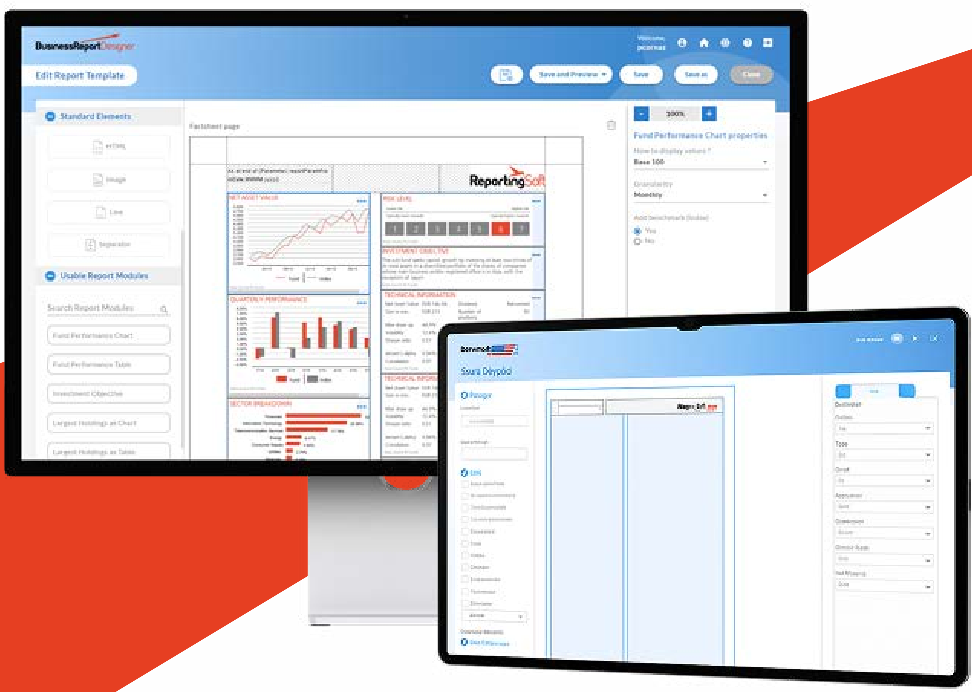
The European Accessibility Act and Client Reporting in Financial Services

A practical guide for private banks, asset managers and wealth management firms



Introduction

The European Accessibility Act has been enforceable since 28 June 2025. For financial institutions serving EU consumers, this means that digital service journeys, including online interfaces and many downloadable client documents delivered through those services, should be assessed against applicable EU accessibility requirements. In practice, this often involves **EN 301 549 and WCAG 2.1-based criteria**, depending on the channel and content type.

This paper is written for heads of client reporting, back-office managers, compliance officers and IT leads at private banks, asset managers and wealth management firms operating in the EU. It explains what the EAA requires, where most institutions currently stand, and how compliant client reporting can be implemented without a large-scale IT project. Readers will leave with a clear picture of their obligations and a practical path to compliant output.

Background / Context

A regulation that is already in force

The EAA (EU Directive 2019/882) was published in April 2019. Member states were required to transpose it into national law by June 2022. Enforcement began on 28 June 2025. As of 2026, national regulatory bodies across the EU are conducting compliance reviews of financial institutions. **Germany enforces EAA obligations through the BFSG, with a defined penalty structure already active.** Other member states have equivalent national frameworks in place.

What has changed for financial services

The financial sector is one of the core areas covered by the EAA. The directive applies to all digital services offered to EU consumers, including online banking interfaces, client portals, investment reports and statements delivered digitally, KIIDs, factsheets, and investment proposals. If a client can access a document or service digitally, it must be accessible. This is not a future requirement. **It applies to every reporting cycle running today.**

Where the opportunity lies

Institutions that use the EAA as a trigger to modernise their client reporting infrastructure gain more than compliance. While accessibility obligations are distinct from frameworks such as MiFID, FINMA, GIPS or internal control requirements, a well-designed production platform can help support several of these objectives at the same time. **Compliance and operational efficiency are not competing priorities here. They are achieved together.**

Key Aspects & Value

1. WCAG 2.1-based criteria are a core part of the technical benchmark

For digital content, accessibility assessments in the EU are commonly mapped through EN 301 549, which incorporates many WCAG 2.1-based requirements. For financial documents this means a minimum contrast ratio of 4.5:1 for body text, meaning text must be dark enough against its background to be readable for people with visual impairments, structural document tagging for screen readers, alternative text for all charts and images, a logical reading order, and keyboard-navigable content in digital formats. **These requirements apply across all delivery channels: PDF, HTML, e-banking portal, and mobile app.**

2. The scope is broader than most institutions expect

The EAA covers both interfaces and the documents delivered through them. A client portal that is accessible but delivers non-compliant PDF statements does not meet the requirement. **Every document type in the reporting chain, including portfolio statements, performance reports, investment proposals, KIIDs and factsheets, must be produced in a compliant format.** Any document with a digital delivery component is in scope, regardless of whether it is also available in print.

3. Manual production cannot guarantee compliance at scale

Standard PDF exports from Word, Excel or most legacy reporting tools do not produce accessible output by default. Every manual step in the production chain creates a point where compliance can break. Across a reporting cycle covering hundreds or thousands of client documents, manual processes make consistent compliance impossible to guarantee. **Structured, automated document production is the only way to ensure compliant output at scale.**

4. Micro-enterprise exemption has limits

The EAA includes a microenterprise exemption for certain service obligations, but that exemption is narrow and will rarely be relevant for established financial institutions. **Most private banks, asset managers and wealth management firms are affected, regardless of whether they serve retail or institutional clients.**

Solution Approaches

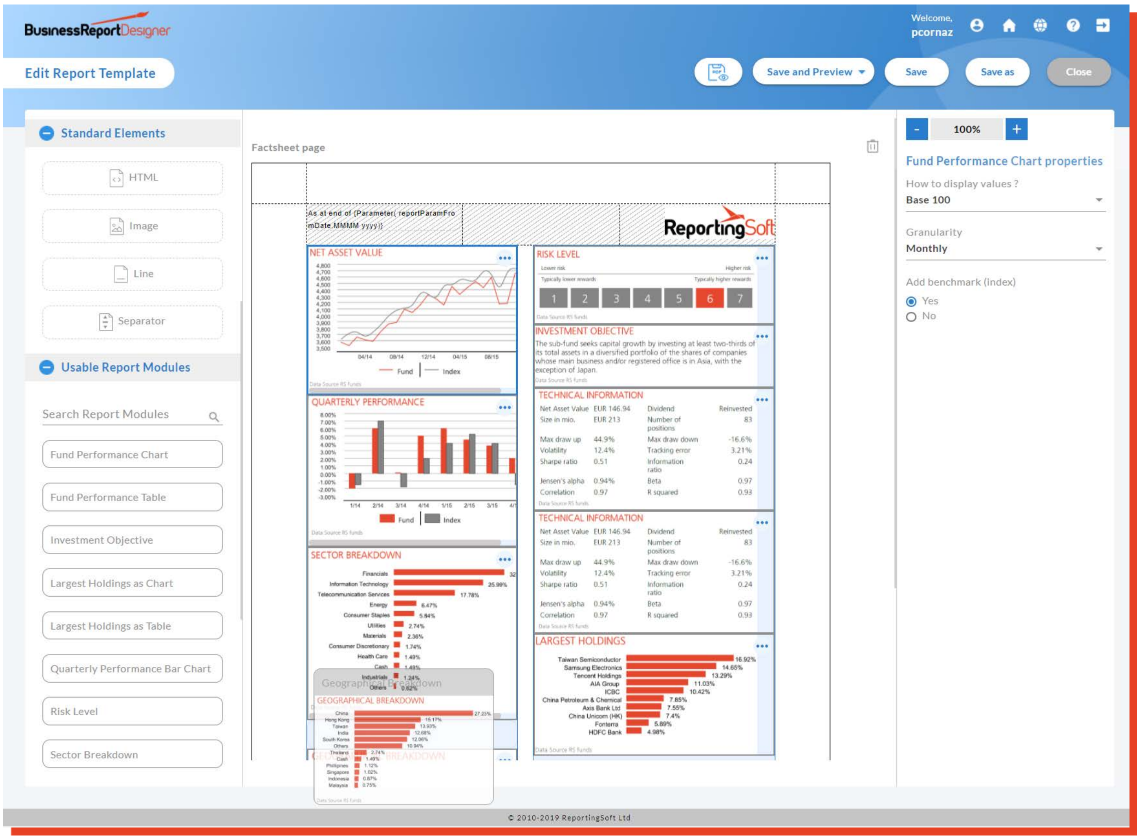
The path to EAA-compliant client reporting does not require replacing existing core banking infrastructure. **It requires connecting a structured production and distribution layer that enforces accessibility requirements at every step.**

1. Automated document production with accessibility built in

Replacing manual assembly steps with an automated production workflow is the foundational requirement. A system like Reporting Maestro acts as a scheduler and production engine that triggers report cycles, extracts data from your connected core banking system, renders output through validated templates, and distributes to all channels in a single run. **In this model, accessibility controls are built into templates and workflows rather than added after production.**

2. Accessible template design and validation

Report templates should be validated against the relevant accessibility criteria before entering production. This typically includes heading structure, tagged content where applicable, contrast, accessible chart labelling, and logical reading order across the intended output formats. Tools such as Business Report Designer can help business users work from an accessibility-aware template library and route changes through an approval workflow, reducing dependence on repeated IT intervention. **Accessibility validation is built into the approval process, removing the IT bottleneck from template updates and new report type launches.**

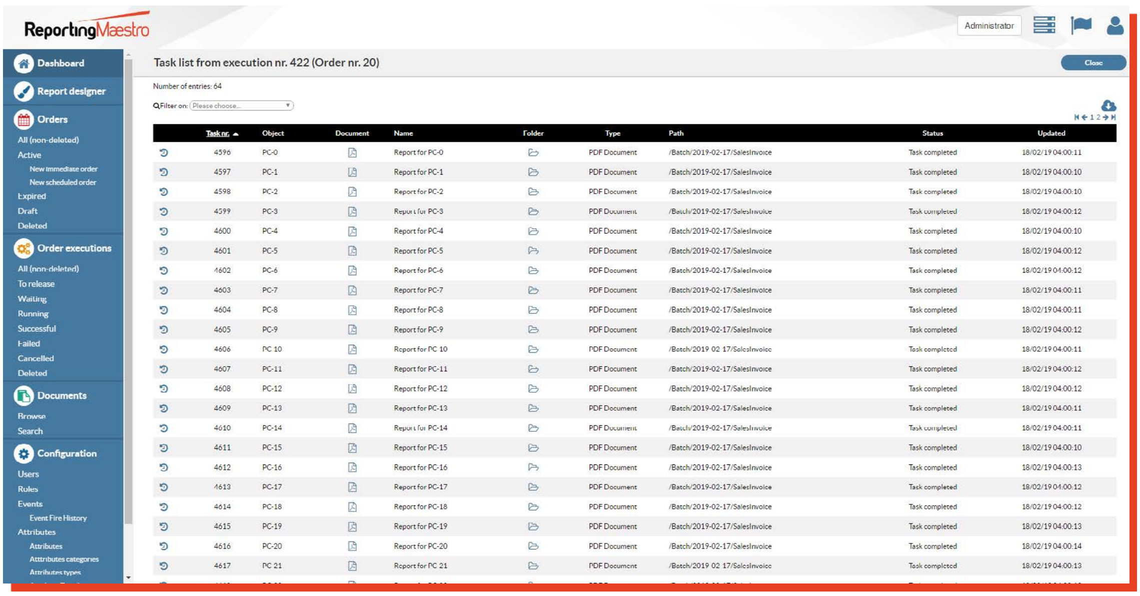


3. Multi-channel distribution with format-specific compliance

Accessibility requirements differ by channel. A downloadable PDF may require structure and reading order, a web-based output needs browser and assistive-technology compatibility, and mobile delivery introduces additional usability considerations. A production system should therefore apply channel-appropriate accessibility controls automatically, rather than relying on separate manual processes per format. **Reporting Maestro handles this within a single workflow, distributing simultaneously to e-banking, email, tablet, smartphone and print.**

4. Full audit trail as standard output

Traceability is valuable in any controlled reporting process: institutions benefit from knowing when a report was generated, through which channel it was delivered, and which approval steps were completed. **Automatic archival with timestamp, distribution record and approval history means regulators and auditors can review compliance directly in the system, without manual preparation by the back-office team.**



Practical Examples / Use Cases

Private bank on Temenos Wealth Suite: 3 to 5 back-office days recovered per cycle

A private bank producing client statements through manual PDF assembly, Excel-based data preparation and individual email distribution spent 3 to 5 days per reporting cycle on coordination between back-office, IT and distribution. No step in the process guaranteed WCAG compliance. After connecting Reporting Maestro to Temenos Wealth Suite through a dedicated Java connector and validating report templates against accessibility in Business Report Designer, the full production and distribution cycle runs unattended. **Every document is archived automatically with a full audit trail.** The 3 to 5 days of manual work per cycle have been eliminated.

Private bank: Compliant multi-currency client mandates across all digital channels

A private bank needed to produce and distribute their client mandates across four currencies (CHF, EUR, GBP, USD) to clients on multiple channels, including e-banking, email and print, with full regulatory documentation per cycle. Manual steps in the production chain made consistent accessibility compliance impossible to guarantee at the required volume. **Reporting Maestro automated the full chain from data extraction through template rendering to multi-channel distribution.** Accessible output is produced per run across all currency variants, with complete audit trail and no manual intervention per document.

CHECKLIST / Step-by-Step Guide

Phase 1: Inventory

Identify every document type your institution produces for clients digitally: portfolio statements, performance reports, investment proposals, KIIDs, factsheets and mandate summaries. For each document type, map the current production process: which system generates the data, which tool creates the document, and through which channels it is delivered. Assess whether any step in the current chain produces structured, tagged output that meets EU accessibility requirements.

Phase 2: Gap Analysis

Compare your current output against EU accessibility requirements for each document type and delivery channel. Check contrast ratios (whether text is readable against its background), document tagging (whether the structure is readable by screen readers), reading order, alternative text for charts, and keyboard navigation for digital formats. Prioritise gaps by volume and client impact. A structured EAA Readiness Assessment conducted with an experienced implementation partner can drastically reduce the number of workshops required.

Phase 3: Integration and Template Validation

Connect your core banking system to a structured production platform using tested connectors. Build or migrate report templates into an accessible template library, validating each template against EU accessibility requirements before it enters production. Define distribution channels and format-specific requirements per channel. Approve templates in the designer interface without waiting for an IT development cycle.

Phase 4: Go-Live and Ongoing Production

Move production to the automated workflow and confirm compliant output across all channels in the first live cycle. Confirm that the audit trail covers all required fields for MiFID, FINMA, GIPS and PIR alongside EAA documentation requirements. From go-live, production runs unattended with automatic quality control and compliant output every cycle.

Success Factors

Build compliance into the production process

Accessibility cannot be bolted on after a document is produced. It must be enforced at the template and workflow level from the start. Institutions that treat EU accessibility as a design requirement achieve consistent output at scale without additional effort per document.

Use your existing infrastructure

EAA compliance does not require replacing Temenos Wealth Suite, Avaloq, Finnova or any other core banking system. It requires adding a structured production layer that connects to existing systems through tested connectors. Implementation timelines are predictable when connectors already exist for your platform.

Keep template control with the business team

Self-service template tools that enforce EU accessibility requirements by default give client reporting teams direct control over layout and content, without creating compliance risk or IT bottlenecks.

Act now

The EAA has been in force since 28 June 2025. Every reporting cycle producing non-compliant output increases regulatory exposure. Implementation typically runs 4 to 8 weeks from signed agreement to go-live.

Conclusion & Recommendations

The EAA is not a future compliance project. It is a current operational requirement for every financial institution producing digital client communication in the EU. The good news is that compliant client reporting and efficient back-office operations are achieved through the same solution: automated, structured document production with accessibility built into every template and every workflow step.

Financial institutions that act now close their compliance gap, reduce manual back-office effort, and create an audit trail that satisfies multiple regulatory frameworks simultaneously. The first step is a structured assessment of your current reporting process. It can be completed in a a few workshops with key stakeholders and gives you a clear picture of where you stand today.

About ReportingSoft

ReportingSoft SA is a Swiss software and IT consulting company specialising in automated client reporting for financial institutions. The company develops and operates Reporting Maestro, a unified client communication platform used by private banks, asset managers and wealth management firms across Europe. Reporting Maestro automates the full production and distribution cycle for client documents, with WCAG 2.1 AA compliance, multi-channel delivery and full audit trail built into every workflow.

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