Supplier, Umbrella and Labour Supply Code of Conduct

Document type	Policy
Document owner	Ignite Talent Group Ltd
Approved by	Nicholas Ryan, Director
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This policy states the corporate position for clients, candidates, workers, suppliers and stakeholders as applicable.

Supplier, Umbrella and Labour Supply Code of Conduct

Ignite expects suppliers, umbrella companies, payroll providers, subcontractors and labour-supply partners to act lawfully, transparently and ethically. This code supports fair recruitment, worker protection, data security and client assurance.

Purpose

This code sets out the standards expected of third parties that support Ignite's recruitment, payroll, umbrella, labour supply, technology, marketing, professional services or compliance activities.

It is particularly important where temporary workers, agency workers, construction labour, umbrella payroll or personal service companies are involved.

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

- Operate lawfully and ethically.
- Protect workers from exploitation, unlawful deductions and misleading pay information.
- Support right-to-work, identity, pay and assignment transparency.
- Protect confidential and personal data.
- Avoid bribery, conflicts and hidden commissions.
- Cooperate with reasonable due diligence and audit requests.
- Report concerns involving exploitation, safety, data breach or non-compliance.

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

Supplier due diligence

Ignite may request information about a supplier's identity, insurance, tax status, ICO/data protection position, payroll arrangements, modern slavery controls, insurance, accreditations and service standards.

- Maintain approved supplier records.
- Re-check higher-risk suppliers periodically.
- Do not use suppliers that refuse basic compliance information without director approval.

Umbrella and payroll standards

Umbrella and payroll providers must provide transparent pay information, lawful deductions and clear worker communications. Ignite will not knowingly work with providers that use disguised remuneration, misleading payslips or exploitative practices.

- Obtain worker-facing pay explanations where relevant.
- Review complaints about deductions or pay.
- Escalate tax or payroll red flags.

Labour supply and no-subcontracting

Labour supplied through Ignite must not be onward subcontracted or substituted without clear authority and appropriate checks. Construction assignments may have no-subcontracting, site access or competence restrictions.

- Confirm who is supplying and supervising the worker.
- Avoid undisclosed substitution.
- Record client restrictions.

Data protection and confidentiality

Suppliers must protect personal data and confidential information and use it only for agreed purposes.

- Use contracts or data processing terms where required.
- Report breaches promptly.
- Delete or return data when no longer required.

Bribery, gifts and conflicts

Suppliers must not offer bribes, secret commissions or improper inducements to Ignite staff or clients.

- Declare conflicts.
- Record introducer or referral arrangements.
- Refuse improper payments.

Records and evidence retained

- Approved supplier list.
- Supplier due diligence forms.
- Umbrella/payroll due diligence records.

- Insurance and accreditation evidence.
- Supplier complaints and corrective actions.
- Data processing agreements where applicable.

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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