This document presents a technical accessibility evaluation based on the documented checks and stated limitations. Automated checks cover only part of the WCAG criteria and do not replace human evaluation. It is not an EAA certification, a legal assessment, a guarantee of regulatory compliance, or protection against penalties; EAA applicability has not been assessed. The accessibility statement and the compliance of the service remain the responsibility of the owner of the digital service.

Accessibility Violations Register

Gruppo Sunino S.p.A. - https://www.grupposunino.com/

[!] Technical register of detected violations — internal use

Issue date: 09/11/2026 • Standard: WCAG 2.1/AA • Technical document for compliance audit

ⓘ Confidential document for technical audit

This register contains the technical details of accessibility violations found during the evaluation. It is intended for internal use for planning corrective actions and documentation required by the European EAA regulation (EU Directive 2019/882), the EN 301 549 technical standard and AgID Guidelines.

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Violations Executive Summary

Summary of issues: 5 violations of WCAG 2.1 A/AA criteria and 26 findings to be verified, which do not demonstrate the failure of a criterion, were identified in the analysis of 32 pages.

2	3	0	0
CRITICAL	HIGH	MEDIUM	LOW
Blocking • Immediate action	Serious	Moderate	Minor • Planning

Audit information

URL analyzed: https://www.grupposunino.com/

Scan date: 03/11/2026

Scanners used: Axe-core, Lighthouse, Pa11y, Playwright, QualWeb

Methodology: Multi-scanner automated analysis

Distribution by Severity

Severity is not defined by WCAG, which does not provide for it: it is the band assigned by the automated tools to each finding, reported here as an operational indication of priority.

SEVERITY	COUNT	PERCENTAGE	IMPACT
CRITICAL	2	40.0%	Completely blocks access for some users
HIGH	3	60.0%	Prevents important functionality
MEDIUM	0	0.0%	Hinders use without blocking it
LOW	0	0.0%	Improves user experience
Total	**5**	100.0%	

P.O.U.R. Principles Analysis

The P.O.U.R. principles (Perceivable, Operable, Understandable, Robust) constitute the four fundamental pillars of WCAG. The following analysis groups violations according to these principles.

[P]

Perceivable

393

Criteria 1.x - Content presentable in different ways

[O]

Operable

0

Criteria 2.x - Accessible interface and navigation

[U]

Understandable

0

Criteria 3.x - Clear information and operations

[R]

Robust

0

Criteria 4.x - Compatibility with assistive technologies

Violated WCAG Criteria

List of success criteria WCAG 2.1 level AA that are not satisfied. Each criterion is linked to official W3C documentation.

CRITERION	NAME	LEVEL	PRINCIPLE	OCCURRENCES	REFERENCE
1.4.3	Contrast (Minimum)	AA	PERCEIVABLE	**378**	W3C Documentation
1.3.1	Info and Relationships	A	PERCEIVABLE	**15**	W3C Documentation

Individual Violations Detail

Below is the complete register of violations found, sorted by descending severity. Each entry includes the element identification, violated WCAG criterion and correction guidance.

#1 - Text has minimum contrast

CRITICAL | WCAG 1.4.3 | PERCEIVABLE

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3) > div:nth-child(1) > div:nth-child(2) > p:nth-child(1)
```

DESCRIPTION

Text has minimum contrast

> **CORRECTIVE ACTION**
>
> Element has contrast ratio lower than minimum.

Detailed documentation

#2 - ARIA required owned elements

CRITICAL | WCAG 1.3.1 | PERCEIVABLE

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(7) > div:nth-child(1) > div:nth-child(2) > header:nth-child(2) > div:nth-child(1) > div:nth-child(1) > div:nth-child(2) > nav:nth-child(3) > ul:nth-child(1)
```

DESCRIPTION

ARIA required owned elements

> **CORRECTIVE ACTION**
>
> The test target owns elements that doesn't have the correct role.

Detailed documentation

#3 - This element has insufficient contrast at this conformance level. Expected a contrast ratio of at least 4.5:1, but text in this element has a contrast ratio of 1:1. Recommendation: change text colour to #767676.

HIGH WCAG 1.4.3 PERCEIVABLE

PAGE

https://www.grupposunino.com/

ELEMENT

```
#menu-item-217 > a > span
```

DESCRIPTION

This element has insufficient contrast at this conformance level. Expected a contrast ratio of at least 4.5:1, but text in this element has a contrast ratio of 1:1. Recommendation: change text colour to #767676.

> CORRECTIVE ACTION
>
> Increase the contrast between text and background to at least 4.5:1 (3:1 for large text).

Detailed documentation

#4 - This element has insufficient contrast at this conformance level. Expected a contrast ratio of at least 3:1, but text in this element has a contrast ratio of 1:1. Recommendation: change text colour to #fefeff.

HIGH WCAG 1.4.3 PERCEIVABLE

PAGE

https://www.grupposunino.com/

ELEMENT

```
#fws_6af1cd0723215 > div:nth-child(2) > div > div > div:nth-child(1) > h3 > span
```

DESCRIPTION

This element has insufficient contrast at this conformance level. Expected a contrast ratio of at least 3:1, but text in this element has a contrast ratio of 1:1. Recommendation: change text colour to #fefeff.

> CORRECTIVE ACTION
>
> Increase the contrast between text and background to at least 4.5:1 (3:1 for large text).

Detailed documentation

#5 - Ensure the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds

HIGH WCAG 1.4.3 PERCEIVABLE

PAGE

https://www.grupposunino.com/companies/plastic-legno/

DESCRIPTION

Ensure the contrast between foreground and background colors meets WCAG 2 AA minimum contrast ratio thresholds

> **CORRECTIVE ACTION**
>
> Increase the contrast between text and background to at least 4.5:1 (3:1 for large text).

Detailed documentation

Findings to be verified

The following findings do not demonstrate the violation of a WCAG 2.1 level A or AA success criterion: they are automated tool notices that require manual verification. They are excluded from the violation count and from the conformance outcome.

#1 - ARIA state or property is permitted

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3)
```

DESCRIPTION

ARIA state or property is permitted

CORRECTIVE ACTION

The aria-label property is neither inherited nor supported by the role generic.

#2 - Duplicate id attribute value "sunino-a11y-eaa" found on the web page.

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
#sunino-a11y-eaa
```

DESCRIPTION

Duplicate id attribute value "sunino-a11y-eaa" found on the web page.

#3 - Text has enhanced contrast

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/the-group/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3) > div:nth-child(1) > div:nth-child(2) > p:nth-child(1)
```

DESCRIPTION

Text has enhanced contrast

CORRECTIVE ACTION

Element has contrast ratio lower than minimum.

#4 - Using percent, em, names for font sizes

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2)
```

DESCRIPTION

Using percent, em, names for font sizes

> **CORRECTIVE ACTION**
>
> This test target has a font-size css property using an absolute unit value with the important flag.

#5 - Zoomed text node is not clipped with CSS overflow

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3) > div:nth-child(1) > div:nth-child(2) > p:nth-child(1)
```

DESCRIPTION

Zoomed text node is not clipped with CSS overflow

> **CORRECTIVE ACTION**
>
> Check if each ancestor or the text node is not clipped by overflow.

#6 - Element in sequential focus order has visible focus

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3)
```

DESCRIPTION

Element in sequential focus order has visible focus

> **CORRECTIVE ACTION**
>
> Check if the element has some visible focus indication

#7 - Failure of Success Criterion 1.1.1 and 1.2.1 due to using text alternatives that are not alternatives

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(2) > button:nth-child(1) > img:nth-child(1)
```

DESCRIPTION

Failure of Success Criterion 1.1.1 and 1.2.1 due to using text alternatives that are not alternatives

> **CORRECTIVE ACTION**
>
> Text alternative needs manual verification.

#8 - Error message describes invalid form field value

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(4) > div:nth-child(1) > div:nth-child(2) > div:nth-child(2) > div:nth-child(2) > div:nth-child(1) > div:nth-child(2) > div:nth-child(1) > div:nth-child(2) > input:nth-child(1)
```

DESCRIPTION

Error message describes invalid form field value

> **CORRECTIVE ACTION**
>
> Check that text error messages provided, identify the cause of the error or how to fix the error.

#9 - Positioning labels to maximize predictability of relationships

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(7) > div:nth-child(1) > div:nth-child(3) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > div:nth-child(7) > div:nth-child(2) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > div:nth-child(2) > div:nth-child(2) > div:nth-child(1) > div:nth-child(1) > div:nth-child(5) > form:nth-child(2) > div:nth-child(2) > div:nth-child(1) > p:nth-child(1) > label:nth-child(1) > span:nth-child(2) > input:nth-child(1)
```

DESCRIPTION

Positioning labels to maximize predictability of relationships

> **CORRECTIVE ACTION**
>
> The form field has incorrect positioned label.

#10 - Using ol, ul and dl for lists or groups of links

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(4) > div:nth-child(1) > div:nth-child(2) > div:nth-child(2) > div:nth-child(1) > div:nth-child(2) > div:nth-child(1) > ul:nth-child(1)
```

DESCRIPTION

Using ol, ul and dl for lists or groups of links

> **CORRECTIVE ACTION**
>
> A list item is not contained in a correct list element.

#11 - Document has a landmark with non-repeated content

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html
```

DESCRIPTION

Document has a landmark with non-repeated content

> **CORRECTIVE ACTION**
>
> Check either there is no non-repeated content after repeated content or there exists an element for which all the following are true: - the element has semantic role inheriting from landmark; and - the first perceivable content (in tree order in the flat tree) which is an inclusive descendant of the element is non-repeated content after repeated content; and - the element is included in the accessibility tree.

#12 - Document has heading for non-repeated content

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html
```

DESCRIPTION

Document has heading for non-repeated content

> **CORRECTIVE ACTION**
>
> Check either there is no non-repeated content after repeated content or there exists an element for which all the following are true: - the element is non-repeated content after repeated content; and - the element has a semantic role of heading; and - the element is visible; and - the element is included in the accessibility tree.

#13 - Block of repeated content is collapsible

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html
```

DESCRIPTION

Block of repeated content is collapsible

> **CORRECTIVE ACTION**
>
> For each block of repeated content in each test target, which is before (in the flat tree) at least one node of non-repeated content after repeated content, check that all the following are true: - there exists an instrument to make all nodes in this block not visible; and - there exists an instrument to remove all nodes in this block from the accessibility tree.

#14 - Document has an instrument to move focus to non-repeated content

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html
```

DESCRIPTION

Document has an instrument to move focus to non-repeated content

> **CORRECTIVE ACTION**
>
> The page has one or more instrument(s) to move focus. Check if any of these instrument(s) is being used before a block of repeated content, and the focus is moved to just before a block of non-repeated content.

#15 - Links with identical accessible names have equivalent purpose

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(7) > div:nth-child(1) > div:nth-child(3) > div:nth-child(3) > div:nth-child(1) > div:nth-child(1) > div:nth-child(2) > div:nth-child(2) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > div:nth-child(2) > div:nth-child(2) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > ul:nth-child(1) > li:nth-child(1) > a:nth-child(1)
```

DESCRIPTION

Links with identical accessible names have equivalent purpose

> **CORRECTIVE ACTION**
>
> The links with the same accessible name have different content. Verify is the content is equivalent.

#16 - Links with identical accessible names and context serve equivalent purpose

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(7) > div:nth-child(1) > div:nth-child(3) > div:nth-child(1) > div:nth-child(1) > div:nth-child(1) > div:nth-child(2) > div:nth-child(3) > div:nth-child(2) > div:nth-child(1) > div:nth-child(2) > div:nth-child(3) > span:nth-child(1) > span:nth-child(1) > a:nth-child(1)
```

DESCRIPTION

Links with identical accessible names and context serve equivalent purpose

> **CORRECTIVE ACTION**
>
> The links with the same accessible name have different content. Verify is the content is equivalent.

#17 - Bypass Blocks of Repeated Content

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html
```

DESCRIPTION

Bypass Blocks of Repeated Content

> **CORRECTIVE ACTION**
>
> No test targets found.QW-ACT-R63

#18 - Organizing a page using headings

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(4) > div:nth-child(1) > div:nth-child(1) > span:nth-child(1)
```

DESCRIPTION

Organizing a page using headings

> **CORRECTIVE ACTION**
>
> Headings are not in the correct order.

#19 - Adding a link at the top of each page that goes directly to the main content area

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(3)
```

DESCRIPTION

Adding a link at the top of each page that goes directly to the main content area

> **CORRECTIVE ACTION**
>
> The first focusable control on the Web page is not a link.

#20 - Supplementing link text with the title attribute

HIGH NO A/AA CRITERION

PAGE

https://www.grupposunino.com/nextalia-sunino-insieme-accelerare-sviluppo-plasticlegno/

ELEMENT

```
html > body:nth-child(2) > div:nth-child(7) > div:nth-child(1) > div:nth-child(3) > div:nth-child(3) > div:nth-child(2) > a:nth-child(1)
```

DESCRIPTION

Supplementing link text with the title attribute

> **CORRECTIVE ACTION**
>
> Please verify that the element's title attribute describes correctly the link.

#21 - This link points to a named anchor "form" within the document, but no anchor exists with that name.

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/the-group/who-we-are/

ELEMENT

```
#fws_6af1ceb20f842 > div:nth-child(2) > div:nth-child(1) > div > div > a
```

DESCRIPTION

This link points to a named anchor "form" within the document, but no anchor exists with that name.

#22 - Ensure all page content is contained by landmarks

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/news/

DESCRIPTION

Ensure all page content is contained by landmarks

#23 - Ensure the main landmark is at top level

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/nextalia-sunino-insieme-accelerare-sviluppo-plasticlegno/

DESCRIPTION

Ensure the main landmark is at top level

#24 - Ensure the document has at most one main landmark

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/nextalia-sunino-insieme-accelerare-sviluppo-plasticlegno/

DESCRIPTION

Ensure the document has at most one main landmark

#25 - Ensure landmarks are unique

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/nextalia-sunino-insieme-accelerare-sviluppo-plasticlegno/

DESCRIPTION

Ensure landmarks are unique

#26 - Ensure the document has a main landmark

MEDIUM NO A/AA CRITERION

PAGE

https://www.grupposunino.com/search/plastica/

DESCRIPTION

Ensure the document has a main landmark

Intervention plan

Suggested order of intervention for the unmet criteria. It contains no duration estimates: these depend on the site architecture and on the resources of the assessed entity.

- **Priority 1:** fix first the issues classified as critical (4), which can block access
- **Planning:** include in the development roadmap the fix of 2 WCAG criteria not satisfied, listed in this document
- **Training:** raise awareness of accessibility principles among the development and content teams
- **Value:** accessibility improves the experience for all users

Regulatory References

□□ European Regulations

- EU Directive 2019/882 (EAA)
- EU Directive 2016/2102 (WAD)
- EN 301 549 v3.2.1

W3C/WAI Standards

- WCAG 2.1 (W3C Recommendation)
- WCAG 2.2 (W3C Recommendation)
- WCAG 3.0 (Working Draft)
- WCAG-EM 1.0

Italian Regulations

- Law 4/2004 (Stanca Law)
- AgID Accessibility Guidelines
- Legislative Decree 82/2005 (CAD)
- Legislative Decree 82/2022 (EAA transposition)

Audit Metadata

Complete technical information about the accessibility evaluation conducted.

FIELD	VALUE
Audit ID	`eaa_1794231663605`
Conducting entity	Principi S.r.l.
Technical manager	Andrea Vadacchino
Assessment date	09/11/2026
Reference standard	WCAG 2.1 level AA - EN 301 549 v3.2.1
Methodology	Multi-scanner automated analysis
Pages in the sample	32
Compliance rate	**95%**

Testing tools used

TOOL	DEVELOPER	TYPE
Axe-core	Deque Systems	Analysis of WCAG violations, identifying the problematic elements
Lighthouse	Google	Evaluation of accessibility best practices
Pa11y	Team Pa11y	Validation of accessibility standards, focusing on HTML5 and ARIA
Playwright	Microsoft	Checks in the browser (keyboard, focus, text spacing, labels). Five checks, tested on test pages, prove that their own criterion is not met (1.4.10, 1.4.12, 2.1.2, 2.4.7, 2.5.3), never that it is met; the other findings are warnings to be verified
QualWeb	Universidade de Lisboa	W3C ACT rules and WCAG techniques

ADDITIONAL AUDIT INFORMATION

Evaluated organization: Gruppo Sunino S.p.A.

Website: https://www.grupposunino.com/

Validation method: Multi-scanner automated analysis + result normalization

Accuracy level: Limited to the WCAG criteria automatically verifiable

Responsibilities

Assignment of responsibilities for managing and resolving violations.

AUDIT PERFORMED BY	CLIENT
Organization: Principi S.r.l. **Technician:** Andrea Vadacchino **Audit date:** 09/11/2026	**Organization:** Gruppo Sunino S.p.A. **Email:** plasticlegno@plasticlegno.com **Phone:** +39 0124.51.86.11

Document notes

- **Identifier:** REG-eaa_1794231663605
- **Version:** 1.2
- **Classification:** Confidential - Internal use only
- **Retention:** 5 years from issue date
- **Generated by:** EAA Scanner v2.0

Revision History

Document revision history with details of changes made.

DATE	RESPONSIBLE	TYPE	VERSION	DESCRIPTION
09/11/2026	Principi S.r.l.	First release	**1.0**	Document automatically generated from EAA Scanner accessibility audit
09/11/2026	Principi S.r.l.	Reissue	**1.2**	New issue of the documents of the same scan, with the rendering rules in force

The integer part of the number counts the scans of the site (X.0 = X-th scan); the decimal part counts the reissues of the documents of the same scan (X.1, X.2…).

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