Status / Rewards	<u>https://app.free2move.com/customer/I oyalty-ui/status</u>	73%	Heading elements are not in a sequentially descending order

Loyalty UI - Reward	<u>https://app.free2move.com/customer/l</u> oyalty-ui/reward/ <u>*</u>	73%	
Paymen t method onboar ding	/billing/payment-profiles/onboardi ng/payment-method	83% Passed: 15 NA: 40	Names and labels: Buttons do not have an accessible name
Paymen t method	/billing/payment-profiles/{payment ProfileId}/payment-methods	73% Passed: 12 N/A: 42	Names and labels: Buttons do not have an accessible name Contrast: Backgroun d and foreground colors do not have a sufficient contrast ratio.
Paymen t method - credit card	/billing/payment-profiles/{payment ProfileId}/payment-methods/credit -card	83% Passed: 15 NA: 40	Names and labels: Buttons do not have an accessible name

Paymen t method - PayPal	/billing/payment-profiles/{payment ProfileId}/payment-methods/paypa I	83% Passed: 15 NA: 40	Names and labels: Buttons do not have an accessible name
Onboar ding - billing details	/billing/payment-profiles/onboardi ng/billing-details	81% Passed: 15 NA: 40 Manual check: 10	Names and labels: Buttons do not have an accessible name
Onboar ding - confirm ation	/billing/payment-profiles/onboardi ng/confirmation	83% Passed: 15 NA: 40 Manual check: 10	Names and labels: Buttons do not have an accessible name

## Feedback and contact

If you are unable to access a piece of content or service, you can contact the site operator to be directed to an accessible alternative or obtain the content in another form.

• Send a message: accessibility@free2move.com

## **Avenues of appeal**

This procedure should be used in the following case.

You have reported to the website and app operator an accessibility defect that prevents you from accessing the content or one of the portal services, and you have not received a satisfactory response.

- Submit a message to the Austrian Disability Ombudsman: <u>Online form</u> (<u>German</u>)
- Regional anti-discrimination offices may be contacted as well: <u>Digital</u>
  <u>accessibility platform</u>
  - Send a letter by post to the Behindertenanwalt Babenbergerstraße
    5/11 1010 Wien Österreich