



# Declaration of Conformity

EAA Services

## About this document

This document serves as NeoDay's formal statement of compliance, providing transparency about the current accessibility status of our products and services and the steps we have taken to make them accessible to everyone, including people with disabilities.

At NeoDay, we are committed to ensuring equal access to our digital services. In line with the European Accessibility Act (EAA), this Declaration of Conformity outlines the extent to which our services comply with the accessibility requirements defined by the EAA.

Through this declaration, we affirm our dedication to creating inclusive digital experiences across the European Union.

# Index of content

<b>Index of content</b>	<b>03</b>
<b>Declaration of Conformity of the European Accessibility ACT (EAA)</b>	<b>04</b>
<ul style="list-style-type: none"><li>• Service provider details</li><li>• Object of the Declaration of Conformity</li><li>• Date of issuance of the declaration / Last update</li></ul>	
<b>Introduction</b>	<b>05</b>
<b>Description of the Service</b>	<b>06</b>
<ul style="list-style-type: none"><li>• NeoDay - General Purpose, Functionality and Vision on Accessibility</li><li>• Service Classification</li><li>• Product and Service Specification</li><li>• Applied Standards and Regulations</li><li>• Accessibility Governance and Conformity Assessment</li><li>• Test Results and Evaluation</li><li>• Statement of Responsibility and Declaration of Conformity</li><li>• Sources</li></ul>	

# Declaration of Conformity of the European Accessibility Act (EAA)

## Service provider details

- NeoDay BV
- Magazijnstraat 13
- 5038 BR Tilburg
- The Netherlands
- Chamber of Commerce 92286852

## Object of the Declaration of Conformity

This declaration applies to the NeoDay platform, a Software-as-a-Service (SaaS) product enabling organizations to build, personalize, and manage their multi-layered loyalty strategy.

## Date of issuance of the declaration / Last update

28 jun 2025 / 28 jun 2025



## Introduction

An important part of NeoDay's product is the delivery of a full-fledged customer facing interfaces that we refer to as clients. These clients provide an interface on desktop (web), iOS and Android devices through which end-user can interact with the NeoDay functionalities. The industries to which NeoDay delivers her product is varied in nature, to an extent where we are required to formulate accessibility guidelines to make sure that fundamental requirements are covered, this also in relation to the various countries we deliver, most of which are situated in the European Union and/or European continent where varying degrees of accessibility guidelines and requirements are in effect.

The European Accessibility Act (EU 2019/882) is a directive of the European Union aimed at improving the accessibility of products and services for people with disabilities. The directive was adopted in 2019 and aims to ensure that people with disabilities can more easily participate in society and the workforce across all EU countries, without facing barriers. This is achieved by reducing or removing obstacles in various areas, such as public transport, digital services, and both public and private sector services.

This declaration confirms that the product or service listed below (see section 4) complies with the rules and regulations of the EAA. It provides assurance to customers, the market, and regulators that key requirements are being met.

## Description of the Service

### **NeoDay - General Purpose, Functionality and Vision on Accessibility**

NeoDay is a SaaS platform for creating and managing gamified loyalty campaigns and personalized customer engagement experiences. Clients use the backoffice to set up challenges, stamp cards, quizzes, lotteries, and more, targeted, triggered, and styled for web and mobile. Campaigns can include reward logic, tiering, segmentation, and visual personalization. The end user engages through branded interfaces, earning points, unlocking rewards, and moving through journeys that align with business goals.

The platform supports loyalty currencies, digital coupons, and physical product fulfillment. A built-in reward shop lets users redeem points, real money, or a combination of both. Visuals, navigation, content, and user flows are all configurable. Clients can set up localized campaigns, adapt the UI for different audiences, and tweak design without writing code. Real-time analytics and predictive insights (like churn risk) help teams iterate fast. GDPR support, including RTBF and DSAR are fully integrated into the product.

NeoDay is designed to be accessible and adaptable. Clients have full control over the platform's branding and content presentation, including navigation, page layouts, fonts, and color schemes, all configurable through an integrated design system. NeoDay is designed to be accessed via web browsers, native iOS and Android applications, or through integration with client applications using a mobile SDK. Across all delivery methods, the platform maintains a consistent and adaptive interface model to support users on different devices and in different contexts, including those relying on assistive tools. As a digital service covered by the European Accessibility Act, NeoDay is committed to continuous accessibility improvements and to enabling equal access to campaign experiences for all users, regardless of ability.

## Service Classification

The NeoDay platform falls under the category of digital services, specifically online services providing access to e-commerce, customer engagement tools, and content management systems, as described in Annex I, Section VIII (E-Commerce Systems) of the EAA, which states:

### SECTION VIII - E-COMMERCE

#### A. services:

- 1. The provision of services in order to maximise their foreseeable use by persons with functional limitations, including persons with disabilities, shall be achieved by:
- (a) providing information about the functioning of the service and about its accessibility characteristics and facilities as follows:
  - (i) the information content shall be available in text EN 16 EN formats that can be used to generate alternative assistive formats to be presented in different ways by the users and via more than one sensory channel,
  - (ii) alternatives to non-text content shall be provided;
  - (iii) the electronic information, including the related online applications needed in the provision of the service shall be provided in accordance with point (b).
- (b) making websites accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;

And, by similarity, Section IV - Audiovisual media services and the related consumer equipment with advance computing capability as NeoDay includes web content, interfaces and user flows that must meet similar digital accessibility standards.

## SECTION IV - AUDIOVISUAL MEDIA SERVICES AND THE RELATED CONSUMER EQUIPMENT WITH ADVANCE COMPUTING CAPABILITY

### A. services:

- 1. The provision of services in order to maximise their foreseeable use by persons with functional limitations, including persons with disabilities, shall be achieved by:
  - (a) ensuring the accessibility of the products they use in the provision of the service, in accordance with the rules laid down in point B "Related consumer equipment with advance computing capability"
  - (b) providing information about the functioning of the service and about its accessibility characteristics and facilities as follows:
    - (i) the information content shall be available in text formats that can be used to generate alternative assistive formats to be presented in different EN 7 EN ways by the users and via more than one sensory channel;
    - (ii) alternatives to non-text content shall be provided;
    - (iii) the electronic information, including the related online applications needed in the provision of the service shall be provided in accordance with point (c).
  - (c) making websites accessible in a consistent and adequate way for users' perception, operation and understanding, including the adaptability of content presentation and interaction, when necessary providing an accessible electronic alternative; and in a way which facilitates interoperability with a variety of user agents and assistive technologies available at Union and international level;
  - (d) providing accessible information to facilitate complementarities with assistive services;
  - (e) including functions, practices, policies and procedures and alterations in the operation of the service targeted to address the needs of persons with functional limitations.

### B. Related consumer equipment with advance computing capability:

- 1. Design and production: The design and production of products in order to maximise their foreseeable use by persons with functional limitations, including persons with disabilities and those with age related impairments, shall be achieved by making accessible the following:

- (a) the information on the use of the product provided in the product itself (labelling, instructions, warning), which:
  - (i) must be available by more than one sensory channel;
  - (ii) must be understandable;
  - (iii) must be perceivable;
  - (iv) shall have an adequate size of fonts in foreseeable use conditions;
- (b) the packaging of the product including the information provided in it (opening, closing, use, disposal);
- (c) the product instructions for use, installation and maintenance, storage and disposal of the product which shall comply with the following:
  - (i) content of instruction shall be available in text formats that can be used for generating alternative assistive formats to be presented in EN 8 EN different ways and via more than one sensory channel, and
  - (ii) instructions shall provide alternatives to non-text content;
- (d) the user interface of the product (handling, controls and feedback, input and output) in accordance with point 2;
- (e) the functionality of the product by providing functions aimed to address the needs of persons with functional limitations, in accordance with point 2;
- (f) the interfacing of the product with assistive devices.
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- 2. User interface and functionality design In order to make accessible the design of the products and their user interface as referred to in points (d) and (e) of point 1 they must be designed, where applicable, as follows:
  - (a) provide for communication and orientation via more than one sensory channel;
  - (b) provide for alternatives to speech for communication and orientation;
  - (c) provide for flexible magnification and contrast;
  - (d) provide for an alternative colour to convey information;
  - (e) provide for flexible ways to separate and control foreground from background including for reducing background noise and improve clarity;
  - (f) provide for user control of volume;
  - (g) provide for sequential control and alternatives to fine motor control;
  - (h) provide for modes of operation with limited reach and strength;
  - (i) provide avoidance of triggering photosensitive seizures.

## Product and Service Specification

Within the current NeoDay product, smaller sized (specialized) products are defined that conform guidelines in their own particular way, they are:

- *NeoDay Backoffice (web-based environment)*
- *NeoDay Customer-facing Web Environment*
- *NeoDay Customer-facing Native iOS/Android Frameworks*

### NeoDay Backoffice (web-based environment)

The NeoDay backoffice is the web-based environment where clients set up and manage everything the end user sees and interacts with. It's used to configure campaigns, define segmentation, manage user tiers, set up rewards, handle translations, and control the look and feel of the platform across iOS, Android, and web.

All campaign logic such as triggers, actions, win moments, gamification layers, is created and maintained in the backoffice. Clients also use it to upload media, build pages, manage coupons, and monitor stock for physical rewards. Analytics, user activity, and GDPR-related tasks are handled here as well.

In short, the backoffice is the control panel for the entire NeoDay setup. It's where clients run their loyalty program, structure customer journeys, and control how everything works across all connected channels.

### NeoDay Customer-facing Web Environment

The customer-facing web environment is where end users interact with the campaigns set up in the backoffice. This includes earning and spending points, completing challenges, claiming rewards, and navigating their personal profile, tiers, and history. The content, layout, and navigation are all controlled by the client from the backoffice.

It runs in the browser and adapts to different screen sizes. The environment supports features like dynamic content, real-time campaign updates, personalized views based on segmentation, and branded styling. Users can log in, view available actions, check progress, and engage with everything the loyalty program offers—without needing to install an app.

### NeoDay Customer-facing iOS/Android frameworks

The iOS and Android environments are native app frameworks that give end users access to the same functionality as the web version, but optimized for mobile. They're built using NeoDay's SDK, which clients can integrate into their own apps or run as a standalone. The app interface is fully configurable from the NeoDay backoffice, campaigns, navigation, styling, content, and logic all sync with what's defined there.

End users can log in, view their points, complete tasks, claim rewards, and interact with features like stamp cards, gamification components, or personal dashboards. The mobile frameworks are built to feel like part of the brand's ecosystem through customization flexibility via the NeoDay backoffice.

## Applied Standards and Regulations

### NeoDay Backoffice (web-based environment)

- For the NeoDay backoffice, we apply the WCAG 2.2 AA (Web Content Accessibility Guidelines) as the primary standard. These guidelines govern structure, navigation, contrast, keyboard access, screen reader support, and content clarity. We use them to define accessibility requirements for all interactive elements and workflows in the backoffice. Compliance with WCAG 2.2 is the baseline for EAA alignment in our web-based environment governance.
- In addition to the WCAG 2.2 AA (Web Content Accessibility Guidelines), to ensure EAA compliance, we reference related chapters as outlined in the EN 301 549 - V3.2.1 document – Section 9 (Web) – covering the Accessibility Requirements for ICT Products and Services, which is considered the Harmonised European Standard (EN) produced by ETSI.

### NeoDay Customer-facing Web Environment

- For the NeoDay Web Environment, we apply the WCAG 2.2 AA (Web Content Accessibility Guidelines) as the primary standard. These guidelines govern structure, navigation, contrast, keyboard access, screen reader support, and content clarity. We use them to define accessibility requirements for all interactive elements and workflows in the backoffice. Compliance with WCAG 2.2 is the baseline for EAA alignment in our web-based

- In addition to the WCAG 2.2 AA (Web Content Accessibility Guidelines), to ensure EAA compliance, we reference related chapters as outlined in the EN 301 549 - V3.2.1 document – Chapter 9 (Web) & Chapter 11 (Software) – covering the Accessibility Requirements for ICT Products and Services, which is considered the Harmonised European Standard (EN) produced by ETSI.

### NeoDay Customer-facing iOS/Android frameworks

- iOS: We follow Apple's Human Interface Guidelines (HIG) with a focus on the Accessibility section, which covers VoiceOver support, dynamic type, color contrast, and touch target sizing. These ensure compliance with iOS accessibility best practices and alignment with EAA expectations.
- Android: We follow Google's Material Design Accessibility Guidelines, which include support for TalkBack, scalable text, accessible touch interactions, and consistent navigation. These guidelines provide the framework for accessibility across Android devices.

- In addition to the Apple's Human Interface Guidelines (HIG) and Google's Material Design Accessibility Guidelines, to ensure EAA compliance, we reference related chapters as outlined in the EN 301 549 - V3.2.1 document – Chapter 11 (Software) – covering the Accessibility Requirements for ICT Products and Services, which is considered the Harmonised European Standard (EN) produced by ETSI.

## **Accessibility Governance and Conformity Assessment**

Accessibility is an integral part of NeoDay's product development and operational processes as they are described in the Process/ISO Processes under Section 5. The Product Manager holds final responsibility for governance and implementation of EAA compliance across the product. The Product Manager coordinates with the UI/UX (Interaction Design) team to ensure correct application of accessibility guidelines, and works with Development, Engineering, Tech Lead, and Q&A to validate outcomes.

Compliance with WCAG 2.2 AA and EN 301 549 is embedded in the product workflow and applied across design, development, testing, and release cycles. Engineering and Tech Lead roles are responsible for implementing accessibility best practices in the codebase and ensuring accessibility is addressed in technical decisions and code reviews.

Q&A plays a key role in validating accessibility against these standards, using both automated tooling and manual testing. Accessibility is assessed across the backoffice, customer-facing web interface, and mobile applications. Where applicable, usability testing with an inclusive user group is conducted to further validate accessibility in real-world scenarios.

Internal process documentation defines how accessibility is applied in day-to-day work. Test protocols, Q&A reports, and release checklists include accessibility validation. The Product Manager monitors ongoing compliance and ensures improvements are included in the product roadmap as needed. Relevant team members are trained on current accessibility standards. Supplier agreements contain clauses requiring external partners to meet the necessary accessibility requirements. Internal reviews and audits, along with periodic checks by independent experts when needed, help ensure continuous improvement and sustainable application of accessibility across the platform.



## Roles, Responsibilities and Authority

### Product Manager

- Defines and maintains EAA compliance requirements
- Coordinates implementation across all product teams
- Monitors ongoing compliance and plans improvements

### Interaction Design (UI/UX)

- Designs user interfaces according to WCAG 2.2 AA and platform guidelines
- Documents accessibility patterns
- Reviews implementation with development and Q&A

### Developers

- Implements accessibility requirements in code
- Applies best practices for semantic structure and interaction
- Resolves accessibility issues in collaboration with Q&A and UI/UX

### Tech Lead

- Oversees technical decisions impacting accessibility
- Ensures accessibility is included in code reviews
- Maintains accessibility standards in shared libraries and frameworks

### Quality Assurance (QA)

- Validates accessibility with automated tools and manual testing
- Documents test results and reports issues
- Includes accessibility checks in release processes

## Test Results and Evaluation

NeoDay monitors accessibility systematically and takes targeted actions to address any issues. The detailed results of accessibility testing are recorded internally and used to guide ongoing improvements. Testing is performed on all parts of the NeoDay product: the backoffice, customer-facing web interface, and mobile applications. The process combines automated testing (WCAG 2.2 AA), manual testing, and usability testing with inclusive user groups where relevant. Tests are carried out during development, at release milestones, and as part of regular internal reviews.

Findings from recent testing have identified areas that meet EAA and EN 301 549 requirements, and some remaining limitations which are known and prioritised for resolution. These limitations and corresponding actions are tracked in the product backlog. In cases where resolving certain issues would result in a disproportionate burden or a fundamental alteration to the service (Article 14), or where specific content falls outside the scope of the EAA (Article 2, paragraph 4), these exceptions will be documented internally and reviewed periodically. NeoDay continues to take adequate steps to ensure accessibility is maintained and improved over time.

## Statement of Responsibility and Declaration of Conformity

NeoDay B.V. declares that the services described in this document meet the applicable accessibility requirements of the European Accessibility Act (Directive (EU) 2019/882), in accordance with EN 301 549 and WCAG 2.2 AA guidelines.

This declaration is issued under the responsibility of:



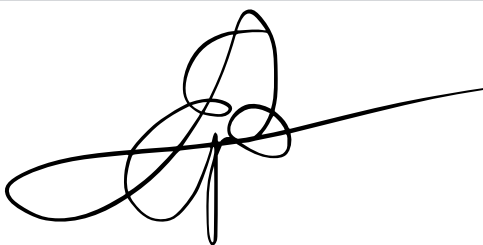
**Erik Paulus**

Product Manager, NeoDay B.V.

Where applicable, this declaration takes into account the accessibility status of services provided by third parties, and any supporting declarations required to meet the overall accessibility objectives of NeoDay's product offering.

This declaration is signed to confirm that accessibility is actively managed within the organisation and that compliance with accessibility standards remains an integral part of product development and service delivery.

***Signed on behalf of NeoDay B.V.***

A stylized, handwritten signature in black ink, enclosed within a light gray rounded rectangular border.

## Sources

1. W3C. (2023). Web Content Accessibility Guidelines (WCAG) 2.2 Quick Reference. W3C Web Accessibility Initiative (WAI). Retrieved from [How to Meet WCAG \(Quickref Reference\)](#)
2. ETSI. (2021). EN 301 549 V3.2.1 (2021-03) - Accessibility requirements for ICT products and services. European Telecommunications Standards Institute. Retrieved from [https://www.etsi.org/deliver/etsi\\_en/301500\\_301599/301549/03.02.01\\_60/en\\_301549v030201p.pdf](https://www.etsi.org/deliver/etsi_en/301500_301599/301549/03.02.01_60/en_301549v030201p.pdf)
3. European Commission. (2019). Directive (EU) 2019/882 of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services (European Accessibility Act). Retrieved from <https://ec.europa.eu/social/BlobServlet?docId=14826&langId=en>