Preparing Accessible, ADA Compliant Shareholder Materials

What is ADA Compliance?

The Americans with Disabilities Act (ADA) is a civil rights law signed in 1990 that prohibits discrimination against individuals with disabilities*. Within ADA, Title III is specific to public accommodation and mandates that public spaces and commercial facilities be designed, constructed, and altered in compliance with ADA accessibility standards. Public spaces include web and mobile spaces that can be accessed via the internet. Content and information, including documents that are available for download, should be accessible to all users. ADA compliance ensures that people with visual, hearing, mobility, cognitive, and other types of impairment can access information within these spaces as readily as everyone else.

How Do I Make My Stakeholder Communications ADA Compliant?

Remediation is a process that makes a PDF readable to assistive technology like screen readers and allows those with impairments to receive all the information. Remediation is made easier by following the Web Content Accessibility Guidelines that provide further details on what makes websites and their content accessible.

The Civil Rights Division of the US Department of Justice released **Guidance on Web Accessibility and the ADA** and provided covered entities flexibility in compliance while highlighting common barriers and fixes.

Among these are:

⊘ **Poor color contrast.** There needs to be strong contrast between the text and background colors so that it can be distinguished easily. You can check the contrast of your own documents and sites by visiting this **Color Checker page** from WebAIM.

Notice of Annual Meeting of Stockholders

⊘ **Use of color alone to give information.** Information solely conveyed via color cues is inaccessible to readers with color vision deficiency due to the inability to distinguish certain colors from others. Technology tools that support readers do not distinguish color differences within images which may lead to information being excluded.

Compensation Committee

CHAIR   MEMBERS
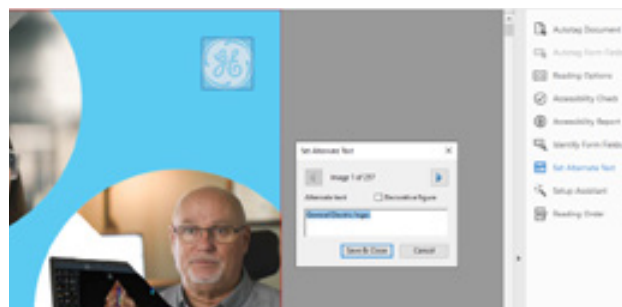

Robert J. Miron   Robert R. Beck   Paul A. Gould   Kenneth W. Lowe

⊘ **Lack of text alternatives ("alt text") on images.** Text alternatives convey the purpose of an image, including pictures, illustrations, charts, etc. Readers who are visually impaired will not benefit from graphics, images or charts if supporting text is not provided.
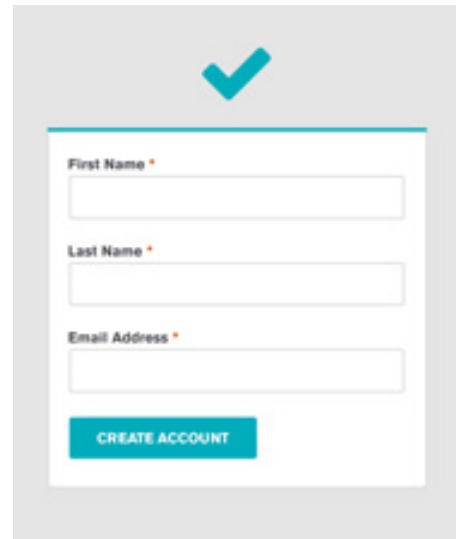

⊘ **No captions on videos.** Video content must include captions of the narrative to support those with hearing or visual impairment.
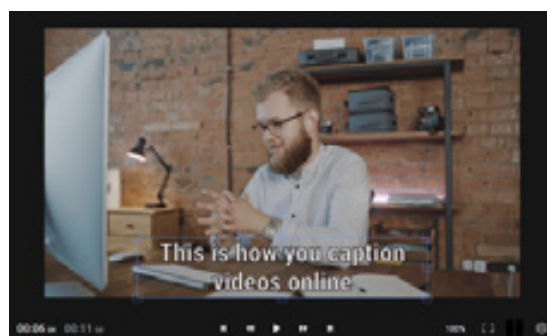
⊘ **Inaccessible online forms.** Online form should also leverage accessibility features such as:

- Labels that screen readers can convey to their users (e.g., text that reads "credit card number" where that number should be entered);
- Clear instructions; and
- Error indicators (e.g., alerts telling the user a form field is missing or incorrect).

⊘ **Mouse-only navigation (lack of keyboard navigation).** Not all users can operate a mouse or track pad. Web pages should be navigable via key strokes and vocal commands.

Accessibility needs to be considered for both PDF documents and websites.

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*   The ADA defines a person with a disability as a person who has a physical or mental impairment that substantially limits one or more major life activity. This includes people who have a record of such an impairment, even if they do not currently have a disability. It also includes individuals who do not have a disability but are regarded as having a disability. The ADA also makes it unlawful to discriminate against a person based on that person's association with a person with a disability.

Web Content Accessibility Guidelines

Web Content Accessibility Guidelines (WCAG) is an ISO international standard developed by the same international community (World Wide Web Consortium, or W3C) that develops web standards such as HTML and CSS. The latest version, WCAG 2.1, was published in 2018 and contains a list of 13 guidelines and testable success criteria to help developers understand how to implement these guidelines.

WCAG guidelines are categorized into **three levels of conformance** in order to meet the needs of different groups and different situations: **A** (minimum), **AA** (mid-range), and **AAA** (highest). Principles, guidelines, success criteria, and sufficient and advisory techniques are the guidelines to make content more accessible. To best meet the needs of the broadest range of users, authors are encouraged to view and apply all layers they are able to, including the advisory techniques.

It should be noted that, especially in the areas of cognitive language and learning, even content that complies to the highest level of accessibility (AAA) will not be usable by people with all types, degrees, or combinations of disabilities. Authors are urged to take into account the full spectrum of techniques to seek pertinent advice about the most effective methods for making sure that Web content is accessible to as many users as possible.

WCAG does not require Level AAA conformance as a general policy as it is not possible to satisfy all of the criteria for some content.

Argyle seeks to achieve AA level compliance with each document design.

The PDF/UA Standard (Universal Accessibility)

The PDF/UA is published as an International Standard in 2012 (ISO 14289) that provides clear terms on how to make PDFs accessible. The PDF/UA standard contains specifications for accessible PDF documents, as well as conforming PDF readers and assistive technologies.

PDF/UA Technical Requirements

The following are just a few of the technical requirements as set out by the **PDF/UA standard**:

• All real (meaningful) content shall be tagged. Artifacts (non-meaningful content) shall not be tagged.

• The "tag tree" created by the individual tags (representing the document's content) should be sorted to reflect the document's logical reading order.

• All structure types in use shall be standard or mapped to standard.

• A manual check of the document is required to ensure that there is no information conveyed using visual means alone (e.g., contrast, color etc.), and that there is no flickering, blinking or flashing content.

• A document title must be given in the metadata. In the Document Properties, the Initial View settings must be set up so that the title (rather than the file name) appears in the window title (under Window Options).

• Any non-text elements (images, charts, graphs, infographics, logos, etc.) must have corresponding alternative text.

The Role of Transparent Information Design in Accessibility

At Argyle, we design reports using techniques for accessibility. Information design—with a committed focus to keeping information clear and accessible—is at the heart of our design practice.

Predictability

Consistency – Consistency in our design systems goes beyond aesthetic. A consistent design vocabulary—palette, iconography, a standard layout architecture—allows the reader to navigate the report more easily. Recurring significant information and concepts are designed to be recognizable throughout a document—keeping a consistent look to aid understanding and recall among readers.

Effective Board Governance at Allstate

1 Board Composition
See page 27

- Regularly consider candidates in light of current skill sets and needs
- All candidates evaluated and considered for their expertise, leadership and diversity, including gender, ethnicity and background
- Added five new directors within the last five years, including two that brought gender and/or ethnic/racial diversity to the Board

2 Board Effectiveness
See page 28

- Board evaluation process includes multiple assessments and reviews of the Board, committees and individual directors
- Robust director orientation and continuing director education program
- High standards of corporate governance

3 Engaged Oversight
See page 31

- Frequent reviews of Allstate's significant risks, including ESG, climate, culture and cybersecurity risk
- Developed three-year IDE strategy to accelerate the pace of change for diversity across the enterprise
- Ongoing reviews of human capital management and organizational health

4 Board Accountability
See page 35

- Transparent lines of accountability to our stakeholders
- A stockholder engagement program based on dialogue, transparency, and responsiveness
- Interactive investor dialogue provides perspective on investor concerns
- Reviewed proxy access provisions to ensure adherence to market standard

5 Board Structure
See page 38

- Clearly defined roles for Board Leadership
- Strong Board independence
- Instituted written policy to rotate Lead Director every three to five years and appointed new Lead Director in 2021
- Independent Board Committees with frequent executive sessions
- Appropriate director compensation structured in a manner that is aligned with stockholder interests

Board Composition

In addition to fulfilling the core competencies and additional capabilities listed on **page 13**, the Board and nominating, governance and social responsibility committee **expect non-employee directors to be free of interests or affiliations that could give rise to a biased approach to directorship responsibilities or a conflict of interest and to be free of any significant relationship with Allstate that would interfere with the director's exercise of independent judgment**. The Board and committee also expect each director to devote the time and effort necessary to serve as an effective director and act in a manner consistent with a director's fiduciary duties of loyalty and care. Allstate executive officers may not serve on boards of other corporations whose executive officers serve on Allstate's Board.

All candidates are evaluated and considered consistent with the criteria described in our Corporate Governance Guidelines (available at www.allstateinvestors.com) which address characteristics such as diversity, including gender, ethnicity and diversity of background, expertise, and perspective.

The Board has limits on the number of other public boards on which our directors may sit. Directors who are active executives may serve on the board of no more than two other public companies, and other **directors may serve on the board of no more than four other public companies (in addition to Allstate's Board in each case)**.

Board nominees are identified through a retained search firm, suggestions from current directors and stockholders, and through other methods, including self-nominations.

The nominating, governance and social responsibility committee will consider director candidates recommended by a stockholder in the same manner as all other candidates recommended by other sources. A stockholder may recommend a candidate at any time of the year by writing to the Office of the Secretary, The Allstate Corporation, 2775 Sanders Road, Suite F7, Northbrook, IL 60062-6127, or by email submission to invrel@allstate.com.

A stockholder or group of up to 20 stockholders owning 3% or more of Allstate's outstanding common stock continuously for at least three years can nominate director candidates constituting up to 20% of the Board in the company's annual meeting proxy materials.

Nomination Process for Board Election

The Board continually considers potential director candidates in anticipation of retirements, resignations, or the need for additional capabilities. Below is a description of the ongoing process to identify highly qualified candidates for Board service.

1 Consider Current Board Skill Sets and Needs
Ensure Board is strong in core competencies of strategic oversight, corporate governance, stockholder advocacy and leadership and has diversity of expertise and perspectives to meet existing and future business needs

2 Check Conflicts of Interest and References
All candidates are screened for conflicts of interest and independence

3 Nominating, Governance and Social Responsibility Committee Dialogue
Considered 277 candidates since 2012

4 Meet with Qualified Candidates
To ensure appropriate personal qualities, such as independence of mind, tenacity, and skill set to meet existing or future business needs

5 Nominating, Governance and Social Responsibility Committee Dialogue
To consider shortlisted candidates, and after deliberations, recommend candidates for election to the Board

6 Board Dialogue and Decision
Added five highly qualified directors in the past five years

Perceptibility

There are several techniques to improve presentation to make it easier for all readers to perceive information. We use a combination of these techniques in visualizations, charts and graphics.
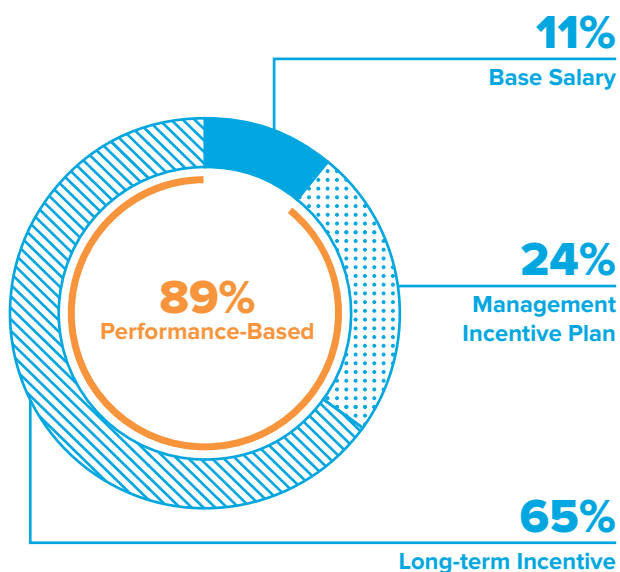
Readability – We use the ideal combination of font size and spacing to make for comfortable reading while meeting ideal page count for print run requirements.

Contrast – Color contrast checking is integrated in our design practice by making sure that text on background (light on dark or dark on light) has a contrast ratio of at least 4.5:1 and headers have a contrast ratio of at least 3:1 as recommended in Web Content Accessibility Guidelines 2.1.*

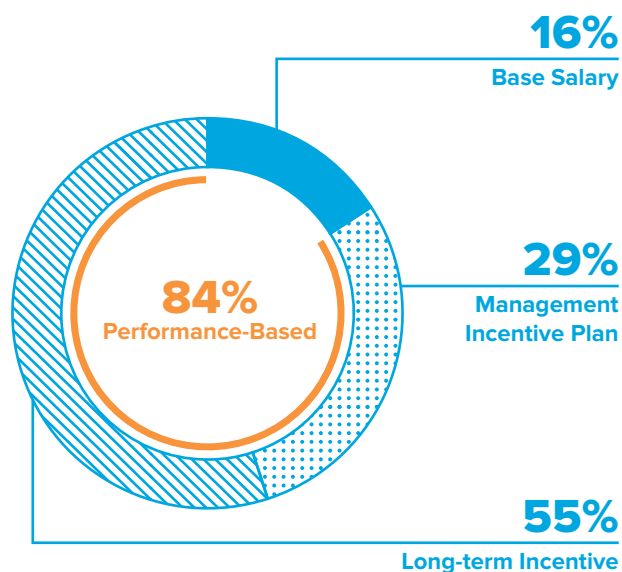|	
Total Contacted	**45%** O/S[1]
Total Engaged	**37%** O/S[1]
Director Engaged	**30%** O/S[1]
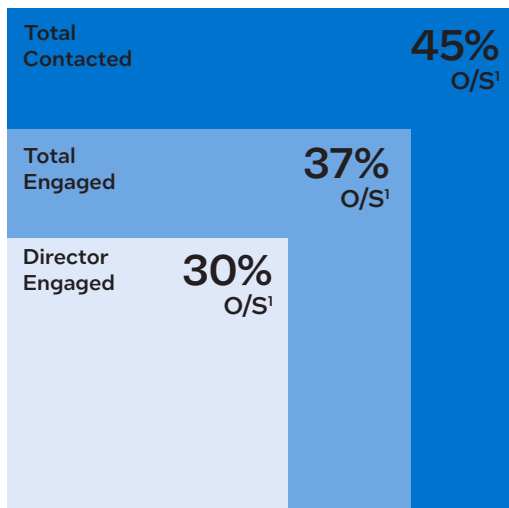
Redundant visual cues – Redundant visual cues such as patterns and shape outlines provide additional information to readers who have difficulty perceiving differences in color and tint.

CEO TARGET COMPENSATION MIX

11%
Base Salary

89%
Performance-Based

24%
Management Incentive Plan

65%
Long-term Incentive

CEO + NEOS AVERAGE TARGET MIX

16%
Base Salary

84%
Performance-Based

29%
Management Incentive Plan

55%
Long-term Incentive
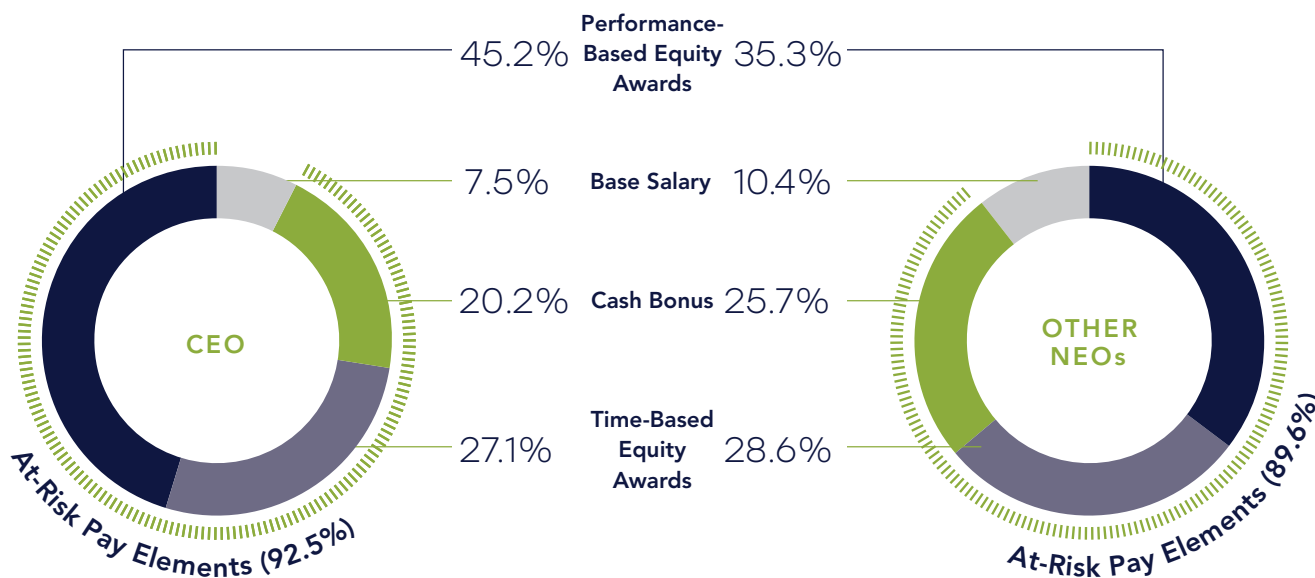
* (Accessibility Guidelines Working Group 2022)

Comprehensibility

Complex principles are best supported by a visual to further communicate the message. Material information should always be articulated in text.

Best Practices in Data Visualization

- Connecting data and labels to graphics ensures that the reader can process information quickly.
- Effective charts have high signal-to-noise ratio design. Highlighting signal (key elements that convey information) while reducing noise (unnecessary elements that distract a reader from perceiving important information) is a reliable way to make data accessible.

Majority of 2021 Pay at Risk

	CEO	OTHER NEOs
Performance-Based Equity Awards	45.2%	35.3%
Base Salary	7.5%	10.4%
Cash Bonus	20.2%	25.7%
Time-Based Equity Awards	27.1%	28.6%

At-Risk Pay Elements (92.5%) — CEO

At-Risk Pay Elements (89.6%) — OTHER NEOs

Argyle and ADA Compliance

Contact your Argyle representative for further information and pricing. Or you can contact us at:

info@argyleteam.com
(201) 793 5400

PDF Remediation

Once we receive your document, we proceed with adding metadata tagging to provide information that assistive technology such as screen readers can access. Elements like headers, table of contents, images, graphics, and tables are all properly tagged as laid out in the PDF. Images are updated to include alternate text which allows images to be interpreted by the assistive technology.

The remediation process is done on a per page basis, directly influencing the time requirements.

ADA-compliant Websites

To ensure that our web services are meeting ADA and WCAG compliance standards, we utilize the **UserWay widget**. UserWay Widget 4.0 is an accessibility solution that provides ADA compliance. It makes accommodations for: visual impairment, color blindness, and blindness; cognitive and learning disabilities; seizures and epilepsy; dyslexia; motor impairment, and ADHD. The widget has over a hundred features that allow users to have control over their site experience such as:

- Use the widget's built in screen reader
- Modify site color and contrast
- Change font size, text and line spacing. It also allows users to change site fonts to make them accessible or dyslexia-friendly.
- Automated creation of image alt text by AI-powered image recognition (for people who use screen readers)
- Rely on widget-created tooltips and page structure to help users better navigate the page
- Stop or pause videos, animations, and blinking or flashing content

This feature is available for both our PDF2WEB websites and custom websites.

About Argyle

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We are a creative communications firm offering end-to-end, in-house execution capabilities.

Our experienced and passionate team is composed of attorneys, designers, project managers, thinkers and web developers. We collaborate together around a process that encompasses drafting, editing, designing and publishing across all digital and print channels.

We are thrilled that communications prepared by Argyle have contributed to trustful relationships between our clients and their readers, whether investors, employees or other stakeholders.

In turn, our commitment to our clients has resulted in meaningful long-term relationships with some of the most respected public and private companies in the world.