

Accessibility statement

Information under Article 13(2) and Annex V of Directive (EU) 2019/882, based on automated measurement. This is not a statement under Directive (EU) 2016/2102 (public sector websites).

Service provider	Example Shop Ltd (sample)
Service	Example online shop (sample)
Member State(s) where the service is offered	DE, FR, IE
Measured on	2026-10-09
Service category (Article 2(2))	e-commerce services (Art. 2(2)(f))
Document date	2026-10-15
Prepared by	SmileStory Inc.
Responsibility	Prepared by SmileStory Inc. from automated measurement. The service provider is responsible for the content of this information and for completing the marked fields.

1. Scope

This statement covers the service "Example online shop (sample)" provided by Example Shop Ltd (sample). It is based on measurement of 4 representative pages:

1. **P1** <https://shop.example/>
2. **P2** <https://shop.example/products/>
3. **P3** <https://shop.example/products/sample-item>
4. **P4** <https://shop.example/account/register>

2. Legal basis

This information is provided under Article 13(2) and Annex V of Directive (EU) 2019/882 (European Accessibility Act), which apply to the services listed in Article 2(2), and under the national law of the Member State(s) where the service is offered:

- **Deutschland:** Gesetz zur Umsetzung der Richtlinie (EU) 2019/882 des Europäischen Parlaments und des Rates über die Barrierefreiheitsanforderungen für Produkte und Dienstleistungen (Barrierefreiheitsstärkungsgesetz – BFSG) (BGBl. 2021 I S. 2970) — Act implementing Directive (EU) 2019/882 on the accessibility requirements for products and services (Accessibility Strengthening Act – BFSG); BFSGV, BGBl. 2022 I S. 928
- **France:** Loi n° 2023-171 du 9 mars 2023 portant diverses dispositions d'adaptation au droit de l'Union européenne dans les domaines de l'économie, de la santé, du travail, des transports et de l'agriculture (DDADUE), article 16 (JORF du 10 mars 2023) — Law No. 2023-171 of 9 March 2023 on various provisions adapting to European Union law in the fields of the economy, health, labour, transport and agriculture (DDADUE), Article 16; Code de la consommation, art. L. 412-13 (créé par la loi n° 2023-171, art. 16); JORF du 10 octobre 2023 (décret n° 2023-931); Arrêté du 9 octobre 2023 fixant les exigences en matière d'accessibilité applicables aux produits et services **Check this against the current official text before publishing.**
- **Éire / Ireland:** European Union (Accessibility Requirements of Products and Services) Regulations 2023 (S.I. No. 636 of 2023) — European Union (Accessibility Requirements of Products and Services)

3. Conformity status

Partially conformant

Automated testing of 4 pages found failures related to 3 accessibility requirement(s). 10 requirement(s) need a manual review that has not yet been carried out. Conformity cannot be established by automated testing alone.

4. Content that is not accessible

The following barriers were found by automated testing. Each item lists the related WCAG success criterion and the pages where it occurred. The link from these checks to the requirements of Annex I is our interpretation, not an official correspondence.

- 1. Elements must meet minimum color contrast ratio thresholds** WCAG 1.4.3 · EN 301 549 9.1.4.3 · color-contrast
4 occurrence(s) on P1, P2, P3, P4
- 2. Images must have alternative text** WCAG 1.1.1 · EN 301 549 9.1.1.1 · image-alt
1 occurrence(s) on P3

5. Corrective measures

Measures to remove the barriers listed above and the timetable for them: [to be completed by the service provider]

6. Fundamental alteration and disproportionate burden (Article 14)

Whether the service provider relies on Article 14 for any requirement, and if so the date of the assessment and the authorities informed: [to be completed by the service provider]

7. How this was assessed

Automated testing with axe-core 4.11.0 on 4 pages, and a keyboard walk of 30 Tab key presses per page, on 2026-10-09. A manual review by a person (screen reader, cognitive load, media, documents) has not been carried out as part of this measurement.

8. Feedback and contact

If you meet an accessibility barrier when using this service, or need information in an accessible format, contact: accessibility@example.invalid

9. Enforcement

Authorities and bodies concerned with the accessibility of services in the Member State(s) concerned (check which one covers this type of service):

- **Deutschland:** Marktüberwachungsstelle der Länder für die Barrierefreiheit von Produkten und Dienstleistungen (MLBF AÖR) — <https://www.mlb-f-barrierefrei.de/>; Schlichtungsstelle nach § 16 des Behindertengleichstellungsgesetzes (bei dem Beauftragten der Bundesregierung für die Belange von Menschen mit Behinderungen) (conciliation) — <https://www.schlichtungsstelle-bgg.de/>; Bundesfachstelle für Barrierefreiheit (advice) — <https://www.bundesfachstelle-barrierefreiheit.de/>
- **France:** Direction générale de la concurrence, de la consommation et de la répression des fraudes (DGCCRF) — <https://www.economie.gouv.fr/dgccrf> Check this against the current official text before publishing.
- **Éire / Ireland:** Competition and Consumer Protection Commission (CCPC) — <https://www.ccpc.ie>; National Disability Authority (advice) — <https://nda.ie/eea>

10. Microenterprises

Microenterprises that provide services are exempt from these accessibility requirements (Article 4(5)); the definition is in Article 3(23). Whether Example Shop Ltd (sample) relies on this exemption: [to be completed by the service provider]

Official text of Directive (EU) 2019/882:

‘microenterprise’ means an enterprise which employs fewer than 10 persons and which has an annual turnover not exceeding EUR 2 million or an annual balance sheet total not exceeding EUR 2 million;

5. Microenterprises providing services shall be exempt from complying with the accessibility requirements referred to in paragraph 3 of this Article and any obligations relating to the compliance with those requirements.

Notices

- SmileStory Inc. is not a certification body. This document does not certify conformity; whether the service meets the requirements is decided by the authorities responsible for checking the compliance of services (Article 23) and, ultimately, the courts.
- This document is not legal advice.
- As of 2026-10-15, no harmonised standards and no technical specifications under Article 15 for Directive (EU) 2019/882 had been published in the Official Journal of the European Union; EN 301 549 V3.2.1 is referenced only under Directive (EU) 2016/2102. Meeting EN 301 549 or WCAG therefore does not give a presumption of conformity with Directive (EU) 2019/882 (Article 15(1)).
- Annex IV technical documentation and the EU declaration of conformity apply to manufacturers of products, not to service providers, and are not part of this document.