



Beyond Compliance: Why EAA Readiness Is the New Standard for Digital Trust

struto

Table of Contents

Executive Summary	03
The EAA: Urgency, Context & What's Changing	04
Who Needs to Act?	05
Let's Start with the Business Case	06
Boost SEO and Discoverability	07
The 3 Most Common Accessibility Gaps	09
Accessibility Is a System, Not a Single Sprint	12
Stronger Brand Trust: Walk the Talk on Values	14
Accessibility Is a System, Not a Single Sprint	12
Stronger Brand Trust: Walk the Talk on Values	14
Appoint an Internal Owner or Accessibility Champion	16
Document Your Progress	18
About Struto	20
Got Questions? Let's talk	21

1. Executive Summary

The European Accessibility Act (EAA) marks a pivotal shift in how digital experiences are designed, delivered, and regulated across the EU.

By requiring businesses to ensure their digital platforms are accessible to everyone, including those who are differently abled, the EAA is drawing a line in the sand between digital products and services that exclude, and those that evolve.

For many organisations, June 28, 2025, represents a compliance deadline. But for forward-thinking businesses, it's something far more valuable: An opportunity to build better user experiences for their customers.

This white paper unpacks what the EAA means, legally, technically, and commercially. It offers clarity for digital leaders, marketing teams, product managers, and CX strategists looking to make informed, strategic decisions around accessibility.

Whether you're ahead of the curve or just starting the journey, the goal of this paper is to provide:

- A clear understanding of EAA obligations
- An honest view of the risks: legal, reputational, and commercial
- A framework to assess your current digital experience
- Strategic guidance for building accessibility into your roadmap
- A reframe: Accessibility as a growth advantage, not a checkbox

While the legislative date may pass, the principles of inclusive design and equitable access will continue to shape the future of digital business.

Let this be your guide for not just meeting the moment, but moving your organisation forward with clarity, integrity, and impact.

2. The EAA: Urgency, Context & What's Changing

More than just legislation, The European Accessibility Act (EAA) provides the catalyst for a reset into how businesses operate in a world that now demands inclusivity as a baseline, not an add-on.

Why Now?

We're living in a moment where digital access isn't a luxury, it's foundational. From banking and ecommerce to education and healthcare, the shift to digital has accelerated across all sectors. But not everyone has been brought along in that shift.

For too long, people with different access needs have been excluded from digital experiences and the EAA is responding to this exclusion by embedding accessibility into the core of digital regulation across the EU.

Passed in 2019 and entering enforcement in June 2025, the Act gives organisations a multi-year runway to prepare. But many have either delayed the work, misunderstood the scope, or underestimated the impact.

What's Actually Changing?

The EAA applies to a wide range of digital products and services, including websites, apps, e-commerce platforms, self-service terminals, and online communications, it demands that they be accessible to all users.



That means:

- Sites and apps must be navigable without a mouse
- Forms must be clearly structured and labelled
- Colour and contrast must support visual clarity
- Multimedia must include captions or transcripts
- Content must be readable, logical, and consistent

Who Needs to Act?

If your organisation:

- Operates in the EU or sells to EU consumers
- Has more than 10 employees or earns more than €2 million in annual revenue

Why This Feels Urgent Now

From June 28, 2025, organisations can face:

- Legal action and financial penalties
- Brand damage and public scrutiny
- Exclusion from public procurement and tenders
- Loss of customer trust and competitive standing

But the deeper urgency is cultural. We are in a trust economy. People want to support brands that reflect their values, equity, access, and responsibility among them. The EAA creates a future where digital equity is embedded into how we build, communicate, and grow.

3. Accessibility as a Business Imperative

For years, accessibility was treated as a compliance box to check or a technical issue to fix, or it was simply not addressed at all. Today, accessibility is a core business function that impacts everything from revenue and customer trust to brand equity and legal resilience.

Let's Start with the Business Case

Most organisations still underestimate the sheer scale of users affected by inaccessible experiences. But the data is clear:

- **1 in 5 people in the EU** experience some form of functional limitation, visual, auditory, cognitive, motor, or situational.
- That represents over **135 million individuals**, not counting those who encounter temporary or situational barriers (such as a broken arm, bright sunlight, or noisy environments).
- The **global spending power** of this community, including family and advocates, is estimated at over **€6 trillion**

This is not a niche market. It's a mainstream audience and it's growing.

If your digital platforms exclude even a fraction of that population, the business cost is staggering, resulting in lost customers, missed opportunities, higher churn, and reputational drag.

Accessibility Drives Performance, Not Just Protection

Companies often view accessibility as defensive, a way to avoid lawsuits or satisfy legal obligations. But the real power of accessible design is offensive. It drives better outcomes across the board.

Here's how:



1. Reach More Customers

Accessible design expands your total addressable market. That means more leads, increased conversions, and higher lifetime value from users who otherwise couldn't engage with your brand fully or at all.



2. Boost SEO and Discoverability

Search engines favour clean, structured, semantic code which is exactly what accessible websites deliver. Captions, alt text, logical heading structures, and mobile-friendly design all help boost organic visibility.



3. Improve Conversion Rates

Good accessibility is good UX. When content is clearer, navigation is easier, and actions are more intuitive, conversion rates go up.



4. Strengthen Brand Trust and Reputation

Today's consumers care about values, not just products. When you invest in accessibility, you're showing that you care about real people, not just personas. That builds brand affinity, earns loyalty, and differentiates your business in a market that's increasingly driven by values.



5. Reduce Support and Service Costs

Accessible experiences reduce friction. That means fewer support tickets, less abandonment, and less reliance on human intervention to complete simple tasks.



6. Increase Resilience and Adaptability

Accessible systems are built on standards. When your platforms are compliant and structured, they're easier to maintain, localise, update, and extend.

A company that lags on accessibility is sending a clear signal to the market: "We're not paying attention." And in an era where attention, trust, and inclusion drive growth, that's a dangerous place to be.

Accessibility is About Smarter Design

There's a myth that making digital experiences accessible means compromising creativity or innovation. The opposite is true.

Some of the world's most admired products, from Apple's iOS to Airbnb's booking flow, are celebrated because they integrate accessibility into the core experience. Accessibility is a design multiplier. It sharpens your focus, challenges assumptions, and pushes teams to build for edge cases, which ultimately benefits everyone.

This Is a Leadership Opportunity

The accessibility conversation is no longer happening in the backrooms of tech companies. It's happening in boardrooms. Executive teams are being asked:

- "Are we compliant?"
- "Are we inclusive?"
- "Are we designing for everyone?"

And the leaders who can answer "yes" are earning the trust of markets, regulators, employees, and customers alike.

If you want to future-proof your business, deepen brand equity, and create experiences that perform, accessibility can no longer be optional. It must be foundational.



4. The 3 Most Common Accessibility Gaps

Most organisations don't fail at accessibility because of bad intentions; they fail because of blind spots. Teams think they've "done enough." They install a plugin. They add alt text. They assign the task to someone already overstretched.

But accessibility isn't a one-time fix. It's a system-wide discipline that needs ownership, infrastructure, and long-term commitment.

Here are the three most common gaps that hold organisations back and what to do about them.

GAP #1: No Clear Ownership

The problem:

In many organisations, accessibility is everyone's responsibility, which quickly becomes no one's responsibility. It floats between departments, landing with whoever has time (usually no one).

Marketing assumes product is handling it. Product thinks it's a dev thing. Devs point to content. The result? No consistent progress, no strategic direction, and no accountability.

The risk:

Without clear ownership, accessibility becomes reactive. You fix what's broken when someone complains, rather than proactively designing for inclusion. You miss roadmap opportunities. You underinvest in systems and training.

The fix:

Appoint a clear owner or team to drive accessibility forward. This doesn't have to be a full-time role but it does need to be a formal one. Give that person the mandate, authority, and support to build an internal practice. Make accessibility a recurring conversation in planning, QA, and product reviews.

Ownership creates momentum. It signals priority. And it's the first step to getting this right.

GAP #2: Outdated Systems and Infrastructure

The problem:

Many companies are building digital experiences on platforms that weren't designed for modern accessibility standards. That includes hardcoded templates, inflexible CMS systems, non-semantic codebases, or tools that don't support ARIA attributes, keyboard navigation, or responsive layouts.

Even if your teams know what "good" looks like, your tech stack may prevent them from implementing it.

The risk:

Outdated infrastructure creates technical debt. Every improvement becomes harder, slower, and more expensive. Teams waste time patching issues that shouldn't exist in the first place. Worse, you end up investing in experiences that still don't meet user needs.

The fix:

Audit your platforms and tools through the lens of accessibility. Where are the blockers? What needs to be upgraded, redesigned, or replaced? Prioritise systems that are compliant out-of-the-box and allow for customisation. Build new experiences using accessible frameworks and components.

Most importantly, factor accessibility into your procurement and vendor evaluations. Don't buy systems that create more friction than they solve.

GAP #3: Superficial Fixes (Instead of Holistic Experience Design)

The problem:

Too many companies treat accessibility as a checklist, not a user experience. They add alt text, run a quick scan, and install an overlay tool. Then they declare themselves "compliant" and move on.

But overlays and audits can only do so much. They don't fix broken user journeys. They don't improve readability. They don't create better navigation, logical flows, or inclusive content. Most importantly, they don't help real people.

The risk:

You might pass an audit but still lose customers. You might avoid a lawsuit but still create frustration, exclusion, and abandonment. Superficial fixes give a false sense of progress and mask deeper UX issues.

The fix:

Shift from a compliance lens to a usability lens. Ask: Can someone with different abilities complete the same tasks with the same ease?

Use real-world testing. Involve people with lived experience. Review journeys end-to-end, not just pages in isolation. Prioritise clarity, simplicity, and flexibility in your design and content. And remember: accessibility is not about adding features. It's about removing barriers.

Accessibility Is a System, Not a Single Sprint

These three gaps; unclear ownership, outdated tech, and surface-level fixes, aren't just common. They're systemic. They show up in companies of every size, in every industry.

But they're solvable.

The organisations that lead in accessibility do one thing differently: they treat it as a discipline. Not a project. Not a PR move. A discipline that spans design, development, content, leadership, and strategy.

Fixing the gaps won't just move you closer to compliance, it will make your digital experiences stronger, simpler, and more valuable to everyone.

5. Accessibility = Opportunity

When people hear "accessibility," they often think of legal compliance, regulation, and risk. But the smartest businesses know something different:

Accessibility isn't a cost. It's a competitive edge.

Yes, the European Accessibility Act enforces certain standards. But the bigger story is this: the same actions that protect your brand legally also improve your product, increase your reach, and build customer trust.

Let's unpack why.

1. Market Expansion: Reach More People, Serve Them Better

One in five people in Europe live with some form of functional limitation.

That's not a niche. That's a massive market segment that is underserved and often ignored. When your digital products and services are accessible, you stop excluding entire populations. You open the door to:

- **New customers** who were previously blocked by friction or poor usability
- **Loyalty from users** who feel seen, included, and respected
- **Broader usability** for aging populations, multilingual users, and low-bandwidth contexts

Inclusivity expands your market reach.

2. SEO & Discoverability: Accessible Sites Perform Better

Accessibility improvements often go hand-in-hand with better technical SEO.

Why?

Because the same elements that help screen readers and assistive devices, like semantic HTML, descriptive alt text, and structured headings, also help search engines understand your content.

And Google increasingly rewards accessible, fast, and usable sites in its rankings.

- **Accessible = crawlable**
- **Crawlable = discoverable**
- **Discoverable = profitable**

3. Stronger Brand Trust: Walk the Talk on Values

More than ever, customers care about how companies operate, not just what they sell. In an era of rising consumer consciousness, accessibility is a trust signal.

By building inclusive experiences, you communicate that you care about:

- Equity
- Empathy
- Thoughtful design
- Long-term value

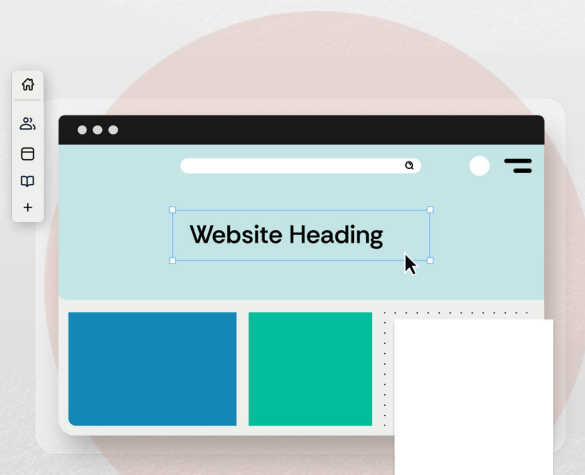
That has a halo effect on your brand, especially with younger, digital-native customers who expect ethics and usability to go hand-in-hand.

You're not just future-proofing your tech. You're aligning with what modern customers care about.

4. Reduced Drop-Off & Higher Conversions

When users can navigate your site or app more easily, no matter their abilities, bandwidth, or device, they stay longer, engage more, and drop off less.

From form submissions to product checkouts, even small fixes in accessibility can unlock huge lifts in performance metrics.



5. Internal Culture & Talent Magnetism

Accessible companies don't just attract more customers, they attract stronger teams.

Top talent is drawn to organisations that design for inclusion, think about the bigger picture, and care about their user base. And when your internal systems are accessible too, your own employees work better, regardless of ability or circumstance.

Remote work, neurodiverse needs, flexible tech: accessibility plays a central role in building modern, resilient companies.

Reframe the Narrative: From Regulation to Opportunity

Yes, the EAA deadline matters. But the real win is longer term.

Businesses that embed accessibility into their DNA are:

- More usable
- More discoverable
- More future-proof
- More trusted
- More profitable

So don't just chase compliance. Lead with accessibility.

Because inclusive design doesn't limit innovation, it multiplies it.

6. The EAA Compliance Roadmap

Your next steps toward building accessible, resilient digital experiences.

Whether you're racing toward the June 28, 2025 deadline or addressing accessibility post-deadline, this roadmap will move your business forward.

Step 1: Appoint an Internal Owner or Accessibility Champion

Compliance doesn't happen without ownership.

- Who's accountable for accessibility in your business today?
- If it's "everyone," it often becomes no one.

Designate a team member or cross-functional lead who can co-ordinate efforts across content, development, design, and compliance. This person should drive alignment, track milestones, and partner with external experts when needed.

Step 2: Get an Accessibility Audit

You can't fix what you can't see.

Start with a professional audit of your digital products, website, mobile, platforms, documents.

Look at:

- Visual design & contrast
- Navigation & structure
- Forms & interactive elements
- Multimedia content (video, audio, images)
- Mobile responsiveness
- Keyboard navigation
- Screen reader compatibility

Step 3: Prioritise High-Impact Fixes

Not every issue is equal. Start where the risk is highest and the value is greatest.

Ask:

- What pages get the most traffic or conversions?
- What issues block access entirely?
- What fixes can we implement fast, with minimal engineering lift?

Fixing alt text or correcting semantic headers may be a fast win. Overhauling a legacy form may take longer, but both matter.

Step 4: Bake Accessibility into Workflow

You can't audit forever. At some point, accessibility must become part of how you build.

That means:

- Designers use contrast checkers and accessible colour palettes by default
- Writers consider screen reader clarity and inclusive language
- Developers build with keyboard navigation, ARIA labels, and semantic code
- QA teams include accessibility checks in regression testing

Step 5: Train Your Teams

Tools don't fix accessibility. People do.

Even small upskilling can go a long way. Create short workshops, documentation, and real-world examples for:

- Product & development teams
- Marketing & content creators
- Sales, support, and leadership

The goal: build a shared accessibility mindset across your business.

Step 6: Document Your Progress

Even if you're not 100% compliant yet, showing intent and traction matters.

Keep internal logs of:

- What you've audited
- What you've fixed
- What's in the roadmap
- Who owns what

If regulators (or customers) come asking, your transparency becomes your defence. Progress signals credibility.

Step 7: Plan for Sustainability

Accessibility isn't a one-time project. It's an operating system for digital integrity.

That means:

- Ongoing audits every 6 – 12 months
- Monitoring changes to the EAA and global accessibility laws
- Keeping your team updated as tools, content, and tech evolve
- Benchmarking progress year over year

Summary: You Don't Need to Be Perfect. You Need to Be Progressing.

Whether you're days from the deadline or discovering this after the fact, the right time to start is now. Because the longer you wait, the greater the risk...and the more opportunity you miss.

This roadmap is not about pressure, it's about empowerment.

Start small. Start smart. Just start.

7. Final Word: Progress Over Perfection

Why starting imperfectly is better than not starting at all.

There's no such thing as "fully accessible."

There's only more inclusive than yesterday, and less risky than before.

The truth is, accessibility isn't a destination. It's a mindset. A way of working. A set of values that shows up in your tech, your content, your leadership, and your customer experience.

And yes, it can feel daunting.

The regulations are evolving. The tools aren't always perfect. And you may not have a dedicated accessibility team or budget.

But here's what you do have:

- A chance to show up differently in your market.
- An opportunity to build better digital experiences for more people.
- A window, right now, to make meaningful, measurable progress.

The companies that win in the next era will not be the fastest.

They'll be the most human.

They'll see accessibility not as an obligation, but as a competitive edge and a reflection of who they are.

What matters now:

- That you start.
- That you assign ownership.
- A window, right now, to make meaningful, measurable progress.
- That you keep learning, iterating, and improving.

It's about building a brand that works for more people, more of the time.

Progress over perfection, that's how real transformation begins.

We're here to help.

8. About Struto

We don't just implement HubSpot.

We build better customer experiences, with accessibility, and performance baked in.

At Struto, we're a HubSpot Elite Partner that believes that digital systems should serve everyone. That's why accessibility isn't a side conversation for us, so whether you're at the beginning of your accessibility journey or already deep in transformation, we can help you:

- Assess risk and opportunity across your platforms
- Create roadmaps tied to business value
- Build a future-proof CX foundation, beyond just compliance

Ready to move from intent to action?

Book your free EAA Readiness Consultation.

We'll help you:

- Identify your riskiest gaps
- Understand where to start
- Prioritise which areas to focus on.

Got questions?

Let's Talk

We'd love to answer them, so get in touch and we'll help you start your journey towards better business operations and efficiency.

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