



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: <https://www.free2move.com/fr-FR/reserver-une-voiture> ) to the new technical stack\*(2) example of page: <https://www.free2move.com/es/es/park/> )

- 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 a11y tests
- A new component library version will be released in conformity with a11y running tests
- Eslint a11y rules are used to cover very basic a11y 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 | <a href="https://www.free2move.com/fr/fr/car-sha ring/">https://www.free2move.com/fr/fr/car-sha ring/</a> | 100%                 | Eg. Videos are not text explana tory |

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

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

- User registration path

| Page<br>title | Flow | Accessibilit<br>y score | Content<br>non<br>accessible |
|---------------|------|-------------------------|------------------------------|
|---------------|------|-------------------------|------------------------------|



|                         |   |     |  |
|-------------------------|---|-----|--|
| Registration - Location | <a href="https://www.free2move.com/customer/registration/">https://www.free2move.com/customer/registration/</a> | 94% | <p>All image alt text is in English</p> <p>Missing aria label for an element produced from Google Captcha with a class selector g-recaptcha-resp</p> <p>SVG images require alternative text (Camelot)</p> <p>Changing location is not easy to do with a keyboard</p> |
|-------------------------|---|-----|--|

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

|                                    |   |      |   |
|------------------------------------|---|------|---|
| Login - Email                      | <a href="https://www.free2move.com/auth/realms/c2gcustomer/protocol/openid-connect/auth">https://www.free2move.com/auth/realms/c2gcustomer/protocol/openid-connect/auth</a>                             | 100% | No cypress or ESLint installed                            |
| Login - Password                   | <a href="https://www.free2move.com/auth/realms/c2gcustomer/login-actions/authenticate">https://www.free2move.com/auth/realms/c2gcustomer/login-actions/authenticate</a>                                 | 100% |   |
| Login - Reset password             | <a href="https://www.free2move.com/auth/realms/c2gcustomer/login-actions/reset-credentials">https://www.free2move.com/auth/realms/c2gcustomer/login-actions/reset-credentials</a>                       | 100% |   |
| Login - Reset password - enter new | <a href="https://www.free2move.com/auth/realms/c2gcustomer/login-actions/require-new-password">https://www.free2move.com/auth/realms/c2gcustomer/login-actions/require-new-password</a>                 | 100% |   |
| Login - SMS verification           | <a href="https://www.free2move.com/auth/realms/c2gcustomer/login-actions/verify-sms">https://www.free2move.com/auth/realms/c2gcustomer/login-actions/verify-sms</a>                                     | 100% |   |
| Login - Change phone               | <a href="https://www.free2move.com/auth/realms/c2gcustomer/login-actions/verify-phone">https://www.free2move.com/auth/realms/c2gcustomer/login-actions/verify-phone</a>                                 | 93%  | [aria-*(3)] attributes do not have valid values (library) |
| Onboarding - Main page             | <a href="https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/">https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/</a>                                     | 85%  |   |
| Onboarding - Email verification    | <a href="https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/email/verification">https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/email/verification</a> | 87%  |   |
| Onboarding - Personal data         | <a href="https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/personal/data">https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/personal/data</a>           | 93%  |   |

|   |   |     |  |
|---|---|-----|--|
| update                                  |   |     |  |
| Onboarding - Pin update                 | <a href="https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/pin">https://app.free2move.com/web/customer/onboarding/web/customer/onboarding/pin</a> | 92% |  |
| Driver's license - Guidelines           | <a href="https://app.free2move.com/customer/drivers-license-ui/guidelines">https://app.free2move.com/customer/drivers-license-ui/guidelines</a>                           | 89% |  |
| Driver's license - Consents             | <a href="https://app.free2move.com/customer/drivers-license-ui/consents">https://app.free2move.com/customer/drivers-license-ui/consents</a>                               | 90% |  |
| Driver's license - Verification success | <a href="https://app.free2move.com/customer/drivers-license-ui/*-verification/success">https://app.free2move.com/customer/drivers-license-ui/*-verification/success</a>   | 87% |  |
| Driver's license - Check last scan      | <a href="https://app.free2move.com/customer/drivers-license-ui/check-last-scan">https://app.free2move.com/customer/drivers-license-ui/check-last-scan</a>                 | 87% |  |

|                               |   |     |  |
|-------------------------------|---|-----|--|
| Loyalty UI - Onboarding       | <a href="https://app.free2move.com/customer/loyalty-ui/onboarding">https://app.free2move.com/customer/loyalty-ui/onboarding</a>   | 73% | <p>Image elements do not have [alt] attributes</p> <p>[user-scalable="no"] is used in the &lt;meta name="viewport"&gt; element or the [maximum-scale] attribute is less than 5.</p> <p>The &lt;html&gt; element does not have a [lang] attribute</p> |
| Loyalty UI - Signup           | <a href="https://app.free2move.com/customer/loyalty-ui/signup">https://app.free2move.com/customer/loyalty-ui/signup</a>           | 71% |  |
| Loyalty UI - Loading          | <a href="https://app.free2move.com/customer/loyalty-ui/loading">https://app.free2move.com/customer/loyalty-ui/loading</a>         | 48% |  |
| Loyalty UI - Celebration      | <a href="https://app.free2move.com/customer/loyalty-ui/celebration">https://app.free2move.com/customer/loyalty-ui/celebration</a> | 76% |  |
| Loyalty UI - Status / Rewards | <a href="https://app.free2move.com/customer/loyalty-ui/status">https://app.free2move.com/customer/loyalty-ui/status</a>           | 73% | <p>Heading elements are not in a sequentially descending order</p>   |

|                              |   |                                  |   |
|------------------------------|---|----------------------------------|---|
| Loyalty UI - Reward          | <a href="https://app.free2move.com/customer/loyalty-ui/reward/*">https://app.free2move.com/customer/loyalty-ui/reward/*</a>                                     | 73%                              |   |
|                              |   |                                  |   |
| Payment method onboarding    | <a href="/billing/payment-profiles/onboarding/payment-method">/billing/payment-profiles/onboarding/payment-method</a>   | 83%<br><br>Passed: 15<br>NA: 40  | Names and labels: Buttons do not have an accessible name  |
| Payment method               | <a href="/billing/payment-profiles/{paymentProfileId}/payment-methods">/billing/payment-profiles/{paymentProfileId}/payment-methods</a>                         | 73%<br><br>Passed: 12<br>N/A: 42 | Names and labels: Buttons do not have an accessible name<br>Contrast: Background and foreground colors do not have a sufficient contrast ratio. |
| Payment method - credit card | <a href="/billing/payment-profiles/{paymentProfileId}/payment-methods/credit-card">/billing/payment-profiles/{paymentProfileId}/payment-methods/credit-card</a> | 83%<br><br>Passed: 15<br>NA: 40  | Names and labels: Buttons do not have an accessible name  |

|                              |   |   |   |
|------------------------------|---|---|---|
| Payment method – PayPal      | <a href="#">/billing/payment-profiles/{paymentProfileId}/payment-methods/paypal</a> | 83%<br><br>Passed: 15<br>NA: 40                     | Names and labels:<br>Buttons do not have an accessible name |
| Onboarding – billing details | <a href="#">/billing/payment-profiles/onboarding/billing-details</a>                | 81%<br><br>Passed: 15<br>NA: 40<br>Manual check: 10 | Names and labels:<br>Buttons do not have an accessible name |
| Onboarding – confirmation    | <a href="#">/billing/payment-profiles/onboarding/confirmation</a>                   | 83%<br><br>Passed: 15<br>NA: 40<br>Manual check: 10 | Names and labels:<br>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](mailto: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 Defensor del Pueblo: [Online contact form](#)
- Contact your federal state ombudsman: [List of regional enforcement bodies](#)
  - Send a letter by post to the Defensor del Pueblo – Calle Zurbano 42 – 28010 Madrid – Spain