

Anti Bribery and Gifts Policy

Pocket Money Adventures CIC | Version 1.1

Effective: 2 October 2026 | Review: 2 October 2027 or sooner on relevant change

Policy owner: Nathan Waldron, Director | Signatories: Nathan Waldron and Bernadette Houlton | Approved policy issue

Adopted by Pocket Money Adventures CIC on 2 October 2026.

Signed electronically: Nathan Waldron, Director and Designated Safeguarding Lead.

Signed electronically: Bernadette Houlton, Director and Deputy Designated Safeguarding Lead.

Typed electronic signatures in the established policy format.

Current operating requirements

Application

Apply recorded gift and hospitality thresholds, conflict declarations and independent approval before acceptance. No classroom product promotion, child data access or influence over teaching is offered in exchange for funding. Maintain the register and decline inappropriate inducements. Policy sign-off does not approve any individual gift or contract.

Detailed policy and procedures

Anti-Bribery and Gifts Policy

Registered office: 68 Nottingham Road, Eastwood, Nottingham, NG16 3NQ Company No. 16994988 • ICO Registration No. ZC124930 General contact: hello@pocketmoneyadventures.co.uk Safeguarding contact: safeguarding@pocketmoneyadventures.co.uk Data Protection contact: dpo@pocketmoneyadventures.co.uk Designated Safeguarding Lead: Nathan Waldron Deputy DSL: Bernadette Houlton

1. Purpose

Pocket Money Adventures CIC is committed to conducting all its activities with honesty, ethics, and integrity. This policy reflects PMA's legal obligations under the Bribery Act 2010. Bribery is illegal, immoral, and undermines trust. Bribery will not be tolerated. Breach of this policy may result in disciplinary action, termination of engagement, and referral to law enforcement agencies.

2. What is bribery?

Bribery is the act of offering, promising, giving, accepting, or requesting a financial advantage or other advantage as an inducement or reward for a person to act improperly. Bribery can take many forms: it may be direct or indirect; it may be cash or non-cash; it may be offered to a person in their own interest or in the interest of a third party. The Bribery Act

2010 creates four principal offences: bribing another person (Section 1); accepting a bribe

(Section 2); bribing a foreign public official (Section 6); and the corporate offence of failing to prevent bribery by an associated person (Section 7).

3. The Section 7 corporate offence

PMA as an organisation can commit a criminal offence if a person associated with PMA (including any employee, contractor, or agent) bribes another person with the intention of obtaining or retaining business or a business advantage for PMA. The only defence available is for PMA to demonstrate that it had in place adequate procedures to prevent persons associated with PMA from bribing. This policy forms part of those adequate procedures and is required by law.

4. Gifts and hospitality

PMA provides schools with programme delivery materials including books, Sidekick Cards, Parent Fridge Cards, and branded posters. These materials are programme delivery items and are NOT inducements. They are available to all schools participating in the PMA

programme and are funded by PMA's sponsors, not provided in exchange for contracts or favours.

The following are acceptable:

- Programme delivery materials provided as part of the standard programme
- Token gifts of nominal value (under £25) at Christmas or on programme completion The following are NOT acceptable:
- Gifts given to influence a business decision or school partnership
- Cash or cash-equivalent gifts (vouchers, credit cards, etc.) to any person
- Gifts of any value to government officials, Ofsted inspectors, or other public officials
- Hospitality that is lavish or disproportionate

5. Facilitation payments

PMA does not make and does not accept facilitation payments. Facilitation payments are unofficial payments made to a public official to secure services that a person is entitled to receive as a right, such as obtaining access to government officials or speeding up administrative processes. Such payments are prohibited and constitute bribery under UK law.

6. Sponsor relationships

All sponsor relationships are conducted at arm's length and documented in writing. Sponsors do not receive preferential access to individual schools, children, their data, or PMA's confidential information as a result of sponsoring the programme. Sponsorship is a commercial contract that supports the delivery of the PMA community benefit programme. Sponsorship fees are documented and paid in accordance with the sponsorship agreement.

7. Reporting concerns

Anyone who is asked for or offered a bribe, or who suspects that bribery has occurred, must:

- Refuse the bribe firmly and clearly
- Report the matter immediately via the Whistleblowing Policy (whistleblowing@pocketmoneyadventures.co.uk) or to Nathan Waldron, Director, at

hello@pocketmoneyadventures.co.uk

- Document what happened in writing, including dates, times, people involved, and what was said or offered
PMA will investigate all reports promptly and confidentially under the Whistleblowing Policy. PMA will cooperate fully with any law enforcement investigation.

8. Training and awareness

All directors, employees, contractors, and volunteers are required to read this policy and understand its requirements. New contractors and volunteers receive a copy of this policy on engagement. PMA reviews and updates this policy annually. An annual reminder of this policy is issued to all staff and associates with the annual policy review.

9. Record of policy briefings

A log of all persons who have confirmed reading and understanding this policy is maintained by the Director. This record forms part of PMA's evidence of adequate procedures under the Bribery Act 2010. The log is kept in the Gifts and Hospitality register operated by PMA.

10. Linked policies and references

- Whistleblowing Policy v1.2
- Disciplinary Policy v1.1
- Anti-Money Laundering Policy v1.1
- Operational Reference Hub - Gifts and Hospitality register (OPREF row)

Issue control: current approved issue dated 2 October 2026. Earlier issues are archived. Policy approval does not complete host agreements, individual acknowledgements or venue checks.