

## STATEMENT ON ACCESSIBILITY

COSIBELLA Sp. z o.o. NIP 5223180504, KRS 0000832314, with its registered office at ul. 15A Mineralna st., building D3, 02-274 Warsaw, in order to ensure equal access to its services for all users, including people with special needs, undertakes all efforts to ensure the accessibility of its website in accordance with the requirements of the Act of April 26, 2024, on ensuring the fulfillment of accessibility requirements for certain products and services by economic operators (Journal of Laws, item 731), which implements in Poland the provisions of the Directive (EU) 2019/882 of the European Parliament and of the Council of April 17, 2019, on the accessibility requirements for products and services (Official Journal of the EU L 2019 No 151, p. 70).

This accessibility statement applies to the website accessible at the address:  
<https://skintra.eu/>

The SkinTra brand, operated by Cosibella Sp. z o.o., provides its online store through this website.

### Compliance Status

This website is partially accessible to people with special needs within the meaning of Article 2, point 3 of the Act of July 19, 2019, on ensuring accessibility for people with special needs (Journal of Laws 2022, item 2240 and 2024, item 731). To meet the legal requirements, Cosibella conducted an accessibility audit and undertook actions to ensure the greatest possible accessibility of the services offered.

During the audit, the website was evaluated in accordance with the WCAG guidelines. According to the verification carried out, the website currently meets the above-mentioned guidelines at the following levels:

- **level A** – minimum, without which the website will not be accessible to many people with disabilities – 53.4%
- **level AA** – the most recommended level providing practicality and high accessibility – 31.8%
- **level AAA** – advanced level, difficult to implement for the entire website and subpages but possible to apply in selected sections of the site – 26.9%.

In accordance with Article 12, point 2, paragraph 3 of the Act of April 26, 2024, on ensuring the fulfillment of accessibility requirements for certain products and services by economic operators (Journal of Laws, item 731) – **in the course of offering and providing services, uniformity of websites and mobile applications is ensured by guaranteeing their perceivability, functionality, comprehensibility, and compatibility**. Below is a list of accessibility features implemented on the website operated by Cosibella Sp. z o.o.

#### 1. Perceivability:

- **Graphics and Media:**
  - SVG graphics adhere to the correct syntax (WCAG 1.1).

- SVG graphics have alternative text (WCAG 1.1.1).
- Alternative text for SVG graphics is neither too long nor too short (WCAG Best Practice).
- Alternative text is not an unnecessary repetition of the surrounding link text (WCAG Best Practice).
- `<object>` elements have accessible names (WCAG 1.1.1).
- If audio or video content is present on the site, it is detected during the audit (WCAG 1.2.1) — this is only identification, not a problem.
- Purely decorative images are not exposed to assistive technologies (WCAG 1.1.1).
- **Structure and Presentation:**
  - There is no more than one H1 heading on the page (WCAG Best Practice).
  - The page has an H1 heading (WCAG Best Practice).
  - Each subpage has a defined title (WCAG 2.4.2).
  - Page titles are not too short (WCAG Best Practice).
  - Table headers (`<th>`) are not empty (WCAG Best Practice).
  - Headings (`<h1>` to `<h6>`) are not empty (WCAG Best Practice).
  - Paragraphs have appropriate line spacing (line height) (WCAG 1.4.8).
  - The page uses headings to structure content (WCAG Best Practice).
  - Font size is not too small (WCAG Best Practice).
  - Paragraphs are not entirely in italics or uppercase letters (WCAG Best Practice).
  - Text is not justified (which can make reading harder for people with dyslexia) (WCAG 1.4.8).

## 2. Functionality:

- **Navigation and Interaction:**
  - `<iframe>` elements (if present) have accessible names (WCAG 4.1.2).
  - Form fields have accessible names (WCAG 4.1.2).
  - `<area>` elements have alternative text (WCAG 4.1.2).
  - `<select>` elements (drop-down lists) have accessible names (WCAG 4.1.2).
  - There are no duplicated accesskey attributes (WCAG Best Practice).
  - Audio and video elements do not play sound automatically (WCAG 1.4.2).
  - `<iframe>` elements do not have duplicated names (WCAG 4.1.2) and do not have negative tabindex attributes (WCAG 2.1.1).
  - `<meta>` elements do not cause automatic page refreshes (WCAG 2.1.1).
  - Scrollable elements are accessible via keyboard (WCAG 2.1.1).

## 3. Understandability:

- **Language and Forms:**
  - The language of the page is declared in the code (WCAG 3.1.1).
  - The language of the page is declared correctly (WCAG 3.1.1).
  - The `lang` attribute is valid (WCAG 3.1.1).
  - The `lang` and `xml:lang` attributes are consistent (WCAG 3.1.1).
  - The `autocomplete` attribute in forms is used correctly (WCAG 1.3.5).
  - Elements do not have invalid `lang` attributes (WCAG 3.1.2).

#### 4. Compatibility:

- **Code and Syntax:**
  - All `id` attributes on the page are unique (WCAG 4.1.1).
  - The `aria-hidden` attribute is not used on the `<body>` element (WCAG 4.1.2).
  - `<li>` elements do not appear outside of `<ul>` or `<ol>` lists (WCAG 1.3.1).
  - Table data cells are correctly associated with headers (WCAG 1.3.1).
  - Presentational (decorative) elements do not contain focusable elements (WCAG 4.1.2).
  - Purely decorative elements are not unnecessarily exposed to assistive technologies (WCAG Best Practice).

For content that is inaccessible to people with special needs, as described below in this statement, Cosibella Sp. z o.o. provides alternative solutions that facilitate and enable the use of offered services. The description of inaccessible content can be found at the end of this statement.

Cosibella Sp. z o.o. continuously works to ensure that its website and online store are digitally accessible to all users, including people with special needs.

#### **Preparation of the Accessibility Statement**

This statement was prepared on June 30, 2025.

The last update to this statement was made on June 30, 2025.

#### **Feedback and Contact Information**

If you encounter any problems or inconveniences while using the website or have any questions related to the digital accessibility of our services, please contact Cosibella Sp. z o.o.:

Email: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl)

Phone: +48 226 022 832

#### **Consumer Claims Procedure**

A consumer has the right to submit a complaint to an economic operator regarding the failure to meet accessibility requirements by a product or service.

The complaint should contain:

- the consumer's full name;
- correspondence address, email address, or phone number, along with the preferred method of contact with the consumer;
- identification of the product or service to which the complaint relates;

- indication of the accessibility requirement that the product or service does not meet, along with a demand for the economic operator to ensure compliance.

If the complaint does not contain the information listed above, per Article 36(3) of the Act of April 26, 2024, on ensuring the fulfillment of accessibility requirements for certain products and services by economic operators (Journal of Laws, item 731), Cosibella Sp. z o.o. will leave the complaint unexamined.

The complaint may include a preferred method of ensuring the fulfillment of the accessibility requirement by the product or service.

The complaint may be submitted:

- In writing – in person at Cosibella Sp. z o.o., or sent by mail within the meaning of Article 3(21) of the Act of November 23, 2012 – Postal Law (Journal of Laws 2025, item 366), or sent to the electronic delivery address within the meaning of Article 2(1) of the Act of November 18, 2020 on electronic deliveries (Journal of Laws 2024, item 1045), listed in the electronic address database referred to in Article 25 of that act, at the address: Mineralna 15A Street, building D3, 02-274 Warsaw,
- Orally – by phone or in person for the record during a visit to Cosibella Sp. z o.o.; phone number: +48 226 022 832,
- Electronically, using means of electronic communication, provided that such means have been indicated by Cosibella Sp. z o.o. for this purpose; email address: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl).

Cosibella Sp. z o.o. is obliged to consider the complaint and provide a response to the address indicated in the complaint within 30 days from the date of receipt of the complaint. In particularly complicated cases that prevent the consideration of the complaint and provision of a response within the indicated term, Cosibella Sp. z o.o. will notify the consumer within that period, in the manner specified in the complaint, of the reason for the delay and indicate a new deadline for considering the complaint and providing a response, not longer than 60 days from the date the complaint was received.

### **Notification of Non-Compliance of a Product or Service with Accessibility Requirements**

Anyone may submit a notification to the President of the Board of PFRON (State Fund for the Rehabilitation of Persons with Disabilities) reporting that a product or service does not meet accessibility requirements.

Such a notification should include:

- identification of the product or service concerned;
- the specific accessibility requirement not met by the product or service;
- the economic operator who makes the product available on the market or offers/provides the service that does not comply with accessibility requirements.

Additionally, the notification may include the notifier's name, correspondence address, email address, or phone number, depending on their preferred method of contact, as well as the preferred way to contact the notifier.

The notification can be submitted:

- In writing – in person at the PFRON office or sent by postal mail to: Aleja Jana Pawła II 13, 00-828 Warsaw, or sent to PFRON's electronic delivery address in the e-Delivery system (AE:PL-20012-50011-SAVUD-30);
- Orally – by phone or in person for the record during a visit to PFRON (phone: +48 22 581 84 10);
- Electronically – via electronic communication means, if such means are designated by the President of the Board of PFRON for this purpose;
- In Polish sign language – for the record during a visit to PFRON or as a recording using electronic communication means, if such means are designated by the President of the Board of PFRON.

This process is established under Article 67 of the Act on Ensuring the Fulfillment of Accessibility Requirements for Certain Products and Services by Economic Operators (effective April 26, 2024).

### Market Supervision Authorities

The authorities responsible for market supervision regarding the fulfillment of accessibility requirements are indicated in Article 38(3) of the Act on ensuring the fulfillment of accessibility requirements for certain products and services by economic operators. The competent supervisory authority, in the case of Cosibella Sp. z o.o., is:

- President of the Board of PFRON (<https://www.pfron.org.pl/kontakt/>) in the scope of monitoring the accessibility of products and services.
- Minister competent for computerization ([www.gov.pl/web/cyfryzacja](http://www.gov.pl/web/cyfryzacja)) with regard to electronic commerce services.

### Inaccessible Content

#### 1. Images without captions or alternative text that is too short

- **Problem description:** Some images on the site lack textual descriptions or have descriptions that are too short. For users of screen readers, this means the program cannot correctly identify and describe the image content. As a result, navigating the site and understanding the visual context is difficult or impossible.
- **Estimated date for implementing new accessibility features:** by December 1, 2025.
- **Alternative solution:** Contact customer service. To obtain information about the content of images, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly answer your questions and provide necessary descriptions.

#### 2. Links without text (empty links)

- **Problem description:** Some pages contain links that have no descriptive text. For users relying on screen readers or keyboard navigation, such "empty" links are problematic. The screen reader may only read "link" or the target file name, which does not indicate where the link leads or its intended purpose. This complicates or even prevents an informed decision about whether to click.
- **Estimated date for implementing new accessibility features:** by December 1, 2025.

- **Alternative solution:** Contact customer service. To find out where these links lead, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly answer your questions and provide necessary explanations.
- 3. Elements that look like lists but are not marked as such**
- **Problem description:** The site contains elements that visually resemble lists (e.g., bulleted and arranged in columns) but are not technically marked as lists in the site code. For screen reader users, this is problematic because the reader does not indicate that it is a list or how many items it contains.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solution:** Contact customer service. For a fuller understanding of the structure of this information, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly answer your questions and help clarify the layout and relationships between these elements.
- 4. Too low contrast between text and background**
- **Problem description:** On some pages, the contrast between text color and background color is too low. This means the text is poorly visible or blends with the background, making reading difficult.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solutions:**
    - High contrast mode in the operating system: Many operating systems (e.g., Windows, macOS) offer built-in high contrast modes that can change the appearance of all apps and websites to improve readability. However, this mode may affect the overall look of all content, not just the problematic site.
    - Contact customer service. If you have difficulty reading content, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly assist you in other ways, for example, by providing information in a more accessible form.
- 5. Buttons without labels (descriptions)**
- **Problem description:** Some buttons on the site lack descriptive text or labels. For screen reader users, this means the program cannot tell what the button does. The screen reader may only say "button" or "unnamed," making it impossible to understand its function. This makes navigation difficult.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solution:** Contact customer service. To learn about the functions of these buttons and how to navigate the site, please contact our customer service at [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly provide all necessary explanations and assist you in using our site.
- 6. Headings without labels or hidden from screen readers**
- **Problem description:** Some headings visually look like headings but have no descriptive text or are deliberately hidden from screen readers (using the aria-hidden attribute). For screen reader users, this is problematic because the reader cannot read the heading, which prevents quick navigation and understanding of the page structure.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.

- **Alternative solution:** Contact customer service. To receive information about page structure and key sections, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly help you understand the page layout and quickly find the information you need.
- 7. No ability to zoom the page (meta viewport)**
- **Problem description:** Technical settings on the page (so-called meta viewport) prevent zooming content using standard browser functions or touch gestures on mobile devices. For people with visual impairments or those who need to enlarge text or graphics to make them readable, this is a significant challenge.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solutions:**
    - High contrast mode in the operating system: Some operating systems provide built-in high contrast modes, which may improve text readability but do not solve the inability to zoom.
    - Contact customer service. If you experience difficulty reading the content, please contact our customer service at [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly help you obtain the needed information in a more accessible form.
- 8. Incorrect ARIA attributes**
- **Problem description:** Our site contains technical errors related to ARIA (Accessible Rich Internet Applications) attributes. This means that important information about site functionalities, such as the purposes of buttons, states of form fields, or roles of sections, is not conveyed to users. As a result, navigation and interaction become difficult or impossible because the screen reader cannot "understand" or correctly read these elements.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solution:** Contact customer service. For assistance with navigating or performing specific actions on the site, please contact our customer service at [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly provide necessary information and support.
- 9. Parent elements without matching child elements**
- **Problem description:** The site contains elements defined in the code as "parent" elements but lacking corresponding "child" elements. For screen reader users, this may be confusing.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.
  - **Alternative solution:** Contact customer service. If you have difficulty understanding the page layout or finding specific information, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly help clarify the site structure and content.
- 10. Elements marked as hidden (aria-hidden) but still accessible by keyboard/screen reader**
- **Problem description:** Some elements marked as hidden from screen readers (using the aria-hidden attribute) are still navigable using the keyboard (e.g., the Tab key). This may cause issues for users of assistive technology.
  - **Estimated date for implementing new accessibility features:** by December 1, 2025.



- **Alternative solution:** Contact customer service. If you encounter difficulties navigating, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly assist with site navigation and explain its structure.

#### **11. Links indistinguishable from regular text**

- **Problem description:** Some links on the site appear identical to the surrounding regular text. They are not underlined, colored differently, or otherwise visually distinguished, which can make them hard to recognize.
- **Estimated date for implementing new accessibility features:** by December 1, 2025.
- **Alternative solution:** Hovering the mouse cursor/tap (on mobile devices). When hovering or tapping, the link should change color or become underlined.

#### **12. Interactive elements without a name in the label (voice control issue)**

- **Problem description:** Some interactive elements (e.g., buttons, form fields, links) have labels, but their names, which should be used for voice control interaction, are not explicitly present. This can cause difficulties with voice control.
- **Estimated date for implementing new accessibility features:** by December 1, 2025.
- **Alternative solution:** Contact customer service. If you experience difficulties using voice commands, please contact our customer service at [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly assist you with navigation and performing intended actions.

#### **13. The touch area of an element is too small**

- **Problem description:** Some interactive elements (e.g., buttons, links, icons) have an area that is too small for clicking or tapping.
- **Estimated date for implementing new accessibility features:** by December 1, 2025.
- **Alternative solution:** Contact customer service. If you have difficulties interacting with specific elements, please contact our customer service at: [zamowienia@cosibella.pl](mailto:zamowienia@cosibella.pl). We will gladly assist with navigation or performing intended actions.