






## **VENDOR CODE OF CONDUCT (VCOC)**

	<b>INTEGRATED MANAGEMENT SYSTEM DEPARTMENTAL POLICY</b>			
	<b>VENDOR CODE OF CONDUCT (VCOC)</b>			
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### Approval

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

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

**Amendment Record**

This VCOC 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	<p>New. This VCOC has been presented and approved by Board of Integrity &amp; 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.</p>
20 October 2023	00	<p>a) All  b) page 7  c) page 10  d) page 11  e) All</p>	<p>a) Improve the VCOC by providing a header for each page including the VCOC title, document reference, revision no., issue date and page no. for traceability purposes. b) Re-phrase Gift, Entertainment, Corporate Hospitality, Sponsorship, Charitable Donation and Political Contribution Policy to Gift Management Policy based on latest update in item 3.3. c) Adding info for whistleblowing channel in item 7. d) Adding in item 7, 'IGU is allowed to make appropriate guidelines for the good purpose of managing this VCOC' for the purpose of uniformity of information for each IGU policy. e) This policy has been presented and approved by Board of Integrity &amp; 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.</p>

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## 1. INTRODUCTION

The Vendor Code of Conduct (VCOC) establishes a set of obligations on business in a lawful and ethical manner with the highest professional conduct expected of all Vendors engaging or working with Indah Water Konsortium Sdn Bhd (IWK).

The VCOC shall apply to all contractors, consultants, suppliers or any person including their employees, agents, suppliers and sub-contractors (representatives). IWK expects the Vendor to comply with the VCOC when engaging with IWK and throughout its conduct of business with IWK.

All Vendors are required to declare in writing to IWK on any potential or actual conflict of interest at the beginning of the procurement exercise. Any enquiries relating to this VCOC can be forwarded to the Integrity and Governance Unit of IWK or its authorised representative.

## 2. PRINCIPLES OF THIS CODE

### 2.1 Integrity and Good Ethics


Vendor must be honest in any representation and be committed to the highest standard of ethical conduct and integrity.

### 2.2 Accountability

Vendor must be accountable for services rendered and goods provided and honour their commitment efficiently and timely in accordance with the agreed terms and conditions.

### 2.3 Protection of asset and information

Vendor must not at any time disclose IWK's confidential information or data to any unauthorised party.

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## **2.4 Workplace Practices and Culture**

Vendor must comply with all applicable laws, regulations relating to work practices and environment.

## **3. ETHICAL BUSINESS PRACTICES**

The Vendor must abide by all applicable laws and regulations and uphold the highest standard of integrity and ethical conduct in all business interactions and dealings with IWK and these include:

### **3.1 Conflict of Interest**

- Vendor must avoid any act or omission which may give rise to a conflict of interest in the discharge of the Vendor's work in relation to the agreement entered into with IWK.
- Vendor must not gain any improper advantage or preferential treatment in their relationship or dealing with IWK's employees.
- Vendor must declare to IWK if any of IWK's employees or family member has an interest of any kind in the Vendor's business. Vendor must also declare to IWK if they have any family relationship with any of IWK's employees in the past or present.
- If at any point of time, should there be any situation of an actual or potential conflict of interest and/or improper advantage, Vendor must promptly report of such situation to [whistle@iwk.com.my](mailto:whistle@iwk.com.my).

### **3.2 Anti-bribery/Corruption**

Vendor is prohibited from:

- Directly or indirectly soliciting or accepting any form of bribery.
- Being directly or indirectly involved in activities such as extortion or facilitating, requesting for or receiving kick-backs.
- Offering any gratification of any kind whatsoever to IWK employees and/or their family members as an inducement or reward in order to obtain any advantage before, during or after the procurement process.



This includes gifts, entertainment, special invitations or functions.

### 3.3 Gift Management

- The Vendor and its representative must not offer gifts, entertainment or other incentives to any IWK employees, directors, family members or agents acting on their behalf directly or indirectly.
- For more information, the Vendor is advised to refer to IWK's Gift Management Policy, IWK/POLISI IGU/02.

### 3.4 Misrepresentation

The Vendor is strictly prohibited at all times from making any misrepresentation including on its capabilities, for the purpose of securing procurement with IWK and with other entities by misrepresenting its capabilities in the services rendered or goods delivered to IWK.

## 4. ACCOUNTABILITY

The Vendor must be accountable and honour its commitment in accordance with the terms and conditions of the contract which has been agreed between the Vendor and IWK.

## 5. PROTECTION OF ASSETS INCLUDING INFORMATION AND INTELLECTUAL PROPERTIES

### 5.1 Confidentiality Obligation and Data Protection

- The Vendor must keep confidential all information made available by IWK related to the business and affairs of IWK (confidential information).
- The Vendor must not disclose or share any of IWK's confidential information to any person without first, obtaining IWK's prior consent in writing.
- The Vendor must not disclose IWK's confidential information for any purpose except to the extent necessary to exercise its rights and perform

its obligations for the procurement with written consent from IWK.

- The Vendor must undertake to put in place appropriate controls, policies and procedures to protect IWK's confidential information and prevent any information leakage.
- The Vendor must use its best endeavor to ensure that its representatives comply with the obligation of the confidentiality.
- The Vendor's obligation of confidentiality shall survive even after the termination or expiration of the engagement period.

## **5.2 Data Protection**

The Vendor must comply with the relevant laws and IWK's policies in relation to protection of personal privacy, including personal data.

## **5.3 Protection of Intellectual Property**

- The Vendor must respect all intellectual property (IP) rights. Any transfer of technology and know-how must be done in a manner that protects intellectual property rights.
- The Vendor must only use software and technology which have been legitimately acquired and licensed, in accordance with their respective terms of use or license.
- The Vendor must comply with IP rights of IWK and all other relevant third parties. IWK views infringement of its IP seriously and will take necessary legal action to protect its IP rights.


## **5.4 Restriction on Making Public Statement and Giving of Reference**

The Vendor is prohibited from making or circulating any public statement on content related to the business or affairs of IWK including making reference of IWK's name for marketing purposes.

# **6. WORKPLACE CULTURE AND BEHAVIOUR**

The Vendor must comply with all applicable laws, regulations and IWK's policies



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relating to work practices and environment including the following:

### **6.1 Professional Workplace Environment and Employment Practices**

- The Vendor must behave and dress in a professional manner that reflects IWK's professional image at all times when dealing with in the course of performing their duties pursuant to the agreement they have with IWK.
- IWK does not tolerate harsh, inhumane treatment of any of IWK or the Vendor's employees, child labour, any form of discrimination and any substance abuse on IWK's premises or during the performance of the Vendor's contractual obligation.
- The Vendor must use IWK's infrastructures and facilities responsibly at all times.

### **6.2 Safety and Health**

- The Vendor shall be responsible for the safety of all persons who may be affected by the activities and shall comply with IWK's safety regulations and procedures.
- The Vendor shall ensure that all works undertaken comply with all the safety, health and environmental regulations and guidelines of Malaysia at all times.
- The Vendor shall comply with all applicable Local Authority's requirements and regulations. Permits and records shall be obtained, kept and properly recorded.
- The Vendor is encouraged to supply less environmentally and socially damaging products which take into account all phases of the products lifecycle i.e. production, transportation, maintenance and disposal.

### **6.3 Security and Access**

- The Vendor must ensure compliance with IWK's security policies and procedures while operating in IWK's premises.
- The Vendor must provide sufficient information to IWK for the purpose of security vetting of its representative and comply with all reasonable

requests for further documents or information.

- The Vendor must display IWK's security pass at all times while on IWK's premises.
- The Vendor and its representatives are only permitted to access areas for which they have been authorised to access and which are necessary for the performance of their work or services.

## **7. WHISTLEBLOWING OR REPORTING OF POTENTIAL BREACH**

Any party or Vendor with knowledge of a potential or questionable breach of this VCOC should raise those concerns and/or submitted through the following channels:

### 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

All information will be promptly reported to the appropriated channels, and will be handled with utmost discretion. The identity of the concerned reporting party will be treated with the strictest confidentiality at all times.

IWK will not tolerate any retaliation taken by employees or Vendor or its representatives against any individual for reporting in good faith questionable

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behaviour or possible violation of the VCOC.

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