



NO GIFT POLICY

INDAH WATER KONSORTIUM SDN BHD
(Co. No: 211763-P)



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1. Purpose

Indah Water Konsortium Sdn Bhd, as a service provider, pride ourselves on the relationships we have with our customers, vendors and suppliers we do business with, and the difference we make together in creating better experiences for the general public. One of our core values is 'Integrity' and this important core value applies to every aspect of our business.

We are committed to being honest, ethical and conduct ourselves with the highest degree of integrity at the workplace. In going about our business, we will avoid the perception of impropriety and our No-Gift Policy is not to seek advantage by giving or accepting any improper gifts, entertainment or payments from any customer, supplier, potential supplier or any person we believe may be seeking to influence our business decisions or transactions, and nor must we do so as individuals. We do not accept any level of corruption.

2. Scope

This Policy applies to all IWK employees.

3. Principles

- We want our relationships with our customers, partners, vendors, suppliers, contractors and consultants to be a positive point of difference for Indah Water and to be a reflection of our core values.
- All employees and senior management are expected to exercise proper judgment in handling gift activities and behave in a manner consistent with the general principles as set out in our Code of Conduct –
 - Consistently maintain the highest degree of integrity,
 - Always exercise proper care and judgment,
 - Avoid conflict of interest,
 - Refrain from taking advantage of your position or exercising your authority to further your own personal interest at IWK's expense,
 - Comply with applicable laws, regulations and IWK's policies and procedures

4. Gifts

- When dealing with existing or potential vendors/contractors on behalf of IWK, we must never give or accept any cash or service which has financial value or could be perceived as a reward or inducement for business.
- This No-Gift Policy includes supplier-provided food, beverages (alcoholic/non-alcoholic), meals or any form of entertainment including sporting events.

5. Gift Policy Exceptions

The following gifts shall be exempted from the prohibition under this Policy :-

- Exchange of gifts at the company-to company level (e.g. gifts exchanged between companies as part of an official company visit/courtesy call and thereafter the said gift is treated as company property);
- Gifts from company to external institutions or individuals in relation to the company's official functions, events and celebrations (e.g. commemorative gifts or door gifts offered to all guests attending the event);
- Gifts from IWK to employees in relation to an internal or externally recognised Company function, event and celebration (e.g. in recognition of an employee's service to the Company);
- Token gifts of nominal value bearing Company's logo (such as pens, notepads, planners, calendars and other small promotional items) that are given out to employees, customers, delegates, students and members of the public, attending events such as conferences, exhibitions, trainings, career fairs, etc, and deemed as part of the company's brand building or promotional activities; and
- Gifts to external parties who have no business dealings with IWK (e.g. monetary gifts or gifts in-kind to charitable organizations)

Employees are required to professionally inform vendors, potential vendors and others of this no-gift policy, and the reasons the company has adopted the policy. Employees should request that vendors respect our company policy and not purchase and deliver any gift for our employees, department, Unit Offices or Company, at any time, for whatsoever reason.

In the event an employee or department receives a gift:

- Where possible, the gift is returned to the vendor.
- Where it is not possible to return the gift, to immediately declare the gift and the gift is to be donated to charity identified by IWK.

If any employee has questions about and / or needs clarification of any aspect of this policy, the employee should check with the Integrity Unit or the Industrial Relations Section/Human Capital and Administration Department ("HCAD"). Any exceptions to the gift policy may be made only with the permission of the company's Chief Executive Officer.