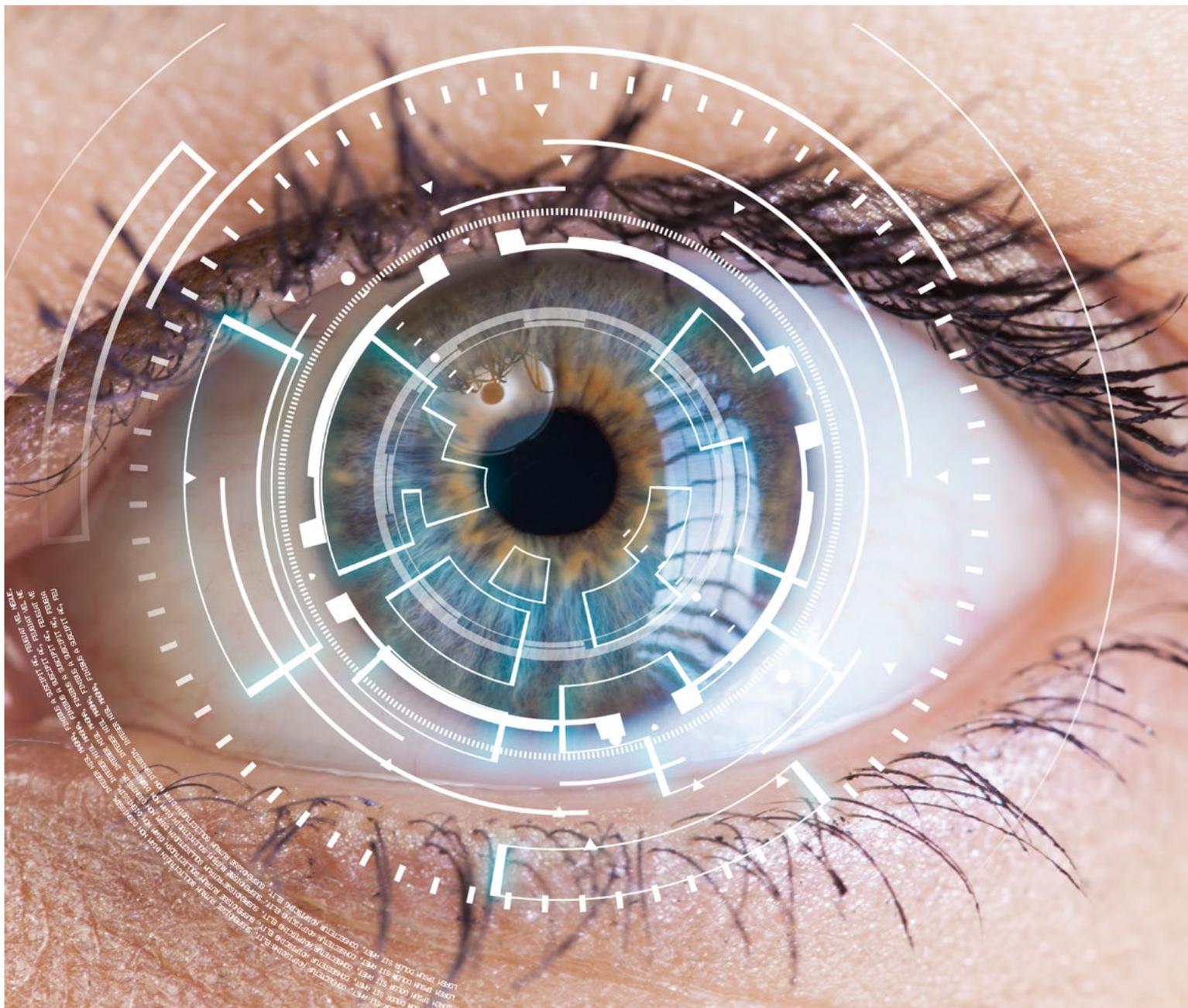
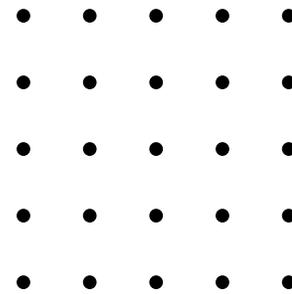


Placewise AODA Compliance

Overview & Technical Update



Solutions that re-invent shopping.

Placewise AODA Compliance Overview and Technical Update

Overview

As part of the Accessibility for Ontarians with Disabilities Act (AODA), on January 1, 2021, all public and private organizations in Ontario will be required to comply with digital standards for web accessibility as established by the World Wide Web Consortium (W3C). This means that your websites and consumer facing digital services must be accessible to users who have disabilities that include, among others, blindness and low vision, deafness and impaired hearing, learning disabilities, cognitive limitations, limited movement, speech disabilities, photosensitivity, and combinations of these.

The standards defined by the W3C are detailed in a technical specification called the Web Content and Accessibility Guidelines 2.0 (WCAG 2.0). The AODA is calling for the WCAG 2.0 AA standards starting January 1, 2021. Currently, the AODA calls for the WCAG 2.0 A standard. January 2021 will require an upgrade to the AA standard.

Disabled individuals frequently use assistive devices and software to read and interpret the Internet. These devices may read aloud, generate braille text, magnify pages, or allow users who cannot use a mouse to navigate with only a keyboard or touchscreen. What's important is that your media be accessible and readable by these devices. This includes images, which require accessible descriptive text to convey the meaning of the image.

Placewise monitors developments in WCAG standards and implements technologies and processes to assist clients in making sure that digital consumer touch-points work with the devices these users employ.

We have also documented numerous overviews of the changing requirements and effects on the shopping center industry, which can be accessed on our website at <https://placewise.com/insights/>. Resources include white papers, webinars and info guides about accessibility. Many of these resources focus on the Americans with Disability Act (ADA). However, compliance with ADA in the United States is widely viewed through the lens of the WCAG 2.0 AA standard as well, so these resources remain relevant to AODA.

To help simplify accessibility compliance, we've compiled the overview below to put more context around the entities, terms, acronyms, and requirements involved with ADA.

Ontario businesses with more than 20 employees **are required to file a compliance report by December 31, 2020. More information can be found here:**

<https://www.ontario.ca/page/completing-your-accessibility-compliance-report>

Accessibility as a Business Standard

While making public spaces, including the digital realm accessible is a legally mandated requirement, we believe it is much more than a compliance issue. Our shopping center clients have worked hard to make their physical environments welcoming and inclusive of all members of society. We think it only natural that this would extend to the digital world. And beyond it being the right thing to do, it makes economic sense to serve this community.

Most of all, accessibility needs to be part of how we operate - in our physical spaces, in our digital presence and in the services we offer. Placewise is committed to helping our clients serve a diverse community, inclusive of all, regardless of ability.

What kinds of Features are Required in the WCAG 2.0 Guidelines?

WCAG 2.0 AA Guidelines provide technical standards on the design and features of websites to enable access to individuals with a disability. The WCAG 2.0 AA Guidelines ask operators of websites to provide:

- Alternative text for non-text content so that it can be changed into other forms people need, such as large print, braille, speech, symbols or simpler language (this is hidden from a non-disabled visitor, but is discoverable by assistive devices)
- Compatibility with most assistive technologies
- Content that is easy-to-see and hear (ex: separating foreground from background)
- All functionality available from a keyboard – provide users with sufficient time to read and use content
- Content without design elements that are known to cause seizures
- Ways to help users navigate, find content, and determine where they are on the website
- Alternatives for time-based media
- Text content readable and understandable to web navigation tools
- Web pages that appear and operate in predictable ways
- ARIA (Accessible Rich Internet Applications): defines a way to make web applications more accessible to people with disabilities. It especially helps with dynamic content and advanced user interface controls.

As summarized above, there are numerous levels of compliance, requirements and guidelines that developers need to adhere to and address when developing websites and managing website content. Placewise is constantly upgrading and enhancing our services and platforms to exceed compliance standards. Below we've outlined accessibility focused upgrades we've implemented into RetailHub and our hosted websites. We've also included the 3rd party applications we use to enhance accessibility and monitor compliance.

WHAT TECHNICAL AND OPERATIONAL UPDATES HAS PLACEWISE IMPLEMENTED IN ITS SERVICES & APPLICATIONS?

RetailHub

In RetailHub, we require all images to include an alternative statement for screen reader visibility.

- Events thumbnail image alt text required
- Events WYSIWYG image alt text required
- Sales images automatically tagged with Sale Title
- Email images alt text required
- iFeature thumbnail images tagged with iFeature Headline

Additionally:

- Set all links to dynamically generate the code (target="_blank") if a link directs off the site. Conversely, the code will be removed from all internal links.

System Code Updates

- Added ARIA-labels for forms, sliders, buttons/links and more complex user interfaces to assist screen readers in defining content.
- Identified role specifications (e.g. repeating content sections such as primary navigation, footer area and navigation and interactive directory maps).
- Added skip-navigation link, providing users the ability to skip directly to relevant content.
- Upgraded 3rd party vendor code libraries for carousels, dropdowns, and icons.
- Improved website template code to include alt attributes for images and logos.
- Implemented tab navigation; coordinating, consolidating and upgrading application for navigation to include enhanced menu functionality.
- Implemented filters to automatically clean up ADA formatting issues generated through WYSIWYG content editors or 3rd party copy-and-paste content (e.g. Microsoft Word)
- Addressed integrated third party application content that trigger errors outside of Placewise control.
 - Google Maps - Replaced the Directions page interactive interface with a static image and alt text
 - Interactive Directory Maps - Added ARIA tags; Included visually-hidden and skip-navigation class IDs
 - Social Feeds - Added ARIA tags; Included visually-hidden and skip-navigation class IDs
- If displaying a video with sound, included additional controls to activate closed captioning.
- Currently integrating accessibility friendly webform captchas.
- Set all links to dynamically generate the code (target="_blank") if a link directs off the site. Conversely, the code will be removed from all internal links.

Accessibility Statement

An Accessibility Statement on your website is normally found next to the Privacy and Terms of Use. It lays out the approach the website owner is taking with regards to accessibility and provides contact information to help with users who wish to provide feedback.

Placewise can provide an Accessibility Statement that should be reviewed and improved by your legal counsel.

Placewise Recommendations

Accessibility Statement

Properties should adopt an accessibility statement.

Accessibility at Your Property

Properties should add content to their websites that outlines physical space AODA accessibility provisions (e.g. wheelchair entrances, elevator access, handicapped parking, etc.). While this content may live on an About Us page, we recommend adding it to the Accessibility Statement page as well.

Ontario Only or Nationwide?

Determine if you want to apply the AODA requirement to all properties regardless of province or limit it just to Ontario. We believe that applying this across all provinces is the most efficient approach from an operational standpoint as well as sending the right message to the community about your company's approach to accessibility.

Userway

Placewise has implemented the Userway accessibility widget on Placewise hosted websites in the United States. Userway (<https://www.userway.org>) is a non-profit that developed their accessibility widget to enhance website accessibility for the visually impaired, elderly, blind, mobility impaired, and those with situational disabilities. The software allows sites to improve compliance with the WCAG 2.0 or 2.1 AA guidelines. It addresses:

- Contrast
- Text
- Links
- Fonts
- Animations
- Keyboard Navigation
- Page Reader
- Page Structure

An example implementation can be seen here (see accessibility widget in lower right corner of home page): <https://jacklondonsquare.com/>

WAVE Accessibility Tool

Placewise uses many accessibility tools to review website compliance, but our primary tool is the WAVE Accessibility Tool. The goal with WAVE is to support true accessibility and they have added as many tests for true accessibility as they can think of, including many checks for compliance issues found in the WCAG 2.1 guidelines.

WAVE helps its users better evaluate the things that automatic tools cannot check. For example, WAVE cannot tell you if your alternative text is equivalent and appropriate, so it instead reveals the alternative text so it can be evaluated by the WAVE user. Using WAVE can help determine if a site is both accessible AND compliant.

Manual Testing

If you wish to pursue manual testing beyond the automated testing, Placewise can assist you with locating a certified tester that will test using commonly used devices and assistive readers.

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About Placewise

Placewise is the global leader in shopping center property tech, serving nearly 1,100 shopping centres, across 4 continents and 20 countries. We offer the only solution purpose-built for shopping centers to create long lasting digital relationships with shoppers - unlocking the power to monetize retail properties beyond the square foot.

For more information visit www.placewise.com.