

Sustainable Testing and Remediation (STAR) Plan

This STAR Plan is only valid after: 12/02/2021

Our solutions aim to improve the usability of the web — providing everyone with an optimal, customizable, and fully inclusive digital experience.

Site URL ("the Client")

sdge.com

Please note: This attestation and all associated statements are valid so long as the AudioEye service remains active on the Client website. To validate activation, visit the following URL at any time:

Validation URL

<https://customer-portal.audioeye.com/sites/a5ecdd4b-955a-40b7-b439-5fbbe6800fb4/attestation>

If active, the following message will display when accessing the provided link: "AudioEye is active." If not active, no message will display, rendering this attestation and all associated statements as invalid.

Created by:

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AudioEye Attestation for Client

In an effort to ensure that individuals with disabilities have equal opportunity and effective communication needed to fully participate in the Client's website offerings, Client has adopted a sustainable, long-term digital accessibility strategy. Client has taken, or is in the process of taking, the following actions to make its website equally accessible to all individuals, regardless of their abilities.

- Client subscribed to accessibility services from AudioEye, Inc., a third-party web accessibility specialist that employs Certified Professionals in Accessibility Core Competencies¹ and experienced assistive technology testers (some of whom are individuals with disabilities). This STAR Plan shall remain applicable so long as Client's AudioEye Subscription remains active;
- Client is striving and will continue to strive to improve and maximize conformance to AudioEye's interpretation of the informative guidance made available from the World Wide Web Consortium's Web Content Accessibility Guidelines (WCAG); and
- Through the adoption of the AudioEye accessibility services, Client has established and began to execute a formal strategic plan to ensure the equitable use of its digital assets and an optimal user experience for everyone.

Below are the key tenets and proactive steps of Client's sustainable accessibility and remediation plan:

- In collaboration with AudioEye, the Client implemented Accessibility Testing & Remediation Technology (Activation or Step One).
- Upon Activation, the AudioEye solution began to dynamically apply remediations to address certain common issues that are programmatically detected. From the date of Activation, the Client site began to improve accessibility by eliminating access barriers for end users.
- Upon Activation, the Client began providing its users with access to a dedicated Web Accessibility Help Desk, which, complete with a feedback loop, allows end users of the Client's site to report accessibility and usability issues to the dedicated Web Accessibility Subject Matter Experts at AudioEye. As issues are reported, AudioEye validates and prioritizes issues based on the end-user feedback. Submissions are responded to in a timely manner and two-way communication is established until issue resolution.
- Upon Activation, the Client began publishing an Accessibility Statement to inform end-users regarding the steps taken/being taken to ensure equal access and to promote the Client's ongoing commitment to address and prioritize digital inclusion
- Upon Activation, AudioEye began tracking usage analytics. On regular intervals, AudioEye began conducting ongoing and continuous monitoring based on the usage analytics tracked by AudioEye. This always-on monitoring ensures that the pages being accessed by our Client's end-users — the pertinent pages relative to the end-user's experience — are

being regularly prioritized and evaluated for accessibility conformance. So long as the AudioEye Services remain active, AudioEye will maintain the always-on monitoring service.

- Testing & Discovery (Step Two): Post Activation, AudioEye Subject Matter Experts (SMEs) and Engineers periodically evaluate the website using AudioEye's ongoing and continuous monitoring service. Additionally, Assistive Technology (AT) Testers periodically conduct manual testing across the Client web environment based on a level of risk the ATs assign to the website based on their experience.
- Remediation, Validation & Optimization (Step Three): based on the results of the testing conducted during the Testing & Discovery Step, AudioEye engineers work to improve automated tests and programmatic fixes. It is AudioEye's goal to continually improve the accessibility baseline of the Client site in accordance with WCAG.
- As an extension of Step 3 and as, perhaps, the most significant reflection of the Client's sincere commitment to digital inclusion, the Client has invested in and made available at no cost to site visitors, assistive tools (via the AudioEye Toolbar) to aid users and provide personalization options for those seeking access to the site.
 - The AudioEye Toolbar allows organizations to provide their site visitors with a fully customizable user experience that is tailored to their individual needs.
 - These tools have benefits for all site visitors, but, in particular, aging populations and individuals who have vision, hearing, motor and intellectual (cognitive) disabilities, those who are epileptic, color blind, dyslexic, are learning to read.

- With continual testing, remediation, and validation, a new accessibility baseline and substantial conformance is achieved. Outstanding items remaining to be fixed are indicated within reports delivered to the Client. The Clients can work with AudioEye to address the website-specific accessibility issues. To the extent warranted, Client may implement design and source improvements to further improve usability and maximize conformance with the accessibility best practices and standards. With remediation validated, ongoing monitoring enabled, and an ongoing remediation strategy in place, AudioEye has granted Client AudioEye Trusted certification status.

- Requirements for maintaining AudioEye Trusted status:
 - Active AudioEye Contract
 - Regular testing from always-on monitoring service
 - Ad hoc hot fixing (if applicable): In the event that a large number of new errors are identified, AudioEye is continually fixing and monitoring for issues. The Client may work with AudioEye to prioritize website-specific accessibility issues for hot fix deployments. Lower volume issue fluctuation is to be expected. In these cases, ongoing remediation and reports are updated at regular intervals.

- Ongoing collaboration with Client to continually integrate digital accessibility best practices within design, development, and content creation processes via available training
- Ongoing access to Training archives and live training webinars
- As the Client continues to mature its accessibility policy, the Client intends to report its conformance level publicly through a public-facing Certification Statement made available from the Client website. The Certification Statement informs end users of the current, up to date AudioEye Trusted Status and conformance level as the site continues to be updated regularly via the continuous monitoring services supplied by AudioEye.

Footnotes

1. AudioEye engineers and SMEs consist of Certified Professionals in Accessibility Core Competencies (CPACC), and/or Certified Web Accessibility Specialists (WAS), and/or Certified Professionals in Web Accessibility (CPWA) as maintained through the International Association of Accessibility Professionals (IAAP). All work supplied in fulfillment of the accessibility audits are conducted by certified AudioEye team members or their work is overseen/validated by a certified team member. Manual assistive technology (AT) testing is overseen by AudioEye's Senior AT Testers, including credentialed Freedom Scientific JAWS Certified Tester(s). Over the past few years, the AudioEye team of accessibility engineers, SMEs, and testers has audited and remediated thousands of web domains and web applications. Today, on a daily basis, AudioEye – through the application of leading-edge dynamic remediation technology serves billions of accessibility fixes across a network of clients who encompass some of the largest and most influential businesses and organizations in the world. AudioEye's mission is to eradicate all barriers to digital accessibility. [^](#)

Description of Services Provided to Client by AudioEye

The intent of providing the following details is to further illustrate the AudioEye Approach and provide a detailed breakdown of AudioEye capabilities and the Services provided by AudioEye that are congruent with applicable ADA-related laws, best practices and the various legal precedents that have come to shape the industry over the last several years.

The timing of any all services rendered should be considered either complete, in progress / ongoing, or scheduled.

Step 1: Activation

In coordination with AudioEye, Client enables the AudioEye JavaScript within the authorized domain.

REQUIREMENTS	AUDIOEYE PRODUCT / SERVICE
Accessibility resource / information	<div>Certification Statement</div> <ul style="list-style-type: none">Public-facing statement that describes Client’s commitment to Digital Inclusion and the steps taken/ being taken to ensure equal access

Accessibility resource / information	<p>Accessibility Help Desk</p> <ul style="list-style-type: none"> • Help Desk utility for end-users to report accessibility issues and grievances should they be encountered • Reported issues set remediation prioritization <p>Accessibility Statement (Recommended)</p> <ul style="list-style-type: none"> • Typically deployed within main navigation or footer and implemented by Client
Remediation	<p>Global Remediations</p> <ul style="list-style-type: none"> • Auto Remediations BEGINS to incrementally improve conformance and usability for common accessibility issues
Accessibility Auditor / SME	<p>Official Auditor Representation is Activated</p> <ul style="list-style-type: none"> • AudioEye makes available Sustainable Testing & Remediation (STAR) Plan • AudioEye attests to fulfilling ongoing accessibility auditor services through Periodic Manual Audits • Provides Client access to accessibility testing, remediation, and monitoring tools/resources and support materials

Training

Access to archived training materials and accessibility training seminars is activated

- Regularly updated trainings topics include:
 - Intro to Accessibility
 - Accessibility Essentials
 - Document / Video Accessibility
 - Accessibility Guideline Updates
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Step 2: Testing and Discovery**Issue**

Always-On Monitoring Service

Identification

- Analytics derived from site usage statistics
 - Evaluations conducted against relative and pertinent web pages as indicated by analytics
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Accessibility

Periodic Manual Audits

Testing

- Regular technical analysis and functional usability testing (manual testing) conducted by Assistive Technology (AT) testers depending upon the level of risk ATs assign to the website based on their experience.

Step 3: Remediation and Validation

REQUIREMENTS	AUDIOEYE PRODUCT / SERVICE
Fixing Identified Issues and Validating Usability	<p>Manual Remediation of Accessibility Issues (if purchased)</p> <ul style="list-style-type: none">• Automated and Manual test results provide feedback for AudioEye Engineers to develop remediations to fix issues of accessibility and increase conformance with WCAG• As issues are addressed, retesting is conducted to validate usability of remediation content & functionality.
Ensuring an Optimal User Experience	<p>Free Assistive Tools via the AudioEye Toolbar</p> <ul style="list-style-type: none">• Web Personalization Tools allow end-users to customize their user experience to meet their individual needs• Includes:<ul style="list-style-type: none">• Page Structure Menu: facilitates keyboard friendly access for quick navigation• Help Desk (web form): allows end-users to report issues of accessibility that impact issue prioritization and are processed by accessibility subject matter experts• Visual Toolkit: allows end-users to easily customize the visual display of the page, including: zoom, contrast, and font.

Step 4: AudioEye Trusted Certification

REQUIREMENTS	AUDIOEYE PRODUCT / SERVICE
Continual Issue Tracking	<p>Compliance Monitoring</p> <ul style="list-style-type: none">• Regular ongoing automated conformance evaluation scanning and continuous WCAG testing conducted against dynamically generated site performance analysis <p>Periodic Manual Audits</p> <ul style="list-style-type: none">• Regular technical analysis and functional usability testing (manual testing) conducted by Assistive Technology (AT) testers depending upon the level of risk the ATs assign to the website based on their experience.
Sustainable Remediation Plan	<p>Hot Fixing and Scheduled Maintenance</p> <ul style="list-style-type: none">• High prevalence of new issues trigger hot fixes to be remediated as needed• Lower priority issues accumulate to be addressed through scheduled remediation maintenance intervals

**Sustainable
Remediation
Plan****AudioEye Trusted Certification**

- AudioEye certifies that its Client's site has met all prerequisites and continues to fulfill the ongoing requirements of the AudioEye Trusted Process and the deployment of the AudioEye Toolbar, with the goal of maximizing and continually improving conformance with the informative guidance provided through the WCAG. Certification presented in AudioEye Toolbar and/or Client-published Accessibility Statement. Includes AudioEye Trusted Badge.
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AudioEye Company Profile

AudioEye's mission is to eradicate all barriers to digital accessibility.

We believe equal access to digital content is the right of every individual and the responsibility of every entity.

Our suite of products and services are designed to enable equal access, enhance the user experience for all, and provide sustainable, results-driven accessibility solutions for any enterprise or organization with an online presence.

The company's products and services are trusted by some of the largest and most influential companies and agencies in the world, which encompass the following categories: K-12 education, higher education, federal government, state & local government, human resources, media, transportation, insurance/banking, travel, food services and retail.

AudioEye, Inc. was formed as a Delaware corporation on May 20, 2005 and is headquartered in Tucson, AZ. Today, an experienced team of in-house engineers, designers, and developers in our Atlanta, GA, and Tucson offices develop the Company's technology & software.

AudioEye's common stock trades on the Nasdaq under the symbol "AEYE".

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