Accessibility Statement

U.S. ADA (42 USC § 12101)
Section 508 (29 USC § 794d)
European Accessibility Act
UK Equality Act 2010
W3C/WAI WCAG 2.1
ISO/IEC 40500:2012

DISPEL

Accessibility Statement

Adherence to Web Content Accessibility Guidelines (WCAG 2.1) and ISO/IEC 40500:2012

Dispel is committed to making its websites and applications accessible, in accordance with Title III of the U.S. Americans with Disabilities Act of 1990 (42 U.S.C. § 12101) and, for our U.S. Government clients, Section 508 of the Rehabilitation Act of 1973 (29 USC § 794d).

To meet this commitment, our websites and applications have been designed to conform to the W3C Web Content Accessibility Guidelines (WCAG) 2.1, Level AA. Our applications use both native operating system ("OS") elements and brand designs. By using native elements, Dispel leverages the powerful accessibility features provided by the OS manufacturer. If not otherwise covered by the native OS, our brand designs are intended to conform to the WCAG 2.1, Level AA.

The information in this document is *not* legal advice. If you have questions about the applicability of the policies to specific situations, please consult legal authorities for the appropriate jurisdiction.

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Technical Information about Dispel's Website and Application Accessibility

Dispel is committed to making its websites and applications accessible, in accordance with the U.S. Americans with Disabilities Act of 1990 (42 U.S.C. § 12101).

Compliance Status

Information on our compliance status is detailed in our Accessibility Conformance Report (ACR) based on the ITI Voluntary Product Accessibility Template® (VPAT®). Dispel uses the VPAT 2.4 INT, which incorporates revised Section 508 standards (the U.S. Federal accessibility standard), EN 301 549 (the European Union's "Accessibility requirements suitable for public procurement of ICT products and services in Europe"), and WCAG 2.1 and ISO/IEC 40500 (W3C/WAI's recently updated Web Content Accessibility Guidelines).

Feedback and Contact Information

We're always looking to improve the accessibility of our websites and applications. If you have feedback or concerns related to the accessibility of any content on our websites or applications, have ideas or comments that would help us improve the accessibility and usability of our website, or think we're not meeting accessibility requirements, please email us at accessibility@dispel.com. If applicable, please include the web address or URL and the specific problems you have encountered.

Enforcement Procedure

The U.S. Department of Justice (DoJ) is responsible for enforcing the American with Disabilities Act (ADA). If you're not happy with how we respond to your complaint, you may contact the DoJ Civil Rights Division to file a complaint.

To file an ADA complaint online:

> Civil Right Division Online Complaint Form

To file an ADA complaint by mail, send the completed ADA complaint form to:

U.S. Department of Justice
Civil Rights Division
950 Pennsylvania Avenue, NW
4CON, 9th Floor
Washington, DC 20530

To file an ADA complaint by facsimile, fax the completed ADA complaint form to:

(202) 307-1197

For more information on how to file an ADA complaint with the DoJ, please visit their website.

About WCAG and What We're Doing to Improve Accessibility

Industrial control systems touch everyone's lives, depending upon contributions from individuals all around the world. Dispel designs and builds our tools with accessibility as a central tenant of our ethos.

Our customers are required by law to comply with regulations governing accessibility, such as the U.S. American with Disabilities Act (ADA), European Accessibility Act (EAA), UK Equality Act 2010, Accessible Canada Act (ACA), and Australian Disability Discrimination Act (DDA).

All told, there are currently 40 web accessibility laws and policies in place across 23 countries and political unions. A preponderance of these regulations do not give strict technical guidance on how to make a site or service accessible; leaving the task up to the discretion and liability of the service provider. Many regulations, however, use the Web Content Accessibility Guidelines ("**WCAG**") as a standard or baseline. This is further recognized as an international standard: ISO/IEC 40500:2012.

WCAG 2.1 as Our Standard

The WCAG is authored by the World Wide Web Consortium (W3C), who develop international standards. Of relevance here, their accessibility standards are, in turn, reviewed by the Accessible Platform Architectures ("**APA**") Working Group. As of writing WCAG is in version 2.1, with a 2.2 working draft in review. There is also an incomplete 3.0 working draft. For our purposes when talking about the WCAG going forward in this document, we will be speaking about version 2.1. You can find the current reference to the WCAG 2.1 here: https://www.w3.org/WAI/WCAG21/quickref/

Four Tenants of WCAG

While the WCAG provides a technical list of requirements to fulfill, it's good to start with the four tenants around which W3C builds out their specifications.

This section provides a summary of the WCAG principals. For the normative technical specification, see www.w3.org/TR/WCAG21.

These four basic principles are websites must be:

1. Perceivable - Information and user interface components must be presentable to users in ways they can perceive.
   - This means that users must be able to perceive the information being presented (it can't be invisible to all of their senses)

2. Operable - User interface components and navigation must be operable.
    - This means that users must be able to operate the interface (the interface cannot require interaction that a user cannot perform)
3. Understandable - Information and the operation of user interface must be understandable.
    - This means that users must be able to understand the information as well as the operation of the user interface (the content or operation cannot be beyond their understanding)
4. Robust - Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.
    - This means that users must be able to access the content as technologies advance (as technologies and user agents evolve, the content should remain accessible)

Understanding Conformance

There are five requirements that must be met for content to be classified as 'conforming' to WCAG 2.1.

Requirements

Requirement 1: Conformance Level	One of the following levels of conformance is met in full. **Level A:** For Level A conformance (the minimum level of conformance), the Web page satisfies all the Level A Success Criteria, or a conforming alternate version is provided. **Level AA:** For Level AA conformance, the Web page satisfies all the Level A and Level AA Success Criteria, or a Level AA conforming alternate version is provided. **Level AAA:** For Level AAA conformance, the Web page satisfies all the Level A, Level AA and Level AAA Success Criteria, or a Level AAA conforming alternate version is provided.
Requirement 2: Full Pages	Conformance (and conformance level) is for full Web page(s) only, and cannot be achieved if part of a Web page is excluded.
Requirement 3: Complete Processes	When a Web page is one of a series of Web pages presenting a process (i.e., a sequence of steps that need to be completed in order to accomplish an activity), all Web pages in the process conform at the specified level or better. (Conformance is not possible at a particular level if any page in the process does not conform at that level or better.)
Requirement 4: Only Accessibility-Supported Ways of Using Technologies	Only accessibility-supported ways of using technologies are relied upon to satisfy the success criteria. Any information or functionality that is provided in a way that is not accessibility supported is also available in a way that is accessibility supported.

Requirement 5: Non-Interference	If technologies are used in a way that is not accessibility supported, or if they are used in a non-conforming way, then they do not block the ability of users to access the rest of the page. In addition, the Web page as a whole continues to meet the conformance requirements under each of the following conditions:
	1. when any technology that is not relied upon is turned on in a user agent,
	2. when any technology that is not relied upon is turned off in a user agent, and
	3. when any technology that is not relied upon is not supported by a user agent
	In addition, the following success criteria apply to all content on the page, including content that is not otherwise relied upon to meet conformance, because failure to meet them could interfere with any use of the page:
	• 1.4.2 - Audio Control,
	• 2.1.2 - No Keyboard Trap,
	• 2.3.1 - Three Flashes or Below Threshold, and
	• 2.2.2 - Pause, Stop, Hide.

Success Criteria

WCAG 2.1 items contain success criteria, which are written as testable criteria to objectively determine of a certain implementation satisfies the item.

> For example, *1.4.1 Use of Color* requires that "color is not used as the only visual means of conveying information, indicating an action, prompting a response, or distinguishing a visual element." In other words, you can't just have text change from red to green to signify something to a user. There are sufficient techniques that can be used in conjunction with color to convey meaning to those individuals with partial sight, limited color vision, or monochromatic displays. 1.4.1 provides success criteria techniques to meet compliance. Some are: (G14) Ensuring that information conveyed by color differences is also available in text; (G205) Including a text cue for colored form control labels; (G182) Ensuring that additional visual cues are available when text color differences are used to convey information; and (G183) Using a contrast ratio of 3:1 with surrounding text and providing additional visual cues on hover for links or controls where color alone is used to identify them.[1]

Conformance with WCAG means that an implementation of an item satisfies the requirements the Success Criteria. Most items have one level of conformance—in other words, you either meet the Success Criteria, or you do not. There are some circumstances when items have three levels of conformance: Level A, AA, and AAA.

One's natural instinct is to aspire for Level AAA conformance across the board. Unfortunately the WCAG is written so that complete conformance is not

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[1] W3C, "Understanding Success Criterion 1.4.1: Use of Color." *WCAG 2.1*. Available: https://www.w3.org/WAI/WCAG21/Understanding/use-of-color.html, Accessed April 1, 2021.

possible. Indeed, the authors at W3C themselves note: "It is not recommended that Level AAA conformance be required as a general policy for entire sites because it is not possible to satisfy all Level AAA Success Criteria for some content."[2] Our goal then is to maximize accessibility as much as reasonably possible without creating an undue burden.

Application Accessibility Across Device Platforms

Dispel provides its customers with applications on Apple macOS®, iPadOS®, iOS; and on Microsoft Windows®.

These operation systems come with accessibility features of their own. For example, macOS includes a wide variety of features and assistive technologies that include screen and cursor magnification, a full-featured screen reader, visual flash alerts, closed captioning support, and more.[3]

Dispel's applications use native design elements—referred to as "modern design" for UWP Windows apps and "design style" for Apple macOS—when building our products. These UI elements often come with built-in accessibility, providing an accessible user experience by default.

To learn more about Apple's accessibility features, please visit:

https://www.apple.com/accessibility/

To learn more about Microsoft's accessibility features, please visit:

https://www.microsoft.com/en-us/accessibility/windows

In the context of our Compliance Status, OS-derived accessibility features are the responsibility of Apple and Microsoft.

Preparation of this Accessibility Statement

This statement was prepared on April 8, 2021.

For UK Article 3(1) of Commission Implementing Decision (EU) 2018/1523, this accessibility statement was prepared using Version 2.4 of the ITI Voluntary Product Accessibility Template® (VPAT®) INI edition.

This statement was last reviewed on April 8, 2021.

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[2] W3C Working Group, "Understanding Conformance." *Understanding WCAG 2.0*. October 7, 2016. Accessible: https://www.w3.org/TR/UNDERSTANDING-WCAG20/conformance.html, Accessed April 1, 2021.

[3] Apple Inc., "macOS." *Accessibility for Developers*. Accessible: https://developer.apple.com/accessibility/, Accessed April 8, 2021.

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Utilities and manufacturers use Dispel for secure remote access to their industrial control systems. Dispel serves over 18 million people and partners every day from offices in New York, Austin, Virginia, and Tokyo.