

Accessibility Conformance Report

WCAG Edition

(Based on VPAT® Version 2.4Rev)

Name of Product/Version: Tribune Publishing Company, LLC and its affiliates' (collectively, the "Company") WordPress Platform

Report Date: February 2026

Product Description: Company's Wordpress Platform is an online content management system for newspaper publications.

Contact Information: attorney@tribpub.com

Notes:

Scope of Report - This report applies to the core digital publishing platform, including the WordPress implementation, base publisher theme, and shared UI components (global navigation, article templates, media players, and interactive forms).

Exclusions and Limitations - The following items are explicitly excluded from the scope of this report:

- Third-party content: Third-party advertising frames (e.g. RevContent, header bidding), social media embeds, and syndicated content provided by external vendors.
- User-generated content: Content created by the public, including comments, obituary guestbooks, and community-submitted obituaries.
- Legacy content: Historical archives and legacy assets that have not yet undergone remediation.
- Editorial formatting: Content manually styled or structured using the Classic Editor (e.g. non-standard heading hierarchies, inline css)
- Vendor widgets: Specific widgets or scripts controlled by external vendors that are not integrated into the core theme architecture

Evaluation Methods Used: Evaluation of the product included a combination of automated and manual testing against the Web Content Accessibility Guidelines WCAG 2.1 Conformance Level A and Level AA. Automated testing tools used include Rocket Validator and Pa11y CLI, using W3C Validator Nu, aXe, HTMLCodeSniffer as test runners. Manual testing was completed using VoiceOver for Mac and NVDA for Windows. The Trace Center's Photosensitivity Epilepsy Analysis Tool (PEAT) was used to analyze screen flashes.

Applicable Standards/Guidelines

This report covers the degree of conformance for the following accessibility standard/guidelines:

Standard/Guideline	Included In Report
Web Content Accessibility Guidelines 2.0	Level A (Yes) Level AA (Yes) Level AAA (No)
Web Content Accessibility Guidelines 2.1	Level A (Yes) Level AA (Yes) Level AAA (No)

Terms

The terms used in the Conformance Level information are defined as follows:

- **Supports:** The functionality of the product has at least one method that meets the criterion without known defects or meets with equivalent facilitation.
- **Partially Supports:** Some functionality of the product does not meet the criterion.
- **Does Not Support:** The majority of product functionality does not meet the criterion.
- **Not Applicable:** The criterion is not relevant to the product.
- **Not Evaluated:** The product has not been evaluated against the criterion. This can be used only in WCAG 2.0 Level AAA.

WCAG 2.x Report

Note: When reporting on conformance with the WCAG 2.x Success Criteria, they are scoped for full pages, complete processes, and accessibility-supported ways of using technology as documented in the [WCAG 2.0 Conformance Requirements](#).

Table 1: Success Criteria, Level A

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.1.1 Non-text Content (Level A)	Partially Supports	Most images include alt text. Remediation is ongoing for certain theme elements missing alt text, including user icons and a paywall image. Some legacy article content and third-party widgets may contain images without text alternatives, both of which are considered outside the scope of this report.
1.2.1 Audio-only and Video-only (Prerecorded) (Level A)	Partially Supports	Video-only content in STN and Outstream videos provide links for text alternative. Trinity audio player is providing a clearly labeled media alternative for the article's text content. Excluded from scope are third party ads, including RevCon ads, which may contain video content without a text alternative.
1.2.2 Captions (Prerecorded) (Level A)	Does Not Support	STN and Outstream videos within articles do not have captions.
1.2.3 Audio Description or Media Alternative (Prerecorded) (Level A)	Supports	Video-only content in STN and Outstream videos provide link for text alternative.
1.3.1 Info and Relationships (Level A)	Partially Supports	Heading tags are applied in logical nested order. Landmark elements are used throughout pages. Editorial and third-party content may contain tables which lack proper labels. Remediation is in progress for adding role attributes to icons.
1.3.2 Meaningful Sequence (Level A)	Supports	Content flows logically top to bottom left to right, maintaining meaningful sequence when switching device width or orientation.
1.3.3 Sensory Characteristics (Level A)	Supports	Instructions for site navigation and interaction do not rely on shape, color, size, visual location, orientation or sound.

Criteria	Conformance Level	Remarks and Explanations
1.4.1 Use of Color (Level A)	Partially Supports	Article links are denoted with both color and an underline. Some elements (e.g. gifting icon in an article) have a focus state indicated by just a color change, will address as discovered by adding a focus outline and/or underline.
1.4.2 Audio Control (Level A)	Supports	Auto-playing videos within articles have sound disabled by default and also include a button for muting audio output.
2.1.1 Keyboard (Level A)	Partially Supports	All pages can be navigated using only a keyboard. Video pause buttons in third party RevCon embed may lack keyboard support.
2.1.2 No Keyboard Trap (Level A)	Supports	No keyboard traps observed. When focus is grabbed by an element (e.g. within a modal or push menu) there is always a clearly labeled method to escape.
2.1.4 Character Key Shortcuts (Level A 2.1 only)	Supports	No character key shortcuts present
2.2.1 Timing Adjustable (Level A)	Supports	No timed interactions present
2.2.2 Pause, Stop, Hide (Level A)	Partially Supports	Auto-playing videos within article content have a functioning pause button. Some auto-playing videos within third party advertiser content (RevCon) have a pause button that lacks keyboard support.
2.3.1 Three Flashes or Below Threshold (Level A)	Does Not Support	Some flashing content exists within third party advertiser content in Outstream, STN, and RevCon videos which was found to be above the three flash threshold.
2.4.1 Bypass Blocks (Level A)	Supports	A "Skip to Content" link exists on every page as the first focusable element. Sections are separated using both heading elements and relevant landmark roles.
2.4.2 Page Titled (Level A)	Supports	Each page contains a <title> element containing a meaningful title.
2.4.3 Focus Order (Level A)	Supports	Web pages can be navigated sequentially using a keyboard.

Criteria	Conformance Level	Remarks and Explanations
2.4.4 Link Purpose (In Context) (Level A)	Partially Supports	Template elements contain clearly labeled link purposes, including notifying a user when a page opens in a new tab/window. Links within articles do not always contain descriptive links. Some links within third-party embeds contain links which are not descriptive (e.g. social media carousel on Daily Bulletin home page).
2.5.1 Pointer Gestures (Level A 2.1 only)	Supports	No functionality exists which requires multipoint or path based/click and drag gestures
2.5.2 Pointer Cancellation (Level A 2.1 only)	Partially Supports	Most pointer interactions are able to be canceled. The method to make a gallery carousel fullscreen is currently firing on mousedown and will be updated to use the correct click event.
2.5.3 Label in Name (Level A 2.1 only)	Supports	Labels are required to contain all visually displayed text.
2.5.4 Motion Actuation (Level A 2.1 only)	Supports	No functionality exists which is dependent on a user's ability to move a device
3.1.1 Language of Page (Level A)	Supports	The main language of a page is defined in the "lang" attribute on the page's <html> element. Most sites use en-US with an exception of excelsiorcalifornia.com which uses es-MX.
3.2.1 On Focus (Level A)	Supports	No behavior exists which changes the user's context when an element receives focus.
3.2.2 On Input (Level A)	Supports	Entering inputs in a form does not change context.
3.3.1 Error Identification (Level A)	Partially Supports	Search date fields provide an accessible popup error. Subscription sign up fields mark the field as invalid data but do not announce the error.
3.3.2 Labels or Instructions (Level A)	Supports	Fields used for site behavior contain descriptive labels.
4.1.1 Parsing (Level A)	Partially Supports	Some duplicate ids within social sharing menus will be addressed/removed. Articles contain an extra closing div within the <main> element. However, these issues do not interfere with a users ability to navigate the page.

Criteria	Conformance Level	Remarks and Explanations
4.1.2 Name, Role, Value (Level A)	Partially Supports	Semantic html used where possible, accurate role attributes assigned otherwise. Video controls within third party RevContent may lack accessible names. Some iframe elements injected within advertiser content may be lacking title attributes.

Table 2: Success Criteria, Level AA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (Level AA)	Not Applicable	The platform does not produce or host live synchronized media. Third-party livestreams (e.g. YouTube embeds) are excluded from scope.
1.2.5 Audio Description (Prerecorded) (Level AA)	Does Not Support	Synced audio descriptions are not provided for video content.
1.3.4 Orientation (Level AA 2.1 only)	Supports	Content is not restricted to any device orientation and reflows logically on orientation change.
1.3.5 Identify Input Purpose (Level AA 2.1 only)	Supports	Subscription inputs use correct autocomplete attributes.
1.4.3 Contrast (Minimum) (Level AA)	Partially Supports	Most elements have been given sufficient contrast. A footer menu needs better contrast on sites using one specific theme, will be addressed by adjusting the text to be darker. Third-party ads are excluded from scope.
1.4.4 Resize text (Level AA)	Supports	All text scales properly when resized using browser or device settings. Third-party advertising containers are excluded from scope.
1.4.5 Images of Text (Level AA)	Partially Supports	Site template images are required to provide text alternatives that include all visually displayed text. Some legacy content, including images in articles and widgets, may contain invalid alt text, but is addressed as discovered.
1.4.10 Reflow (Level AA 2.1 only)	Supports	Text flows into next line when viewport is resized and does not require horizontal scrolling.

Criteria	Conformance Level	Remarks and Explanations
1.4.11 Non-text Contrast (Level AA 2.1 only)	Partially Supports	Some elements found which need better contrast with their focus, will address by adjusting the colors (e.g. article gifting icon)
1.4.12 Text Spacing (Level AA 2.1 only)	Partially Supports	Most elements still display properly when applying line-height, letter-spacing, word-spacing and margin-bottom styles. Minor clipping occurs in the Trending bar when these styles are applied.
1.4.13 Content on Hover or Focus (Level AA 2.1 only)	Supports	Any elements which change content on hover or focus have been replaced with elements requiring interaction for content to be updated.
2.4.5 Multiple Ways (Level AA)	Supports	Users can navigate site via several different link options, the search page, or a sitemap.
2.4.6 Headings and Labels (Level AA)	Supports	Form fields require labels. Homepage, section, and article templates include sections labeled with descriptive heading tags.
2.4.7 Focus Visible (Level AA)	Partially Supports	All elements contain visible focus indicator. Remediation is ongoing for specific article sharing icons which rely solely on color to indicate they have received focus.
3.1.2 Language of Parts (Level AA)	Partially Supports	Most content is programmatically identified. Remediation is in progress for specific header items which require translations, including the "All Sections" label for the hamburger menu and elements within the search bar.
3.2.3 Consistent Navigation (Level AA)	Supports	Sites contain consistent header and footer structure across pages, including a skip link, navigation menu, and search functionality for ease of navigation.
3.2.4 Consistent Identification (Level AA)	Supports	Functional components used repeatedly including search icon, caret up and caret down have consistent labeling. Elements which have the same function have the same label.

Criteria	Conformance Level	Remarks and Explanations
3.3.3 Error Suggestion (Level AA)	Partially Supports	Some fields provide instructions for how to correct the error (e.g. entering a Date End that is before Date Start on search page). Specific suggestions for correction are not yet implemented for all fields (e.g. entering email in subscription sign up).
3.3.4 Error Prevention (Legal, Financial, Data) (Level AA)	Supports	When signing up for a subscription, user input is checked for errors as it is provided. A user has a chance to review their order as a final step before the order is placed.
4.1.3 Status Messages (Level AA 2.1 only)	Partially Supports	Error messaging for search fields is provided with a notice to the user. Error messaging for subscription fields is partially provided - there is a visible error displayed, but aria-live regions are not in use to announce the error.

Table 3: Success Criteria, Level AAA

Notes:

Criteria	Conformance Level	Remarks and Explanations
1.2.6 Sign Language (Prerecorded) (Level AAA)	Not Evaluated	
1.2.7 Extended Audio Description (Prerecorded) (Level AAA)	Not Evaluated	
1.2.8 Media Alternative (Prerecorded) (Level AAA)	Not Evaluated	
1.2.9 Audio-only (Live) (Level AAA)	Not Evaluated	
1.3.6 Identify Purpose (Level AAA 2.1 only)	Not Evaluated	
1.4.6 Contrast (Enhanced) (Level AAA)	Not Evaluated	
1.4.7 Low or No Background Audio (Level AAA)	Not Evaluated	
1.4.8 Visual Presentation (Level AAA)	Not Evaluated	
1.4.9 Images of Text (No Exception) (Level AAA)	Not Evaluated	
2.1.3 Keyboard (No Exception) (Level AAA)	Not Evaluated	
2.2.3 No Timing (Level AAA)	Not Evaluated	
2.2.4 Interruptions (Level AAA)	Not Evaluated	
2.2.5 Re-authenticating (Level AAA)	Not Evaluated	
2.2.6 Timeouts (Level AAA 2.1 only)	Not Evaluated	

Criteria	Conformance Level	Remarks and Explanations
2.3.2 Three Flashes (Level AAA)	Not Evaluated	
2.3.3 Animation from Interactions (Level AAA 2.1 only)	Not Evaluated	
2.4.8 Location (Level AAA)	Not Evaluated	
2.4.9 Link Purpose (Link Only) (Level AAA)	Not Evaluated	
2.4.10 Section Headings (Level AAA)	Not Evaluated	
2.5.5 Target Size (Level AAA 2.1 only)	Not Evaluated	
2.5.6 Concurrent Input Mechanisms (Level AAA 2.1 only)	Not Evaluated	
3.1.3 Unusual Words (Level AAA)	Not Evaluated	
3.1.4 Abbreviations (Level AAA)	Not Evaluated	
3.1.5 Reading Level (Level AAA)	Not Evaluated	
3.1.6 Pronunciation (Level AAA)	Not Evaluated	
3.2.5 Change on Request (Level AAA)	Not Evaluated	
3.3.5 Help (Level AAA)	Not Evaluated	
3.3.6 Error Prevention (All) (Level AAA)	Not Evaluated	

Legal Disclaimer

Remediation efforts are ongoing; this document represents a point-in-time assessment.