



CODE OF BUSINESS ETHICS

Integrity

Work Ethics

Knowledge

**INTEGRITY IN ACTION
GOVERNANCE WITH TRUST**

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1. INTRODUCTION

Indah Water Konsortium Sdn. Bhd. (“IWK” or “the Company”) is entrusted with providing essential sewerage services in the interest of public health, environmental protection, and sustainable development. As a public service-oriented organisation, IWK recognises that the confidence and trust of stakeholders are built upon the integrity, transparency, and professionalism with which its business is conducted.

This Code of Business Ethics (“the Code”) sets out the ethical principles, standards of conduct, and behavioural expectations applicable to all persons and entities associated with IWK. The Code serves as a foundation for ethical decision-making and reinforces IWK’s commitment to good governance, accountability, and compliance with all applicable laws and regulations.

2. PURPOSE OF THE CODE

The purpose of this Code is to:

- Establish a clear framework for ethical and responsible conduct;
 - Promote a culture of integrity, accountability, and professionalism across IWK;
 - Provide guidance in identifying and managing ethical risks;
 - Prevent misconduct, corruption, abuse of power, and conflicts of interest;
 - Safeguard IWK’s reputation, assets, and public trust; and
 - Support compliance with legal, regulatory, and governance requirements.
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3. SCOPE AND APPLICABILITY

This Code applies to:

- All employees of IWK, including permanent, contract, and temporary staff;
- Members of the Board of Directors;
- Business partners, consultants, agents, and representatives acting for or on behalf of IWK.

Compliance with this Code is mandatory. Where applicable, this Code shall be read together with other IWK policies, procedures, and contractual obligations. In the event of any inconsistency, the stricter requirement shall apply.

4. CORE ETHICAL PRINCIPLES

4.1 INTEGRITY

All parties shall act honestly, ethically, and transparently in the performance of their duties and in all dealings involving IWK.

4.2 ACCOUNTABILITY

Individuals shall be accountable for their decisions and actions, including the proper use of authority, public funds, and organisational resources.

4.3 PROFESSIONALISM

All duties shall be performed with competence, diligence, fairness, and respect, in accordance with professional and organisational standards.

4.4 COMPLIANCE

All activities shall be conducted in full compliance with applicable laws, regulations, policies, and contractual obligations.

4.5 PUBLIC INTEREST AND SUSTAINABILITY

Decisions and actions shall prioritise public interest, environmental protection, occupational safety, and long-term sustainability.



5. STANDARDS OF ETHICAL CONDUCT

5.1 COMPLIANCE WITH LAWS AND REGULATIONS

All parties shall comply with all applicable laws, regulations, directives, and regulatory requirements governing IWK's operations. Ignorance of the law shall not be accepted as a defense for non-compliance.

5.2 CONFLICT OF INTEREST

Individuals must avoid situations where personal, financial, or other interests may conflict, or appear to conflict, with the interests of IWK. All actual, potential, or perceived conflicts of interest shall be declared promptly in accordance with IWK's policies. Appropriate measures shall be taken to manage or eliminate such conflicts.

5.3 ANTI-BRIBERY AND ANTI-CORRUPTION

IWK adopts a zero-tolerance approach towards bribery and corruption. All forms of bribery, corruption, facilitation payments, kickbacks, or improper inducements are strictly prohibited, whether directly or indirectly. No individual shall offer, give, solicit, or accept any benefit intended to influence a business decision or secure an improper advantage.

5.4 GIFTS, HOSPITALITY, AND ENTERTAINMENT

The giving or receiving of gifts, hospitality, or entertainment in connection with official duties is prohibited unless expressly permitted under IWK's policies. Any permitted gifts or hospitality must be declared, recorded, and approved in accordance with established procedures.

5.5 ABUSE OF POWER AND POSITION

Authority and position within IWK shall not be misused for personal gain or to provide unfair advantage to any party. Decisions shall be made objectively, fairly, and in the best interest of IWK.

5.6 CONFIDENTIALITY AND INFORMATION PROTECTION

Confidential, sensitive, or proprietary information obtained through association with IWK shall be protected and used solely for legitimate business purposes. Such information shall not be disclosed without proper authorisation, except where required by law.

5.7 PERSONAL DATA PROTECTION

IWK is committed to safeguarding personal data in accordance with applicable personal data protection laws. Personal data collected and used are only for legitimate purposes and to ensure it is accurate, secure, and protected against unauthorised access; and - Immediately report any suspected data breach.

5.8 FAIR DEALING AND BUSINESS CONDUCT

All dealings with customers, regulators, contractors, suppliers, and business partners shall be conducted fairly, honestly, transparently, and without discrimination. IWK does not tolerate fraudulent, deceptive, or misleading practices.

5.9 USE OF IWK ASSETS AND RESOURCES

IWK's assets, funds, systems, and resources shall be used responsibly and solely for legitimate business purposes. Misuse, wastage, or unauthorised use of IWK property is prohibited.

5.10 WORKPLACE CONDUCT AND RESPECT

IWK is committed to providing a safe, respectful, and inclusive workplace. Harassment, discrimination, intimidation, or abusive behaviour in any form will not be tolerated.

5.11 ENVIRONMENTAL AND SOCIAL RESPONSIBILITY

All activities shall be conducted with due regard to environmental protection, public health, occupational safety, and community wellbeing, in line with IWK's sustainability commitments.

6. ROLES AND RESPONSIBILITIES

6.1 BOARD OF DIRECTORS

The Board shall provide leadership and oversight to ensure the effective implementation and enforcement of this Code.

6.2 MANAGEMENT

Management shall lead by example, promote ethical conduct, and ensure that adequate systems and controls are in place to support compliance with this Code.

6.3 EMPLOYEES AND BUSINESS PARTNERS

All employees and business partners are responsible for understanding, complying with, and upholding the principles and standards set out in this Code.

7. RAISING CONCERNS AND REPORTING MISCONDUCT

IWK encourages the reporting of any suspected unethical conduct, wrongdoing, or breach of this Code. Reports may be made through designated reporting or whistleblowing channels. All reports shall be handled confidentially, and individuals who raise concerns in good faith shall be protected against retaliation.

8. INVESTIGATION AND ENFORCEMENT

All reported breaches shall be assessed and investigated in a fair, objective, and timely manner. Investigations shall be conducted in accordance with applicable policies and procedures.

9. CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this Code may result in disciplinary action, termination of employment or contractual relationship, and/or legal or regulatory action, depending on the severity of the breach.

10. REVIEW AND AMENDMENT

This Code shall be reviewed periodically to ensure its continued relevance and effectiveness. Any amendment shall be subject to approval by the Board of Directors.

11. DECLARATION OF COMMITMENT

All persons and entities subject to this Code are expected to acknowledge, understand, and commit to complying with its provisions as a condition of their engagement with IWK.







Prepared By

INTEGRITY AND GOVERNANCE
DEPARTMENT (IGD)