

## **Accessibility Statement**

### **1. Introduction**

Croatian Mint Ltd. is dedicated to ensuring the digital accessibility of its websites for all users, including persons with disabilities. We continuously strive to increase inclusiveness and enable equal, independent access to our online content. We believe that everyone has the right to a dignified and equal user experience, reflected in our social responsibility and commitment to inclusion.

In practice, this means that during the design, development, and maintenance of websites, we apply principles of universal design (design for all) and follow internationally recognized best practices for web accessibility. We regularly assess whether we meet accessibility standards and raise employee awareness of the importance of removing digital barriers. In this way, Croatian Mint Ltd. aims to contribute to a more accessible internet and ensure that no user is denied access to our content due to disability or specific needs.

### **2. Legal Basis**

This accessibility statement has been created in consideration of the following regulations and standards, which define the obligations and guidelines for ensuring digital accessibility:

**Directive (EU) 2016/2102** – the European directive on the accessibility of websites and mobile applications of public sector bodies, prescribing requirements for public web and mobile application accessibility. The Republic of Croatia transposed its provisions into national legislation.

**The Law on the Accessibility of Web Pages and Software Solutions for Mobile Devices** (NN 17/2019) - a national law that came into force on September 23, 2019, which implements Directive (EU) 2016/2102. This Law mandates public sector bodies to align their websites with the prescribed accessibility standards.

**European Accessibility Act – Directive (EU) 2019/882** – A European Union directive that expands accessibility requirements to certain products and services in the private sector (including online shops and electronic services available to consumers). According to Article 15 of this Directive, products and services that are in compliance with harmonized standards (e.g., European standard EN 301 549) are also presumed to comply with the accessibility requirements of the Directive. The obligations of this Directive are relevant to the Croatian Mint Ltd., effective from June 2025.

**WCAG 2.1 Level AA guidelines and the EN 301 549 standard** – Web Content Accessibility Guidelines (Guidelines for Web Content Accessibility) version 2.1, levels A and AA, represent internationally recognized standards for creating accessible web content. The European standard EN 301 549 'Accessibility requirements for ICT products and services' encompasses the WCAG 2.1 Level AA criteria almost in its entirety. Consequently, compliance with these guidelines ensures 'presumption of conformity' with the aforementioned legal accessibility requirements. The Croatian Mint strives to implement all relevant success criteria according to WCAG 2.1 (Level AA), in accordance with the EN 301 549 standard.

### **3. Scope of the statement**

This accessibility statement applies to the official websites of the Croatian Mint Ltd.:

**www.croatianmint.hr** – official site in Croatian (Croatian Mint)

**www.croatianmint.hr/en/**— official site in English (Croatian Mint)

The statement covers all content and formats on the specified websites, including textual information, images, multimedia content, navigation elements, and documents in digital format (e.g., PDF files) published by the Croatian Mint Ltd. The aim is to cover all publicly available content on these pages.

**Exceptions to the scope:** This statement does not apply to content outside the specified domains or to those over which the Croatian Mint Ltd. has no control. For example, embedded components or third-party content (e.g., maps, external websites opened via links, content published or maintained by an external service provider) may be excluded. Also, content that was archived before the relevant regulations came into effect may not fully comply with accessibility standards. Croatian Mint Ltd. continuously works to make such content accessible wherever possible in future revisions.

### **4. Current accessibility status**

**Level of compliance:** The websites [www.croatianmint.hr](http://www.croatianmint.hr) and [www.croatianmint.com](http://www.croatianmint.com) are currently partially compliant with the requirements of WCAG 2.1 level AA and applicable legal regulations. The compliance is partial due to certain non-compliances and exceptions listed below. We have identified accessibility issues through a combination of automated tools (such as Google Lighthouse, AXE, WAVE) and manual checks, and we are transparently presenting these findings. The contents and elements that are not fully accessible are as follows:

**Lack of alternative text for images:** Some image content on websites does not have an appropriate text description ('alt' text). As a result, users who utilize screen readers may have difficulty understanding the meaning of these images. For instance, decorative photos or icons are not always equipped with an empty or descriptive alt attribute, and some informative images lack a description that conveys their content. (WCAG criterion 1.1.1 – Non-text content – partially unmet).

**Insufficient color contrast:** It has been determined that some text elements and graphics do not have sufficient contrast between the text color and the background. This primarily relates to smaller text in gray tones on a white background and similar, which makes it difficult to read for individuals with impaired vision or lower contrast perception. This inconsistency means that the requirements for minimum contrast are not fully met (WCAG criterion 1.4.3 – Contrast (minimum) – **not fulfilled** for the affected elements).

**Imprecise or missing link descriptions:** On certain parts of the pages, there are hyperlinks (links) with insufficiently descriptive text. This includes generic labels such as 'Click here' or situations where the link is represented only by an icon without text description. Such links are not self-explanatory from the context and do not provide clear information about the purpose of the link to users who use screen readers. According to the guidelines, the text of each link should clearly indicate its purpose or destination. (WCAG criterion 2.4.4 – Link Purpose (in context) – partially not fulfilled).

**Keyboard navigation issues:** Although most content can be navigated using the keyboard, certain shortcomings have been noticed that make complete navigation without a mouse difficult. Some interactive elements (such as dropdown menus or video controls if they exist) are not properly focused or accessible via the keyboard. Additionally, the visual representation of focus (the outline or emphasis on the element currently selected by the keyboard) is not always clearly visible, which can confuse users who rely solely on the keyboard for navigation. (WCAG criterion 2.1.1 – Keyboard – **partially unmet**; WCAG criterion 2.4.7 – Visible focus – **unmet**).

**Interactive components in the purchasing process:** In the online store (web shop) of the Croatian Mint, a number of minor issues have been observed that may affect the accessibility of the purchasing process for some users. This includes: a lack of clearly associated labels and instructions next to certain form fields (e.g., for entering the address or payment), which makes it difficult for screen reader users to understand what to input in each field; inadequate display of error or success messages (e.g., confirmation of adding an item to the cart) that are not programmatically announced or sufficiently visible to all users. Some dynamic changes in content may not be accompanied by appropriate ARIA labels or notifications, leaving users who cannot see the screen without that information. (These issues are related to several WCAG criteria, such as 3.3.2 -

Labels or Instructions, 4.1.2 - Name, Role, Value, and 4.1.3 - Status Messages - **partially unfulfilled**).

**Note:** The deficiencies mentioned above were identified during the accessibility evaluation and are planned to be addressed according to the schedule described in the following text (see Chapter 5. Improvement Plan). Aside from the above, no other inaccessible content has been noticed. In the event that certain content or functionality is not mentioned here, and a user encounters an accessibility issue, we encourage users to inform us so that we can take appropriate steps (see Chapter 6. **User Support and Reporting Inaccessible Content**).

## **5. Accessibility Improvement Plan**

The Croatian Mint Ltd. has developed a detailed plan to improve the accessibility of its websites. The plan includes short-term, medium-term, and long-term measures, focusing on staff training, technical improvements in development, and involving end-users in the process of continuous enhancement. Below are the planned activities by timeframes:

### **Short-term measures (in the next 6 months)**

**Removing simple identified deficiencies:** As a priority, we will add missing alt descriptions to images, correct color schemes to achieve sufficiently high contrast between text and background, and update unclear link texts (replacing generic phrases with more descriptive text). We will also implement a more visible focus indicator for keyboard navigation (e.g., highlighted borders around focused elements) to immediately enhance the experience of users navigating without a mouse.

**Introducing basic elements of accessibility into the code:** The programming team will short-term integrate key fixes into the existing interface – for example, adding accessibility attributes (ARIA labels) where necessary, ensuring that all important elements (form controls, navigation slider buttons, etc.) have properly defined names, roles, and values in the HTML structure. This will address issues such as unlabeled form fields and unannounced dynamic messages.

**Quick check and testing:** After implementing the mentioned changes, we will conduct an automated accessibility check using the Google Lighthouse tool and similar tools to confirm the improvement in the accessibility score. At the same time, we will involve several test users (internally) to try keyboard navigation and screen reader access through key parts (e.g., the ordering process) and promptly fix any remaining issues they detect.

**Accessibility statement publication:** We have created and publicly published this detailed accessibility statement in order to fulfill the legal obligation to transparently inform users. In the short term, we will ensure that the link to the statement is

prominently displayed on our websites (in the footer of the page), as required by the Law. We will regularly update the content of the statement in accordance with the progress in addressing deficiencies.

**Internal education and awareness:** In the first few months, we will conduct targeted training for our web editors, designers, and developers on the basic principles of web accessibility. This includes familiarization with the WCAG guidelines, a demonstration of using screen readers and other assistive technologies, as well as showcasing identified issues on our website as case studies. The education will help the team be aware of accessibility in their daily work.

### **Medium-term measures (6 to 12 months)**

**Comprehensive review of the user interface:** Over the next year, we plan to conduct a thorough analysis and refinement of specific components of websites that are more complex for users with disabilities. Special focus will be on redesigning or refining the online shopping system: we will review and, if necessary, redesign purchase forms to ensure that all fields have visible and programmatically associated labels, that instructions within the form are clearly highlighted, and that messages about success/errors are automatically announced to users (e.g., using **ARIA-live** regions for dynamic notifications).

**Accessibility of documents and multimedia:** In the medium term, we commit to improving or replacing existing documents and files that are not accessible. PDF files that are crucial for users will be regenerated in an accessible format (with the addition of structure, tags, and textual descriptions of images within the PDF). If a specific PDF or other document cannot currently be made accessible, we will provide an alternative – for example, an HTML page with the same content or an option for the user to request information in an accessible format. We will also ensure that any video or audio content (if available) is published with subtitles, text transcripts, or audio descriptions in accordance with WCAG requirements.

**Integrating accessibility into the development process:** We will implement the practice of checking accessibility with every significant change or addition of new content on the web. This means that the development team will integrate automated accessibility testing tools into our development cycle (for example, during the testing phase, AXE or a similar framework will be used to identify deficiencies). Instructions for editors will be supplemented with a checklist for accessibility so that they can verify alt descriptions, heading structure, link descriptions, and similar before publishing content.

**External evaluation:** We plan to engage independent accessibility experts or certified companies to conduct audits of our sites in the medium term. An independent review will provide us with an objective assessment of progress and highlight any potential hidden issues. We will include the recommendations obtained in our further improvement plan.

**Compliance with new regulations:** Our goal is to achieve full compliance with the WCAG 2.1 AA criteria, and thus with legal obligations, as soon as possible, in order to align with the implementation of the provisions of the European Accessibility Act (Directive (EU) 2019/882) for existing services. This also includes timely alignment with any new versions of standards (e.g. WCAG 2.2) if they are officially adopted within the harmonized standard. In this regard, we will monitor the development of standards and upgrade our website accordingly to meet these requirements.

**Continuation of education:** In the mid-term, we will continue to educate our staff about accessibility at an advanced level. Workshops with practical exercises are planned (e.g., a simulation of using the web without sight or hearing), as well as sending key people to specialized courses or conferences on digital accessibility. With this, we aim to ensure that improvements are sustainable and that our organization builds an internal culture that values accessibility.

#### **Long-term measures (12 months and beyond)**

**Continuous monitoring and maintenance of accessibility:** We will treat accessibility as a continuous process, not a one-time project. We will implement periodic audits – at least once a year, a comprehensive review of the pages will be conducted according to WCAG criteria, either by internal resources or by hiring external experts. We also plan to establish a monitoring system that will automatically alert us if new issues arise on the pages (e.g. if an editor accidentally publishes an image without alt text or if an external component becomes inaccessible after an update).

**Accessibility statement update:** This statement will be regularly revised to reflect the actual state. Any significant change in the level of compliance (e.g., achieving full compliance or introducing new functionalities) will be transparently entered into the statement. This informs users of what is new and how we are progressing.

**Planning according to WCAG 2.2 and further standards:** As standards evolve, we will strive to achieve and maintain compliance with future versions of WCAG guidelines (e.g., WCAG 2.2) to the extent that they are relevant to our pages. We will monitor the work of the W3C community and integrate new guidelines through regular updates.

**User involvement and feedback:** We will rely on real users to assess the effectiveness of our efforts. In the long term, we will establish a mechanism for collecting feedback from website visitors (e.g. through a short accessibility questionnaire or via official

communication channels). We particularly want to encourage users with disabilities to share their experiences and suggestions with us. We are open to feedback and suggestions from users to improve the accessibility of our website and will actively collaborate with users to understand their needs. For instance, we will consider organizing periodic usability testing with included users of various abilities in order to firsthand identify remaining barriers and eliminate them.

**The culture of accessibility within the organization:** We will strive to maintain and improve an internal culture that values accessibility. This means that accountability for accessibility will be clearly assigned (an accessibility coordinator or responsible person will be appointed), management will be regularly informed about progress, and achievements in the field of accessibility will be recognized and appreciated. We continuously educate our staff on the rules and guidelines of accessibility to raise awareness of the importance of accessible design and development, and we encourage staff to actively participate in ensuring accessibility and to report any shortcomings or suggestions for improvement.

By implementing the stated plan, the Croatian Mint Ltd. strives to achieve full compliance of its websites with accessibility standards, as well as to maintain a high level of accessibility in the long term. We are aware that the improvement process is iterative and requires ongoing commitment, therefore we will continue to invest time and resources in this area even after the initial measures.

Accessibility culture within the organization: We will strive to maintain and improve an internal culture that values accessibility. This means that responsibility for accessibility will be clearly assigned (an accessibility coordinator or responsible person will be appointed), management will be regularly informed of progress, and achievements in accessibility will be recognized and valued. We continuously educate our staff on accessibility rules and guidelines so they are aware of the importance of accessible design and development, and we encourage staff to actively participate in ensuring accessibility and to report any shortcomings or suggestions for improvement.

## **6. User support and reporting inaccessible content.**

Croatian Mint Ltd. continuously works on improving the accessibility of its websites and we wish to collaborate with users in this effort. If you notice accessibility difficulties while browsing our pages or need information in another format (e.g., a specific document in an accessible form), please contact us. All comments, questions, or requests related to accessibility can be submitted via:

- **Email:** [info@croatianmint.hr](mailto:info@croatianmint.hr)

- **Mail** (in writing): Croatian Mint Ltd., Svetonedeljska cesta 2, Kerestinec, 10431 Sveta Nedelja, Croatia.

Through the mentioned communication channel, we will receive your feedback and respond to it within the legal timeframe. We will endeavor to respond to you or provide the requested content in an accessible form.

**Note:** The official email address [info@croatianmint.hr](mailto:info@croatianmint.hr) is the central point for accessibility inquiries. Please include in your request: (1) the URL (address) of the page or content to which the complaint refers, (2) a description of the problem you encountered, and (3) your contact information (e.g., email or phone number) so we can provide you with feedback. We are open to all constructive suggestions – every comment or suggestion you make will help us improve our websites for all users.

## **7. Procedure for Monitoring Compliance with Regulations**

If you are not satisfied with our response to your report of inaccessible content or believe that we have not adequately responded to your request for an accessible format of content, you have the right to initiate a monitoring procedure for compliance with the regulations. In the Republic of Croatia, the supervision of the implementation of the Accessibility Act and user complaints is carried out by the **Information Commissioner** as the competent authority for monitoring the compliance of public sector bodies' websites with accessibility requirements. Although Croatian Mint Ltd., is not a traditional public sector body, we voluntarily accept the same monitoring mechanism in the spirit of transparency and accountability to users.

If you are not satisfied with our response or resolution, users can contact the Information Commissioner of the Republic of Croatia:

**Phone:** +385 1 2099 100

**Email:** [ppi@pristupinfo.hr](mailto:ppi@pristupinfo.hr)

**Website:** [www.pristupinfo.hr](http://www.pristupinfo.hr)

The Commissioner for Information will independently investigate your case and may take actions in accordance with their powers. More information about the complaint procedure itself can be found on the official website of the Commissioner for Information. The Croatian Mint will, of course, fully cooperate with the competent authorities in resolving any complaints and will take all necessary measures to address any identified irregularities.



## **8. Date of statement publication and revision**

This accessibility statement was prepared and published on **May 15, 2025**. The statement was created using a combined evaluation method – including a self-assessment using automated tools and a manual check of key accessibility aspects – according to the Accessibility Statement Template in accordance with Directive (EU) 2016/2102 and relevant implementing acts of the European Commission.

The statement was last reviewed and updated on **May 15, 2025**. A regular review of the statement will be conducted at least once a year and more frequently if necessary, to ensure that the information in it is always accurate and up-to-date.

## **9. Conclusion**

Croatian Mint Ltd. remains permanently dedicated to improving the accessibility of its websites. We believe that ensuring digital accessibility is a continuous process that goes hand in hand with technological advancement and changes in our services. Therefore, we will continue to make the necessary efforts to remove remaining barriers and keep pace with best practices and standards. Our commitment to accessibility is part of our core values – including equality, inclusion, and respect for diversity. This statement confirms our commitment to enabling everyone, including people with disabilities, to have uninterrupted access to our services and information. We will continuously work to ensure that our websites are an example of best practice and that every user, regardless of their abilities, can confidently use the content of the Croatian Mint. With our permanent commitment to improving accessibility, we aim to contribute to the overall goal of creating an inclusive digital environment for all citizens.

**Croatian Mint Ltd.** would like to thank you for your interest and understanding. If you have any questions about this statement or our accessibility program, please feel free to contact us using the provided contacts. Your trust is important to us, and we will strive to justify it by continuously improving the user experience for everyone.