

## JPMC TPP WCAG Standard

JPMorgan Chase Bank, National Association and/or one or more of its affiliates (“**JPMC**”) has an agreement with a third-party provider (“**TPP**”) for services and/or goods (the “**TPP Agreement**”) that implicates this JPMC Third Party Provider WCAG Standard (“**TPP WCAG Standard**”).

In the event of a conflict between the TPP Agreement and this TPP WCAG Standard, the TPP Agreement shall control. In the event a TPP identifies a conflict between the TPP Agreement and this TPP WCAG Standard, the TPP 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 TPP WCAG Standard.

### **Applicability**

This TPP WCAG Standard applies to a TPP where the TPP interacts via Digital and Electronic Content offered via applicable JPMC web and mobile properties or via Digital and Electronic Content offered via TPP web and mobile properties, where such TPP web or mobile properties are a JPMC customer or employee’s only access to TPP’s services, or as otherwise indicated by the TPP Agreement and/or JPMC Relationship Manager (or Delivery Manager as the case may be) as being applicable.

### **Definitions**

1. “**WCAG**” means Web Content Accessibility Guidelines, Version 2.1, Level A and AA (Level AAA is not required) (ISO/IEC 40500) including PDF/UA.
2. “**Voluntary Product Accessibility Template**” or “**VPAT**” means the most recent WCAG version of a tool used to document a product’s conformance with WCAG accessibility standards that can be downloaded at <https://www.itic.org/policy/accessibility/vpat>.
3. “**PDF/UA**” means Portable Document Format/ Universal Accessibility (ISO 14289-1) as a mechanism for encoding instructions to be rendered, played, or executed by user agents to retrieve or present content to users.
4. “**Digital and Electronic Content**” means ATMs, web pages and web sites, webinars, mobile applications, electronic documents, emails, and videos.

### **Conformance Requirements**

1. Without limiting the requirements of WCAG conformance generally, in the event TPP does not conform to this TPP WCAG Standard, TPP shall first obtain express written approval from the JPMC Relationship Manager confirming that such conformance variants have been approved by LOB Risk and Controls.
2. To the extent TPP Digital and Electronic Content requires remediation based on JPMC evidence, such remediation will be completed within a mutually agreed upon timeline not to exceed six (6) months, unless otherwise agreed.
3. To the extent that TPP identifies a WCAG defect in its Digital and Electronic Content, TPP shall immediately notify JPMC of each defect in writing and remediation will be completed within a mutually agreed upon timeline not to exceed thirty (30) days, unless otherwise agreed.

### **Evidence Requirements**

1. JPMC may periodically conduct a review to assess TPP’s current accessibility and ongoing conformance support, capability. The expectation is that TPP provides response related to the review feedback within 30 days, unless otherwise agreed.
2. JPMC may rely upon a VPAT as an indication of TPP’s product conformance, current or under consideration. JPMC requires a completed VPAT within 30 days of request. JPMC, at its sole discretion, may require TPP to obtain an independently completed VPAT at TPP’s expense.

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. JPMC will provide TPP with test results and a list of identified accessibility defects with assigned priority/severity classifications. TPP will provide an accessibility remediation roadmap within 30 days of request or during schedule negotiation, whichever comes first outlining the target timeline to address the identified defects. TPP will provide updated remediation timelines and progress reports during recertification process. Remediation will be completed within a mutually agreed upon timeline not to exceed six (6) months, unless otherwise agreed.

The Web Content Accessibility Guidelines (WCAG) 2.1 are published by the World Wide Web Consortium (W3C) at: <https://www.w3.org/TR/WCAG21/>