



WHISTLEBLOWING POLICY



**INSIGHTS ANALYTICS BERHAD
(202401035770 (1581617-V))**

WHISTLEBLOWING POLICY

Effective Date: 15th January 2025

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1.0 Overview

- 1.1 Insights Analytics Berhad, its subsidiaries and its Board of Directors (herein referred to as “Group”) are committed to the highest form of integrity and accountability in the course of its business. In view of this, the Group undertakes to provide an avenue for both internal and external parties including employees, business associates, or members of the public (“Whistleblowers”) to disclose any real or suspected incidents or misconduct that may affect and impact the Group’s integrity.

2.0 Scope of Policy

- 2.1 A Whistleblower can lodge a Whistleblowing complaint of any of the wrongdoings including but not limited to these following issues:
- Fraud (embezzlement, forgery, theft and misappropriation);
 - Bribery and corruption;
 - Money laundering;
 - Criminal breach of trust, abuse of power and position;
 - Sexual harassment;
 - Improprieties and irregularities in accounting and financial reporting
 - Conflict of interest
 - Unauthorized disclosure of confidential information; or
 - Acts or omissions which are unethical and deemed to be against the interest of the Group, laws, regulations, or public policies.
- 2.2 All whistleblowing reports must be made in good faith with reasonable belief that the information and allegation is true and not frivolously or maliciously or for personal gain.

3.0 Reporting Procedure

- 3.1 A whistleblower may lodge his/her complaint or allegation regarding bribery, corruption, or any misconduct by writing via:
- Email: whistleblower@insightsanalytics.ai; or
 - Mail: **Attn: Whistleblowing Unit**
Parcel Lot No. D272, D273 & D274,
1st Floor, Block D, Icom Square,
Jalan Pending,
93450 Kuching, Sarawak.
- 3.2 Upon receiving the written complaint or allegation, the Whistleblowing Unit will review the nature of the complaint within fourteen (14) working days and establish an investigation team for further actions and investigations. The investigation process will be managed with the highest standards of integrity, accuracy, and fairness, with the aim of determining the validity of the report received.
- 3.3 The Whistleblowing unit comprises of the Board Chairman of the Group and the Audit Committee.

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- 3.4 If any member of the Whistleblowing Unit or investigation team is the subject of the complaint or suspected of involvement in the misconduct, they will be abstained from the investigation process.
- 3.5 A thorough investigation will be carried out in a fair manner as a neutral fact-finding process, without any presumption of guilt. The whistleblower is expected to make their best effort to cooperate with the investigation team.
- 3.6 All findings after due investigation will be documented by the Whistleblowing Unit, and the whistleblower shall be notified of the outcome of the investigation, provided the identity of the whistleblower is known. The time from the date of receipt of the complaint to the findings shall not exceed sixty (60) working days unless otherwise extended due to the complexity of the case.
- 3.7 All reports of suspected or actual anti-corruption complaints will be reported to the Audit and Risk Committee to ensure appropriate action is taken.

4.0 Whistleblower's Protection

- 4.1 For the purpose of investigation, whistleblowers are encouraged to provide their identities for further clarification.
- 4.2 All whistleblowers will be afforded protection of confidentiality of identity to the extent practicable, provided the complaint or allegation is made in good faith and with a reasonable belief.
- 4.3 Retaliation of any kind against the whistleblower will not be tolerated by the Group.

5.0 Consequences of Committing Improper Conduct

- 5.1 The Board of Directors and the Management Team will take serious and consistent action against any parties who commit an improper conduct including necessary disciplinary action such as termination of employment, report to the relevant authorities or any other action deemed appropriate by the Group.

6.0 References

- 6.1 This policy shall be read in conjunction with the Anti-Bribery and Anti-Corruption Policy and other related policies adopted by the Group.
- 6.2 If there is any doubt about the scope of applicable laws or the application of this policy, reference may be made to the HR or Legal Department.

Appendix I: Whistleblowing Notice**Important Notice**

While all reporting of improper conduct in good faith and not for malicious intent will be investigated, a Whistleblower is encouraged to identify himself/herself when reporting, for credibility purposes and to allow an avenue for the Company to follow up to ascertain the facts or to obtain further information for investigation purposes. Please attach reliable evidence to substantiate your disclosure and assist in the investigation. You may use additional sheets for additional witnesses or supporting evidence if necessary.

Please provide the following details for any suspected Misconduct and submit directly to the Whistleblowing Unit.

WHISTLEBLOWER'S CONTACT INFORMATION	
Full Name (Optional)	
Designation (Optional)	
Department (Optional)	
Contact Number / Email (Mandatory)	
SUSPECT'S INFORMATION	
Full Name	
Designation	
Department	
Contact Number	
Email	
WITNESS' INFORMATION (if any)	
Full Name	
Designation	
Department	
Contact Number	
Email	

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COMPLAINT	
Briefly describe the misconduct and how you know about it. Specify what, who, when, where and how. If there is more than one (1) allegation, number each allegation and use as many pages as necessary.	
What misconduct / improper activity are you reporting?	
Who committed the misconduct / improper activity?	
When did it happen and when did you notice it?	
How did you know about it?	
Where did it happen?	
Is there any evidence(s) that you could provide us?	
Are there any other parties involved other than the suspect stated above?	
Do you have any other details or information which would assist us in the investigation?	
Additional comments	
Date:	Signature: _____