Anti-Bribery and Corruption Policy

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Document owner	Ignite Talent Group Ltd
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This policy states the corporate position for clients, candidates, workers, suppliers and stakeholders as applicable.

Anti-Bribery and Corruption Policy

Ignite operates a zero-tolerance approach to bribery, corruption, improper influence and facilitation payments. Recruitment activity can involve introductions, fees, commission, gifts, hospitality and client relationships; those arrangements must remain transparent and lawful.

Purpose

This policy sets out the standards expected from employees, consultants, directors, contractors, suppliers and representatives when acting for or on behalf of Ignite.

It applies to all verticals, client relationships, candidate relationships, suppliers and introducers.

Scope

This policy applies to Ignite Talent Group Ltd and to each Ignite recruitment vertical where the policy is relevant to its operations, client work, candidates, workers, consultants, employees and supply-chain relationships.

Where a vertical has a sector-specific requirement, that requirement should be read with the relevant appendix or operational procedure. Construction-specific controls are applied more rigorously where client sites, labour supply, temporary assignments, training evidence or framework onboarding require additional assurance.

Policy commitments

- Never offer, promise, give, request or accept a bribe.
- Do not use gifts, hospitality or commission arrangements to improperly influence decisions.
- Declare conflicts, gifts and hospitality in line with internal procedures.
- Do not make facilitation payments.
- Use transparent terms for fees, referrals, introducers and supplier arrangements.
- Report bribery or corruption concerns promptly.

Responsibilities

Directors and senior leaders

- Set the policy direction, provide resources, and maintain accountability for the governance framework.
- Ensure material risks are reviewed and that controls remain proportionate to the size, risk profile and vertical activity of the group.

Managers and consultants

- Apply the policy in day-to-day recruitment, client, candidate and worker interactions.
- Keep records accurate and escalate gaps, concerns or client requirements promptly.

Employees, workers and representatives

- Act honestly, follow approved processes, protect confidential information and report concerns without delay.

How this policy is applied

Gifts and hospitality

Reasonable low-value hospitality may be acceptable where it is proportionate, transparent and not intended to influence a decision. Cash, cash equivalents, secret commissions and lavish hospitality are prohibited.

- Declare gifts and hospitality above internal thresholds.
- Never accept gifts during a live tender or procurement process where this could create a conflict.
- Refuse gifts that create improper pressure.

Recruitment fees and commission

Client fees, consultant commissions, referral fees and introducer arrangements must be approved, documented and commercially justified. They must not conceal bribery or create improper influence.

- Use approved terms of business.
- Record referral or introducer arrangements in writing.
- Escalate unusual payments or requests.

Third parties and suppliers

Ignite may be exposed to bribery risk through introducers, umbrella providers, payroll intermediaries, suppliers, consultants or joint ventures.

- Carry out proportionate due diligence on higher-risk third parties.
- Avoid informal side arrangements.
- Terminate relationships where bribery risk cannot be controlled.

Facilitation payments and improper advantage

Facilitation payments and unofficial payments to speed up routine action are prohibited. Staff must not offer advantages to secure candidate placements, client instructions, framework access or supplier approval.

- Report requests for improper payment.
- Keep accurate financial records.

Record keeping

Accurate records are a core anti-bribery control. False invoices, unexplained payments, cash payments, undisclosed discounts and misdescribed expenses are prohibited.

- Retain invoices, approvals and expenses records.
- Document gifts, hospitality and conflicts.

Records and evidence retained

- Gifts and hospitality register.
- Conflict declarations.
- Client terms and fee agreements.
- Supplier and introducer agreements.
- Expense approvals.

- Reports and investigations of suspected bribery.

Reporting concerns

Questions, concerns or requests for further information should be raised through the relevant manager or through the group compliance contact at compliance@ignitetalentgroup.co.uk.

Concerns involving wrongdoing, unsafe practice, exploitation, bribery, unlawful discrimination, data protection or serious non-compliance may also be escalated under the Whistleblowing and Speak-Up Policy.

Approval and review

Approved by	Nicholas Ryan
Position	Director
For and on behalf of	Ignite Talent Group Ltd
Date approved	12 June 2026
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