



Conflict of Interest Policy

Company Name: HEX 101 LTD
Document Reference: HEX-ABC-002
Version: 3.0
Effective Date: 1 September 2026

1. Document Control & Approvals

Revision History

Version	Date	Author	Description of Changes
1.0	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.

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

2. Policy Purpose & Scope

Objective

The purpose of this policy is to protect the integrity, reputation, and business decisions of **HEX 101 LTD**. We are committed to ensuring our business operations are conducted ethically, transparently, and free from improper influence.



Scope

This policy applies to all employees, directors, contractors, consultants, and temporary staff working for or on behalf of HEX 101 LTD.

Core Statement

A **conflict of interest** occurs when an individual's personal relationships, financial holdings, or external activities interfere—or appear to interfere—with their ability to make objective, unbiased decisions on behalf of HEX 101 LTD. Having a potential conflict is not inherently wrong but **failing to declare it is a breach of this policy**.

3. Specific MSP Conflict Risks

As a Managed Service Provider (MSP), HEX 101 LTD faces unique operational risks where personal interests could compromise commercial neutrality. The following scenarios require mandatory declaration:

- **Vendor and Channel Relationships:** Holding a personal financial stake, shares, or receiving undocumented personal incentives from technology distributors, software developers, or hardware manufacturers that HEX 101 LTD resells or recommends to clients.
 - **Customer Procurement & IT Consulting:** Recommending a specific IT vendor, subcontractor, or software solution to a client because a close friend or family member works for that business or stands to profit from the deal.
 - **Referrals and Introducer Schemes:** Receiving or routing referral fees, finder's fees, or commissions to personal accounts rather than corporate accounts during tech stack sourcing.
 - **Moonlighting and Side Businesses:** Operating a personal IT support, cyber security, software development, or consulting business outside of work hours that competes with HEX 101 LTD or serves HEX 101's clients.
 - **Access to Privileged Client Data:** Using privileged administrative access to client infrastructure, proprietary code, or cloud environments to gain a commercial advantage for a personal project or an external entity.
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4. Categories of Conflicts

To guide staff, conflicts of interest generally fall into three main categories:

- **Financial Interests:** Directly owning shares, holding a partnership, or having financial arrangements with suppliers, clients, competitors, or distributors (excluding minor holdings in publicly traded index funds).



- **Personal and Family Relationships:** Hiring, managing, or actively participating in the procurement evaluation of a close relative, spouse, partner, or close friend.
 - **External Commitments:** Accepting external directorships, secondary employment, advisory roles, or speaking engagements that conflict with your working hours or intellectual property obligations to HEX 101 LTD.
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5. Disclosure, Management, & Escalation

The Disclosure Process

If you suspect or become aware of a potential, actual, or perceived conflict of interest, you must act immediately.

1. **Immediate Notification:** Complete the **HEX 101 LTD Conflict of Interest Declaration Form** and submit it to your Line Manager as soon as the situation arises.
2. **Board Escalation:** The Line Manager will forward the disclosure to the Compliance Officer or Managing Director via accounts@hex101.com.
- 3.

Risk Mitigation Strategies

Once a conflict is disclosed, management will evaluate the risk and implement a formal mitigation plan. Actions may include:

- **Divestment / Relinquishment:** Asking the employee to step away from the external role or financial interest.
 - **Recusal:** Removing the employee from specific procurement decisions, contract negotiations, or client accounts entirely.
 - **Restricted Access:** Revoking specific system or administrative access privileges related to the affected vendor or client.
 - **Acceptance with Monitoring:** Allowing the situation to continue under strict monitoring if the risk is deemed negligible to HEX 101's operations.
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6. Training, Governance, & Enforcement

Training and Annual Declarations

- All new employees must complete a Conflict of Interest questionnaire during their induction.
- All directors and high-risk personnel (Sales, Procurement, Vendor Management, Senior Engineers) are required to submit an **Annual Conflict Declaration**, even to confirm a nil return.



Record Keeping

The Finance and Compliance team will maintain a secure, confidential **Central Register of Conflicts of Interest**. This register is reviewed quarterly by the Board.

Consequences of Non-Compliance

Failure to declare an active conflict of interest, deliberately concealing a commercial connection, or manipulating HEX 101 procurement channels for personal gain constitutes gross misconduct. It will lead to immediate disciplinary proceedings up to and including **summary dismissal** and potential legal action to recover lost assets.

7. Related Policies and Records

This policy forms part of HEX 101's broader governance framework and must be read alongside:

- HEX 101 LTD Anti-Corruption and Bribery Policy
 - HEX 101 LTD Employee Handbook & Employment Contract
 - HEX 101 LTD Procurement & Supplier Guidelines
 - **Corporate Form:** Conflict of Interest Declaration Form
 - **Corporate Record:** Central Register of Conflicts of Interest
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