



***Anti-Money Laundering, Anti-Bribery
& Anti-Corruption Policy***

Corporate Office

***Arkade House, Next to Children's Academy,
A.S. Marg, Ashok Nagar, Kandivali (E),
Mumbai 40 0101***



1. Purpose

Arkade Developers Limited (“Arkade”) is committed to the highest standards of ethics, integrity, and transparency. This Policy establishes a **zero-tolerance approach** towards bribery, corruption, and money laundering and ensures compliance with applicable laws.

2. Scope

Applies to:

- Employees, Directors, and Management
- Contractors, Consultants
- Vendors, Suppliers, Channel Partners
- Agents, Intermediaries, and all Third Parties

3. Policy Statement

Arkade strictly prohibits:

- Bribery, corruption, kickbacks
- Facilitation payments
- Money laundering

All business transactions must be **transparent, lawful, and properly recorded.**

4. Risk-Based Approach

Arkade shall **periodically assess risks** related to:

- Bribery and corruption
- Money laundering
- Third-party engagements

Controls and mitigation measures shall be **proportionate to identified risks.**

5. Gifts, Hospitality & Donations

- Must be **reasonable, transparent, and not influence decision-making**
- Defined **thresholds, approvals, and disclosures** must be followed
- Includes gifts, hospitality, political contribution, charitable donations etc.

6. Books, Records & Internal Controls

- All transactions must be **accurately recorded**
- No undisclosed or off-book accounts permitted
- Strong internal controls must be maintained

7. Money Laundering Prevention

Employees must ensure:

- Proper due diligence of customers and partners
- Verification of source of funds
- Monitoring of suspicious transactions

Red Flags include:

- Unusual payment structures
- Cash transaction requests
- Offshore accounts
- Lack of transparency

8. Third-Party Compliance & ESG Alignment

- Third parties must comply with Arkade's ethical standards
- Policy adherence shall form part of **contracts and agreements**
- ESG alignment expected wherever applicable

9. Training & Awareness

- Periodic training for employees and relevant third parties
- Awareness programs to strengthen compliance culture

10. Monitoring & Audit

- Periodic **internal audits and monitoring mechanisms**
- Compliance reviews to ensure effectiveness

11. Reporting & Whistleblower Linkage

Violations can be reported through:

- Reporting Manager
- HR / Compliance
- Whistleblower Mechanism

All reports will be treated confidentially.

12. Non-Retaliation

No retaliation against individuals reporting concerns in good faith.

13. Consequences of Non-Compliance

Violations may lead to:

- Disciplinary action (including termination)
- Legal action, where applicable

14. Review

Policy will be periodically reviewed by HR and Compliance.