

Sample: EAA Exposure Report

SAMPLE. This report describes a fictitious online shop. Every screen and finding below is invented to show what the deliverable looks like. The legal references are real. It is not a real engagement.

Client	Xylospora (fictitious), an online shop selling olive-wood kitchenware and soap
Website	xylospora.example (a reserved example domain, not a real site)
Customers	Consumers in Greece and other EU countries
Date	Sample — not a real engagement
Reviewer	Matthaios Mantzios, UXellence
Scope	10 templates or screens, against WCAG 2.2 and EN 301 549
Time	Five working days from the day the screen list was agreed

Who this report is for

Three groups will read it, and each needs a different column:

- **Your developers** need the WCAG 2.2 success criterion. It tells them exactly what to fix.
- **Your lawyers and your procurement team** need the EAA obligation each finding sits under. It tells them what the finding means for you.
- **Whoever owns the shop** needs the order in section 5. It tells you what to fix first.

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1. Summary: can a disabled customer buy from you today?

We found **20 issues** across the 10 screens. **Six of them stop a customer from completing a purchase.** They are listed first in the remediation order.

Customer	Can they buy today?	What stops them
Uses a keyboard, not a mouse	No	The cookie banner cannot be closed by keyboard, so the shop cannot be used at all (E-01).
Uses a screen reader	No	Greek text is read with an English voice (E-02). Nothing confirms that an item was added to the cart (E-08). The card fields have no labels (E-16).
Needs more time	Often not	The payment step times out after 10 minutes with no warning (E-17).

Customer	Can they buy today?	What stops them
Uses zoom or has low vision	Yes, with difficulty	Prices are low-contrast (E-07). On a phone, the sticky total bar covers the field being filled in (E-15).

Your obligation applies now. Xylospora sells online to consumers in the EU. E-commerce services are in the scope of the European Accessibility Act (EAA, Directive (EU) 2019/882), which has applied since 28 June 2025. In Greece, e-commerce services are in scope of v. 4994/2022 (Article 3 par. 2 (στ)). With 14 staff, Xylospora does not qualify for the micro-enterprise exemption for services, which needs fewer than 10 staff and turnover or balance sheet up to €2m.

What your exposure looks like in Greece. Article 26 of v. 4994/2022 sets no fine amounts. The Presidential Decree that Article 27 par. 2 foresees for fine amounts covers products, not services such as an online shop. For e-commerce services, Article 26 names no authority that imposes administrative sanctions. That does not make you safe. Article 25A, added by Article 68 of v. 5218/2025, lets associations that represent people with disabilities go to court against service providers, including online shops. They can ask the court to stop the unlawful conduct and for interim measures. That route needs no decree and no fine table.

Xylospora also ships to customers in other EU countries. Each country writes the EAA into its own law, and scope, enforcement and penalties vary. This report does not assess those countries.

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2. The 10 screens

Chosen with you: the pages that carry the purchase journey, not twenty variations of the same card. One screen means one distinct layout. The category listing counts once, however many products run through it.

#	Screen	Why it is in scope
S1	Home page, with the header, main menu and cookie banner	Every visit starts here; header and banner appear on every page
S2	Category listing, with filters	Main route to products
S3	Product page	Where the buying decision is made
S4	Search results	Second route to products
S5	Cart	Start of checkout
S6	Checkout, step 1: delivery details	Required for every order
S7	Checkout, step 2: payment (with the payment provider's embedded card form)	Required for every order
S8	Order confirmation	Proof the order went through
S9	Sign in and create account	Needed for order history; guest checkout also exists
S10	Returns request form	The main after-sales task

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3. How we tested

An automated pass over all 10 screens, on desktop and mobile widths.

A manual review of the criteria automation cannot see: keyboard operation, focus order, meaningful alternative text, and announcement of errors and state. We used:

- keyboard only, in Firefox and Chrome on Windows;
- NVDA with Firefox on Windows, and VoiceOver with Safari on an iPhone;
- zoom to 400% on desktop and a 320-pixel-wide view on mobile;
- a contrast checker on text and controls.

Automated tooling finds somewhere between a third and a half of accessibility issues. In this review, the automated pass found 7 of the 20. The manual review found the other 13, including four of the six that stop a purchase. A tool can confirm that an image has alternative text. It cannot tell you that the text says "IMG_2041.jpg".

About WCAG versions. The current reference is EN 301 549 V3.2.1 (2021), which is based on WCAG 2.1 Level AA. ETSI published V4.1.1 in September 2026, aligned to WCAG 2.2 Level AA; it gives a presumption of conformity under the EAA once it is cited in the Official Journal of the EU. We test against WCAG 2.2 Level AA, which prepares you for V4.1.1, and rate every finding by its effect on customers.

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4. Findings

Every finding is mapped twice: to a WCAG 2.2 success criterion, and to the EAA obligation it sits under.

EAA obligation codes used below

- **O1 — Accessible service.** The online shop must be accessible. The practical benchmark is EN 301 549 (see "About WCAG versions" in section 3).
- **O1 (payment) — Accessible payment.** The Directive's Annex I, section IV(g), covers the accessibility of payment functionality delivered as part of the service.

Exposure rating

- **High:** stops a group of customers from completing a purchase.
- **Medium:** makes a purchase much harder, or blocks another key task.
- **Low:** a barrier that slows customers down without stopping them.

ID	Screen	What we found	WCAG 2.2	EAA	Found by	Exposure
E-01	S1, all pages	The cookie banner's buttons are not reachable by keyboard. Focus stays behind the banner, so a keyboard user cannot close it or use the shop.	2.1.1 Keyboard (A)	O1	Manual	High

ID	Screen	What we found	WCAG 2.2	EAA	Found by	Exposure
E-02	All pages	Pages are marked as English ('lang="en"') but written in Greek. Screen readers read the Greek text with an English voice, which is close to impossible to follow.	3.1.1 Language of Page (A)	O1	Automated	High
E-03	S1, all pages	The main menu opens only on mouse hover. Keyboard users cannot reach the product categories. Search still works.	2.1.1 Keyboard (A)	O1	Manual	Medium
E-04	S2	Filter options are styled boxes with no checkbox role or checked state. A screen reader announces nothing useful when a filter is chosen.	4.1.2 Name, Role, Value (A)	O1	Automated	Medium
E-05	S2, S3	Product photos use their file names as alternative text, such as "IMG_2041.jpg".	1.1.1 Non-text Content (A)	O1	Manual	Medium
E-06	S2	Out-of-stock products are shown only by greying out the card. There is no text.	1.4.1 Use of Color (A)	O1	Manual	Medium
E-07	S3	The price line "€24,90 με ΦΠΑ" and the delivery note are light grey (#9A9A9A) on white, about 2.8:1. The minimum for body text is 4.5:1.	1.4.3 Contrast (Minimum) (AA)	O1	Automated	Medium
E-08	S3	After "Προσθήκη στο καλάθι" (Add to cart), a short message appears and fades. It is not announced, so a screen-reader user does not know the item was added.	4.1.3 Status Messages (AA)	O1	Manual	High
E-09	S3	The quantity buttons (+ and -) are 18 by 18 pixels, below the 24 by 24 minimum, and sit close together.	2.5.8 Target Size (Minimum) (AA)	O1	Automated	Low
E-10	S4	The search field has placeholder text ("Αναζήτηση...") but no label. The hint disappears as soon as the customer types.	3.3.2 Labels or Instructions (A)	O1	Manual	Medium
E-11	S5	The "remove item" button is an icon with no accessible name. Screen readers announce only "button".	4.1.2 Name, Role, Value (A)	O1	Automated	Medium
E-12	S6	Form errors are shown only as a red border. There is no text saying what is wrong or how to fix it.	3.3.1 Error Identification (A)	O1	Manual	High
E-13	S6	Name, address, email and phone fields have no 'autocomplete' values, so browsers and assistive tools cannot fill them in.	1.3.5 Identify Input Purpose (AA)	O1	Automated	Medium

ID	Screen	What we found	WCAG 2.2	EAA	Found by	Exposure
E-14	S6	The billing address must be typed again even when it is the same as the delivery address. There is no "same as delivery" option.	3.3.7 Redundant Entry (A)	O1	Manual	Low
E-15	S6, S7 (mobile)	The sticky "Σύνολο" (Total) bar at the bottom of the screen covers the field that has focus.	2.4.11 Focus Not Obscured (Minimum) (AA)	O1	Manual	Low
E-16	S7	The embedded card form has no frame title, and its card number, expiry and security code fields have no labels a screen reader can read.	4.1.2 Name, Role, Value (A)	O1 (payment)	Automated and manual	High
E-17	S7	The payment step times out after 10 minutes. There is no warning and no way to ask for more time; the cart has to be filled again.	2.2.1 Timing Adjustable (A)	O1	Manual	High
E-18	S6, S7, S8	Every checkout step has the same page title, "Xylospora". Customers who use a screen reader cannot tell which step they are on, or whether the order went through.	2.4.2 Page Titled (A)	O1	Manual	Low
E-19	S9	Creating an account requires a slider puzzle with no other way to prove you are human. Guest checkout still works.	1.1.1 Non-text Content (A); also 2.5.7 Dragging Movements (AA)	O1	Manual	Medium
E-20	S10	The "reason for return" list is a custom menu that cannot be opened by keyboard, so the return request cannot be sent.	2.1.1 Keyboard (A)	O1	Manual	Medium

Also noted (not a screen finding). We could not find an accessibility statement on the site. The EAA requires service providers to explain how the service meets the accessibility requirements and to make that information public, including in a form accessible to persons with disabilities (Article 13(2) and Annex V). This sits outside the 10 screens and has no WCAG criterion, so it is not rated. We list it because it is usually one of the first things a complaint or a business customer asks for.

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5. Remediation order

Ordered by how much exposure each fix closes, not by how hard it is. A fix that unblocks the purchase for a whole group of customers comes before a fix that is quicker but smaller.

First: the six purchase blockers. Together these decide whether a disabled customer can buy from you at all.

1. **E-01** Cookie banner: make its buttons real buttons, move focus to the banner when it opens, and return focus to the page when it closes. Until this is fixed, nothing else is usable by keyboard.

2. **E-02** Page language: set `lang="el"` on Greek pages. Every screen-reader customer gains on every page.
3. **E-16** Payment form: ask your payment provider to add the frame title and field labels. If their form cannot be fixed, a different form or provider is the fix.
4. **E-12** Checkout errors: show a text message next to each field, and a summary at the top of the form.
5. **E-17** Payment timeout: warn the customer before time runs out and let them extend it, or remove the limit.
6. **E-08** Add to cart: announce the confirmation to screen readers.

Second: the barriers that make buying much harder. E-03, E-20, E-04, E-11, E-10, E-19, E-05, E-06, E-07, E-13.

Third: the remaining items. E-15, E-09, E-14 and E-18.

Add the accessibility statement alongside the first group. It is short work, and it is what a complaint will ask for first.

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6. The 30-minute call

One call to walk through this report with whoever has to act on it, so the report lands with the people who have to fix it.

Who should join: your developer or agency lead, the person who owns the shop, and anyone who deals with legal or business-customer questions.

What we cover:

- the six purchase blockers, screen by screen;
- what to ask your payment provider about E-16;
- the order in section 5, and anything in it that conflicts with your release plans;
- what this report does not cover, and what to do about that.

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7. What this report is not

- **Not remediation.** We tell you what is wrong and in what order to fix it. We do not fix it as part of this engagement.
- **Not a legal opinion.** The EAA is a directive; each member state writes it into national law, and scope, enforcement and penalties vary by country. This report scopes your technical exposure. It is not advice from a lawyer and does not replace it.
- **Not a full conformance statement.** A complete EN 301 549 conformance report covers every criterion across the whole product. This covers 10 screens.

8. What happens next

- **If you need the full picture**, that is the full audit. The €1,200 you paid for this report is credited against it, with no time limit.
- **If you want a re-test** after your fixes, that is a separate, smaller engagement. It makes most sense once the fixes are actually in.

UXellence is a full-lifecycle UX consultancy: strategy, research, design systems and accessibility. Matthaios Mantzios leads every engagement himself, and we take on a limited number at a time.

UXellence · uxellence.gr · matthaios@uxellence.gr

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