

Accessibility Guidelines

Stern Advisory Group has adopted the Worldwide Web Consortium Web Content Accessibility Guidelines version 2.0, Level AA Conformance (WCAG 2.0 Level AA) as its goal for accessible Stern Websites. The guidelines and success criteria of WCAG 2.0 Level AA are organized around the following four principles which lay the foundation for users with disabilities to access and use web content. For a Stern Website to be accessible under these principles, its content must be:

1. **Perceivable** – Information and user interface components must be presentable to users in ways they can perceive.
2. **Operable** – User interface components and navigation must be operable.
3. **Understandable** – Information and the operation of user interface must be understandable.
4. **Robust** – Content must be robust enough that it can be interpreted reliably by a wide variety of user agents, including assistive technologies.

Implementation Guidelines

1. All personnel responsible for existing Stern Websites must use good faith efforts, subject to the requirements and exceptions of the applicable laws, to bring those Websites into conformance with WCAG Level 2.0 AA.
2. New Stern Website development and purchases, including development and purchases for major revisions and updates of existing Stern Websites, should conform to WCAG 2.0 Level AA.
3. Vendors seeking to develop or provide Websites or web-based applications for Stern are to demonstrate that their products satisfy WCAG 2.0 Level AA Success Criteria, unless undue burden or fundamental alteration can be demonstrated (see below). Preferred standards for demonstrating satisfaction of WCAG 2.0 Level AA Success Criteria, and accessibility language for Stern Website vendor contracts, as well as for other types of Electronic Information Technology vendor contracts, may be obtained from Stern office

4. Each Stern Website should contain "Accessibility" contact information for the site's webmaster. The contact information may take a variety of forms, such as an email address, or a contact form on the site. The recommended location for this information is the Website's "Contact" or "About Us" page.
5. The Screening office will continue to test Stern Websites for accessibility and report accessibility issues to the webmaster for that website.
6. Screening office will continue to seek feedbacks from Stern clients, stakeholders, and partners regarding accessibility issues.
7. Conformance to WCAG 2.0 Level AA guidelines may be an undue burden due to the nature of the content, the purpose of the resource, the lack of accessible solutions, or an unreasonably high administrative or financial cost necessary to make the resource meet that goal. However, these difficulties do not relieve Stern programs or activities from meeting applicable legal obligations to provide reasonable accommodations to Users in regard to access to the content and services provided on Stern Websites. Managers of digital programs and activities must be prepared to provide content and/or services in a suitable alternative format (e.g., electronic text file or audio description) or manner upon request.

Responding to Accessibility Issues

Recognising the ongoing evolution of current web content and technologies, the designated webmaster for a particular site, upon being made aware of an accessibility issue on that site, should proceed as follows:

- Acknowledge receipt of the issue in writing (via email) to the User raising the issue, with a copy to the Screening Office.
- Open an accessibility case for recording the issue and resulting action taken.
- Verify that the issue is an authentic accessibility issue.
- Treat all issues as important. Address any time-sensitive need of the User promptly (generally within a period of no greater than two business days), unless

technology or work involved requires more effort, in which case the User will be promptly notified in writing of expected delivery.

Upon receiving a report of an accessibility issue, the Screening Office shall notify the site's webmaster, If the Office, in consultation with the site's webmaster, determines that the information or service provided on the Stern Website cannot be made accessible, or that doing so would constitute an undue burden or fundamental alteration, Screening office will engage in an interactive process with the User about alternative methods for providing the information or service and will provide an equally effective alternative format or service. In the event that an alternative format or service cannot be provided or the user is not satisfied with the results, he or she may contact the Compliance Officer at Stern by telephone at +44 (0) 203 130 4000 or by email at compliance@sternadvisory.com for assistance in resolving the issue.