



## **DEALING WITH THIRD PARTY POLICY**



**INTEGRATED MANAGEMENT SYSTEM  
DEPARTMENTAL POLICY**

**DEALING WITH THIRD PARTY POLICY**

Doc. Ref.:  
IWK/IGU/DTP/DP/04



Rev. No.:  
00

Issue Date:  
20 OCT 2023

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**Approval**


The signature below certify that this Policy has been reviewed, accepted and demonstrates that the signatories are aware of all the requirements contained herein and are committed to ensuring their provision.

	<b>Signature</b>	<b>Name</b>	<b>Position</b>
Prepared by:		Suzinor Kamaralzaman	Head Unit of Integrity and Governance
Approved by:		Narendran Maniam	Chief Executive Officer

### Amendment Record

This policy is reviewed to ensure its continuing relevance to the systems and process that it's describe. A record of contextual or omissions is given below:

Date	Rev. No.	Page No.	Remark
26 June 2020		All	New. This policy has been presented and approved by Board of Integrity & Governance (BIGC) on 15 June 2020 ref. no. : IWK/BIC/17/05 and approved by the Board on 26 June 2020 ref. no. : IWK/BD/120/07.
20 October 2023	00	a) All  b) page 5  c) page 7  d) page 8  e) All	a) Improve the policy by providing a header for each page including the policy title, document reference, revision no., issue date and page no. for traceability purposes. b) Adding reference to use for interested parties in section 3 Scope. c) Title changes in section 9 from 'Enquiries' to 'Enquiries and Reporting' for the purpose of uniformity of information for each IGU policy and adding info for whistleblowing channel in section 9. d) Adding in section 10, 'IGU is allowed to make appropriate guidelines for the good purpose of managing this policy' for the purpose of uniformity of information for each IGU policy. e) This policy has been presented and approved by Board of Integrity & Governance (BIGC) on 2 October 2023 ref. no. IWK/BIGC/28/04 and approved by Board on 20 October 2023 ref. no. IWK/BD/136/05.

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## **1. INTRODUCTION**

- 1.1 This Dealing with Third Parties Policy (the “Policy”) concerns Indah Water Konsortium Sdn. Bhd. (“IWK”) and applies to all employees of the IWK, without exception. This includes the Chief Executive Officer, Chief Operating Officer, Heads of Department and all staff employed with IWK and affiliated companies and members of the board of directors (collectively, the “Employees”).
- 1.2 This document is to be read together with the Code of Conduct (the “Code”) and other integrity-related policies as approved by the Management.

## **2. OBJECTIVE**


This Policy is established to provide guidance on establishing and monitoring relationships with third parties as well as on managing bribery and corruption risk related to business dealings with third party.

## **3. SCOPE**

This Policy applies to all IWK employees. This policy also should be used as a guidance by stakeholders, business partners or any individual / organisation that deals with IWK employees / facilities.

## **4. GENERAL RULE**

- 4.1 IWK expects that all parties acting for or on its behalf to share the Company’s values and ethical standards as their actions may implicate IWK legally and tarnish IWK’s reputation.
- 4.2 IWK’s dealings with third parties, which include its business partners, government intermediaries, introducers etc., must be carried out in compliance with all relevant laws and must be consistent with the values

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and principles of the Code and IWK Vendor Code of Conduct. As part of this commitment, all forms of bribery and corruption are unacceptable and will not be tolerated.


- 4.3 When dealing with third parties, we must conduct appropriate counterparty due diligence to understand the business and background of IWK's counterparties before entering into any arrangements to ensure that they subscribe to acceptable standards of integrity in the conduct of their business.

## **5. DEALING WITH PUBLIC OFFICIALS**

'Public or government officials' include, without limitation to, candidates for public office, officials of any political party and officials of state-owned enterprises other than IWK. Providing gifts, entertainment or corporate hospitality to public officials or their family/household members is generally considered a 'red flag' situation. If approval is obtained for IWK Employee to provide gifts, entertainment or corporate hospitality to public officials, the IWK Employee must ensure that the gifts, entertainment or corporate hospitality is not excessive or lavish, and must commensurate with the official designation of the public official and not in his personal capacity. IWK Employees must also be aware of local laws governing the activity and to ensure compliance.

## **6. IWK EMPLOYEES AS PUBLIC OFFICIALS**

Under the Malaysian Anti-Corruption Commission Act 2009 ("MACC Act 2009"), IWK Employees may be considered as public officials because IWK is a company owned by the Ministry of Finance Incorporated (MOF Inc) where the Government has direct or indirect controlling powers and rights over IWK. To prevent violation of law and underscore our commitment to ethical behavior, IWK Employees should always be abide by IWK's policies and provisions in relation to gifts, entertainment and corporate hospitality. IWK Employees are strictly prohibited from accepting gifts, entertainment or corporate hospitality that are excessive, lavish,

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inappropriate, illegal, or given to influence a business decision or with an understanding that, in return, some desirable outcome may be expected.

## **7. DUE DILIGENCE**

- 7.1 The key principle when dealing with business partners is “trust but verify.”
- 7.2 Proper due diligence procedures enable IWK to follow through on its commitment to act with integrity by protecting against partnering with companies and individuals that do not operate pursuant to ethical principles. Such procedures also minimize reputational and legal risks arising from anti- corruption legislation, including the MACC Act 2009, by investigating potential business partners’ past and current ethical standing.
- 7.3 Generally, managing risk involved with third party relationships and dealings can be achieved through (i) assessing third party risk, (ii) binding third parties to IWK’s business standards, and (iii) monitoring third party compliance with IWK’s business standards.

## **8. COMPLIANCE**

Failure or refusal of IWK Employees to comply with this Policy may be deemed to be defective and subject to disciplinary action under the IWK Code of Conduct.

## **9. ENQUIRIES AND REPORTING**

Any enquiries or reports on violation of this Policy may be submitted through the reporting channels as follows:

Whistle Blowing Channel

- i) Telephone : 03-2780 1295
- ii) Email : [whistle@iwk.com.my](mailto:whistle@iwk.com.my)
- iii) Send the Whistleblower Form to the Head of the Integrity & Governance Unit

- iv) Send the Whistleblower Form through <https://www.iwk.com.my> or IWK Mobile App
- v) Attend and meet at :  
Integrity & Governance Unit  
Indah Water Konsortium Sdn Bhd  
No. 1, Jalan Damansara  
60000 Kuala Lumpur

## 10. CONCLUSION

Employees with information on potential non-compliant conduct of IWK, its employees, or any third party with whom IWK conducts or anticipates conducting business must report the situation in accordance with the instructions provided in the Code.

IGU is allowed to make appropriate guidelines for the good purpose of managing this policy.