



ANTI-SEXUAL HARASSMENT POLICY



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

CODE OF CONDUCT AND ETHICS

Effective Date: 15th January 2025

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1.0 The Policy Statement

Insights Analytics Berhad (“the Company”) and its subsidiaries (collectively known as “the Group”) is committed to providing a safe environment for all its employees free from discrimination on any ground and from harassment at work including sexual harassment. The Group will operate a zero-tolerance policy for any form of sexual harassment in the workplace, treat all incidents seriously and promptly investigate all allegations of sexual harassment. Any person found to have sexually harassed another will face disciplinary action, up to and including dismissal from employment. All complaints of sexual harassment will be taken seriously and treated with respect and in confidence. No one will be victimised for making such a complaint.

2.0 Definition of Sexual Harassment

2.1 Sexual harassment is unwelcome conduct of a sexual nature which makes a person feel offended, humiliated and/or intimidated. It includes situations where a person is asked to engage in sexual activity as a condition of that person’s employment, as well as situations which create an environment which is hostile, intimidating or humiliating for the recipient. Sexual harassment can involve one or more incidents and actions constituting harassment may be physical, verbal and non-verbal. Examples of conduct or behaviour which constitute sexual harassment include, but are not limited to:

2.1.1. Physical conduct

- (i) Unwelcome physical contact including patting, pinching, stroking, kissing, hugging, fondling, or inappropriate touching
- (ii) Physical violence, including sexual assault
- (iii) Physical contact, e.g. touching, pinching
- (iv) The use of job-related threats or rewards to solicit sexual favours

2.1.2. Verbal conduct

- (i) Comments on a worker’s appearance, age, private life, etc.
- (ii) Sexual comments, stories and jokes
- (iii) Sexual advances
- (iv) Repeated and unwanted social invitations for dates or physical intimacy
- (v) Insults based on the sex of the worker
- (vi) Condescending or paternalistic remarks
- (vii) Sending sexually explicit messages (by phone or by email)

2.1.3. Non-verbal conduct

- (i) Display of sexually explicit or suggestive material
- (ii) Sexually suggestive gestures
- (iii) Whistling
- (iv) Leering

2.2 Anyone can be a victim of sexual harassment, regardless of their sex and of the sex of the harasser. The Group recognises that sexual harassment may also occur between people of the same sex. What matters is that the sexual conduct is unwanted and unwelcome by the person against whom the conduct is directed.

- 2.3 The Group recognises that sexual harassment is a manifestation of power relationships and often occurs within unequal relationships in the workplace, for example between manager or supervisor and employee.
- 2.4 Anyone, including employees of the Group, clients, customers, casual workers, contractors or visitors who sexually harasses another will be reprimanded in accordance with this internal policy.
- 2.5 All sexual harassment is prohibited whether it takes place within the Group premises or outside, including at social events, business trips, training sessions or conferences sponsored by the Company.

3.0 Complaint Procedure

- 3.1 Anyone who is subject to sexual harassment should, if possible, inform the alleged harasser that the conduct is unwanted and unwelcome. The Group recognizes that sexual harassment may occur in unequal relationships (i.e. between a supervisor and his/her employee) and that it may not be possible for the victim to inform the alleged harasser. If a victim cannot directly approach an alleged harasser, he/she can approach one of the designated staff members responsible for receiving complaints of sexual harassment. This person could be another supervisor, a member of the human resources department, etc.
- 3.2 When a designated person receives a complaint of sexual harassment, he/she will:
- immediately record the dates, times and facts of the incident(s).
 - ascertain the views of the victim as to what outcome he/she wants.
 - ensure that the victim understands the company's procedures for dealing with the complaint.
 - discuss and agree on the next steps: either informal or formal complaint, on the understanding that choosing to resolve the matter informally does not preclude the victim from pursuing a formal complaint if he/she is not satisfied with the outcome.
 - keep a confidential record of all discussions.
 - respect the choice of the victim.

3.2.1. Informal Complaint

If the victim wishes to deal with the matter informally, the designated person will:

- give an opportunity to the alleged harasser to respond to the complaint.
- ensure that the alleged harasser understands the complaints mechanism.
- facilitate discussion between both parties to achieve an informal resolution which is acceptable to the complainant.
- ensure that a confidential record is kept of what happens.
- follow up after the outcome of the complaints mechanism to ensure that the behaviour has stopped.
- ensure that the above is done speedily and within 14 days of the complaint being made.

3.2.2. Formal Complaint

The designated person who initially received the complaint will refer the matter to the Group Human Resources or the Group Managing Director to instigate a formal investigation. The designated person may deal with the matter him/herself or refer the matter to an internal investigator.

The disciplinary procedure is as below:

- The person carrying out the investigation will interview the victim and the alleged harasser separately.
- The person carrying out the investigation will interview other relevant third parties separately.
- Once the facts have been established, decide whether or not the incident(s) of sexual harassment took place.
- produce a report detailing the investigations, findings and any recommendations
- if the harassment took place, decide what the appropriate remedy for the victim is, in consultation with the victim (i.e. an apology, a change to working arrangements, a promotion if the victim was demoted as a result of the harassment, training for the harasser, discipline, suspension, dismissal)
- follow up to ensure that the recommendations are implemented, that the behaviour has stopped and that the victim is satisfied with the outcome
- if it cannot determine that the harassment took place, he/she may still make recommendations to ensure proper functioning of the workplace
- keep a record of all actions taken
- ensure that all records concerning the matter are kept confidential
- ensure that the process is done as quickly as possible and in any event within 14 days of the complaint being made

3.2.3. Outside complaints mechanisms

A person who has been subject to sexual harassment can also make a complaint outside of the company. They can do so through:

- Getting help from any women NGOs
- contacting Women's Aid Organisation (WAO) Hotline at 03 3000 8858 or SMS/WhatsApp TINA at +6018 988 8058
- lodging a complaint to Tribunal for Anti-Sexual Harassment (TAGS) under Ministry of Women, Family and Community Development
- lodging a complaint to Malaysian Communications and Multimedia Commission (MCMC) through online (<https://www.mcmc.gov.my/en/make-a-complaint/complaint-circle>) or at any MCMC office
- making a written complaint to the Labour Department
- lodging a police report

4.0 Disciplinary Measures

- 4.1 Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following disciplinary measures:
- written warning;
 - adverse performance evaluation;
 - reduction in wages;
 - transfer;
 - demotion;
 - suspension;
 - dismissal; or
 - withholding increments or bonus.
- 4.2 The nature of the disciplinary measures will depend on the gravity and extent of the harassment. Suitable deterrent sanctions will be applied to ensure that incidents of sexual harassment are not treated as trivial.
- 4.3 Certain serious cases, including physical violence, will result in the immediate dismissal of the harasser.

5.0 Implementation of this Policy

- 5.1 The Company will ensure that this policy is widely disseminated to all relevant persons. It will be included in the staff handbook.
- 5.2 All new employees must be trained on the content of this policy as part of their induction into the company.
- 5.3 Every year, the Company will require all employees to attend a refresher training course on the content of this policy.
- 5.4 It is the responsibility of every manager to ensure that all his/her employees are aware of the policy.

6.0 Monitoring and Evaluation

- 6.1 The Group recognises the importance of monitoring this sexual harassment policy and will ensure that it anonymously collects statistics and data as to how it is used and whether or not it is effective.
- 6.2 Supervisors, managers and those responsible for dealing with sexual harassment cases will report on compliance with this policy, including the number of incidents, how they were dealt with, and any recommendations made. This will be done on a yearly basis. As a result of this report, the company will evaluate the effectiveness of this policy and make any changes needed.

REFERENCE:

ANTI-SEXUAL HARASSMENT ACT 2022 (Published 18 October 2022)
This policy was adopted by the Board on 15th January 2025.

Appendix I: Complaint Form

Case Ref No.:

Reported Date:

Attention to:

COMPLAINT DETAILS	
Name Respondent	
Designation of Respondent	
Company/Firm	
Date of incident	
Location of incident	
Detailed explanation (please attached separate sheet(s) as necessary and sign off at the end of each page)	
Supporting evidence if any (Include digital recording of oral complaints)	
Other parties involved if any	
Witness(s) if any	

Details of Complainant/Recipient of Complaint

Name:

Designation:

Company Name:

Contact No.:

Email:

***Signature of Complainant/
Recipient of Complaint:***