

September 27, 2019

Letter of Reasonable Accessibility for Riedel

No organization can claim that its digital properties are 100% accessible because of the subjective nature and interpretation of absolute accessibility. The best anyone can do is test and resolve for best practices and provide a dedicated outlet to assist users when issues occur.

Riedel has taken such steps by retaining the Bureau of Internet Accessibility (“BoIA”) to assist in testing and improving the accessibility of Riedel’s website and digital properties. BoIA is an independent, third-party accessibility consultant that has expertise and knowledge concerning accessible web development, digital accessibility and Web Content Accessibility Guidelines (“WCAG”). Since 2001, BoIA has successfully been working with organizations to improve the accessibility of their websites and digital properties by conducting digital accessibility audits and assisting with remediation.

This letter serves to summarize the results of BoIA’s testing of Riedel’s website and digital properties as well as the steps being taken by Riedel to improve accessibility and/or remedy any noted issues. This letter is provided at Riedel’s request and is intended for use only by Riedel. Third parties are not entitled to rely on the contents of this letter. Likewise, while the contents of this letter reflect BoIA’s professional impressions and opinions, BoIA’s auditors are not attorneys and this letter should not be construed as a legal opinion.

Accessibility

Overview

As used in this letter, “Reasonable Efforts” means, with respect to a given goal or obligation, the efforts that a reasonable person or entity would use to achieve that goal or obligation. Reasonable Efforts shall be interpreted so as not to require Riedel to undertake measures that might constitute an undue burden (as defined in Title III of the Americans with Disabilities Act (the “ADA”)), whether due to the cost, difficulty or impact of such measures on Riedel’s website or digital-related operations or otherwise, or that might result in a fundamental alteration in the manner in which Riedel operates its website or digital-related properties or the primary functions related thereto.

As described in greater detail herein, BoIA’s professional opinion is that the Riedel digital properties tested:

- Do not deny persons with an impairment the opportunity to participate in and benefit from the goods, services, facilities, privileges, advantages, and accommodations provided through Riedel’s website. 42 U.S.C. §12182(b)(1)(A)(i); 28 C.F.R. § 36.202(a);
- Use Reasonable Efforts to provide persons with an impairment an equal opportunity to participate in or benefit from the goods, services, facilities, privileges, advantages, and accommodations provided through Riedel’s website. 42 U.S.C. § 12182(b)(2)(A)(ii); 28 C.F.R. § 36.202(b); and
- Use Reasonable Efforts to ensure that persons with an impairment are not excluded, denied services, segregated, or otherwise treated differently because of the absence of auxiliary aids and services provided through Riedel’s website. 42 U.S.C. § 12182(b)(2)(A)(iii); 28 C.F.R. § 36.303.

BoIA believes that the Riedel digital properties tested are reasonably accessible and have made appropriate accommodations for individuals with disabilities, including individuals who are blind or have low vision, individuals who are deaf or hard of hearing, and individuals who have physical disabilities affecting manual dexterity.

Testing Standards

Riedel has selected WCAG 2.1 Level A and AA Success Criteria (“WCAG 2.1 A/AA”) as its standard for testing. The Web Accessibility Initiative (“WAI”) of the World Wide Web Consortium (“W3C”) has created recognized international guidelines for digital accessibility. These guidelines, which are set out in the WCAGs, detail how to make websites accessible to all individuals with disabilities. The Department of Justice currently uses WCAG 2.0 Level AA as the accepted standards by which to measure a website’s accessibility. WCAG 2.1 Level

AA includes WCAG 2.0 Level AA standards.

The results of BoIA's testing indicate that Riedel's website substantially conforms to the WCAG 2.1 A/AA standards, such that the website is likely to be reasonably accessible to persons with impairments.

Testing for Diverse Abilities

Testing conducted on the website includes testing for a diversity of abilities, including auditory, cognitive, physical, speech, and visual disabilities.

Visual

Visual disabilities range from mild or moderate vision loss in one or both eyes ("low vision") to substantial and uncorrectable vision loss in both eyes ("blindness"). Some individuals have reduced or lack of sensitivity to certain colors ("color blindness"), or increased sensitivity to bright colors. These variations in perception of colors and brightness can be independent of visual acuity. Testing for accessibility to those with visual disabilities includes testing of:

- Images, controls, and other structural elements that do not have equivalent text alternatives.
- Text, images, and page layouts that cannot be resized, or that lose information when resized.
- Missing visual and non-visual orientation cues, page structure, and other navigational aids.
- Video content that does not have text or audio alternatives, or an audio-description track.
- Inconsistent, unpredictable, and overly complicated navigation mechanisms and page functions.
- Text and images with insufficient contrast between foreground and background color combinations.
- Websites, web browsers, and authoring tools that do not support the use of custom color combinations.
- Websites, web browsers, and authoring tools that do not provide full keyboard support.

Auditory

Auditory disabilities range from mild or moderate hearing loss in one or both ears ("hard of hearing") to substantial and uncorrectable hearing loss in both ears ("deafness"). Some individuals with auditory disabilities can hear sounds but are not sufficiently able to

understand all speech, especially when there is background noise. This can include people using hearing aids. Testing for accessibility to those with auditory disabilities includes testing of:

- Audio content, such as videos with voices and sounds, without captions or transcripts.
- Media players that do not display captions and that do not provide volume controls.
- Media players that do not provide options to adjust the text size and colors for captions.
- Web-based services, including web applications, that rely on interaction using voice only.
- Lack of sign language to supplement important information and text that is difficult to read.

Cognitive, Learning, and Neurological

Cognitive, learning, and neurological disabilities involve neurodiversity and neurological disorders, as well as behavioral and mental health disorders that are not necessarily neurological. These disorders may affect any part of the nervous system and impact how well people hear, move, see, speak, and understand information. Cognitive, learning, and neurological disabilities do not necessarily affect the intelligence of a person. Testing for accessibility to those with cognitive, learning and neurological disabilities includes testing of:

- Complex navigation mechanisms and page layouts that are difficult to understand and use.
- Complex sentences that are difficult to read and unusual words that are difficult to understand.
- Long passages of text without images, graphs, or other illustrations to highlight the context.
- Moving, blinking, or flickering content, and background audio that cannot be turned off.
- Web browsers and media players that do not provide mechanisms to suppress animations and audio.
- Visual page designs that cannot be adapted using web browser controls or custom style sheets.

Physical

Physical disabilities (sometimes called “motor disabilities”) include weakness and limitations of muscular control (such as involuntary movements and tremors, lack of coordination, and paralysis), limitations of sensation, joint disorders (such as arthritis), pain that impedes movement, and missing limbs. Testing for accessibility to those with physical disabilities

includes testing of:

- Websites, web browsers, and authoring tools that do not provide full keyboard support.
- Insufficient time limits to respond or to complete tasks, such as to fill out online forms.
- Controls, including links with images of text, that do not have equivalent text alternatives.
- Missing visual and non-visual orientation cues, page structure, and other navigational aids.
- Inconsistent, unpredictable, and overly complicated navigation mechanisms and page functions.

Speech

Speech disabilities include difficulty producing speech that is recognizable by others or by voice recognition software. For example, the loudness or clarity of someone's voice might be difficult to understand. Testing for accessibility to those with speech disabilities includes testing of:

- Web-based services, including web applications, that rely on interaction using voice only.
- Websites that offer phone numbers as the only way to communicate with the organizations.

The Riedel Organization:

Riedel is a glassware manufacturer based in Austria, best known for its glassware designed to enhance different types of wines. Riedel's website offers an easy way to purchase glassware, book a tasting, and educate consumers about their products.

Digital Properties Tested

www.riedel.com was tested on Desktop, iOS and Android.

Testing Conducted on the Digital Properties

Manual Testing

BoIA employs human testers to conduct manual tests on websites and mobile applications. Manual testers with visual disabilities used assistive technology to thoroughly examine the content and accessibility of high-traffic pages and unique templated pages, as well as the functionality of each custom use case. Then, a fully-sighted subject matter expert reviewed and validated each outcome, evaluated the accessibility checkpoints that the first-round tester could not assess, such as color contrast or those related to video, and performed a complete second round of manual testing.

Specific use cases were developed to emulate an actual user's activity:

1. Generations Walk-Through
2. Create Account and Check Error Messaging
3. Another Country Pop up Overlay Modal
4. Search, Shop, Filter, Review Rating and Add to Cart
5. Update Cart and Purchase
6. Search, Filter, Add to Cart and Purchase (iOS and Android)

The manual review using both visually impaired testers and sighted subject matter experts was completed on 6/4/2019.

Automated Testing

BoIA programmed its automated A11Y® platform to break down the WCAG 2.1 A/AA guidelines and checkpoints of a website into testable components with specific rules and parameters for each case scenario. The server-scanning technology methodically tests each page against hundreds of rules. All violations are organized into specialized databases by issue theme (Media, Structure, Text, Scripting, CSS and Forms) and are tied back to specific WCAG 2.1 A/AA checkpoints. The last automated test was conducted during the audit.

Issues Discovered During the Audit

During the audit, specific issues detected by BoIA were reviewed with the Riedel team. Some of the most frequently found issues include headings not being provided correctly, inaccessible form fields, incorrect form field indicators, lack of keyboard navigability, and lack of visible focus.

Plan for Addressing Additional Issues not Fixed

To address outstanding issues in the short term, Riedel was provided with an email address for website visitors to access if they have accessibility inquiries. Ongoing, Riedel has retained BoIA's support services which allows for retesting of issues found during the audit, as well as quarterly automated scans.

The Riedel team has been working to remediate the issues found during the audit, and BoIA is awaiting word that they are ready for testers to retest the issues found during the audit and confirm accessibility improvements.

3rd Party Content Found on the Riedel Digital Properties

The following third-party applications or plug-ins were found on Riedel's website.

- Instagram
- YouTube
- Facebook
- Twitter
- Pinterest

In order to improve the accessibility of these third-party applications, Riedel is in the process of contacting each of the applicable application providers to request that they issue a letter of commitment agreeing to substantially conform to the WCAG 2.1 A/AA standards.

Sitewide Accessibility Issues Accommodations

Riedel has been instructed to ensure their website contains an accessibility statement that is clearly disclosed (the "Accessibility Statement"). BoIA provided the language for the Accessibility Statement to Riedel on 8/30/2019. The Accessibility Statement indicates that Riedel is making efforts to maintain and increase the accessibility of its website in order to ensure that persons with disabilities have full and equal enjoyment of the goods, services, facilities, privileges, advantages, and accommodations that Riedel provides through its website. The Accessibility Statement also solicits feedback from site visitors on how website accessibility can be improved and offers immediate support for issues relating to accessibility, including by means of an accessible email address where representatives knowledgeable about the Web Accessibility Policy can be reached.

Dedicated Accessibility Phone Number

A Federal District Court Judge in California (U.S. District Judge James Otero) stated that telephonic access could be a lawful alternative for people experiencing accessibility issues on a website (Case CV 16-06599 SJO).

A dedicated toll-free number was offered to Riedel for use on their website for accessibility issues and is intended to be available to all site visitors. Visitors with disabilities who are experiencing technical difficulties with the website or mobile applications can call for assistance and will have the option to speak with a live representative 24 hours per day, 7 days per week. The live operator uses his or her best efforts to resolve the caller's issue while on the phone. All issues are tracked as tickets. A full transcription of the call with any additional notes is reviewed following the call and, if appropriate, the caller is contacted as needed to follow up on any such issues.

Riedel has not yet provided BoIA with the required information to set up the toll-free number.

Dedicated Accessibility Email Address

Riedel was also provided with a dedicated email address of riedel@a11y.com for addressing accessibility issues. All issues are tracked as tickets.

The email is not currently posted on the website.

Accessibility Statement Link Location

As of the date of this letter, the Accessibility Statement has not been uploaded to the Riedel website.

Dedicated Accessibility Statement Language

The provided language of the Accessibility Statement is as follows:

Accessibility Statement

Riedel is committed to making its website usable by all people, including those with disabilities by meeting or exceeding the requirements of the Web Content Accessibility Guidelines 2.1 Level A/AA (WCAG 2.1 A/AA). We strive to make our site an equal experience for everyone.

We continue to monitor our site and make sure that all content provided is accessible to all visitors. In order to help us in this process, we have engaged The Bureau of Internet Accessibility (BoIA.org), an accessibility consulting company, to conduct a full accessibility audit consisting of

both automated and manual testing of our website using BoIA's A11Y® platform which provides us with specific recommendations that will assist us in ensuring that our Web presence is in conformance with the WCAG 2.1 A/AA.

Disclaimer

It is important to note that efforts to the website are ongoing as we work to implement the relevant improvements to meet WCAG 2.1 A/AA guidelines over time.

ACCESSIBILITY SUPPORT

If you are having issues using this website, we want to help you achieve what you came to do. Please write to riedel@a11y.com and be sure to specify the web page so we can look into making that page accessible for you. We greatly value your questions and comments.

Third Party Applications

While you are visiting our site, you will notice that we make use of third-party sites such as Instagram, YouTube, Facebook, Twitter, and Pinterest to provide information about Riedel. Though individuals may have challenges with access to these particular sites, Riedel does not control or remedy the way content is portrayed.

Internally Addressing Digital Accessibility

Staff training

Riedel has been provided annual training on website accessibility for website content personnel. Riedel has purchased 10 licenses for accessibility best practices training from BoIA. Currently none of the organization's personnel have completed the training course. This course is for individuals that are new to accessibility. It covers an overview of the WCAG 2.1 guidelines and breaks them down into easy-to-understand summaries. It also offers instruction using specific, real-life examples, teaching what to watch for when ensuring your online presence is reasonably accessible to everyone.

Accessibility Coordinator

Riedel has informed BoIA that it has designated an employee as the web accessibility coordinator for each of the digital properties, and that such employee will report directly to the Riedel executive team.