



Anti-Corruption and Bribery Policy

Company Name: HEX 101 LTD
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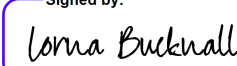
1. Document Control & Approvals

Revision History

Version	Date	Author	Description of Changes
4.0	1 September 2026	Board of Directors Initial	Release and Implementation

Management Approvals

This policy is formally approved and mandated by the Board of Directors of HEX 101.

- Signed by:
- **Signature:** 
 - **Name:** L Bucknall
 - **Title:** Managing Director / Board Representative
 - **Date:** 1 September 2026

2. Policy Core & Framework

Zero-Tolerance Statement

HEX 101 maintains a strict zero-tolerance stance against all forms of bribery and corruption. We conduct our business in an honest, fair, and ethical manner. We are committed to acting professionally and with integrity in all our business dealings and relationships globally.



UK Bribery Act 2010 Framework

This policy complies fully with the **UK Bribery Act 2010**. Under this Act, it is a criminal offense to:

- Offer, promise, or give a bribe.
- Request, agree to receive, or accept a bribe.
- Bribe a foreign public official.
- **Fail to prevent bribery** by an associated person (such as an employee, contractor, agent, or supplier) on behalf of HEX 101 LTD.

Proportionality & MSP Context

In alignment with the UK Ministry of Justice guidance, HEX 101 LTD applies a **proportionate approach** to anti-bribery. As a Managed Service Provider (MSP), our size and operating model mean our risks are highly concentrated around **technology vendors, software/hardware resellers, channel partner ecosystems, referral fees, and public-sector IT procurement**. Our controls are explicitly designed to target these specific areas without creating unnecessary administrative burdens.

3. High-Risk MSP Areas & Prohibited Actions Hardware/Software Vendors & Resellers

As an MSP, HEX 101 LTD frequently interacts with major technology distributors, original equipment manufacturers (OEMs), and software vendors.

- **Prohibition:** Employees must never accept personal incentives, hidden rebates, or excessive hospitality from vendors designed to influence which technology solutions we recommend to our customers.
- All vendor volume rebates or market development funds (MDF) must be documented transparently in corporate financial accounts and approved by management.

Introducers, Referrals, & Finder's Fees

- **Incoming Fees:** HEX 101 LTD may accept standard, transparent channel referral fees or partner commissions, provided they are part of a formally documented vendor program.
- **Outgoing Fees:** Paying third parties or "introducers" to win customer contracts is strictly prohibited unless covered by a legitimate, legally vetted, and written referral agreement. Cash payments for introductions are entirely banned.



Customer Procurement & IT Contracts

- During active customer tenders, Request for Proposals (RFPs), or IT contract renewals, no employee may offer any gifts, hospitality, or personal favours to the customer's decision-makers or IT staff.

Public-Sector Customers & Officials

Interactions with public-sector clients (e.g., local government, NHS bodies, education sectors) carry enhanced legal risks.

- **Strict Rule:** A public-sector official must never be offered any gift or hospitality, regardless of value, without prior written clearance from the Board.

Facilitation Payments

- HEX 101 strictly prohibits **facilitation payments** (small kickbacks or "grease payments" made to low-level officials to speed up routine administrative processes).

4. Operational Boundaries & Controls

Gifts and Hospitality

Gifts and hospitality must never be offered or accepted to influence a business decision. They must always be reasonable, proportionate, and justifiable.

- **Acceptable:** Minor promotional tokens (e.g., branded pens, calendars) or modest business meals with a clear business purpose.
- **Prohibited:** Cash or cash equivalents (e.g., gift vouchers, shares), lavish accommodation, or weekend trips.
- **Approval Thresholds:** All items must follow the approval matrix outlines in Section 7.

Conflicts of Interest

All employees must avoid situations where their personal interests conflict with the interests of HEX 101 LTD. This includes having a personal or family financial interest in a customer, vendor, competitor, or subcontractor. Any potential conflict must be declared immediately to management.

Charitable Donations and Sponsorship

HEX 101 LTD only makes charitable donations that are legal and ethical under local laws. No donation or corporate sponsorship may be offered as an inducement to secure business or vendor favour.



Political Contributions

HEX 101 LTD does not make financial or in-kind contributions to any political parties, organizations, or individual politicians.

Procurement and Suppliers

Our selection of suppliers, contractors, and cloud hosting providers must be based purely on objective criteria such as price, quality, performance, and security compliance.

Third-Party/Agent Due Diligence

Before engaging any third-party agent, subcontractor, or independent consultant who will represent HEX 101, management must perform a proportionate risk assessment. This includes basic background checks, verification of reputation, and ensuring they sign a written contract binding them to anti-corruption compliance.

Financial Controls and Accurate Record Keeping

- We must keep secure, accurate, and transparent financial records.
- All accounts, invoices, and receipts relating to dealings with third parties (including vendors, clients, and suppliers) must be prepared and recorded with strict accuracy.
- **No accounts may be kept "off the-books"** to facilitate or conceal improper payments.

5. Compliance & Governance

Risk Assessment

The Board will conduct a proportionate anti-bribery risk assessment annually. This review evaluates our market exposure, vendor ecosystem changes, and public sector engagements to update controls as necessary.

Employee & Contractor Responsibilities

Every employee, contractor, and director working for HEX 101 is personally responsible for reading, understanding, and complying with this policy. You must avoid any activity that could lead to, or imply, a breach of these rules.

Training and Awareness

- All new employees will receive basic anti-corruption and bribery awareness training during induction.
- Regular refreshers will be provided to staff operating in high-risk environments, such as procurement, sales, and account management.



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Monitoring and Review

The Board will regularly monitor the effectiveness and implementation of this policy. Internal financial audits will routinely verify that gifts, hospitality, and vendor rebates are correctly accounted for.

Disciplinary Consequences

Breaching this policy constitutes gross misconduct. It will result in immediate disciplinary action up to and including **summary dismissal**. Where legal violations occur, HEX 101 LTD will actively cooperate with law enforcement, which may result in criminal prosecution for the individuals involved.

6. Reporting, Whistleblowing, & Escalation

How to Report a Concern

If you suspect or become aware of any bribery, corruption, or unethical payment system (including suspicious vendor kickbacks or skewed procurement processes), you must report it immediately.

1. **First Line:** Raise the concern with your immediate Line Manager.
2. **Escalation Line:** If the matter involves your manager or is highly sensitive, report it directly to the Managing Director or via our designated internal email: accounts@hex101.com.
- 3.

Whistleblowing Protection

HEX 101 is committed to ensuring that no one suffers detrimental treatment, retaliation, or harassment for refusing to take part in bribery, or for reporting a genuine suspicion in good faith.

Investigation and Escalation

Upon receiving a report, HEX 101 will initiate a prompt, confidential investigation. The findings will be reviewed directly by the Board, and appropriate corrective actions will be executed immediately.

7. Practical Gifts & Hospitality Approval Guide

Use this reference table to determine the required actions for receiving or offering gifts and hospitality:

Value (per person)	Item Type / Target Audience	Action Required
Under £50	Normal commercial gifts or modest meals (Commercial sector only).	No approval needed. Must be transparent and reasonable.
£50 to £150	Standard business hospitality or seasonal gifts.	Line Manager Approval required before accepting/giving. Must be recorded locally.



Over £150	Lavish dinners, event tickets, travel, or accommodation.	Board/Director Pre-Approval required. Must be entered into the Central Gift Register.
Any Value	Public-Sector Customers or Officials.	Strictly Prohibited without explicit, written Board clearance before any interaction.
Any Value	Cash, gift cards, vouchers, or personal discounts.	Strictly Prohibited.

8. Related Policies and Records

This policy should be read alongside the following internal corporate documents:

- HEX 101 LTD Whistleblowing Policy
- HEX 101 LTD Code of Conduct
- HEX 101 LTD Employee Handbook
- HEX 101 LTD Procurement & Vendor Management Guidelines
- **Corporate Record:** Central Gifts and Hospitality Register (Maintained by Finance/Compliance)

