

# FreeWill Accessibility Conformance Report

## WCAG Edition

(Based on VPAT<sup>®</sup> Version 2.5Rev)

**Name of Product/Version:** Planned Giving Suite - Durable Financial Power of Attorney

**Report Date:** May 6, 2026

**Product Description:** Keep your financial accounts accessible and bills paid by appointing someone to make financial decisions on your behalf if you're unable.

**Contact Information:** Trisha Arora <trisha@freewill.com>

**Evaluation Methods Used:** Accessibility testing was conducted manually by 7 auditors including one with visual disabilities. The following tools were used for evaluation.

- Keyboard-only testing on all browsers
- Contrast testing using Colour Contrast Analyser by TPGi
- Screen reader testing using the following tools:
  - NVDA with FireFox on Windows
  - JAWS with Chrome on Windows

- VoiceOver with Safari on macOS
- VoiceOver with Safari on iOS
- Talkback with Chrome on Android OS

# Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
<a href="#">Web Content Accessibility Guidelines 2.0</a>	Level A (Yes) Level AA (Yes) Level AAA (No)
<a href="#">Web Content Accessibility Guidelines 2.1</a>	Level A (Yes) Level AA (Yes) Level AAA (No)
<a href="#">Web Content Accessibility Guidelines 2.2</a>	Level A (Yes) Level AA (Yes) Level AAA (No)

## Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can only be used in WCAG Level AAA criteria.

## WCAG 2.2 Report

Note: When reporting on conformance with the WCAG 2.2 Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

## Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.1.1 Non-text Content</a> (Level A)	Supports	
<a href="#">1.2.1 Audio-only and Video-only (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">1.2.2 Captions (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">1.2.3 Audio Description or Media Alternative (Prerecorded)</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">1.3.1 Info and Relationships</a> (Level A)	Supports	
<a href="#">1.3.2 Meaningful Sequence</a> (Level A)	Supports	
<a href="#">1.3.3 Sensory Characteristics</a> (Level A)	Supports	
<a href="#">1.4.1 Use of Color</a> (Level A)	Supports	
<a href="#">1.4.2 Audio Control</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.1.1 Keyboard</a> (Level A)	Supports	
<a href="#">2.1.2 No Keyboard Trap</a> (Level A)	Supports	
<a href="#">2.1.4 Character Key Shortcuts</a> (Level A 2.1 and 2.2)	Supports	
<a href="#">2.2.1 Timing Adjustable</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.2.2 Pause, Stop, Hide</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.3.1 Three Flashes or Below Threshold</a> (Level A)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.4.1 Bypass Blocks</a> (Level A)	Supports	
<a href="#">2.4.2 Page Titled</a> (Level A)	Supports	
<a href="#">2.4.3 Focus Order</a> (Level A)	Partially Supports	<ul style="list-style-type: none"> <li>The Review page has multiple links with “Edit” as their label which allow the user to revisit previously completed pages. These are distinguishable by the page heading they are placed under but have identical screen reader descriptions. Users can still use the navigation menu to return to previously visited pages in the same manner</li> </ul>
<a href="#">2.4.4 Link Purpose (In Context)</a> (Level A)	Supports	
<a href="#">2.5.1 Pointer Gestures</a> (Level A 2.1 and 2.2)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.5.2 Pointer Cancellation</a> (Level A 2.1 and 2.2)	Supports	
<a href="#">2.5.3 Label in Name</a> (Level A 2.1 and 2.2)	Supports	

Criteria	Conformance Level	Remarks and Explanations
<a href="#">2.5.4 Motion Actuation</a> (Level A 2.1 and 2.2)	Not Applicable	Criterion is not relevant to the product.
<a href="#">3.1.1 Language of Page</a> (Level A)	Supports	
<a href="#">3.2.1 On Focus</a> (Level A)	Supports	
<a href="#">3.2.2 On Input</a> (Level A)	Supports	
<a href="#">3.2.6 Consistent Help</a> (Level A 2.2 only)	Supports	
<a href="#">3.3.1 Error Identification</a> (Level A)	Supports	
<a href="#">3.3.2 Labels or Instructions</a> (Level A)	Supports	
<a href="#">3.3.7 Redundant Entry</a> (Level A 2.2 only)	Supports	
<a href="#">4.1.1 Parsing</a> (Level A)	Does not apply	
<a href="#">4.1.2 Name, Role, Value</a> (Level A)	Supports	

**Table 2: Success Criteria, Level AA**

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.2.4 Captions (Live)</a> (Level AA)	Not Applicable	Criterion is not relevant to the product.
<a href="#">1.2.5 Audio Description (Prerecorded)</a> (Level AA)	Not Applicable	Criterion is not relevant to the product.
<a href="#">1.3.4 Orientation</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.3.5 Identify Input Purpose</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.3 Contrast (Minimum)</a> (Level AA)	Supports	
<a href="#">1.4.4 Resize text</a> (Level AA)	Supports	
<a href="#">1.4.5 Images of Text</a> (Level AA)	Supports	
<a href="#">1.4.10 Reflow</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.11 Non-text Contrast</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.12 Text Spacing</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">1.4.13 Content on Hover or Focus</a> (Level AA 2.1 and 2.2)	Supports	
<a href="#">2.4.5 Multiple Ways</a> (Level AA)	Supports	
<a href="#">2.4.6 Headings and Labels</a> (Level AA)	Supports	
<a href="#">2.4.7 Focus Visible</a> (Level AA)	Supports	
<a href="#">2.4.11 Focus Not Obscured (Minimum)</a> (Level AA 2.2 only)	Supports	

Criteria	Conformance Level	Remarks and Explanations
<a href="#">2.5.7 Dragging Movements</a> (Level AA 2.2 only)	Not Applicable	Criterion is not relevant to the product.
<a href="#">2.5.8 Target Size (Minimum)</a> (Level AA 2.2 only)	Supports	
<a href="#">3.1.2 Language of Parts</a> (Level AA)	Supports	
<a href="#">3.2.3 Consistent Navigation</a> (Level AA)	Supports	
<a href="#">3.2.4 Consistent Identification</a> (Level AA)	Supports	
<a href="#">3.3.3 Error Suggestion</a> (Level AA)	Supports	
<a href="#">3.3.4 Error Prevention (Legal, Financial, Data)</a> (Level AA)	Supports	
<a href="#">3.3.8 Accessible Authentication (Minimum)</a> (Level AA 2.2 only)	Supports	
<a href="#">4.1.3 Status Messages</a> (Level AA 2.1 and 2.2)	Supports	

**Table 3: Success Criteria, Level AAA**

Notes:

Criteria	Conformance Level	Remarks and Explanations
<a href="#">1.2.6 Sign Language (Prerecorded)</a> (Level AAA)	Not evaluated	
<a href="#">1.2.7 Extended Audio Description (Prerecorded)</a> (Level AAA)	Not evaluated	
<a href="#">1.2.8 Media Alternative (Prerecorded)</a> (Level AAA)	Not evaluated	
<a href="#">1.2.9 Audio-only (Live)</a> (Level AAA)	Not evaluated	
<a href="#">1.3.6 Identify Purpose</a> (Level AAA 2.1 and 2.2)	Not evaluated	
<a href="#">1.4.6 Contrast (Enhanced)</a> (Level AAA)	Not evaluated	
<a href="#">1.4.7 Low or No Background Audio</a> (Level AAA)	Not evaluated	
<a href="#">1.4.8 Visual Presentation</a> (Level AAA)	Not evaluated	
<a href="#">1.4.9 Images of Text (No Exception)</a> (Level AAA)	Not evaluated	
<a href="#">2.1.3 Keyboard (No Exception)</a> (Level AAA)	Not evaluated	
<a href="#">2.2.3 No Timing</a> (Level AAA)	Not evaluated	
<a href="#">2.2.4 Interruptions</a> (Level AAA)	Not evaluated	
<a href="#">2.2.5 Re-authenticating</a> (Level AAA)	Not evaluated	
<a href="#">2.2.6 Timeouts</a> (Level AAA 2.1 and 2.2)	Not evaluated	
<a href="#">2.3.2 Three Flashes</a> (Level AAA)	Not evaluated	
<a href="#">2.3.3 Animation from Interactions</a> (Level AAA 2.1 and 2.2)	Not evaluated	

Criteria	Conformance Level	Remarks and Explanations
<a href="#">2.4.8 Location</a> (Level AAA)	Not evaluated	
<a href="#">2.4.9 Link Purpose (Link Only)</a> (Level AAA)	Not evaluated	
<a href="#">2.4.10 Section Headings</a> (Level AAA)	Not evaluated	
<a href="#">2.4.12 Focus Not Obscured (Enhanced)</a> (Level AAA 2.2 only)	Not evaluated	
<a href="#">2.4.13 Focus Appearance</a> (Level AAA 2.2 only)	Not evaluated	
<a href="#">2.5.5 Target Size</a> (Level AAA 2.1 and 2.2)	Not evaluated	
<a href="#">2.5.6 Concurrent Input Mechanisms</a> (Level AAA 2.1 and 2.2)	Not evaluated	
<a href="#">3.1.3 Unusual Words</a> (Level AAA)	Not evaluated	
<a href="#">3.1.4 Abbreviations</a> (Level AAA)	Not evaluated	
<a href="#">3.1.5 Reading Level</a> (Level AAA)	Not evaluated	
<a href="#">3.1.6 Pronunciation</a> (Level AAA)	Not evaluated	
<a href="#">3.2.5 Change on Request</a> (Level AAA)	Not evaluated	
<a href="#">3.3.5 Help</a> (Level AAA)	Not evaluated	
<a href="#">3.3.6 Error Prevention (All)</a> (Level AAA)	Not evaluated	
<a href="#">3.3.9 Accessible Authentication (Enhanced)</a> (Level AAA 2.2 only)	Not evaluated	

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