

JPMC TPP WCAG STANDARD

JPMorgan Chase Bank, N.A. and/or one or more of its affiliates (“**JPMC**”) has an agreement with a Third Party Provider (henceforth to be referred to as “**Supplier**”) for services and/or goods (the “**TPP Agreement**”) that implicates this JPMC Third Party Provider 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 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.

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) 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/UA](#) conformant.
3. 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 from the JPMC Relationship Manager confirming that such conformance variants have been approved by JPMC Risk and Controls.
4. To the extent supplier digital content requires remediation, such remediation will be completed in accordance with the following, unless otherwise agreed. The severity and priority of a defect will be determined by JPMC:
 - a Critical severity or critical priority defects for WCAG success criteria found prior to production release are to be remediated prior to production release
 - b Critical severity or critical priority defects for WCAG success criteria discovered in production must be remediated with the next production release or within 30 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
5. 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 days to allow for priority and severity assignment by JPMC.

Evidence Requirements

1. JPMC requires an Accessibility Conformance Report (ACR) in the form of a completed [Voluntary Product Accessibility Template \(VPAT®\)](#) as an indication of the supplier’s product conformance either within 30 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®.

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2. JPMC may periodically conduct a review to assess the supplier's current accessibility maturity and ongoing conformance support capability. The expectation is that supplier provides response related to the review feedback within 30 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/severity classifications
 - b The supplier will provide an accessibility remediation roadmap outlining the target timeline to address the identified defects within 30 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 recertification process

Definitions

1. **"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.
2. **"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 WCAG standards. The word "voluntary" within the title is not indicative that the VPAT® is an optional requirement.
3. **"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).

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 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>.