

FreeWill Accessibility Conformance Report

WCAG Edition

(Based on VPAT[®] Version 2.5Rev)

Name of Product/Version: Smart Giving Suite - QCDs

Report Date: May 6, 2026

Product Description: FreeWill's QCD product allows donors to make Qualified Charitable Distributions from their IRAs in support of their chosen nonprofit organization.

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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 |
|--|---|
| Web Content Accessibility Guidelines 2.0 | Level A (Yes) Level AA (Yes) Level AAA (No) |
| Web Content Accessibility Guidelines 2.1 | Level A (Yes) Level AA (Yes) Level AAA (No) |
| Web Content Accessibility Guidelines 2.2 | 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 |
|--|--------------------|--|
| 1.1.1 Non-text Content (Level A) | Supports | |
| 1.2.1 Audio-only and Video-only (Prerecorded) (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 1.2.2 Captions (Prerecorded) (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 1.3.1 Info and Relationships (Level A) | Partially Supports | <ul style="list-style-type: none"> The summary of the user's designation value is visually formatted as a table but is not identified as a table by screen readers. |
| 1.3.2 Meaningful Sequence (Level A) | Supports | |
| 1.3.3 Sensory Characteristics (Level A) | Supports | |
| 1.4.1 Use of Color (Level A) | Supports | |
| 1.4.2 Audio Control (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 2.1.1 Keyboard (Level A) | Supports | |
| 2.1.2 No Keyboard Trap (Level A) | Supports | |
| 2.1.4 Character Key Shortcuts (Level A 2.1 and 2.2) | Supports | |
| 2.2.1 Timing Adjustable (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 2.2.2 Pause, Stop, Hide (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 2.3.1 Three Flashes or Below Threshold (Level A) | Not Applicable | Criterion is not relevant to the product. |
| 2.4.1 Bypass Blocks (Level A) | Supports | |
| 2.4.2 Page Titled (Level A) | Supports | |
| 2.4.3 Focus Order (Level A) | Partially Supports | <ul style="list-style-type: none"> Some screen readers do not enter expanded menu regions. These menus can still be operated using standard keyboard navigation inputs. |
| 2.4.4 Link Purpose (In Context) (Level A) | Supports | |
| 2.5.1 Pointer Gestures (Level A 2.1 and 2.2) | Not Applicable | Criterion is not relevant to the product. |
| 2.5.2 Pointer Cancellation (Level A 2.1 and 2.2) | Supports | |
| 2.5.3 Label in Name (Level A 2.1 and 2.2) | Supports | |
| 2.5.4 Motion Actuation (Level A 2.1 and 2.2) | Not Applicable | Criterion is not relevant to the product. |

| Criteria | Conformance Level | Remarks and Explanations |
|--|--------------------|--|
| 3.1.1 Language of Page (Level A) | Supports | |
| 3.2.1 On Focus (Level A) | Supports | |
| 3.2.2 On Input (Level A) | Supports | |
| 3.2.6 Consistent Help (Level A 2.2 only) | Supports | |
| 3.3.1 Error Identification (Level A) | Partially Supports | <ul style="list-style-type: none"> • Upon generating an error message on a form, screen readers do not announce the text describing the specific error that occurred. The screen reader still announces the text alerting the user that an error is present within the form. • Some screen readers will identify an invalid selection in the State form field before the user has made a selection. Making a selection from the menu will remove this error. |
| 3.3.2 Labels or Instructions (Level A) | Supports | |
| 3.3.7 Redundant Entry (Level A 2.2 only) | Supports | |
| 4.1.1 Parsing (Level A) | Does not apply | |
| 4.1.2 Name, Role, Value (Level A) | Supports | |

Table 2: Success Criteria, Level AA

Notes:

| Criteria | Conformance Level | Remarks and Explanations |
|---|--------------------|---|
| 1.2.4 Captions (Live) (Level AA) | Not Applicable | Criterion is not relevant to the product. |
| 1.2.5 Audio Description (Prerecorded) (Level AA) | Not Applicable | Criterion is not relevant to the product. |
| 1.3.4 Orientation (Level AA 2.1 and 2.2) | Supports | |
| 1.3.5 Identify Input Purpose (Level AA 2.1 and 2.2) | Supports | |
| 1.4.3 Contrast (Minimum) (Level AA) | Partially Supports | <ul style="list-style-type: none"> • Selecting some buttons on the page with the tab key may cause the text of the button to appear with low contrast. • The placeholder text in date fields may appear with low contrast in some web browsers. |

| Criteria | Conformance Level | Remarks and Explanations |
|---|--------------------|--|
| 1.4.4 Resize text (Level AA) | Supports | |
| 1.4.5 Images of Text (Level AA) | Supports | |
| 1.4.10 Reflow (Level AA 2.1 and 2.2) | Does Not Support | <ul style="list-style-type: none"> Viewing the page in a small width browser may trigger a horizontal scroll region and/or cause the Cryptocurrency informational tab to become unviewable. |
| 1.4.11 Non-text Contrast (Level AA 2.1 and 2.2) | Partially Supports | <ul style="list-style-type: none"> The navigation links at the top of the page may have keyboard focus states that appear at a low contrast compared to their unselected state. Keyboard users can still navigate to pages using the Previous and Next buttons. |
| 1.4.12 Text Spacing (Level AA 2.1 and 2.2) | Supports | |
| 1.4.13 Content on Hover or Focus (Level AA 2.1 and 2.2) | Supports | |
| 2.4.5 Multiple Ways (Level AA) | Supports | |
| 2.4.6 Headings and Labels (Level AA) | Partially Supports | <ul style="list-style-type: none"> Some sub-headings on the Review page are ranked at level 2 but are semantically presented as level 3 headings. |
| 2.4.7 Focus Visible (Level AA) | Supports | |
| 2.4.11 Focus Not Obscured (Minimum) (Level AA 2.2 only) | Supports | |
| 2.5.7 Dragging Movements (Level AA 2.2 only) | Not Applicable | Criterion is not relevant to the product. |
| 2.5.8 Target Size (Minimum) (Level AA 2.2 only) | Supports | |
| 3.1.2 Language of Parts (Level AA) | Supports | |
| 3.2.3 Consistent Navigation (Level AA) | Supports | |
| 3.2.4 Consistent Identification (Level AA) | Supports | |
| 3.3.3 Error Suggestion (Level AA) | Supports | |
| 3.3.4 Error Prevention (Legal, Financial, Data) (Level AA) | Supports | |
| 3.3.8 Accessible Authentication (Minimum) (Level AA 2.2 only) | Supports | |
| 4.1.3 Status Messages (Level AA 2.1 and 2.2) | Supports | |

Table 3: Success Criteria, Level AAA

Notes:

| Criteria | Conformance Level | Remarks and Explanations |
|---|--------------------------|---------------------------------|
| 1.2.6 Sign Language (Prerecorded) (Level AAA) | Not evaluated | |
| 1.2.7 Extended Audio Description (Prerecorded) (Level AAA) | Not evaluated | |
| 1.2.8 Media Alternative (Prerecorded) (Level AAA) | Not evaluated | |
| 1.2.9 Audio-only (Live) (Level AAA) | Not evaluated | |
| 1.3.6 Identify Purpose (Level AAA 2.1 and 2.2) | Not evaluated | |
| 1.4.6 Contrast (Enhanced) (Level AAA) | Not evaluated | |
| 1.4.7 Low or No Background Audio (Level AAA) | Not evaluated | |
| 1.4.8 Visual Presentation (Level AAA) | Not evaluated | |
| 1.4.9 Images of Text (No Exception) (Level AAA) | Not evaluated | |
| 2.1.3 Keyboard (No Exception) (Level AAA) | Not evaluated | |
| 2.2.3 No Timing (Level AAA) | Not evaluated | |
| 2.2.4 Interruptions (Level AAA) | Not evaluated | |
| 2.2.5 Re-authenticating (Level AAA) | Not evaluated | |
| 2.2.6 Timeouts (Level AAA 2.1 and 2.2) | Not evaluated | |
| 2.3.2 Three Flashes (Level AAA) | Not evaluated | |
| 2.3.3 Animation from Interactions (Level AAA 2.1 and 2.2) | Not evaluated | |
| 2.4.8 Location (Level AAA) | Not evaluated | |
| 2.4.9 Link Purpose (Link Only) (Level AAA) | Not evaluated | |
| 2.4.10 Section Headings (Level AAA) | Not evaluated | |
| 2.4.12 Focus Not Obscured (Enhanced) (Level AAA 2.2 only) | Not evaluated | |
| 2.4.13 Focus Appearance (Level AAA 2.2 only) | Not evaluated | |
| 2.5.5 Target Size (Level AAA 2.1 and 2.2) | Not evaluated | |
| 2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 and 2.2) | Not evaluated | |
| 3.1.3 Unusual Words (Level AAA) | Not evaluated | |
| 3.1.4 Abbreviations (Level AAA) | Not evaluated | |
| 3.1.5 Reading Level (Level AAA) | Not evaluated | |
| 3.1.6 Pronunciation (Level AAA) | Not evaluated | |
| 3.2.5 Change on Request (Level AAA) | Not evaluated | |
| 3.3.5 Help (Level AAA) | Not evaluated | |
| 3.3.6 Error Prevention (All) (Level AAA) | Not evaluated | |
| 3.3.9 Accessible Authentication (Enhanced) (Level AAA 2.2 only) | Not evaluated | |

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