Nutaku Entertainment Ltd ("Nutaku")

ACCESSIBILITY PROGRESS REPORT

Prepared in accordance with the *European Accessibility Act (EAA)*
(Directive (EU) 2019/882)
Reporting Period: June 2025 - June 2026

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Table of Contents

Executive summary 3
Declaration of Accessibility 3
Main Achievements – Accessibility Features 3
Known Limitations 5
Testing Completed 5
Feedback and Support 5
Complaint and Escalation Procedure 6
Statement Metadata 12

Executive summary

Over the reporting period, Nutaku has continued to advance its commitment to digital accessibility, guided by the principles of inclusivity, compliance, and continuous improvement. This Accessibility Progress Report outlines the current status of accessibility across our user-facing web and mobile platforms, our main achievements during the reporting period, and our ongoing efforts to meet the requirements of the European Accessibility Act (Directive (EU) 2019/882).

This report applies to Nutaku Entertainment Ltd public-facing platforms within the European Union, including websites, mobile applications, and web-based services related to video streaming and digital subscriptions.

It does not apply to internal enterprise systems, corporate facilities, or non-consumer-facing communication channels.

Declaration of Accessibility

Nutaku continues to work towards full compliance with the European Accessibility Act and applicable harmonized standards such as the Web Content Accessibility Guidelines (WCAG) 2.1, Level AA.

After the reporting period of this progress report, our platforms are: Partially Compliant

Our overall status is currently 'In Progress' as significant enhancements have been implemented, with continuous improvements underway.

We are continuing to address identified accessibility issues through targeted product updates, testing efforts, and internal training.

Main Achievements – Accessibility Features

Throughout the reporting period, Nutaku achieved impactful and noticeable progress.

Efforts were focused on the features outlined in our initial Accessibility Statement while also incorporating feedback received through the accessibility webform to ensure both strategic and user-informed alignment. Notably, 24% of the feedback submissions we received were related to navigation challenges, guiding our prioritization of these enhancements.

- **Keyboard Accessibility:** Many of our webpages, menus, modals, and checkout flows are now navigable using only a keyboard. We have ensured that keyboard focus is visually

indicated, enhancing the browsing experience for users who do not use a mouse. We also ensured that all form fields have valid labels, enabling a seamless and intuitive interaction with forms.

- **Screen Reader Compatibility:** Enhancements include the following features:
    - **Alternative Text:** We have implemented alternative text for images, icons, and controls critical in user interaction, ensuring visually impaired users receive necessary context for navigating and understanding site content.
    - **ARIA Labels for Dynamic Content:** Dynamic content areas now utilize ARIA labels to convey important updates, relaying real-time information to users employing screen readers. This structure allows instant awareness of changes or notifications as they occur, enhancing user engagement and interaction.
    - **Heading Hierarchy:** Our websites now boast a refined heading hierarchy, logically ordered to optimize navigation. This hierarchical structuring aids users, especially those using screen readers, providing a straightforward path through content and ensuring consistency and clarity in information delivery.
- **Closed Captions:** Accounting for approximately 20% of the feedback received, we have thoroughly reviewed captioning accessibility and are developing a standardized approach that accommodates varying video players and systems. Implementation is in progress, with the goal of ensuring accurate, consistent, and inclusive captioning for all video content.
- **Staff training:** We implemented comprehensive accessibility training programs that cater to both customer support representatives and engineering staff. For customer support, the training focused on effective communication strategies and understanding the diverse needs of customers with disabilities, ensuring a higher standard of service. For our engineering and software development teams, training was designed to emphasize the importance of prioritizing accessibility during the design and development phases of new features. Training completion rate reached 100% across both customer support and engineering teams, demonstrating strong organizational commitment to accessibility.

  Additionally, accessibility training has been integrated into our onboarding process to nurture an inclusive workplace culture from the outset. This holistic approach ensures that accessibility is embedded across all levels of our organization's operations.
- **Service Agreements:** To ensure all procured goods and services meet accessibility standards, we revised our vendor contracts to explicitly state adherence to WCAG 2.1/2.2 AA criteria. This includes providing clear accessibility guidelines to potential vendors, requiring detailed documentation on their compliance processes, and establishing regular checkpoints for assessment and feedback.

Known Limitations

While notable progress has been made, several areas remain targeted for enhancement:

- Closed caption standardization
- Audio descriptions for video content
- Screen-reader and keyboard navigation refinement
- Consistency across dynamic content announcements

Target date for enhancements: June 2027

Testing Completed

Accessibility reviews were conducted using a combination of manual and automated assessments, supported by user testing and structured feedback analysis. Testing methods included

- Internal accessibility audits, incorporating the use of automated scanning tools for initial analysis and issue identification
- Manual keyboard-only navigation testing encompassing modals, interactive webforms, menus, and transactional processes
- Comprehensive review of accessibility-related user feedback to inform ongoing improvements

Feedback and Support

We continue to encourage users to notify us of any accessibility barriers they encounter or adjustments they may require to access content effectively. Feedback is critical to our improvement processes and treated confidentially and respectfully.

Since publication of the Initial Plan, Nutaku has received **27 feedback submissions**. The majority of feedback was related to:

- website navigation
- screen-reader compatibility
- improperly labeled elements
- closed captions
- audio descriptions

You can provide feedback or request alternative content through any of the following channels:

Email: accessibilityfeedback@nutaku.com
Webform: Available through the "Accessibility" footer link on each platform: https://www.nutaku.com/accessibility/

Response time: We aim to address all accessibility-related queries and support requests within 14 business days.

Complaint and Escalation Procedure

If you are unsatisfied with our response to an accessibility request or concern, you may submit a formal complaint to the regulatory enforcement body designated in your country under the European Accessibility Act.

AT Austria

Federal Ministry of Social Affairs, Health, Care and Consumer Protection

Website: https://www.sozialministerium.gv.at/

Email: information@sozialministerium.at

Jurisdiction: Accessibility rights, anti-discrimination (including digital and physical accessibility)

BE Belgium

Equal Opportunities Commission (Institute for the Equality of Women and Men)

Website: https://igvm-iefh.belgium.be

Unia (interfederal equality body)

Website: https://www.unia.be

Email: info@unia.be

Jurisdiction: Equality and anti-discrimination, including disability rights and digital accessibility

BG Bulgaria

Commission for Protection against Discrimination

Website: https://www.kzd-nondiscrimination.com/

Email: kzd@kzd.bg

Jurisdiction: Accessibility and anti-discrimination, including web accessibility

HR Croatia

Ombudswoman for Persons with Disabilities

Website: https://www.posi.hr/

Email: ured@posi.hr

Jurisdiction: Accessibility complaints and rights protection for persons with disabilities

CY Cyprus

Cyprus Commissioner for Administration and the Protection of Human Rights (Ombudsperson)

Website: http://www.ombudsman.gov.cy

Email: ombudswoman@ombudsman.gov.cy

Jurisdiction: Human rights, non-discrimination, including accessibility

CZ Czech Republic

Czech Trade Inspection Authority (Enforcement under EAA)

Website: https://www.coi.cz/

Email: coi@coi.cz

Jurisdiction: Market surveillance and accessibility enforcement

Office for People with Disabilities (for policy support)

Website: https://www.vlada.cz/en/ppov/vvzpo/uvod-892/

DK Denmark

Agency for Digital Government

Website: https://digst.dk/

Email: digst@digst.dk

Jurisdiction: Digital accessibility (public sector websites/apps)

Danish Board of Equal Treatment

Website: https://www.ligebehandlingsnaevnet.dk/

Jurisdiction: Anti-discrimination, general accessibility

EE Estonia

Estonian Consumer Protection and Technical Regulatory Authority (TTJA)

Website: https://ttja.ee/

Email: info@ttja.ee

Jurisdiction: Digital accessibility complaints for public sector

FI Finland

Regional State Administrative Agency (AVI) for Southern Finland

Website: https://www.saavutettavuusvaatimukset.fi

Email: saavutettavuus@avi.fi

Jurisdiction: Monitoring and enforcement of digital accessibility

Non-Discrimination Ombudsman

Website: https://www.syrjinta.fi

Email: yvv@oikeus.fi

FR France

Direction Interministérielle du Numérique (DINUM)

Website: https://www.numerique.gouv.fr

Enforcement: Accessibility of digital services

Defender of Rights (Défenseur des droits)

Website: https://www.defenseurdesdroits.fr

Email: contact@defenseurdesdroits.fr

Jurisdiction: Accessibility and discrimination (physical and digital)

DE Germany

Federal Monitoring Agency for Accessibility of Information Technology (BFIT-Bund)

Website: https://www.bfit-bund.de/

Email: kontakt@bfit-bund.de

Federal Government Commissioner for Matters relating to Persons with Disabilities

Website: https://www.behindertenbeauftragter.de

Jurisdiction: Accessibility rights and compliance (digital and physical)

GR Greece

Ministry of Digital Governance

Website: https://mindigital.gr/

General Secretariat for Digital Governance and Simplification of Procedures

Ministry of Labour and Social Affairs (for disability rights)

Website: https://ypakp.gr

HU Hungary

Kék Vonal (complaint support), but formal enforcement via:

National Authority for Data Protection and Freedom of Information

Website: https://www.naih.hu/

Jurisdiction: Accessibility of public sector websites/apps

Equal Treatment Authority (merged under Commissioner for Fundamental Rights)

Website: https://www.ajbh.hu

IS Iceland

The Ministry of Social Affairs and the Labour Market

Website: https://www.stjornarradid.is/verkefni/felagsmal/

Icelandic Consumer Agency

Website: https://www.neytendastofa.is/

IE Ireland

National Disability Authority (NDA) – for monitoring

Website: https://nda.ie

Email: nda@nda.ie

Enforcement: The Commission for Communications Regulation (ComReg)

Website: https://www.comreg.ie

Office of the Ombudsman (also accepts accessibility complaints)

Website: https://www.ombudsman.ie

IT Italy

Agenzia per l'Italia Digitale (AgID)

Website: https://www.agid.gov.it

Jurisdiction: Digital accessibility for public sector

Ministro per le Disabilità

Website: https://www.governo.it/it/disabilita/

LV Latvia

Ministry of Environmental Protection and Regional Development

Website: https://www.varam.gov.lv

Digital accessibility enforcement: Latvian State Regional Development Agency

Website: https://www.vraa.gov.lv

LT Lithuania

Communications Regulatory Authority (RRT)

Website: https://www.rrt.lt

Email: rrt@rrt.lt

Jurisdiction: Digital accessibility enforcement

LU Luxembourg

Information and Press Service of the Government

Website: https://sip.gouvernement.lu

Jurisdiction: Accessibility monitoring authority (including for digital accessibility)

MT Malta

Commission for the Rights of Persons with Disability (CRPD)

Website: https://www.crpd.org.mt

Email: helpdesk@crpd.org.mt

Jurisdiction: All accessibility rights and disability complaints

NL Netherlands

Ministry of the Interior and Kingdom Relations (BZK), Program “Digitoegankelijk”

Website: https://www.digitoegankelijk.nl

General enforcement: Dutch Data Protection Authority (for complaints)

Email: info@autoriteitpersoonsgegevens.nl

NO Norway

The Norwegian Digitalisation Agency (Digdir)

Website: https://www.digdir.no

Email: post@digdir.no

PL Poland

Ministry of Digital Affairs – digital accessibility

Website: https://www.gov.pl/cyfryzacja

Office of the Ombudsman for Persons with Disabilities

Website: https://www.niepelnosprawni.gov.pl

PT Portugal

Agência para a Modernização Administrativa (AMA)

Website: https://www.ama.gov.pt

Disability rights/body: Instituto Nacional para a Reabilitação

Website: https://www.inr.pt

RO Romania

National Authority for the Rights of Persons with Disabilities, Children and Adoptions (ANDPDCA)

Website: https://andpdca.gov.ro

SK Slovakia

Ministry of Investment, Regional Development and Informatization of the Slovak Republic (MIRDI SR)

Website: https://www.mirri.gov.sk

Contact: info@mirri.gov.sk

Slovak National Centre for Human Rights (SNCHR) – anti-discrimination enforcement

SI Slovenia

Ministry of Digital Transformation

Website: https://www.gov.si/en/state-authorities/ministries/ministry-of-digital-transformation/

Equal Opportunities Ombudsman

Website: https://www.zagovornik.si

ES Spain

Ministry of Economic Affairs and Digital Transformation – Directorate for Digital Public Services (SGAD)

Website: https://administracionelectronica.gob.es

Email: accesibilidadweb@correo.gob.es

Disability Rights: Real Patronato sobre Discapacidad

Website: https://www.rpd.gob.es

SE Sweden

Agency for Digital Government (DIGG)

Website: https://www.digg.se

Email: info@digg.se

Jurisdiction: Monitoring and enforcement of digital accessibility

Statement Metadata

- Reporting Period: June 2025 – June 2026
- Version:1.1

This Accessibility Statement is reviewed and updated annually or whenever significant changes affecting digital accessibility occur.