



Disrupt Talent Limited

Anti-Bribery & Corruption Policy

Policy Statement

Disrupt Talent Limited has a zero tolerance approach to bribery and corruption. We are committed to conducting all of our business dealings in an honest, transparent, and ethical manner. We comply with the Bribery Act 2010 and expect the same high standards from our employees, contractors, suppliers, and business partners.

Bribery is the offering, promising, giving, accepting, or soliciting of an advantage as an inducement for action that is illegal, unethical, or a breach of trust. Corruption is the misuse of power for private gain.

Scope

This policy applies to all employees, directors, consultants, contractors, and anyone acting on behalf of Disrupt Talent Limited.

Our Commitments

Disrupt Talent Limited will:

1. Prohibit the giving or receiving of bribes in any form, whether in cash, gifts, hospitality, or other benefits.
2. Ensure that any hospitality or gifts given or received are reasonable, proportionate, and for legitimate business purposes.
3. Maintain accurate records and transparent reporting of all financial transactions.
4. Provide training and guidance to staff on recognising and preventing bribery and corruption.
5. Require all staff and representatives to avoid situations where a conflict of interest could arise.
6. Encourage staff to report any concerns or suspicions of bribery or corruption immediately.
7. Take firm disciplinary action against employees who breach this policy, up to and including dismissal for gross misconduct.
8. Report incidents of bribery or corruption to the appropriate authorities where required.



Responsibility

- The **Managing Director, Nicky Grogan**, has overall responsibility for ensuring this policy is implemented and complied with.
- All employees are responsible for understanding and applying this policy in their day-to-day work.
- Concerns should be raised directly with management or via confidential reporting channels.

Breach of Policy

Any breach of this policy will be treated seriously and may result in disciplinary action, termination of contracts, and, if applicable, referral to law enforcement authorities.

Signed:

Nicky Grogan

Managing Director, Disrupt Talent Limited

Date: 29 September 2025

Review Date: 29 September 2026