

1. Preface

Responsible corporate management at S W Aroma Sdn Bhd has always played an important role. That is how it should be in the future as well. Since the first day of establishment, our family-owned company has stood for continuity and personality. Fairness and respect are the basic principles and rules for our conduct towards our employees and in relation to our external partners.

We are aware that we have reciprocal relationship with various stakeholders. Among others, these include our employees, suppliers, customers, partners, the managing board and other business associates, in addition to the general public and environment. In all our company decisions and activities, we aim to keep sight of their legitimate interests and to act both accordingly and responsibly. It is for this reason that we maintain regular dialogues with our most important groups of stakeholders.

2. Why a code of conduct?

Our entrepreneurial actions are based on the respective legal systems of the different countries and regions we are active in. Further to these, the following compliance guidelines apply to us here at S W Aroma. They delineate our fundamental principles and regulate behaviors within our company as well as in relation to our external partners and the general public.

The conduct guidelines set out how we as company perceive our ethical, legal and social responsibilities as we work to fulfill our vision and mission statement. They are the directions and the future for being a responsible family-owned company.

The present conduct guidelines are intended to strengthen awareness of the law, moral standards and responsibility as integral parts of our corporate policy. They should serve to support our employees in their daily business and protect them from committing misconduct. In addition, they should advise employees of how to handle the wrongdoing of third parties. Each employee influences the repute of the company through his or her actions. The key message is that only clean business is S W Aroma business. Only with our employees we can sustain and preserve the reputation of our company.

3. Validity

The present conduct guidelines apply to all S W Aroma employees and managing directors, in Malaysia as well as worldwide. S W Aroma expects the conduct guidelines to not only be lived internally, but also to be practiced while dealing with the customers, suppliers, business partners or any other parties. These lay the foundation for cooperative business relations, based correspondingly on the S W Aroma mission of achieving top professionalism service quality.

All employees are called upon to live up to these conduct guidelines. In the event of non – compliance with these guidelines, various channels of communication are open to those concerned. These will be described at the end of the document.

4. Legal Compliance



The compliance with laws and legal systems of the respective country in which we have business activities is a fundamental principle of S W Aroma. Each employee must comply with the laws of the applicable legal systems of the countries in which we operate. All courses of action which are illegal or which would result in liability claims are prohibited.

Additionally, S W Aroma expects the same compliance from each of our business partners. Within our sphere of influence then, S W Aroma also demands compliance with appropriate international standards of conduct.

5. Business Records

Accurate record-keeping and reporting of financial and non-financial information reflect on S W Aroma reputation and are an important part of our legal regulatory obligation. Accurate record-keeping and reporting are also necessary to assess individual performance and assess compensation for all employees fairly, based on merit and actual results.

The term “business record” is interpreted broadly. Every corporate document, even an apparently insignificant one, must be complete and accurate.

Example of Business Records:

- Expenses and travel reports;
- Invoices;
- Purchase orders;
- Quality control documents;
- Inventory records;
- Payment acknowledgement;
- Performance reviews.

6. Prohibition of Corruption, Bribery and Dishonest Influence

S W Aroma has a zero-tolerance policy when it comes to bribery. S W Aroma employees and directors are not permitted to unlawfully influence business partners or be unlawfully influenced by them. Therefore, employees are prohibited from receiving promises for or accepting any type of inducement from third parties, regardless of whether this is done directly or indirectly, for themselves or for others. It is equally prohibited for employees to promise, offer or grant any such inducement or other advantages to third parties.

In this context, “third parties” are companies or people that are associated with the business doings and/or interests of S W Aroma.

Accepting gifts, entertainment, and other business courtesies from competitor or business may appear and easily create the appearance of a conflict of interest or suspicious act, especially if the value of the item is significant.

Generally, acceptance of inexpensive “token” non-cash gift is permissible. In addition, infrequent and moderate business meals and entertainment with clients and infrequent invitation to attend local sporting events and celebratory meals with clients can be appropriate aspects of many S W Aroma business relationships, provided that they aren’t excessive and don’t create the appearance of impropriety. Before accepting any gift or courtesy, consult with the board of management of S W Aroma to obtain approval.

7. Handling of Information / Data Protection

S W Aroma relies heavily on business data and information to achieve business information. Therefore, fundamental business processes need to be documented properly and truthfully. Confidential trade or company information which is not intended for the public is to be considered under obligation of secrecy. The duty of secrecy extends beyond termination of employment. Personal data may only be collected, processed, or used insofar as it is necessary in a secure manner. All employees are bound to uphold applicable data protection laws and regulations in order to protect the personal rights of business partners, co-workers and third parties.

S W Aroma employee shall avoid station personal opinions on behalf of the Company unless you are authorized to do so. Do not attack or malign personally or as a group any person, product, customers, supplier, colleague or any other stakeholder.

8. Charitable Contribution and Sponsoring

In order to make simultaneous contribution towards long-term and sustainable development, S W Aroma takes up this responsibility very seriously and strives to fulfil it. For this reason, we made donation to a variety of social and cultural benefit projects, primarily within the Ipoh area. All payment transactions are legally compliant and well-documented to ensure maximal transparency.

S W Aroma makes no political contributions of any kind and does not sponsor private parties or organization whose aims are not compatible with S W Aroma’s company principles.

9. Health and Safety of Employees, Environmental Protection

The physical health, psychological integrity and safety of our employees are all of great importance to S W Aroma. Each of our employees has a share responsibility to uphold work safety standards in the workplace.

S W Aroma views environmental protection and the conservation of natural resources as an effort to create a sustainable development.