

# JPMC TPP WCAG STANDARD

JPMorgan Chase & Co., and/or one or more of its subsidiaries or affiliates, including JPMorgan Chase Bank, N.A., collectively referred to as “**JPMC**,” has an agreement with a Third Party Provider (TPP) (henceforth to be referred to as “**Supplier**”) for services and/or goods (the “**TPP Agreement**”) that incorporates this JPMC TPP Web Content Accessibility Guidelines (WCAG) Standard (“**Supplier WCAG Standard**”).

In the event of a conflict between the TPP Agreement and this Supplier WCAG Standard, the TPP Agreement shall control. In the event a supplier identifies a conflict between the TPP Agreement and this Supplier WCAG Standard, the supplier shall promptly report such conflict in writing to the JPMC Relationship Manager of the TPP Agreement. Otherwise, the terms of the TPP Agreement shall be deemed consistent with this Supplier WCAG Standard.

## **Applicability**

This Supplier WCAG Standard applies to a supplier where the supplier interacts with actual or potential JPMC customers and/or employees via [Digital Content](#) offered through applicable JPMC web and mobile properties or by JPMC Digital Content delivered via supplier web and mobile properties, or as otherwise indicated by the TPP Agreement and/or JPMC Relationship Manager (or Delivery Manager as the case may be) as being applicable. This Standard also applies to [Design Guidelines](#) and related materials that may be used as a basis for Digital Content production at a later date.

## **Conformance Requirements**

1. The standard for accessible customer-facing and employee-facing Digital Content is the Web Content Accessibility Guidelines (WCAG) v2.1 Level A and AA success criteria established by the World Wide Web Consortium (W3C) or other future versions of WCAG as detailed below and in compliance with the Twenty-First Century Communications and Video Accessibility Act.
2. All documents published in Portable Document Format (PDF) and accessed through digital channels must be [PDF/Universal Accessibility \(UA\)](#) conformant.
3. We reserve the right to seek conformance based on future versions of the WCAG and PDF/UA accessibility standards in light of new events that may include, but are not limited to, regulatory guidance, amended relevant statute(s), and/or as detailed in latest Department of Justice settlement agreements.
4. Without limiting the requirements of WCAG conformance generally, in the event the supplier does not conform to this Supplier WCAG Standard, supplier shall first obtain express written approval of a risk acceptance from the JPMC Relationship Manager **confirming that such conformance variants have also been approved by JPMC Risk and Controls**.
5. To the extent supplier Digital Content requires remediation, such remediation will be completed in accordance with the below, unless otherwise agreed. Timelines for defect resolution are driven by the applicable [Priority Level](#) of a defect as determined by JPMC.
  - a. Critical priority defects for WCAG success criteria found prior to production release are to be remediated prior to production release.
  - b. Critical priority defects for WCAG success criteria discovered in production must be remediated with the next production release or within 30 calendar days, whichever is sooner.

- c. High priority defects for WCAG success criteria are to be remediated within 120 calendar days after the defect was identified.
  - d. Medium and low priority defects for WCAG success criteria are to be remediated within 240 calendar days after the defect was identified.
6. To the extent that the supplier identifies a WCAG defect in its Digital Content, supplier shall notify JPMC of each defect in writing within 15 calendar days of discovery.

**Priority Levels**

Priority levels are applied to defects based on the level of impact to users. JPMC uses the below guidelines when assessing prioritization for defects.

Priority Level	Guideline
Critical	Any accessibility issue caused by a failure of any of the following WCAG Success Criteria is automatically prioritized as critical priority: <ul style="list-style-type: none"> <li>• 1.3.4 Orientation</li> <li>• 1.4.2 Audio Control</li> <li>• 2.1.2 No Keyboard Trap</li> <li>• 2.2.2 Pause, Stop, Hide</li> <li>• 2.3.1 Three Flashes or Below Threshold</li> <li>• 3.3.4 Error Prevention</li> </ul>
Critical	Any accessibility issue which does all of the following: <ul style="list-style-type: none"> <li>• Fails to conform to required accessibility standards</li> <li>• Limits a <a href="#">User's</a> ability to access and use the product</li> <li>• Has no <a href="#">Workaround</a> (see <a href="#">Definitions</a> for further detail)</li> </ul>
High	Any accessibility issue which does all of the following: <ul style="list-style-type: none"> <li>• Fails to conform to required accessibility standards</li> <li>• Limits a User's ability to access and use the product</li> <li>• Has a Workaround</li> </ul>
Medium	Any accessibility issue which does all of the following: <ul style="list-style-type: none"> <li>• Does not fail to conform to required accessibility standards</li> <li>• May limit a User's ability to access and use the product</li> </ul> <p><b>Note:</b> Medium priority defects may result in complaints because they may limit (but do not prevent) a User's ability to access and use the product.</p>
Low	Any accessibility issue which does all of the following: <ul style="list-style-type: none"> <li>• Does not fail to conform to required accessibility standards</li> <li>• Does not limit a User's ability to access and use the product</li> </ul> <p><b>Note:</b> Low priority defects are non-WCAG usability issues that have an accessibility impact.</p>

## **Priority Level Examples**

For guidance, examples of each type of priority defect is included. The examples cited should not be viewed as an exhaustive list of possible defects, but as an aid in determining categorization and prioritizing remediation.

<b>Priority Level</b>	<b>Example</b>
Critical (no workaround is available)	<p><b>Meaningful Sequence</b></p> <p>A PDF of an annual report contains crucial statistics on stock performance. The PDF has two columns of text, reading visually down the left column first and then to the second column – a typical visual organization of content.</p> <p>Due to the logical (code) structure of the PDF, a screen reader will read across the full breadth of the PDF page, reading the first line of the left column uninterrupted, then immediately reading the first line of the second column, thus making the content of the PDF unusable to a screen reader. Even when the PDF is untagged, the screen reader will follow the logical content order of the PDF page.</p> <p>The page from which the user downloaded the PDF has no links to accessible alternative versions.</p>
Critical (no workaround is available)	<p><b>Focus Order</b></p> <p>During the account opening flow, a dialog appears with a button the user must click to accept account terms. For a visual user, the dialog and button are readily apparent and actionable.</p> <p>Due to a defect, the screen reader focus does not move to the dialog and appears at the top of the page's document order. The content "under" the dialog remains screen reader navigable/is not hidden.</p> <p>Due to the incorrect implementation of the focus order, the button for accepting terms is not discoverable, and the screen reader user cannot complete the process without visual assistance.</p>
High (workaround available)	<p><b>Status Messages</b></p> <p>While a screen reader user is on a screen that initiates an account transfer, a message appears at the top of the screen that indicates the transfer service is temporarily unavailable. However, due to the defect, that message is not read by the screen reader.</p> <p>When the user activates the button to make the transfer, nothing happens. Through exploration of the screen, the user eventually locates and can read the service outage announcement at the top.</p>

Priority Level	Example
Medium	<p><b>Non-WCAG/Usability</b></p> <p>Columns in a table of account transactions are sortable. However, the button that performs the initial sort only becomes visible when you hover or focus table header cells. Once sorted, an icon button displays, indicating the column is sorted ascending or descending. The buttons and programmatic states of not sorted, sorted ascending, and sorted descending are available to a screen reader user.</p> <p>Some users may never locate the sort buttons unless they are always present visually, even when a column is in an unsorted state.</p>
Low	<p><b>Non-WCAG/Usability</b></p> <p>A web page contains a number of minor and subtle animations, including:</p> <ul style="list-style-type: none"> <li>• Accordions in which the panel regions expand and collapse with a slight ease-out/ease-in quarter-second animation.</li> <li>• The page's menu icon transitions between the three-bars "hamburger" appearance to an "X."</li> <li>• Links anchoring to content elsewhere on the page cause a smooth scroll rather than an abrupt jump.</li> </ul> <p>These animations may induce a vertigo in people with vestibular disorders.</p>

### **Software for Testing**

For the best user experience, suppliers must test for accessibility using the currently supported versions of the manufacturer's assistive technology applications and web browsers paired as follows:

- Chrome and JAWS
- Mozilla Firefox and NVDA
- Chrome and TalkBack for Android devices
- Safari and VoiceOver for iOS and macOS devices

### **Evidence Requirements**

1. JPMC requires an [Accessibility Conformance Report \(ACR\)](#) in the form of a completed WCAG [Voluntary Product Accessibility Template \(VPAT®\)](#) as an indication of the supplier's product conformance either within 30 calendar days of JPMC request and/or prior to production implementation of new or updated content that impacts user experience. The supplier may engage a third party, at their own expense, to perform an assessment and complete a VPAT®.
2. JPMC may periodically conduct a review to assess the supplier's current accessibility maturity and ongoing conformance support capability. The supplier is expected to provide a response to the review feedback within 30 calendar days, unless otherwise agreed.

3. Related to applications used by JPMC employees, JPMC may perform accessibility assessments in our computing environment using a combination of automated, manual and assistive technology focused techniques.
  - a. JPMC will provide the supplier with test results and a list of identified accessibility defects with assigned priority classifications.
  - b. The supplier will provide an accessibility remediation roadmap outlining the target timeline to address the identified defects within 30 calendar days of initial test results delivery or subsequent roadmap update request.
    - i. Remediation will be completed within a mutually agreed upon timeline not to exceed six (6) months, unless otherwise agreed.
  - c. The supplier will provide updated remediation timelines and progress reports during remediation process.

## **Definitions**

1. **“Accessibility Conformance Report”** or **“ACR”** is a representation of how a product meets the applicable accessibility standards. JPMC accepts ACRs only in the form of a completed WCAG VPAT® using the latest version of the template available via the ITIC.org website link below.
2. **“Design Guidelines”** are a set of recommendations JPMC utilizes to build its brand identity and how it is portrayed to the public, including its logo and all other elements related to its identity. They guide how to use the JPMC’s visual elements, such as logos, fronts, and color palettes.
3. **“Digital Content”** is text, images, sounds, videos and animations encountered as part of the user experience presented through various digital and electronic platforms and interfaces, including but not limited to websites, desktop or mobile applications, ATM interfaces, webinars, text messages, emails, electronic documents (such as PDFs) and plug-ins.
4. **“PDF/UA”** is a Portable Document Format (PDF) built for Universal Accessibility (UA) in conformance with ISO 14289-1 standard which contains specifications for accessible PDF documents as published by the International Organization for Standardization (ISO).
5. **“User”** is a person or entity that engages with a product, service, or system in some way, such as by using it, interacting with it, or consuming it.
6. **“Voluntary Product Accessibility Template”** or **“VPAT®”** is a reporting format published by the Information Technology Industry Council (ITI) used to document a product’s conformance with applicable standards. The word “voluntary” within the title is not indicative that the VPAT® is an optional requirement.
7. **“Workaround”** is when, within the same product and/or workflow, there is an alternative means of accomplishing the same task, using the same device, browser/application, and assistive technology. This alternative means must be on the same page or screen (or referenced on the same page or screen) in a manner that is readily discoverable. Workarounds do not require a user to turn off an assistive technology, use a different device, browser/application, or assistive technology or require the user to request the help of someone else.

## **Links**

1. Web Content Accessibility Guidelines (WCAG) 2.1 standards are published by the Worldwide Web Consortium (W3C) at: <https://www.w3.org/TR/WCAG21/>.
2. The WCAG Voluntary Product Accessibility Template (VPAT®) is published by the Information Technology Industry Council (ITI) and can be downloaded from: <https://www.itic.org/policy/accessibility/vpat>.