

ACCESSIBILITY AND ACCESSIBLE CUSTOMER SERVICE POLICY

TalentSphere Staffing Solutions Inc.

Version: 1.1

Effective Date: August 2026

Approved By: Managing Director

Policy Owner: TalentSphere Management

Last Reviewed: August 2026

Revision: Updated for 2026 accessibility audit requirements

Public Location: [Accessibility at TalentSphere](#)

Policy Statement

TalentSphere is committed to identifying, preventing and removing accessibility barriers and to providing services in a manner that respects dignity, independence, integration and equal opportunity for people with disabilities.

1. Purpose

TalentSphere Staffing Solutions Inc. ("TalentSphere") is committed to providing an inclusive and accessible environment for candidates, clients, employees and members of the public.

TalentSphere seeks to identify, prevent and remove barriers to accessibility and to provide its services in a manner that respects the dignity, independence, integration and equal opportunity of people with disabilities.

This policy establishes TalentSphere's approach to accessible customer service, information and communications, recruitment, employment practices and accessibility training.

The policy is intended to support TalentSphere's obligations under applicable accessibility and human rights legislation, including the Accessibility for Ontarians with Disabilities Act, 2005 ("AODA"), the Integrated Accessibility Standards Regulation ("IASR"), and the Ontario Human Rights Code, where applicable.

TalentSphere may apply the principles in this policy throughout its operations even where a particular statutory requirement applies only within Ontario.

2. Scope

This policy applies to TalentSphere's provision of recruitment, staffing and related professional services to candidates, clients and members of the public.

- employees;
- managers and senior leaders;
- individuals involved in developing TalentSphere policies;
- contractors, agents and other persons who provide goods, services or facilities on behalf of TalentSphere; and
- other individuals who are required to comply with applicable accessibility legislation.

This policy applies to services delivered through channels including telephone, email, video conferencing, websites, electronic documents, online recruitment systems and in-person interactions.

3. Our Accessibility Principles

Dignity

People with disabilities will be treated as valued individuals deserving of effective, respectful and equitable service.

Independence

Where possible, people with disabilities will be supported in accessing TalentSphere's services independently and in the manner they prefer.

Integration

TalentSphere will seek to provide its services in ways that allow people with disabilities to use the same services and processes as others wherever reasonably possible.

Equal Opportunity

People with disabilities will be provided with an equitable opportunity to access, use and benefit from TalentSphere's services.

4. Communication

TalentSphere will communicate with people with disabilities in ways that take their accessibility needs into account.

When determining an appropriate method of communication, TalentSphere will consider the individual's needs and, where appropriate, consult with the individual regarding a suitable method.

Depending upon the circumstances, alternative methods may include:

- accessible electronic documents;
- larger print;
- telephone or video communication;
- providing information verbally;
- alternate electronic formats;
- communication supports; or
- another reasonable method agreed upon with the individual.

TalentSphere employees are expected to communicate respectfully and to ask the individual what method of communication or assistance works best when an accessibility need is identified.

5. Accessible Formats and Communication Supports

TalentSphere will make information and communications available in accessible formats or with communication supports upon request where required by applicable law.

When a request is received, TalentSphere will:

1. consult with the person making the request;
2. determine a suitable accessible format or communication support based on the person's accessibility needs;
3. provide or arrange for the information or support within a reasonable timeframe; and
4. provide the accessible format or communication support at no additional cost beyond any regular cost that would otherwise apply to the information.

If information cannot reasonably be converted into a particular format, TalentSphere will discuss the reason with the individual and work to identify an appropriate alternative.

6. Accessible Recruitment

As a recruitment and staffing organization, TalentSphere recognizes the importance of accessibility throughout the recruitment process.

TalentSphere will notify candidates and members of the public that accommodation is available upon request during recruitment and selection processes. Where appropriate, this notice may be included in job advertisements, application information, interview invitations, assessment communications or other recruitment correspondence.

Accommodation may be requested for any stage of a recruitment process, including:

- job applications;
- telephone interviews;
- video interviews;
- in-person interviews;
- assessments or testing;
- meetings and presentations;
- recruitment documentation and communications; and
- other recruitment or selection activities.

When a candidate requests an accommodation, TalentSphere will consult directly with the candidate to understand their accessibility needs and determine an appropriate accommodation for the relevant recruitment or assessment process.

TalentSphere does not require a candidate to disclose a diagnosis in order to request accommodation. Information reasonably necessary to understand functional limitations or accommodation requirements may be requested where appropriate.

Where TalentSphere is recruiting on behalf of a client and the client's involvement is required to provide an accommodation, TalentSphere will work with the candidate and, where appropriate and with due regard for privacy and confidentiality, coordinate with the client regarding the accommodation.

Where a later stage of a recruitment process is controlled directly by a client, TalentSphere will encourage and support an accessible transition of the accommodation process as appropriate.

7. Notice to Successful Job Applicants

When TalentSphere makes an offer of employment, the successful applicant will be informed that TalentSphere maintains policies and processes to support employees with disabilities and that workplace accommodation is available in accordance with applicable accessibility and human rights requirements.

This notice may be provided through an offer letter, employment agreement, onboarding material or another written communication provided to the successful applicant.

Where a successful applicant identifies an accessibility need, TalentSphere will consult with the individual regarding appropriate accommodation and the workplace processes available to support them.

8. Employment and Workplace Accessibility

TalentSphere is committed to inclusive employment practices and to supporting employees with disabilities in accordance with applicable accessibility and human rights requirements.

TalentSphere will inform employees about policies and practices available to support employees with disabilities, including workplace accommodation.

Employees will be provided with updated information when TalentSphere materially changes its disability-related accommodation policies or practices.

Where requested and required, TalentSphere will consult with an employee with a disability regarding accessible formats or communication supports needed to:

- perform the employee's job; or
- access information generally available to employees in the workplace.

TalentSphere will consider employees' accessibility needs in applicable performance management, career development and redeployment processes.

TalentSphere will maintain workplace accommodation and other disability-related employment processes required by applicable law.

9. Individualized Workplace Emergency Response Information

TalentSphere will provide individualized workplace emergency response information to an employee with a disability where TalentSphere is aware of the need for accommodation and the employee's disability is such that individualized emergency response information is necessary.

TalentSphere will consult with the employee regarding the employee's accessibility needs and the emergency information or assistance that may be required.

Individualized workplace emergency response information will be provided as soon as practicable after TalentSphere becomes aware of the need.

Where an employee who receives individualized workplace emergency response information requires assistance and provides consent, TalentSphere will provide the relevant information to a person designated to provide assistance to that employee.

TalentSphere will review individualized workplace emergency response information:

- when the employee moves to a different work location within the organization;
- when the employee's overall accommodation needs or Individual Accommodation Plan are reviewed; and
- when TalentSphere reviews its general emergency response policies or procedures.

Emergency response information and related disability information will be handled with appropriate regard for the employee's privacy and confidentiality.

10. Documented Individual Accommodation Plans

TalentSphere will maintain a written process for developing documented Individual Accommodation Plans for employees with disabilities where required by applicable law. The purpose of an Individual Accommodation Plan is to document the employee's individual accessibility needs, the accommodation measures to be provided, responsibilities for implementation and the plan's review requirements.

Individual Accommodation Plan Process

When an employee requests disability-related workplace accommodation, TalentSphere will use the following process:

- 5. Receive and review the request.** An employee may request accommodation through their manager or another appropriate TalentSphere representative. The employee will be encouraged to participate actively in the development of their accommodation plan.
- 6. Consult directly with the employee.** TalentSphere will discuss the employee's accessibility needs, functional limitations and potential accommodation options with the employee.
- 7. Assess the employee's needs individually.** Accommodation requests will be considered on an individual basis, taking into account the employee's duties, workplace circumstances and disability-related accessibility needs.
- 8. Request supporting information where necessary and appropriate.** TalentSphere may request information reasonably necessary to understand functional limitations or accommodation requirements. Where

TalentSphere determines that an evaluation by an outside medical or other qualified expert is required to assist in determining whether and how accommodation can be achieved, TalentSphere will arrange the evaluation at its expense.

9. **Permit participation by a representative where requested.** The employee may request the participation of a bargaining-agent representative, where applicable, or another representative from the workplace in the development of the accommodation plan.
10. **Develop a written Individual Accommodation Plan.** Where accommodation is approved, TalentSphere will document the agreed accommodation measures in writing.
11. **Keep personal information confidential.** Disability, medical and accommodation information will be shared only with individuals who reasonably require the information to assess, approve or implement the accommodation, or as otherwise permitted or required by law.
12. **Provide the employee with the finalized plan.** The employee will receive a copy of the finalized Individual Accommodation Plan in an accessible format that takes into account the employee's accessibility needs, upon request.
13. **Review and update the plan.** TalentSphere will review the plan periodically and when the employee requests a review, the employee's accessibility needs change, the employee's duties or work circumstances materially change, an accommodation is no longer effective, or another circumstance makes review appropriate.
14. **Provide written reasons where accommodation is denied.** If TalentSphere determines that a requested accommodation or Individual Accommodation Plan cannot be provided, the employee will be advised of the reasons for the decision in writing and in an accessible format upon request.

An Individual Accommodation Plan may include, as applicable:

- specific workplace accommodation measures;
- accessible formats or communication supports required by the employee;
- individualized workplace emergency response information;
- changes to work methods, scheduling, equipment, technology or communication;
- responsibilities of the employee and TalentSphere in implementing the accommodation;
- the date on which accommodations will begin;
- the review date or circumstances that will trigger review; and
- other disability-related accommodations to be provided.

If TalentSphere receives a future request for workplace accommodation, this process will be used to consult with the employee, assess their individual needs, document agreed measures, protect confidentiality and review the accommodation as needs change.

11. Assistive Devices

People with disabilities may use their own assistive devices when accessing TalentSphere's services.

Assistive devices may include mobility, communication, hearing, vision or other devices that assist an individual in accessing services or information.

TalentSphere employees will not interfere with the use of an assistive device unless there is a legitimate health, safety or legal reason that prevents its use.

If an assistive device cannot be used in a particular circumstance, TalentSphere will work with the individual to identify an alternative method of accessing the service wherever reasonably possible.

12. Service Animals

TalentSphere welcomes people with disabilities who are accompanied by a guide dog or other service animal in areas of premises under TalentSphere's control that are open to the public or other third parties, except where the animal is otherwise excluded by law.

The person accompanied by the service animal is responsible for maintaining care and control of the animal.

If a service animal cannot legally be admitted to a particular location, TalentSphere will work with the individual to identify another reasonable way for the individual to access the relevant service.

Where it is not readily apparent that an animal is a service animal, TalentSphere may request documentation permitted under applicable accessibility legislation.

13. Support Persons

A person with a disability may be accompanied by a support person when accessing TalentSphere's services.

TalentSphere will ensure that the person with a disability is able to access their support person while receiving TalentSphere services.

TalentSphere will communicate directly with the person with a disability unless that person requests otherwise.

Where confidential or personal information may be discussed in the presence of a support person, TalentSphere may confirm the individual's consent to disclose the information and may take reasonable steps to protect confidentiality and privacy.

TalentSphere will only require a support person to accompany a person with a disability in the limited circumstances permitted by applicable law, including where necessary to protect health or safety and where no reasonable alternative is available.

14. Digital and Remote Services

TalentSphere provides a significant portion of its services through digital and remote channels.

TalentSphere is committed to identifying and addressing accessibility barriers that may arise through:

- TalentSphere websites;
- online job listings;
- online application processes;
- electronic forms;
- email;
- digital documents;
- telephone communications;
- video conferencing; and
- other recruitment and communication technologies.

TalentSphere will continue to review its websites and digital services to improve accessibility and usability for people who use assistive technologies.

If an individual encounters a digital accessibility barrier, TalentSphere will work with the individual to provide the information or service through another suitable method where reasonably possible.

TalentSphere will not represent a website, platform or digital service as conforming to a particular accessibility standard unless it has an appropriate basis for making that statement.

15. Temporary Disruptions

Where a facility, technology, system or service relied upon by people with disabilities becomes temporarily unavailable, TalentSphere will provide notice where reasonable in the circumstances.

The notice will identify, where applicable:

- the nature of the disruption;
- the reason for the disruption, where appropriate;

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- the expected duration, if known; and
 - alternative services, facilities or methods of access that may be available.

The method used to provide notice will depend upon the nature and impact of the disruption and may include a notice on TalentSphere's website, email or telephone communication, a notice at an affected physical location where applicable, or another reasonable communication channel.

Where practical, TalentSphere will use a standard temporary disruption notice containing the information above so that affected individuals can understand the disruption and available alternatives.

16. Accessibility Feedback

TalentSphere welcomes feedback about the accessibility of its services, recruitment processes, communications, digital services and workplace practices.

Feedback may include:

- an accessibility barrier experienced by an individual;
- a request for accommodation;
- difficulty accessing information;
- feedback regarding TalentSphere's website or digital services;
- a request for an accessible format or communication support; or
- suggestions for improving accessibility.

Accessibility feedback can be provided by email, telephone, mail or another suitable communication method.

TalentSphere will review accessibility feedback and will respond where a response has been requested or where follow-up is otherwise appropriate.

The feedback process itself will be made accessible upon request, including through the provision or arrangement of accessible formats and communication supports.

Accessibility feedback will be handled respectfully and with appropriate regard for privacy and confidentiality.

17. Training

TalentSphere will provide accessibility training as required by applicable legislation. Training will be appropriate to the duties and responsibilities of the individuals receiving it.

Accessibility training will be provided, as applicable, to:

- employees and volunteers;
- persons who participate in developing TalentSphere's policies; and
- other persons who provide goods, services or facilities on behalf of TalentSphere where the training requirement applies.

Training content will include the requirements of applicable accessibility standards and the Ontario Human Rights Code as it pertains to persons with disabilities, together with TalentSphere's accessibility policies and practices.

Training may also include:

- the purposes of the AODA;
- how to interact and communicate with people with different types of disabilities;
- how to interact with people who use assistive devices;
- how to interact with people accompanied by service animals;
- how to interact with people who use support persons;
- what to do if a person with a disability is having difficulty accessing TalentSphere's services;
- accessible recruitment and employment responsibilities where relevant to the individual's role; and

- the use of accessibility-related equipment, systems or procedures provided by TalentSphere, where applicable.

Required training will be provided as soon as reasonably practicable after an individual assumes duties to which the training applies.

Additional training will be provided when material changes are made to applicable accessibility policies or practices.

Where required, TalentSphere will maintain records of accessibility training, including the dates on which training occurred and the number of individuals trained.

18. Third-Party Services

TalentSphere may use third-party providers or technology platforms in providing recruitment, communication and other services.

TalentSphere will consider accessibility when selecting or using third-party services where reasonably practicable and where TalentSphere has control or influence over the relevant service.

Where a third-party platform creates an accessibility barrier, TalentSphere will work with the affected individual to identify an alternative method of accessing the TalentSphere service where reasonably possible.

Nothing in this section limits any accessibility obligations TalentSphere may have where it controls a website, process or service through a contractual relationship.

19. Procurement and Technology

Where applicable and practicable, TalentSphere will consider accessibility when acquiring or implementing technology, services, communications tools and other systems that affect candidates, employees, clients or members of the public.

Accessibility considerations may include:

- keyboard accessibility;
- compatibility with assistive technologies;
- readable and scalable content;
- colour contrast;
- accessible forms;
- captions or transcripts;
- accessible documentation; and
- the availability of alternative methods of access.

20. Availability of This Policy

This policy will be made available to the public through TalentSphere's website.

Upon request, TalentSphere will provide or arrange for this policy to be provided in an accessible format or with an appropriate communication support.

TalentSphere will consult with the person requesting the policy to determine a suitable accessible format or support.

21. Responsibilities

TalentSphere management is responsible for supporting the implementation of this policy and ensuring that accessibility obligations relevant to their areas of responsibility are addressed.

Employees and other individuals acting on behalf of TalentSphere are responsible for:

- following this policy;
- completing required accessibility training;
- treating people with disabilities respectfully;
- responding appropriately to accommodation and accessibility requests;
- identifying accessibility barriers where they encounter them; and
- escalating accessibility concerns to the appropriate TalentSphere representative when assistance is required.

22. Privacy and Confidentiality

Information relating to an individual's disability, accessibility needs or accommodation request will be treated with appropriate confidentiality and will only be shared with individuals who reasonably require the information to assess, arrange or implement an accommodation or as otherwise permitted or required by law.

TalentSphere will generally focus on the individual's functional accessibility needs rather than requesting unnecessary medical or diagnostic information.

23. Modifications to Policies and Practices

TalentSphere will review its policies, practices and procedures with accessibility in mind.

No change to a TalentSphere policy or practice should be made where the change would create an accessibility barrier unless the change is required by law or there is no reasonable alternative.

Where TalentSphere becomes aware that an existing policy, process or technology creates an accessibility barrier, TalentSphere will assess reasonable steps to remove or reduce that barrier.

24. Policy Review

TalentSphere will review this policy periodically and when:

- accessibility legislation materially changes;
- TalentSphere materially changes the way it provides services;
- significant accessibility barriers are identified;
- digital or recruitment processes materially change; or
- other circumstances make a review appropriate.

Revisions will be communicated to employees and other affected individuals where required.

25. Contact Us

Questions, accommodation requests, requests for accessible formats and accessibility feedback may be directed to:

Contact us about accessibility

EMAIL

accessibility@talentsphere.ca

TELEPHONE

416-900-3435

MAIL

TalentSphere Staffing Solutions Inc.
19-13085 Yonge St, Ste 302
Richmond Hill, ON L4E 0K2

Information about accessibility at TalentSphere is also available through the Accessibility section of our website.

Document Control

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