

**EAST COAST REGIONAL  
OPERATIONS (ECRO):**

Lot 21877, Tingkat 1 & 2, Jalan CU13,  
Taman Chukai Utama, Kubang Kurus,  
24000 Kemaman, Terengganu.  
Tel: +609-8593131

**SOUTHERN REGIONAL  
OPERATIONS (SRO):**

No. 1A, Jalan Impian Senai Utama,  
Taman Impian Senai,  
81400 Senai, Johor.  
Tel: +607-5985578

**NORTHERN REGIONAL  
OPERATIONS (NRO):**

No. 12-A, Jalan Perai Jaya 1,  
Bandar Perai Jaya,  
13600 Perai, Pulau Pinang.  
Tel: +604-3989853



THE ENVIRONMENTAL SPECIALIST WITH MS ISO 9001:2015 & ISO 14001:2015 CERTIFICATIONS.

## **CODE OF ETHICS AND BUSINESS CONDUCT (KOD ETIKA DAN PERLAKUAN PERNIAGAAN)**

### **Preamble (*Mukadimah*):**

The Code of Ethics and Business Conduct Policy details the behavioral expectations for employees towards colleagues, supervisors, managers, stakeholders and the organization. The Code emphasizes open communication, professionalism, respect and adherence to the laws, while also outlining potential disciplinary actions for violations.

This Code of Ethics and Business Conduct serves as a guideline for ethical behaviors and framework for ethical decision making within our organization. It is the communication tools that informs internal and external stakeholders about what is valued by our organization, the employees and the management.

Airwastewater Management Sdn Bhd (AWWAM) promotes freedom of expression and open communication and thus, AWWAM requests all employees to adhere to AWWAM Code of Ethics and Business Conduct when they engage or deal with colleagues, supervisors, managers or other stakeholders within or outside the organization.

Employees should avoid offending, participating in serious disputes or disrupting in the workplace. AWWAM expects employees to foster a well-organized respectful and collaborative working environment.

### **Message from the Managing Director (*Mesej dari Pengarah Urusan*):**

Our commitment to ethical behavior and the solid ethical foundations are one of the most essential components of AWWAM business operations. We are committed to doing business the right way, based on a culture of ethics and compliances.

In the longer term, we could successfully face the challenges of competitive market environment by accepting the imperatives of moral responsibility, both as individuals and as an organization. In performing the job duties, the employees should always act lawfully, ethically and in the best interests of AWWAM.

Thank you for upholding our values and helping us in doing things right. It does not only mean that we provide well made, fairly priced and of exceptional quality products and services, but also means that ethics and integrity is always born in mind. We source materials from suppliers who have impeccable human rights and compliance records, and we ensure that our supply chain is of high integrity and we monitor our entire operations for compliances with our Code.

Dr. Ahyar Idris  
Managing Director.

01<sup>st</sup> December 2023.



**AIRWASTEWATER MANAGEMENT SDN BHD'S SUBSIDIARIES:**

AWWAM PLASMA SDN BHD (201501041782) | AWWAM TRAVEL & TOURS SDN BHD (2013011021332) |  
AWWAM ENVIRONMENTAL LABORATORY SERVICES SDN BHD (202201004155)

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## 1. Introduction:

This Code of Ethics and Business Conduct of Airwastewater Management Sdn Bhd (AWWAM) serves as our ethical commitment and as a guide to proper business conduct for all of our stakeholders. We, at AWWAM are committed to doing business legally, ethically and in a transparent manner.

This document applies to all employees who work for the AWWAM Group of Companies including officers, directors, managers, team leaders, employees, temporary or interim employees, consultants, contractors, sub-contractors, agencies, stakeholders and other organizations who do business with us.

AWWAM expects employees to be impartial and honest in all affairs relating to their job duties. All employees shall act responsibly in their job duties, be in good faith and maintain the trust necessary for employment.

The success of our business is based on the trust we earn from our employees, customers, and shareholders. We gain credibility by adhering to our commitment to fairness and reaching our goals solely through ethical conduct. All employees are expected to adhere to this Code in their professional and personal conduct, treat everyone with respect, honesty and fairness.

AWWAM is open to any questions at any time and shall not allow punishment or retaliation against anyone for reporting a misconduct in good faith.

Managers and leaders shall have higher responsibility for demonstrating, also through their actions, the importance of this Code, and responsible for promptly addressing every ethical question or concern. Employees shall cooperate in investigations of potential or alleged misconduct.

Non-compliance to this Code shall be considered as a misconduct that could warrant disciplinary action, including termination of employment or other contract in deserving cases.

We are committed to making efforts to apply our values and norms also throughout the entire value chain of our own suppliers, sub-contractors, service providers and business partners.

## 2. Scope and Applicability:

This policy applies to all AWWAM employees irrespective of their status and regardless of their employment agreement, rank or their positions or locations. Contractors, vendors, suppliers, distributors or similar shall also be expected to adhere to this Code of Ethics and Business Conduct while working for or on behalf of the Company.

AWWAM employees are bound by their contract of employment to adhere to AWWAM' Code of Ethics and Business Conduct while performing their duties in the Company.



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### 3. Core Values and Principles:

The Company's core values and principles are:

- Visionary & Creativity
- Integrity & Honesty
- Ethical Behaviors & Transparency
- Leadership & Teamwork
- Passion & Patience
- Confidence & Self-Motivated
- Adaptability & Accountability
- Loyalty & Sustainability
- Humility & Compassion
- Positive Attitude & Good Stewardship

### 4. Compliances with the Laws and Regulations:

All employees shall protect the Company legality. Employees shall comply with all applicable laws, acts and regulations when performing or during the course of performing their job duties. Employees shall also be committed to adhere to every valid and binding contractual agreement concluded and shall not abuse their rights.

We shall comply with the Environmental, Occupational Safety and Health, Malaysian Anti-Corruption Commission, Employment and other applicable acts and regulations. We expect employees to be ethical and responsible when dealing with Company's products, services, partnerships, finances and public image to ensure compliant operations.

### 5. Human Rights:

We shall commit to respect human dignity and rights of each individual and community whom we interact with during the course of work. We shall not in any way, cause or contribute to the violation of human rights. Our employees shall treat everybody with dignity, respect and care and uphold human rights.

### 6. Fair Labor Practices and Working Conditions:

We shall be committed to promote equality in our employment practices and fair employment and remuneration policy in compliance with applicable laws. We shall firmly oppose to employ or contract child or slave labor or any form of forced or compulsory or bonded labor. We shall condemn all forms of illegal, unfair, unethical labor practices that exploits workforce, destroys social security or serve as tax evasion, including but not limited to undeclared and "grey" work or holding back wages.

Our employees shall act with integrity and treat their colleagues and others through the work with full respect.



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## 7. Environment, Social and Governance (ESG):

We shall be committed to meet the current requirements without compromising the needs of future generations. We shall combine economic, environment, social and governance factors in our operations and business decisions.

### Environment:

We shall provide a safe and healthy working environment in our workplace for our employees. Likewise, to protect their safety and from injury employees shall wear the appropriate personal protective equipment (PPE) provided by the Company during the performance of their job duties either onsite or offsite. When handling any products or materials employees shall identify hazardous chemicals for proper storage and disposal. It is our intent to eliminate the generation of hazardous wastes and to prevent pollution when we perform our job duties.

All employees shall be familiarized themselves with the requirements of permits and authorizations to conduct works and be trained and responsive to emergency response and preparedness plans in the job duties. They should be able to identify, assess and prepare for emergencies.

### Social:

We shall provide equal opportunity for employment. Employees shall be treated with dignity and respect. They shall be protected from sexual harassment, physical, verbal abuse, coercion or other types of abuses. The employees shall be allowed to associate and interact with others freely, communicate or express their views with the management concerning their working conditions without encountering any threats such as reprisal, retribution or harassment.

We shall provide all employees with fair compensations and benefits in accordance with our terms and conditions of employment and the local laws and regulations. Employees are expected to comply with the general laws and Company's working standards of working days, working hours including breaks, rest periods, provisions of leaves and other employment terms and conditions.

Employees have free choice of employment and any persons with unacceptable age of employment shall be rejected.

### Governance:

All employees shall comply with this Code of Ethics and Business Conduct including Anti-Bribery and Anti-Corruption Policy, Receiving Gifts and Benefits Policy and other policy elements of Code of Conducts.



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Employers shall protect employees' privacy regarding personal data and information and any individuals who infringe laws and regulations shall face the necessary consequences reflecting the infringement scope and type.

All employees are prohibited from involvement of money laundering activities.

## **8. Respect in the Workplace:**

All employees shall respect their colleagues and value diversity. We shall be committed to fostering an inclusive environment where all employees feel valued and respected. We shall reject and shall not tolerate any kind of discriminatory behavior, harassment or victimization. Employees shall conform with equal opportunity practices in all aspects of their work, from recruitment and performance evaluation to interpersonal relations.

## **9. Discrimination and Harassment:**

We shall provide equal opportunity in employment and we shall not tolerate any kind of discrimination or harassment or any type from abuse. Discriminations shall not take place for traits or circumstances such as gender, marital status, age, nationality, social status, ethnic origin, color, religion, race, disability, political opinion, birth, property or any other status. Any kind of discriminatory behavior, harassment, bullying or victimization shall be prohibited.

All employees shall follow the highest standards of conduct in all verbal and written communication based on mutual respect, and shall refrain from any form of harassment, slander or any behavior that could be taken as offensive, intimidating, humiliating, malicious or insulting.

## **10. Security and Protection of Company Resources, Assets and Properties:**

We shall be responsible for the security, protection and for the economic use of Company resources. Company's resources shall include time, buildings, structures, facilities, equipment, instruments, devices, and other assets and properties including materials, reports, soft-wares, softcopies or hardcopies, tangible or intangible, products, services, trademarks, slogans copyrights and information; and are provided for legitimate business use only. Occasional personal use is permissible as long as it is lawful, does not affect job performances or disrupts workplace morale.

All employees shall follow appropriate security measures and shall treat all Company's resources, assets and properties with respect and care. Employees shall use them only as necessary to perform and complete their job duties and shall not misuse them or use them carelessly. We shall protect these Company's assets and properties from damage and/or vandalism.

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## 11. Professionalism, Integrity and Ethics:

All employees shall show professionalism and shall act with integrity in the workplace. This shall include punctuality, reliability, commitment to delivering high-quality work and uphold the highest ethical standards in all professional interactions.

## 12. Fair competition and Business Conduct:

Our relationships with business partners shall be built upon trust and mutual benefits compliant with competition law. We shall be dedicated to ethical and fair competition for selling our products and services based on their quality, functionality and competitive pricing.

We shall make independent pricing and marketing decisions and shall not improperly cooperate or coordinate our activities with our competitors. We shall not offer or solicit improper payments or gratuities, nor shall we engage or assist in unlawful boycotts of particular customers. We shall commit to comply with all applicable trade controls, restrictions, sanctions and import-export embargos.

We shall not allow any violence of the fairness of any tendering process in any way. We shall refrain from damaging competition and the reputation of any business partners and any behavior that harms competitors' creditability.

We shall not hold back maliciously, unlawfully or unduly payments towards our partners, and we shall not allow such practices in our supply chain and we fight the unethical practices of "debt chain".

Our employees shall be responsible for ensuring fair business during their job duties and adhere to every competition, consumer protection and fair marketing rules. Customers and business partners shall be treated fairly and equally, products and services shall be displayed in a manner that is fair and accurate that discloses all relevant information.

## 13. Confidentiality, Information Security, Proprietary Information and Intellectual Property:

All employees shall be committed to business information confidentiality, integrity and accessibility. We shall implement proper technical security measures to uphold this commitment. Proprietary information shall include all non-public information that might be harmful to the Company or its customers, business partners if disclosed to unauthorized parties.

All employees shall handle any such information as confidential. Employee shall not be entitled to trade with securities while in possession of non-public information or deliver non-public information to others that could have impact on the securities.

We shall respect the property rights of others. We shall not acquire or seek to acquire trade secrets or other proprietary or confidential information by improper means. We shall not engage in unauthorized use, copying, distribution or alteration of software or other protected intellectual property.



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## 14. Company's Technology, Materials, Information and Social Media Usage:

All employees shall use Company's technology, materials, information and social media responsibly in accordance with the Company policy and procedures. Company's confidential technology, materials or information shall not be shared online or through social media platforms. Employees shall treat all Company's technology, materials or information obtained during work as private and confidential and shall not be released to any third party during or after employment.

## 15. Consistent Management Standards:

All employees shall comply with the current practices of the management standards in the course of performing their job duties.

Management Standards include organizational and functional reporting structures, visions, missions, objectives, core values, key success factors, policies, procedures and the management systems standards that are presently in operations or in practices within the Company's organization including ISO Management Systems under Quality Management System (QMS); MS ISO 9001:2015 and Environmental Management System (EMS); ISO 14001:2015; ISO/IEC Laboratory Management Accreditation System such as ISO/IEC 17205:2017 and other management standards or similar.

All Directors and Senior Management are expected to act consistently in accordance with the highest standards of personal and professional integrity, independence, honesty and ethical conduct including use of utmost care and sound judgement in good faith in business decision making.

## 16. Book Keeping, True Reporting and Financial Integrity:

Our books, records, accounts and financial statements shall be maintained in appropriate details, truly and properly reflect our transactions. We condemn all forms of money laundering as we are committed to do business with partners involved in legitimate business activities with funds derived from legitimate sources.

We shall commit ourselves to fair taxation and to avoid all tax evasion practices, including such as failing to issue receipts or accounting fake expense invoices.

All employees shall follow accounting procedures, ensure that business transactions are recorded and documented appropriately and make certain that all disclosures made in financial reports are full, honest, accurate, timely and understandable. Employees shall not improperly, manipulate or mislead any audit.

## 17. Environmental Sustainability, Occupational Safety & Health:

All employees shall adhere to environmental sustainability, occupational safety and health policies subscribed by the Company. Employees shall be committed to minimize the impact on the natural

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environment of our operations. We shall make efforts to reduce harmful emissions, wastes and the use of finite resources like energy and water.

Each employee shall comply with all the relevant acts and regulations, commit to maintaining clean, safe and healthy working environment and report any hazards or unsafe conditions.

## **18. Personal Appearance and Dress Code:**

All employees shall adhere to Company's dress code and personal appearance guidelines. We are expected to dress in a manner that are appropriate for our roles and the work environment.

## **19. Anti-Bribery and Anti-Corruption:**

All employees shall reject any practices of bribery and corruption and shall adhere to Company's Anti-Bribery & Anti-Corruption Policy. We prohibit directly or indirectly offering, promising, giving, soliciting or accepting any unfair advantage or benefit, in order to obtain, retain or facilitate in any way the business, bribes and corruptions for the benefits of any internal or external party. Employees shall discourage themselves from accepting any gifts seen as inducements from clients or partners.

We shall not permit facilitation payments to government officials or private business partners in order to secure or speed up routine actions. Bribery and corruption shall also cover the misuse of function or position as well, as someone makes that false appearance that he or she improperly influences a decision maker.

Corruption for either to obtain or retain business, or to obtain or retain an advantage in the conduct of business shall be considered as gross misconduct. Similarly accepting or allowing another person to accept a bribe shall be considered gross misconduct. Our employees shall account for all the benefits received in the course of doing business and shall not give or receive bribes or otherwise act corruptly.

## **20. Anti-Fraud:**

Fraud is an unethical act or intent to cheat, steal, deceive or lie and could lead to criminal cases. All employees shall avoid unethical behaviors that lead to fraud. Submitting false expense reports; false overtime claim forms; false petty-cash request forms; forging or altering financial documents or certifications; misappropriating assets or misusing Company's property; making untrue financial or non-financial entry on records or statements are prohibited.

## **21. Gifts and Hospitality:**

All employees shall avoid any actions that create a perception that favorable treatment was sought, received or given in exchange for personal benefits.



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Business courtesies or benefits include gifts, gratuities, meals, refreshments, entertainments or other advantage from persons or companies with whom we do or may do business. We shall neither give nor accept such benefits that constitute, or could reasonably be perceived as constituting, unfair business inducements that would violate law, regulations or policies, or would cause embarrassment. Our employees shall never use personal funds or resources to do something that cannot be done with our resources.

We may accept and offer occasional gifts and hospitality that are customary and conform to reasonable ethical practices of the market, provided that they shall not be inappropriately excessive, not frequent and shall not reflect a pattern of frequent acceptance, shall not create the appearance of an attempt to influence business decisions.

Only low value (less than RM100.00) gifts could be accepted by the employees with the knowledge of the Managing Director of the Company. All other gifts shall be politely refused or, if received shall be returned to the donor. If returned shall not be possible, it shall be offered for charity or community purposes.

It shall be the responsibility of the person offering, providing, receiving or accepting the gifts to decide whether the gifts are appropriate.

**22. Job Duties and Authority:**

All employees shall fulfil their job duties with integrity and respect toward customers, stakeholders and the community. Supervisors and managers shall not abuse their authority. We expect them to delegate duties to their team members taking into account their competences and workload. Likewise, we expect team members follow team leaders' instructions and complete their duties with skill and timely manner.

Any workplace conflicts shall be resolved in a professional and respectful manner. Employees are encouraged to seek the assistance of their supervisor or managers or Human Resources and Administration if needed. We encourage mentoring throughout our Company.

**23. Reporting Mechanisms:**

Employees are encouraged to report any unethical behavior or violations of this Code. AWWAM is committed to protecting the anonymity and safety of those who report misconduct.

By adhering to this Code of Ethics and Business Conduct, all employees contribute to the success and reputation of Airwastewater Management Sdn Bhd. Failure to comply to this Code may result in disciplinary actions, up to and including termination of employment.

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**24. Absenteeism and Tardiness:**

All employees shall follow their work schedules and the Company standard working schedules. We expect all employees to be punctual when coming to work, attend meetings or engage with appointments.

**25. Conflict of Interests:**

All employees shall avoid any personal, financial, favor or other interests that might hinder their capability or willingness to perform their job duties. We shall avoid conflict of interest and act in the best interest of the Company.

A conflict of interest exists when an employee's personal interest interferes or potentially interferes with the best interest of the Company. Our employees' decisions shall be based on objectives and fair assessments avoiding the possibility of any improper influences.

**26. Collaboration:**

All employees shall be friendly and collaborative with their colleagues, customers and other stakeholders. We shall not disrupt the workplace or present obstacles to the work of others.

**27. Communication:**

All employees shall be open to communication with their colleagues, team members, supervisors or managers. Open communication in the workplace is when employees can openly express their thought and ideas to one another to obtain the benefits of building the confidence, improving loyalty and productivity, and reduce cultural gaps between employees.

Employees are therefore, encouraged to build open communication as part of their work culture to communicate or share ideas with their supervisors or managers for the betterment of the Company's operations.

AWWAM operations has the objectives of improving employees' engagements, promoting feeling of inclusion, strengthen team bonds and enhancing trust between employees and the management.

**28. Privacy and Personal Data Protection:**

We shall respect people's privacy and acknowledge employees, customers and other natural persons' need to feel confident that their personal data is processed appropriately and for legitimate business purpose. We shall be committed to comply with all personal data protection laws. We shall only acquire and keep personal information that is necessary and we shall give proper information on these activities to data owners. We shall implement proper security measures to assure confidentiality, integrity and availability of personal information.

# AIRWASTEWATER MANAGEMENT SDN BHD (200701021637) (779652-U)

("AIR, WASTE & WATER", DON'T WASTE THEM!)

E-Mail: [airwastewater@awwam.com](mailto:airwastewater@awwam.com) Website: [www.awwam.com](http://www.awwam.com)

**AWWAM Main Office:** No. 154, Jalan S2 B5, Seremban 2, 70300 Seremban, Negeri Sembilan, Malaysia.

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All employees shall observe the legal requirements, apply compliant practices and follow related procedures to ensure legality of personal data handling and processing activities.

## 29. Benefits:

All employees shall not abuse their employment benefits provided by the Company. The benefits may include time off, medical insurance, out-patient clinical visits, facilities, subscriptions, any type of allowances, mileage claims, or any other benefits.

## 30. Disciplinary Actions:

Any employees who intentionally or repeatedly fail to follow the Company's Code of Conduct shall be taken for disciplinary actions by the Company including:

- a) Reprimand
- b) Detraction of benefits
- c) Demotion
- d) Suspension or termination
- e) Legal actions.



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