

Voluntary Product Accessibility Template

Version 2.5, International Edition

Accessibility Conformance Report (ACR)

Pallas by Lonia AI

Web-based institutional accessibility remediation platform. Pallas provides automated scanning of websites and documents against WCAG 2.2, Revised Section 508, and EN 301 549 standards; findings management with team collaboration; a remediation workflow with a cryptographically chained, tamper-evident audit trail; and multi-standard conformance reporting including VPAT/ACR and AODA formats. Automated scanning covers the criteria that can be machine-tested; a manual review checklist covers the rest, because most of WCAG cannot be verified by software. Section 508 and EN 301 549 mappings are derived from the WCAG scan. Pallas scans server-rendered pages; support for JavaScript-rendered applications is on the roadmap.

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Product version: 1.0
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Prepared by: Lonia AI
Contact: support@lonia.ai
<mailto:support@lonia.ai>

Notes

Pallas is offered to institutional customers globally. Determining which accessibility laws apply to a buyer's specific use of Pallas is the buyer's responsibility; Pallas provides the technical evidence for that determination through this report, the Pallas Trust Center, and the organization's Data Processing Addendum. Pallas voluntarily conforms to WCAG 2.2 Level AA as its published floor, and targets Level AAA for text contrast where the interface permits it.

Evaluation Methods Used

Evaluation combines: (a) automated testing with axe-core 4.11.3, run in the browser during scans and as a build-time gate against the marketing site; (b) automated source-level checks that run on every push as part of continuous integration (tests/a11y/repoChecks.test.ts), covering entity-name sweeps, verification that every accessibility preference control is backed by a real CSS rule rather than only persisted, accessible-name checks on buttons, images, form controls and scrollable regions, and verification that browser storage is not used for authentication, entitlement or quota decisions beyond one documented and mitigated exception; (c) operator-conducted keyboard navigation on Windows during development; (d) partial screen-reader compatibility testing with NVDA on Windows against selected pages; and (e) axe-core run against rendered application component markup in continuous integration (tests/a11y/axe.test.tsx); and (f) a route-level axe-core run in a real Chromium browser against every authenticated route and the sign-in page at 1280px and 375px viewport widths, with a horizontal-overflow measurement at 375px for reflow, produced by scripts/axe-evidence.mjs and committed per page under test-results/axe/2026-09-16-b2/ with a SHA-256 manifest (axe-core 4.13.0, 22 routes at 3 breakpoints, 66 files, 0 violations, 0 pages with horizontal overflow at 375px). Methods (b) and (e) run without a browser layout engine and therefore evaluate structure, roles, ARIA and accessible names but NOT color contrast and NOT reflow. Method (f) runs with a layout engine, so the axe color-contrast rule and the reflow measurement are machine-checked on the application; contrast ratios quoted in this report are additionally computed from the color token definitions. Testing on macOS with VoiceOver, iOS with VoiceOver, and Android with TalkBack has not been performed by Pallas and is not claimed. Independent third-party expert review has not been performed and is not claimed. This report describes conformance as evaluated on the platforms and by the methods named here.

Applicable Standards and Guidelines

This report covers the following standards and guidelines:

Standard or Guideline	Included in Report
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Web Content Accessibility Guidelines (WCAG) 2.0 Level A	Yes
Web Content Accessibility Guidelines (WCAG) 2.0 Level AA	Yes
Web Content Accessibility Guidelines (WCAG) 2.1 Level A	Yes
Web Content Accessibility Guidelines (WCAG) 2.1 Level AA	Yes
Web Content Accessibility Guidelines (WCAG) 2.2 Level A	Yes
Web Content Accessibility Guidelines (WCAG) 2.2 Level AA	Yes
Web Content Accessibility Guidelines (WCAG) 2.2 Level AAA (selective; text contrast target)	Yes
Revised Section 508 standards published January 18, 2017, and corrected January 22, 2018	Yes
EN 301 549 Accessibility requirements for ICT products and services - V3.2.1 (2021-03)	Yes

Terms

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

Term	Definition
Supports	The functionality of the product has at least one method that meets the criterion without known defects, or meets the criterion 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 is used only in WCAG 2.x Level AAA.

Assessment Summary

This report evaluates 160 success criteria across WCAG 2.x (Levels A, AA, and selective AAA), Revised Section 508 (Chapters 3, 5, and 6), and EN 301 549 v3.2.1 (Chapters 4, 5, 9, 10, 11, and 12). The verdict distribution below is provided as an at-a-glance description of the assessment shape; every individual verdict is defensible against the state of the Pallas codebase and marketing site on the report date.

Conformance Level	Count
Supports	111
Partially Supports	27
Does Not Support	0
Not Applicable	20
Not Evaluated	2
Total	160

WCAG 2.x Report

This section describes the conformance of Pallas by Lonia AI with the Web Content Accessibility Guidelines (WCAG) 2.0, 2.1, and 2.2 at Levels A and AA. Selective AAA criteria the operator has chosen to target or evaluate are reported in Table 3.

Table 1: Success Criteria, Level A

This table covers WCAG 2.0, 2.1, and 2.2 Level A success criteria. Every criterion below has been evaluated against the state of the Pallas application and marketing site as of the report date; verdicts name the specific defect where one is present.

Criteria	Conformance Level	Remarks and Explanations
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1.1.1 Non-text Content (WCAG 2.0 Level A)	Supports	Informative images carry descriptive alt text. Decorative images use alt="" or aria-hidden="true". Icon-only buttons carry aria-label. Chart and diagram output in generated reports carries a text-alternative sibling. Verified: no unlabeled interactive controls were found in the application repository at commit a268cb2.
1.2.1 Audio-only and Video-only (Prerecorded) (WCAG 2.0 Level A)	Not Applicable	Pallas contains no audio-only or video-only prerecorded media.
1.2.2 Captions (Prerecorded) (WCAG 2.0 Level A)	Not Applicable	Pallas contains no prerecorded video with audio.
1.2.3 Audio Description or Media Alternative (Prerecorded) (WCAG 2.0 Level A)	Not Applicable	Pallas contains no prerecorded video content.
1.3.1 Info and Relationships (WCAG 2.0 Level A)	Partially Supports	Semantic HTML5 landmarks are used throughout the app and the marketing site. Form controls carry associated labels. Heading hierarchy is validated. However: hand-authored tables in the application do not use <caption> elements (six tables affected in the app; two generated report tables in the marketing site also lack captions and use <td> where <th scope="row"> belongs). Remediation is scheduled.
1.3.2 Meaningful Sequence (WCAG 2.0 Level A)	Supports	DOM order matches visual presentation. Tab order follows logical sequence. Generated PDF reports are rendered by a tagged-PDF pipeline with source-order rendering.
1.3.3 Sensory Characteristics (WCAG 2.0 Level A)	Supports	Instructions do not rely solely on sensory characteristics. Actions are described by name and function; icon-only affordances always carry an accessible name.
1.4.1 Use of Color (WCAG 2.0 Level A)	Supports	Color is not the sole means of conveying information. Finding severity uses color plus icon plus text label. Form validation uses color plus icon plus text message. Links are distinguished by underline in addition to color.
1.4.2 Audio Control (WCAG 2.0 Level A)	Not Applicable	Pallas does not auto-play audio.
2.1.1 Keyboard (WCAG 2.0 Level A)	Supports	All interactive functionality is keyboard-operable. Every horizontal-scroll container in the application (governance tables, report views, findings tables) carries tabIndex with an accessible name, so a keyboard user on a viewport that clips these tables can reach the right-hand columns. The only containers without their own tab stop are those whose children are all focusable, which are listed individually as reviewed exemptions. This is enforced on every push by the check "makes every scrollable region keyboard reachable" in tests/a11y/repoChecks.test.ts, which fails the build if a scroll container appears with neither tabIndex nor a written exemption. The mobile navigation drawer implements a full focus trap with Escape dismissal and focus restoration.
2.1.2 No Keyboard Trap (WCAG 2.0 Level A)	Supports	Focus can move to and from all interactive elements using standard keyboard commands. Modal dialogs implement focus traps that release on Escape or close-button activation, then restore focus to the element that opened them.
2.1.4 Character Key Shortcuts (WCAG 2.1 Level A)	Not Applicable	Pallas does not implement single-character keyboard shortcuts that could conflict with assistive technology.

2.2.1 Timing Adjustable (WCAG 2.0 Level A)	Supports	Session lifetimes follow the OAuth provider defaults with graceful re-authentication. No time-limited content is used in the interface. Long-running scans use progress indicators and impose no user time limits.
2.2.2 Pause, Stop, Hide (WCAG 2.0 Level A)	Not Applicable	Pallas contains no moving, blinking, scrolling, or auto-updating content that lasts more than five seconds.
2.3.1 Three Flashes or Below Threshold (WCAG 2.0 Level A)	Supports	Pallas contains no content that flashes more than three times per second.
2.4.1 Bypass Blocks (WCAG 2.0 Level A)	Supports	Skip links are provided on the marketing site, the application login page, every authenticated route, the pre-organization onboarding page, the no-organization landing page, and the standalone data-export route. On each one the link is the first focusable element and targets a container that can receive focus. This is enforced on every push by the check "gives every page that renders its own main landmark a skip link" in tests/a11y/repoChecks.test.ts, which fails the build if a route renders a main landmark without one.
2.4.2 Page Titled (WCAG 2.0 Level A)	Supports	Every page has a descriptive, unique title element. The React application updates the title on route change. The marketing site sets per-page titles via a shared SEO component.
2.4.3 Focus Order (WCAG 2.0 Level A)	Supports	Tab order follows meaningful sequence. Modal dialogs move focus into the dialog on open and restore focus on close.
2.4.4 Link Purpose (In Context) (WCAG 2.0 Level A)	Supports	Link text alone, or in combination with the programmatically determinable context, describes the destination or purpose of the link. Generic labels such as "click here" and "read more" are not used.
2.5.1 Pointer Gestures (WCAG 2.1 Level A)	Supports	All functionality that uses multi-point or path-based gestures has a single-point alternative. Pallas does not require multi-point or path gestures for any core function.
2.5.2 Pointer Cancellation (WCAG 2.1 Level A)	Supports	Click events execute on up-event. Down-only triggers are not used. Drag-and-drop file upload provides a keyboard-accessible file-picker alternative.
2.5.3 Label in Name (WCAG 2.1 Level A)	Supports	The accessible name of every UI component contains the visible text label where a visible label is present.
2.5.4 Motion Actuation (WCAG 2.1 Level A)	Not Applicable	Pallas does not use device motion or user motion for input.
3.1.1 Language of Page (WCAG 2.0 Level A)	Supports	The html lang attribute is set to "en" on every page. The marketing site declares hreflang alternates for en-US, en-GB, en-IE, en-CA, and en-AU.
3.2.1 On Focus (WCAG 2.0 Level A)	Supports	Focus does not trigger context changes. Focused elements do not submit forms, open new windows, or move focus without explicit user action.
3.2.2 On Input (WCAG 2.0 Level A)	Supports	Form input changes do not cause context changes without user notification.
3.2.6 Consistent Help (WCAG 2.2 Level A)	Supports	Help mechanisms (contact email, documentation links) appear in a consistent location across pages.
3.3.1 Error Identification (WCAG 2.0 Level A)	Supports	Form errors are identified in text with the specific field name, announced to assistive technology via aria-live regions, and persist until corrected.

3.3.2 Labels or Instructions (WCAG 2.0 Level A)	Supports	Form controls have visible labels. Required fields carry aria-required and a visual indicator. Placeholder text is supplementary to labels, not a replacement.
3.3.7 Redundant Entry (WCAG 2.2 Level A)	Supports	Information previously entered in a process is not required to be re-entered. User profile data auto-populates from the OAuth provider on first sign-in.
4.1.1 Parsing (obsolete in WCAG 2.2) (WCAG 2.0 Level A)	Supports	Historical criterion, removed in WCAG 2.2. Reported for backward compatibility. HTML validates without duplicate IDs or invalid nesting per the build-time gate.
4.1.2 Name, Role, Value (WCAG 2.0 Level A)	Supports	All UI components expose accessible name, role, and value via native HTML semantics or ARIA where necessary. Custom React components follow WAI-ARIA Authoring Practices patterns.

Table 2: Success Criteria, Level AA

This table covers WCAG 2.0, 2.1, and 2.2 Level AA success criteria. The operator targets Level AAA for text contrast where the interface permits; AAA verdicts, where met, are reported in Table 3.

Criteria	Conformance Level	Remarks and Explanations
1.2.4 Captions (Live) (WCAG 2.0 Level AA)	Not Applicable	Pallas contains no live audio content.
1.2.5 Audio Description (Prerecorded) (WCAG 2.0 Level AA)	Not Applicable	Pallas contains no prerecorded video content.
1.3.4 Orientation (WCAG 2.1 Level AA)	Supports	Content is not restricted to a single display orientation. Responsive layout supports both portrait and landscape.
1.3.5 Identify Input Purpose (WCAG 2.1 Level AA)	Supports	Autocomplete attributes are used on personal-information fields where applicable. OAuth-only authentication minimizes traditional form input for user data.
1.4.3 Contrast (Minimum) (WCAG 2.0 Level AA)	Supports	Body text meets or exceeds 4.5:1 against background across the application and marketing site. The accent color used for link text and selected-tab backgrounds is #7c3aed, which measures 5.70:1 on #ffffff and 5.41:1 on #f8f9fb. The built-in high-contrast mode overrides the accent tokens to #4c1d95 at 10.95:1 and #164e63 at 9.11:1, both above the 7:1 Level AAA threshold. A previously reported accent (#a78bfa) at 2.72:1 was replaced and appears nowhere in the product, an absence now enforced by a build gate (scripts/check-hardcoded-colors.mjs) rather than asserted. Note that #0891b2 (accent-cyan) measures 3.68:1 and is therefore restricted to decorative fills and borders on large elements; it is used as foreground text nowhere, and introducing such a use would return this criterion to Partially Supports. The axe color-contrast rule also runs against every route in a real browser (evaluation method (f)). Its first run found one failure, a 12px badge on the Billing page at 4.19:1 on a tinted fill, which was corrected before the committed batch (test-results/axe/2026-09-16-b2/) was produced; that batch records zero contrast violations.
1.4.4 Resize Text (WCAG 2.0 Level AA)	Supports	Text can be resized up to 200% without loss of content or functionality. Layouts use relative units rather than fixed pixel sizing.
1.4.5 Images of Text (WCAG 2.0 Level AA)	Supports	Text is presented as real text using web fonts. The Lonia AI logo is the only image containing stylized text and is considered essential branding.

1.4.10 Reflow (WCAG 2.1 Level AA)	Supports	Content reflows at 320 CSS pixel width without loss of information or functionality. Layouts use relative units and responsive containers throughout. This criterion is verified two ways: by operator-conducted manual testing at 375px viewport width during development (ACCESSIBILITY.md records the scope and date), and by the automated horizontal-overflow measurement in evaluation method (f), which loads every authenticated route and the sign-in page at 375px in a real browser and records whether the document scrolls horizontally and which elements, if any, extend past the viewport. In the committed batch (test-results/axe/2026-09-16-b2/) no page scrolled horizontally. The unit test suite still cannot evaluate reflow on its own; the measurement is the browser run.
1.4.11 Non-text Contrast (WCAG 2.1 Level AA)	Supports	Interactive control borders, focus indicators, and status icons meet or exceed 3:1 against adjacent colors. The primary call-to-action button is bounded by a 1px border in the accent token #7c3aed, measuring 5.70:1 against #ffffff and 5.41:1 against #f8f9fb; the secondary button is bounded by #6b7280 at 4.83:1. In the built-in high-contrast mode the accent resolves to #4c1d95 at 10.95:1. A previously reported accent (#a78bfa) at 2.72:1 was replaced and appears nowhere in the product; a build gate now fails on any reintroduction of it. #0891b2 (accent-cyan) measures 3.68:1, which clears this criterion for non-text use, and appears only as a decorative low-alpha gradient fill that is not relied on to identify any control. Every ratio in this remark is recomputed from the token definitions in src/index.css on each test run by tests/a11y/colorContrast.test.ts, so a palette change that broke one would fail the build rather than reach this document.
1.4.12 Text Spacing (WCAG 2.1 Level AA)	Supports	No loss of content or functionality occurs when users override text spacing (line height, paragraph spacing, letter spacing, word spacing) via browser or extension.
1.4.13 Content on Hover or Focus (WCAG 2.1 Level AA)	Supports	Tooltips and popovers are dismissible via Escape, hoverable, and persistent until dismissed or the trigger loses focus.
2.4.5 Multiple Ways (WCAG 2.0 Level AA)	Supports	The marketing site provides primary navigation, footer navigation, sitemap.xml, and search-engine indexing. The application provides sidebar navigation and in-context links between related records (findings link to scans; scans link to assets).
2.4.6 Headings and Labels (WCAG 2.0 Level AA)	Supports	Headings and labels describe topic or purpose. Heading hierarchy is enforced (h1 to h2 to h3, no skipped levels).
2.4.7 Focus Visible (WCAG 2.0 Level AA)	Supports	A single global focus indicator (3px outline, 2px offset) is defined once in the application stylesheet and is never overridden. There is no occurrence of "outline: none" without a replacement anywhere in the application source.
2.4.11 Focus Not Obscured (Minimum) (WCAG 2.2 Level AA)	Supports	When a component receives focus, it is not entirely hidden by author-created content. Sticky headers do not obscure the focus ring on scroll-into-view.
2.5.7 Dragging Movements (WCAG 2.2 Level AA)	Supports	The one drag-and-drop surface (file upload) provides a keyboard- accessible file-picker alternative.
2.5.8 Target Size (Minimum) (WCAG 2.2 Level AA)	Supports	Interactive target size is at least 24x24 CSS pixels for pointer inputs. Buttons and links exceed this minimum.

3.1.2 Language of Parts (WCAG 2.0 Level AA)	Supports	Foreign-language passages, where present, are marked with the appropriate lang attribute. Interface content is currently English-only; French, German, Dutch, Hebrew, and Traditional Chinese translations are not offered at this time.
3.2.3 Consistent Navigation (WCAG 2.0 Level AA)	Supports	Navigation mechanisms appear in a consistent relative order across pages. The marketing site header and footer are identical across all pages. The application sidebar is consistent across all authenticated routes.
3.2.4 Consistent Identification (WCAG 2.0 Level AA)	Supports	Components with the same functionality are identified consistently. Icon usage is consistent across the interface.
3.3.3 Error Suggestion (WCAG 2.0 Level AA)	Supports	Where input errors are detected and suggestions are known, suggestions are provided to the user (valid email format, minimum character requirements, and similar).
3.3.4 Error Prevention (Legal, Financial, Data) (WCAG 2.0 Level AA)	Supports	Actions with legal, financial, or data consequences (subscription changes, organization deletion, data exports) require explicit confirmation. Organization deletion requires typing "DELETE" to confirm.
3.3.8 Accessible Authentication (Minimum) (WCAG 2.2 Level AA)	Supports	OAuth-only authentication with Google or Microsoft eliminates password entry entirely. No cognitive-function test is required from the user beyond the OAuth provider's own sign-in flow.
4.1.3 Status Messages (WCAG 2.1 Level AA)	Partially Supports	Status messages in the application (form validation, scan progress, save confirmations) use ARIA live regions with appropriate politeness levels. However: on the marketing site, the newsletter subscription and the resource-download modal replace their status region with the same DOM update that destroys the focused button, so the announcement lands in a destroyed live region and is not announced to screen readers. Remediation is scheduled.

Table 3: Success Criteria, Level AAA (selective)

Level AAA conformance is not claimed as a whole. Pallas targets AAA for text contrast where the interface permits it, and reports below against the AAA criteria the operator has chosen to meet or evaluate. Criteria not listed have not been evaluated at AAA.

Criteria	Conformance Level	Remarks and Explanations
1.4.6 Contrast (Enhanced) (WCAG 2.0 Level AAA)	Partially Supports	Body text meets or exceeds 7:1 against background across most application surfaces (content-text #1a1d23 on content-bg #f8f9fb measures 16.0:1). Muted secondary text meets AA (5.0:1) but not AAA. Remediation is scheduled to raise all text contrast to AAA where the visual system permits. The accent color is no longer among the shortfalls: #7c3aed measures 5.70:1 and the built-in high-contrast mode raises it to 10.95:1, above the 7:1 AAA threshold.
2.4.12 Focus Not Obscured (Enhanced) (WCAG 2.2 Level AAA)	Not Evaluated	Enhanced (fully-unobscured) focus behavior has not been systematically evaluated across all sticky elements.
2.4.13 Focus Appearance (WCAG 2.2 Level AAA)	Not Evaluated	The global focus indicator meets the visible-focus AA criterion. A full 2.4.13 AAA evaluation (area, contrast, and border-color change) has not been completed.

3.3.9 Accessible Authentication (Enhanced) (WCAG 2.2 Level AAA)	Supports	OAuth-only authentication with Google or Microsoft requires no cognitive-function test from the user, including no object recognition and no personal-content recognition on the Pallas side. Object recognition inside the OAuth provider's own flow (for example, a CAPTCHA) is the provider's concern and outside this VPAT's scope.
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Revised Section 508 Report

The tables below cover the Revised Section 508 chapters that apply to Pallas as a web-based software application. Chapter 4 (Hardware) is Not Applicable to Pallas and is not tabled.

Chapter 3: Functional Performance Criteria

Criteria	Conformance Level	Remarks and Explanations
302.1 Without Vision	Partially Supports	The product provides a text-based interface exposing accessible name and role for all controls. Compatibility with NVDA on Windows has been partially evaluated. Compatibility with VoiceOver on macOS or iOS has not been evaluated by Pallas. Compatibility with TalkBack on Android has not been evaluated by Pallas. Compatibility with JAWS has not been evaluated by Pallas.
302.2 With Limited Vision	Partially Supports	Text can be resized to 200% without loss of functionality. Text and non-text contrast meet AA across the application (see WCAG 1.4.3 and 1.4.11), and the built-in high-contrast mode raises the accent tokens above the AAA threshold. This clause remains Partially Supports for a different reason: OS-level high-contrast mode is not currently honored via prefers-contrast or forced-colors CSS media queries; remediation is scheduled.
302.3 Without Perception of Color	Supports	Color is never the sole means of conveying information. Severity, status, and validation state are indicated by color plus icon plus text.
302.4 Without Hearing	Supports	Pallas has no audio-only content. Any audio content added in the future would carry text alternatives.
302.5 With Limited Hearing	Not Applicable	Pallas has no audio content.
302.6 Without Speech	Supports	No speech input is required. All input is via keyboard or pointing device.
302.7 With Limited Manipulation	Supports	All functions are accessible via single-input keyboard operation. No fine motor control is required for essential functions. Target sizes meet the 24x24 CSS pixel minimum.
302.8 With Limited Reach and Strength	Supports	No physical operation of the platform is required beyond standard keyboard, mouse, or touch input.
302.9 With Limited Language, Cognitive, and Learning Abilities	Partially Supports	Consistent navigation and identification. Errors are identified with clear explanations and suggestions. Documentation is available in plain language on the marketing site. A dedicated plain-language mode inside the application is not implemented and is a candidate for future enhancement.

Chapter 5: Software

Chapter 4 (Hardware) is Not Applicable to Pallas as a web-based software product and is omitted from this report.

Criteria	Conformance Level	Remarks and Explanations
501.1 Scope - Incorporation of WCAG 2.0 AA	Partially Supports	Pallas targets WCAG 2.2 Level AA, which incorporates the WCAG 2.0 AA criteria required by 501.1. The specific defects reported in Tables 1 and 2 above apply; remediation is scheduled.
502 Interoperability with Assistive Technology	Partially Supports	See sub-sections below and see the platform-scope caveat at 302.1.
502.2.1 User Control of Accessibility Features	Supports	Pallas does not override user accessibility preferences at the OS or browser level.
502.2.2 No Disruption of Accessibility Features	Supports	Pallas does not disrupt platform accessibility features.
502.3.1 Object Information	Supports	UI components expose name, role, state, boundary, and description via HTML and ARIA to accessibility services.
502.3.2 Modification of Object Information	Supports	State changes are programmatically communicated (aria-checked, aria-expanded, aria-selected, aria-invalid).
502.3.3 Row, Column, and Headers	Partially Supports	The generated PDF reports and application data grids use th elements with scope attributes. However: hand-authored tables in the application do not use <caption> and some use <td> where <th scope="row"> belongs, as reported at WCAG 1.3.1.
502.3.4 Values	Supports	The current value of form controls and interactive components is programmatically determinable.
502.3.5 Modification of Values	Supports	Values are programmatically settable by assistive technology.
502.3.6 Label Relationships	Supports	Labels are programmatically associated with form controls via label/for or aria-labelledby.
502.3.7 Hierarchical Relationships	Supports	Parent-child relationships (list items, tree nodes) are programmatically determinable.
502.3.8 Text	Supports	Text content is programmatically determinable by assistive technology.
502.3.9 Modification of Text	Supports	Text is modifiable by the user in text input controls; changes are communicated to assistive technology.
502.3.10 List of Actions	Supports	Available actions are programmatically determinable via role and accessible name.
502.3.11 Actions on Objects	Supports	Actions can be programmatically executed via keyboard.
502.3.12 Focus Cursor	Supports	Focus is programmatically settable and trackable.
502.3.13 Modification of Focus Cursor	Supports	Focus is programmatically modifiable.
502.3.14 Event Notification	Supports	Changes to state, value, name, description, and focus are communicated to assistive technology.
502.4 Platform Accessibility Features	Partially Supports	Browser zoom, OS-level text size, and the application's built-in high-contrast toggle function correctly. OS-level forced-colors and prefers-contrast are not honored by the application stylesheet today; remediation is scheduled.
503.2 User Preferences	Partially Supports	Platform-level user preferences for font size and color are respected. Contrast preferences at the OS level are honored via the application's own high-contrast toggle only; the OS-level forced-colors signal is not currently honored (see 502.4).
503.3 Alternative User Interfaces	Not Applicable	Pallas does not provide an alternative UI outside the accessibility conformance path.

503.4 User Controls for Captions and Audio Description	Not Applicable	No video with audio content.
504.2 Content Creation or Editing	Supports	Text input controls support standard accessibility features. Rich-text formatting is not currently offered.
504.2.1 Preservation of Information Provided for Accessibility in Format Conversion	Supports	Content added by users is preserved on save and displayed with its accessibility information intact.
504.2.2 PDF Export	Partially Supports	PDF exports use an in-house tagged-PDF pipeline that emits structural tags (H1, H2, P, Table, TR, TD, Figure, Link), sets the document /Lang, sets a real document /Title, and sets /MarkInfo Marked true. The pipeline is validated against PDF Accessibility Checker (PAC) 2024 as part of the release process for the VPAT itself. Application-generated reports (AODA, Executive Summary, Practitioner Detail) share the same pipeline and are subject to the same validation posture, with a formal PAC validation for every artifact type in progress.
504.3 Prompts	Supports	Prompts are provided to end users during content creation.
504.4 Templates	Not Applicable	Users do not author templates. Report profiles (VPAT, AODA, Executive Summary, Practitioner Detail) are conformant per the WCAG report above.

Chapter 6: Support Documentation and Services

Criteria	Conformance Level	Remarks and Explanations
601.1 Scope	Supports	Support documentation is provided via the marketing site (https://pallas.lonia.ai/guide) and via email at support@lonia.ai .
602.2 Accessibility and Compatibility Features	Supports	This VPAT/ACR describes the accessibility and compatibility features of Pallas.
602.3 Electronic Support Documentation	Partially Supports	Electronic support documentation on the marketing site conforms to WCAG 2.2 AA subject to the specific defects reported in this document. This VPAT PDF is emitted as a tagged PDF and is validated against PAC 2024 prior to release.
602.4 Alternate Formats for Non-Electronic Support Documentation	Not Applicable	All support documentation is electronic.
603.2 Information on Accessibility and Compatibility Features	Supports	Support responds to inquiries about accessibility features. Contact: support@lonia.ai .
603.3 Accommodations for Communication Needs	Supports	Email support is asynchronous and accessible via screen reader and keyboard. Alternative communication methods are available on request.

EN 301 549 Report

The tables below cover EN 301 549 v3.2.1 (2021-03) chapters that apply to Pallas as a web-based ICT product. Chapters 6 (ICT with two-way voice communication), 7 (ICT with video capabilities), 8 (Hardware), and 13 (ICT providing relay or emergency service access) are Not Applicable and are not tabled.

Chapter 4: Functional Performance Statements

Criteria	Conformance Level	Remarks and Explanations
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4.2.1 Usage without vision	Partially Supports	The interface provides accessible name and role for all controls and has been partially evaluated with NVDA on Windows. VoiceOver, TalkBack, and JAWS have not been evaluated by Pallas.
4.2.2 Usage with limited vision	Partially Supports	Text resizes to 200% without loss. High-contrast mode is provided via an in-application toggle. Accent-color contrast meets AA: SC 1.4.3 and SC 1.4.11 are declared Supports in Table 1. OS-level forced-colors is not honored via prefers-contrast or forced-colors. Remediation is scheduled.
4.2.3 Usage without perception of color	Supports	Color is not the sole means of conveying information.
4.2.4 Usage without hearing	Supports	No audio-only content.
4.2.5 Usage with limited hearing	Not Applicable	No audio content.
4.2.6 Usage with no or limited vocal capability	Supports	No voice input is required.
4.2.7 Usage with limited manipulation or strength	Supports	All functions are single-input operable and keyboard-accessible. Target sizes meet the 24x24 CSS pixel minimum.
4.2.8 Usage with limited reach	Supports	Standard input methods only.
4.2.9 Minimize photosensitive seizure triggers	Supports	No content flashes more than three times per second.
4.2.10 Usage with limited cognition, language or learning	Supports	Consistent navigation, clear error messages, progressive disclosure of complex features.
4.2.11 Privacy	Supports	Assistive-technology-provided assistance does not require exposing personal data. The OAuth flow does not leak identity to assistive technology beyond what the user reveals.

Chapter 5: Generic Requirements

Criteria	Conformance Level	Remarks and Explanations
5.1 Closed functionality	Not Applicable	Pallas is not closed functionality.
5.2 Activation of accessibility features	Supports	Platform accessibility features are respected and not overridden.
5.3 Biometrics	Not Applicable	No biometrics used.
5.4 Preservation of accessibility information during conversion	Partially Supports	Structural tags, alt text, document language, and metadata are preserved in generated PDFs by the in-house tagged-PDF pipeline. Formal PAC 2024 validation is completed for this VPAT and is in progress for the other report artifacts.
5.5 Operable parts	Supports	All operable parts are identifiable and operable.
5.5.1 Means of operation	Supports	Operation is identifiable by touch, sound, or sight where relevant.
5.5.2 Operable parts discernibility	Supports	Operable parts have discernible boundaries and labels.
5.6 Locking or toggle controls	Not Applicable	No physical locking or toggle controls.
5.7 Key repeat	Supports	Follows browser and OS defaults.
5.8 Double-strike key acceptance	Supports	Follows browser and OS defaults.
5.9 Simultaneous user actions	Supports	No simultaneous actions are required.

Chapter 9: Web

Chapter 9 clauses invoke WCAG 2.1 Level A and AA success criteria. Pallas targets WCAG 2.2 Level AA, which is a superset of WCAG 2.1 AA. Verdicts below inherit from Tables 1 and 2.

Criteria	Conformance Level	Remarks and Explanations
9.1 Perceivable (WCAG 2.1 A and AA references)	Partially Supports	Inherits from Tables 1 and 2. Specific defect: SC 1.3.1 (hand-authored tables lack captions and correct th usage in the application). The accent-color shortfalls previously listed here against SC 1.4.3 and SC 1.4.11 are closed: both criteria are declared Supports in Table 1.
9.2 Operable (WCAG 2.1 A and AA references)	Supports	Inherits from Tables 1 and 2 without exception. The two defects previously listed here are closed: SC 2.1.1 (horizontal-scroll containers) and SC 2.4.1 (two pre-organization pages without a skip link) are both declared Supports in Table 1, and each is backed by a named check in tests/a11y/repoChecks.test.ts.
9.3 Understandable (WCAG 2.1 A and AA references)	Supports	Inherits from Tables 1 and 2 without exception.
9.4 Robust (WCAG 2.1 A and AA references)	Partially Supports	Inherits from Tables 1 and 2. Specific defect: SC 4.1.3 (newsletter and resource-download success paths destroy their own live regions on the marketing site).
9.5 Non-interference (obsolete in WCAG 2.2)	Not Applicable	Obsolete in WCAG 2.2. Conformance would be met per legacy 2.1 semantics.
9.6 Additional requirements (not derived from WCAG)	Supports	No additional non-WCAG requirements identified in scope.

Chapter 10: Non-Web Documents

Chapter 10 covers the PDF and other non-web documents Pallas generates. All PDFs are produced by an in-house tagged-PDF pipeline; this VPAT itself is validated against PAC 2024 as part of release.

Criteria	Conformance Level	Remarks and Explanations
10.1 General (WCAG 2.1 SC application)	Partially Supports	Generated PDFs apply WCAG 2.1 A/AA success criteria to document structure. Specific defects reported in the WCAG tables above apply where the interface behavior is reproduced in a PDF (reading order, alt text, structural tagging).
10.1.1.1 Non-text Content	Supports	Images in generated PDFs carry alt text.
10.1.3.1 Info and Relationships	Supports	Semantic structure (H1, H2, P, Table, TR, TD, TH, Figure, Link) is preserved via the tagged-PDF pipeline.
10.1.3.2 Meaningful Sequence	Supports	Reading order matches source order in the tag tree.
10.1.3.3 Sensory Characteristics	Supports	Instructions in generated PDFs do not rely on sensory characteristics.
10.1.4.1 Use of Color	Supports	Finding severity in generated PDFs is indicated by color plus text plus icon.
10.1.4.2 Audio Control	Not Applicable	No audio in PDFs.
10.2.1 Bookmarks (in PDFs longer than 21 KB)	Supports	Generated PDFs include a document outline (bookmarks) for major sections.
10.3 Document Metadata: Title	Supports	The PDF /Title metadata field is set to a human-readable title (e.g. "VPAT 2.5 for Pallas by Lonía AI"). /DisplayDocTitle is set to true so conforming readers announce the title rather than the filename.
10.4 Document Metadata: Language	Supports	The PDF Catalog /Lang entry is set (e.g. "en-US") so assistive technology can announce the correct natural language.

10.5 Structural Tags	Supports	Structural tags are applied to all content per PDF/UA guidance. MarkInfo Marked is true and a StructTreeRoot is present.
10.6 Reading Order	Supports	The tag tree reflects logical reading order.
10.7 Alternative Text	Supports	Alt text is present on all figures.
10.8 Character Encoding	Supports	UTF-8 is used throughout.

Chapter 11: Software

Chapter 11 covers software conformance, including web applications. Verdicts below inherit from Tables 1 and 2.

Criteria	Conformance Level	Remarks and Explanations
11.1 Perceivable	Partially Supports	Inherits from Chapter 9.1.
11.2 Operable	Supports	Inherits from Chapter 9.2.
11.3 Understandable	Supports	Inherits from Chapter 9.3.
11.4 Robust	Partially Supports	Inherits from Chapter 9.4.
11.5 Interoperability with assistive technology	Partially Supports	See the platform-scope caveat at Section 508 302.1. NVDA on Windows only; VoiceOver, TalkBack, and JAWS have not been evaluated.
11.6 Authoring tools	Supports	The findings-management workflow (comments, exceptions) supports WCAG 2.1 A/AA conformance for user-authored content per Section 508 §504.
11.7 User preferences	Partially Supports	Platform user preferences for font size and color are respected. OS-level forced-colors is not currently honored (see Section 508 502.4).
11.8 Authoring tools (accessible content production)	Partially Supports	Report profiles produce accessible output; the tagged-PDF pipeline emits valid PDF/UA structure. Formal PAC 2024 validation of every report profile is in progress; this VPAT is validated.

Chapter 12: Documentation and Support Services

Criteria	Conformance Level	Remarks and Explanations
12.1 Product documentation	Partially Supports	This VPAT/ACR describes accessibility features. The product guide at https://pallas.lonia.ai/guide targets WCAG 2.2 AA subject to the specific defects reported in this document.
12.1.1 Accessibility and compatibility features	Supports	Documented in this VPAT.
12.1.2 Accessible documentation	Partially Supports	Product documentation is electronic and targets WCAG 2.2 AA conformance.
12.2 Support services	Supports	Email support is provided at support@lonia.ai. Alternative communication methods are available on request.
12.2.1 Information on accessibility and compatibility features	Supports	Support staff respond to accessibility inquiries.
12.2.2 Effective communication	Supports	Email is asynchronous and accessible.
12.2.3 Accessible documentation	Partially Supports	Electronic support documentation is accessible subject to the specific defects reported in this document.
12.2.4 Information on accessibility features via multiple channels	Supports	Accessibility information is available via the product guide, this VPAT, and support email.

Legal Disclaimer

Lonia AI has prepared this VPAT/ACR in good faith to describe the accessibility and compatibility features of Pallas by Lonia AI as of the report date. This document is intended to assist procurement officials in evaluating Pallas against accessibility requirements applicable to their jurisdiction.

This report does not constitute a legally binding warranty of accessibility conformance under any specific accessibility law, including but not limited to Section 508 of the Rehabilitation Act (USA), the Americans with Disabilities Act (USA), the European Accessibility Act (EU), EN 301 549 (EU), the Equality Act 2010 (UK), the Accessibility for Ontarians with Disabilities Act (Canada-Ontario), the Accessible Canada Act (Canada-Federal), the Disability Discrimination Act 1992 (Australia), or equivalent laws in other jurisdictions.

Buyers requiring specific legal compliance representations should engage qualified accessibility consultants and legal counsel to conduct independent verification. Lonia AI provides this VPAT/ACR as a good-faith assessment; buyers relying on it for procurement decisions do so at their own discretion.

For questions about this VPAT/ACR, or to request an updated version reflecting a specific product release, contact Lonia AI at support@lonia.ai.

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This report follows the VPAT 2.5 (Rev April 2023) template structure.