



CONFLICT OF INTEREST POLICY

INDAH WATER KONSORTIUM SDN BHD
(Co. No: 199101001452 (211763-P))

CONTENTS

1. INTRODUCTION.....	3
2. OBJECTIVE	3
3. SCOPE.....	3
4. DEFINITIONS.....	3
5. STATEMENT OF POLICY.....	4
6. DECLARATION OF INTERESTS	5
7. COMPLIANCE.....	6
8. ENQUIRIES AND REPORTING	6
9. CONCLUSION	6
10. CONFLICT OF INTEREST POLICY ACCEPTANCE WHEN DEALING WITH THIRD PARTIES.....	7
11. REFERENCES.....	10

1. INTRODUCTION

- 1.1 Indah Water Konsortium (IWK) Sdn Bhd intends to achieve the highest level of standards to avoid conflict of interest in every matter. This Conflict of Interest Policy is IWK's commitment to avoid any conflict of interest involving IWK citizens and Third Parties in any IWK service and operation matters that may lead to abuse of power, malpractice, corrupt practices and any misconduct. A conflict of interest may prevent a person from acting objectively and transparently; at the same time, it is difficult to make fair and just decisions related to official affairs and creates a bad perception of IWK's transparency and responsibility.
- 1.2 This document should be read together with the Code of Conduct and other integrity-related policies approved by Management.

2. OBJECTIVE

This policy was created to provide guidance to IWK citizens to explain the principles, rules and issues related to conflicts of interest that arise when carrying out official duties in order to ensure that duties are carried out transparently, fairly and with integrity.

3. SCOPE

This policy applies to all IWK members and Third Parties. This policy should also be used as a guide by stake holders, business partners or any individual / organization that deals with citizens / IWK facilities.

4. DEFINITIONS

Conflict of interest

Any behavior or manner that may cause the officer to have personal interests conflict with public interests; or use his public position for his own benefit, relatives or allies.

IWK members

Officers and staff who serve in IWK either through permanent, temporary, temporary, loan, contract or part-time appointments including political appointments.

IWK members also include the Chairman, Board Members, Chief Executive Officers, Chief Operating Officers, Heads of Departments and Heads of Operations or companies under IWK.

Relatives and allies

Referring to the interpretation of "relatives" and "associates" under Section 3, Act Malaysian Anti-Corruption Commission (MACC) 2009 (Act 694).

Third party

Contractors, vendors, suppliers, consultants, service providers, organizations, inspectors from regulatory departments, public or government employee management, stake holders or any party dealing with IWK.

Corruption

Bribery in the context of the Malaysian Anti-Corruption Commission Act 2009 (Act 694) means giving or offering, receiving or requesting or agreeing to receive or request a bribe directly or indirectly as an inducement or reward to do or not do an act related to official duties.

5. STATEMENT OF POLICY

IWK always strives to apply and strengthen the values of integrity, accountability and professionalism in all official affairs. In accordance with these efforts and commitments, IWK citizens are prohibited from:

- i. Establish direct or indirect contact with any third party for personal interests that conflict with official duties;
- ii. have personal / financial interests with third parties involved in any official business at IWK;

- iii. allowing himself or a relative/associate to behave in a way that may cause his personal interests to conflict with the interests of official duties;
- iv. involved in making decisions or procurement matters in the capacity of official duties with any party in which a relative/associate has an interest in said party;
- v. pass on any classified information related to IWK that enables third parties to benefit in any official dealings at IWK;
- vi. carry out any form of transaction using a personal account with a third party who has official business at IWK;
- vii. receiving compensation/ fees/ commissions/ wages/ services in any form from third parties who have official business at IWK; and
- viii. use the official position to develop the career advancement of brothers and associates at IWK.
- ix. Abusing an official position to influence decisions in favor of himself or his relatives/associates;
- x. Misusing an official position as an IWK citizen to get special treatment or profit from any third party.

6. DECLARATION OF INTERESTS

- 6.1 IWK members who have a conflict of interest in any work process must declare their interest in writing to the Head of Department.
- 6.2 The Head of Department must replace any IWK member who has declared his interest with an officer who has no interest in the work process.
- 6.3 IWK members who have a conflict of interest and are involved in making decisions in any meeting must declare their interest orally to the meeting and leave the meeting.
- 6.4 The secretariat of the meeting must record the declaration of interest of the officer and the action of the officer leaving the meeting in the minutes of the meeting.
- 6.5 Ensure that any party maintains the confidentiality of any secret, confidential and classified information related to IWK that allows any party to benefit in any IWK business.

7. COMPLIANCE

Failure or refusal of IWK staff to comply with this Policy may be considered breached and subject to disciplinary action under the IWK Conduct Policy.

8. 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
- 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
Level 22,
No. 1, Jalan Damansara
60000 Kuala Lumpur

9. CONCLUSION

Employees who have information about possible conduct that does not comply with the rules of IWK, its employees, or any third party with whom IWK deals or is expected to do business, should report this situation in accordance with the instructions given in the Code.

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

10. CONFLICT OF INTEREST POLICY ACCEPTANCE WHEN DEALING WITH THIRD PARTIES

There are 2 forms for the Declaration of Conflict of Interest which are:

i. Acceptance of Conflict of Interest

It should be filled in by those involved in official IWK affairs between IWK and third parties.

ii. Exception of Conflict of Interest

It should be filled in by those who declare conflict of interest with any third parties and would like to exclude from any official IWK affairs between IWK and the third parties.

ACCEPTANCE OF CONFLICT OF INTEREST

Date:

Location:

Details of work/Subject:

To (Head of Office) :

1. I hereby declare that I do not have any conflict of interest involving relatives and associates (referring to the interpretation in the Malaysian Anti-Corruption Commission Act 2009 – Act 694) while carrying out official duties at IWK.
2. I also promise that if I have a conflict of interest in any official duties, I must declare those interests in writing to the head of the Department and withdraw from being involved in the official affairs concerned.
3. I agree that if I break this promise or have given false information to cover up my interests while carrying out official duties, I may be subject to disciplinary action according to the IWK code of conduct or according to the applicable Public Officer Regulations.
4. I declare that the information provided is true and correct.

Confirmation from those involve:

1.	Name:		
	Occupation:		
	Place of Duty:		
	Tel. No.:		
2.	Name:		
	Occupation:		
	Place of Duty:		
	Tel. No.:		
3.	Name:		
	Occupation:		
	Place of Duty:		
	Tel. No.:		
4.	Name:		
	Occupation:		
	Place of Duty:		
	Tel. No.:		
5.	Name:		
	Occupation:		
	Place of Duty:		
	Tel. No.:		

EXCEPTION OF CONFLICT OF INTEREST

Date:

Location:

Details of work/Subject:

To (Head of Office):

1. I hereby declare that I have a direct or indirect interest in the work process or matters that cause or may cause a conflict of interest with my official duties. The details of the work process or the matter concerned are stated as the list below.
2. I hereby request to be exempted from being involved in any work process related to the official affairs above.
3. I declare that the information provided is true and correct.

Confirmation from those involve:

1.	Name of IWK staff:		
	Occupation:		
	Department:		
	Relationship:		
	Tel. No.:		
2.	Name of individual/company/organisation:		
	Occupation:		
	Relationship:		
	Tel. No.:		
3.	Name of individual/company/organisation:		
	Occupation:		
	Relationship:		
	Tel. No.:		
4.	Name of individual/company/organisation:		
	Occupation:		
	Relationship:		
	Tel. No.:		
5.	Name of individual/company/organisation:		
	Occupation:		
	Relationship:		
	Tel. No.:		

11. REFERENCES

- i. Perlembangaan Persekutuan
- ii. Akta Suruhanjaya Pencegahan Rasuah Malaysia 2009 (Akta 694)
- iii. Peraturan-Peraturan Pegawai Awam (Kelakuan Dan Tatatertib) 1993
- iv. Pelan Antirasuah Nasional 2019 – 2023