

ACCESSIBILITY STATEMENT

First Investment Bank AD undertakes to provide access to its mobile application in accordance with the Law on the accessibility requirements for products and services (Promulgated SG, issue 31 of 11.04.2025, in force since 28.06.2025), which transposes Directive (EU) 2019/882 on the accessibility requirements for products and services (European Accessibility Act), as well as Art. 58c of the Electronic Government Act (Promulgated SG, issue 46 of 12.06.2007; last amended SG issue 17 of 13.02.2026) and Art. 39 and 39a of the Ordinance on the general requirements for information systems, registers and electronic administrative services (Promulgated SG, issue 5 of 17.01.2017; last amended and supplemented SG issue 80 of 20.09.2024).

This accessibility statement refers to the Mobile application My Fibank available for iOS and Android.

Accessibility requirements standard to be complied with: [EN 301 549 V3.2.1 \(2021-03\)](#) / WCAG 2.1

COMPLIANCE STATUS

The mobile application partially complies with the requirements of the standard due to the inconsistencies and exceptions listed below.

Date of initial statement:	07.10.2021
Date of last update (review) of the statement:	22.04.2026
Method used to prepare the statement:	- Self-assessment; - Independent accessibility audit performed by Valantic SME AD.

NON-ACCESSIBLE CONTENT

The requirements of the standard that have not yet been covered or are partially covered are described in *Table 1* below.

Table 1

Requirement of EN 301 549 V3.2.1 (2021-03) WCAG 2.1	Description
5.5.2 Operable parts discernibility	Partial compliance. Some interactive elements may not have sufficiently descriptive accessibility labels or may be labeled with generic terms.

10.1.3.1 Info and relationships	Partial compliance. In some cases, the structure and semantics of the content may not be fully interpretable by assistive technologies.
10.1.3.2 Meaningful sequence	Partial compliance. In certain scenarios, the logical flow of content and navigation may not be entirely optimal.
10.1.4.3 Contrast (minimum)	Partial compliance. Some visual elements may not fully meet the minimum contrast requirements and are subject to further optimization.
10.1.4.4 Resize text	Partial compatibility. Font scaling is supported, but limitations or discrepancies may occur under specific configurations.
10.1.4.11 Non-text contrast	Partial compliance. Partial non-compliance may occur regarding the contrast of non-text elements (e.g., buttons, icons, banners).
10.2.4.3 Focus order	Partial compliance. In certain cases, the focus may not fully follow the expected logical sequence when navigating with assistive technologies.
10.2.4.6 Headings and labels	Partial compliance. Some headings and labels may not be sufficiently clear or consistent.
10.2.4.7 Focus visible	Partial compliance. In some cases, the visual indication of focus may not be sufficiently distinguishable.
10.3.1.2 Language of parts	Partial compliance. Content may be present in different languages, which could lead to inconsistencies when using assistive technologies.
10.3.3.1 Error identification	Partial compliance. In certain scenarios, errors may not be presented clearly enough for all users.
10.3.3.2 Labels or instructions	Partial compliance. Some forms and fields may lack sufficiently clear instructions or descriptions.
10.4.1.2 Name, role, value	Partial compliance. In some cases, information about elements (name, role, value) may not be conveyed entirely correctly to assistive technologies.
11.7 User preferences	Partial compliance. Support for system accessibility settings is available, but may not be fully consistent across all scenarios and devices.

FEEDBACK AND CONTACT INFORMATION

To provide feedback or suggestions on the accessibility of the mobile application, you can use the [inquiry form](#) or email: my.fibank@fibank.bg, or phone +359 700 12 777, +359 2 800 2700 on business days from 8:45 a.m. to 5:45 p.m.

ENFORCEMENT PROCEDURE

Pursuant to Art. 58d of the Electronic Government Act and in accordance with its internal procedures, First Investment Bank AD shall respond to feedback within 30 days. Response shall be provided according to the communication channel selected.

In the event that the Bank does not respond to feedback within the specified period or does not take measures to eliminate the accessibility violation indicated therein, the matter may be referred to the competent supervisory authority as follows:

- 1.) Regarding the provision of consumer banking services in connection with payment services under Art. 4 of the Law on Payment Services and Payment Systems (LPSPS), services linked to a payment account pursuant to § 1, item 60 of the supplementary provisions of the LPSPS, and electronic money pursuant to Art. 34 of the LPSPS – to the Bulgarian National Bank (BNB):
 - by e-mail to: BNB-Delovodstvo@bnbank.org;
 - in hard copy at the BNB's address: 1 Knyaz Alexander I Sq., 1000 Sofia.
- 2.) Regarding the provision of consumer banking services in connection with credit agreements within the scope of the Law on Consumer Credit or the Law on Real Estate Loans for Consumers – to the Commission for Consumer Protection (CCP):
 - via the CCP's online form for submitting complaints/reports at: <https://kzp.bg/>;
 - in hard copy at a CCP office. The full list of offices in the country is available at: <https://kzp.bg/en/contacts>.
- 3.) Regarding the provision of consumer banking services in connection with services pursuant to Art. 6, para. 2, items 1, 2, 4 and 5, and para. 3, items 1, 2, 4 and 5 of the Markets in Financial Instruments Act – to the Financial Supervision Commission (FSC) or the FSC deputy chair in charge of the Investment Supervision Division:
 - by e-mail to: delovodstvo@fsc.bg or via the FSC's online form for submitting complaints/reports/inquiries at: <https://eis.fsc.bg/>;
 - in hard copy at the FSC's registry or by mail to the FSC's address: 16 Budapeshta str., 1000 Sofia.

First Investment Bank AD is committed to ensuring a high degree of accessibility, eliminating any identified issues of non-compliance with the accessibility requirements for its mobile application, and ensuring a consistently high level of accessibility for the information published.

OPTIONAL CONTENT

As part of the ongoing maintenance and development of the mobile application (Android and iOS), covering core functionalities such as login and authentication (including biometric methods and multi-factor authentication), account overview, transactions and statements, transfers and payments, card management, settings, as well as error handling, dynamic

content, and notifications, measures have been taken to achieve and maintain compliance with the applicable accessibility requirements.

Naming and labeling practices for interactive elements are applied in accordance with established standards and internal guidelines. In some cases, certain elements may not contain comprehensive or sufficiently descriptive accessibility labels, and some controls may be labeled with generic names. Such scenarios are addressed within the context of ongoing maintenance processes and do not preclude the implementation of follow-up actions if necessary.

Focus and navigation logic is implemented in accordance with accessibility best practices. In certain scenarios or configurations, the focus may not automatically land on the first logical element when a screen loads; such cases are subject to review and subsequent optimization as part of planned improvements.

Regarding color contrast, guidelines compliant with applicable standards (including WCAG 2.1 AA) are applied; however, the presence of individual elements where compliance is partial or subject to further optimization cannot be ruled out.

Features related to font scaling (Dynamic Type) and adaptation to the device's system settings are supported within the technical capabilities of the respective platforms. Individual limitations or deviations in behavior may occur under specific configurations, which are considered part of the ongoing development process.

Language localization of content is carried out with a view to ensuring consistency and clarity for users. In isolated cases, inconsistencies or the presence of text in a different language may occur, which should not be interpreted as a significant limitation of functionality.

The improvement measures undertaken are implemented in phases, in accordance with internal priorities, technical feasibility, and resource availability. This description does not constitute an exhaustive guarantee of full compliance at all times, nor does it create an obligation to immediately rectify all potential inconsistencies.

In line with our commitment to continuous improvement, efforts are focused on:

- Further optimizing color ratios and contrast;
- Ensuring full and consistent support for system font size settings;
- Standardizing and refining accessibility labels;
- Final refinement of focus and navigation logic when using screen readers.

The process of improving accessibility is viewed as a continuous and systematic commitment, integrated into all stages of the application's development and maintenance lifecycle. This includes regularly reviewing and updating functionalities against applicable standards and best practices, tracking user feedback, and implementing internal quality control mechanisms. This approach aims to sustainably improve accessibility, promptly address emerging non-conformities, and ensure a consistent and inclusive user experience.