



CODE OF CONDUCT & ETHICS



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

CODE OF CONDUCT AND ETHICS

Effective Date: 15th January 2025

Part I: Overview

1.0	Purpose And Scope Of The Code	2
2.0	Responsibility And Compliance With The Code	2
3.0	Amendments To The Code	2

Part II: Code Of Conduct

Section A: Workplace Culture And Environment

4.0	Equal Opportunity And Non-Discrimination	3
5.0	Workplace Health And Safety	3
6.0	Harassment, Threat And Violence	3
7.0	Drugs, Alcohol And Prohibited Substances	3

Section B: Company Information, Records And Assets

8.0	Data Integrity And Data Protection	4
9.0	Protection And Use Of Company Assets And Resources	4
10.0	Proprietary And Confidential Information.....	4

Section C: Duties Of Good Faith, Diligence And Integrity

11.0	Conflict Of Interest	5
12.0	Accepting & Providing Gifts And Other Benefits	5
13.0	Bribery And Corruption	6
14.0	Insider Trading	6
15.0	Anti-Money Laundering.....	6
16.0	Whistleblowing	6
17.0	Compliance With Laws	6

PART I: OVERVIEW**1.0 Purpose and Scope of the Code**

- 1.1 This Code of Conduct and Ethics (“**Code**”) applies to all employees and directors of Insights Analytics Berhad (the “**Company**”) and its subsidiaries (collectively, “**the Group**”), including full-time or permanent employees, part-time employees, employees on probation, trainees and interns, employees on secondment and personnel on fixed-term contracts (collectively, “**Employees**”).
- 1.2 This Code sets out the principles to guide standards of behaviour and business conduct when Employees deal with third party. In this context, third party refers to any individual or organisation the Employee comes into contact with during the course of his/her work, and includes actual and potential customers, competitors, suppliers, contractors, distributors, business contacts/partners, agents, advisers, regulators, government and public bodies and officials, shareholders, investors and the community in which the Group operates in.
- 1.3 This Code is not a comprehensive guide that covers every ethical situation Employees may encounter in their course of work. In any circumstance which is not covered by this Code or in case of any doubt, Employees shall refer to his or her Head of Department or the Company’s Head of Human Resources Department for clarification or guidance.

2.0 Responsibility and Compliance with the Code

- 2.1 It is the responsibility of every Employee to act in accordance with the policies, principles and guidelines detailed in this Code, and any update or amendment which may be issued from time to time by the Company. It is also the Employee’s responsibility to report violations or suspected violations of this Code and support the implementation of this Code. Any violation or suspected violation of this Code shall be reported to the Chairman of the Board (in the case of any Director) or the Company’s Head of Human Resources Department or Employee’s Head of Department (in all other cases) or such other officer designated by the Company from time to time.
- 2.2 Non-compliance with this Code will be treated seriously and may result in disciplinary action, including the possibility of suspension or dismissal, and if warranted, legal proceedings against the Employee. Violation of applicable laws may subject Employee to civil and/or criminal penalties imposed by a governmental agency or a court, in addition to disciplinary action.
- 2.3 This Code should be read in conjunction with other applicable policies of the Group. It is everyone’s responsibility to be familiar with this Code, policies, guidelines, and any supplemental policies.

3.0 Amendments to the Code

- 3.1 The Board of Directors has approved this Code.

3.2 Updates or amendments to this Code may be made from time to time to be in line with any change in applicable laws and regulations, or changes to the Group's vision and mission or other relevant factors.

3.3 Employees will be informed of any update or amendment to the Code.

PART II: CODE OF CONDUCT

SECTION A: WORKPLACE CULTURE AND ENVIRONMENT

4.0 Equal Opportunity and Non-discrimination

4.1 The Group upholds the principle of diversity of workforce, equal opportunity, non-discrimination and fair treatment in all aspects of employment, including recruitment and hiring, compensation and benefits, working conditions, training, rewards and recognition, career development and retirement.

4.2 Employees must strive to create a workplace where everyone is treated fairly and equally.

5.0 Workplace Health and Safety

5.1 The Group is committed to providing a safe and healthy work environment to all Employees.

5.2 Health and safety support and training will be provided to Employees so that they understand their occupational health and safety obligations and diligently comply with all health and safety requirements, policies and procedures set out by the Company.

5.3 Safety is everyone's responsibility.

6.0 Harassment, Threat and Violence

6.1 The Group seeks to provide a work environment where Employees are treated with respect and free from any form of harassment, threat, intimidation, violence or any other inappropriate behaviour.

6.2 Employees are responsible to report any harassment, intimidation, offensive or inappropriate behaviour.

6.3 All complaints or grievances will be investigated, and appropriate action will be taken to stop such conduct and prevent future occurrences.

7.0 Drugs, Alcohol and Prohibited Substances

7.1 Employees are expected to perform their job duties free from the influence of any substance that could impair job performance or pose unacceptable safety risk to the Employee or others.

- 7.2 The Group therefore prohibits working under the influence of alcohol, illegal drugs or controlled substances.
- 7.3 In addition, the use, possession, distribution or sale of alcohol, illegal drugs or other controlled substances in the workplace (other than for approved medicinal purposes) is strictly prohibited.
- 7.4 There may be company-sponsored events or functions where the serving of alcoholic beverages is permitted. In these cases, all appropriate liquor laws must be followed.

SECTION B: COMPANY INFORMATION, RECORDS AND ASSETS

8.0 Data Integrity and Data Protection

- 8.1 The Group has put in place the Personal Data Protection Policy, and everyone shall record, manage, store and/or transfer all data and records in compliance with the policy and applicable laws and regulations.

9.0 Protection and Use of Company Assets and Resources

- 9.1 The Group may provide its Employees a variety of resources and assets including any licensed applications and/or software for its Employees to deliver their work.
- 9.2 Employees shall safeguard and make proper and efficient use of the assets and resources in compliance with all applicable laws, the Group's policies and licensing agreements, and take all necessary steps to prevent loss, damage, misuse, theft, fraud or destruction of the Group's assets and resources.
- 9.3 All employees should endeavor to protect the Group's assets and to ensure efficient use of the same.
- 9.4 Any suspected incident of fraud or theft shall be immediately reported for investigation.
- 9.5 Except for incidental personal use, the Group's equipment should not be used for purposes that do not relate to its business.
- 9.6 The obligation of employees to protect the Group's both tangible and intangible assets include its proprietary information, which includes but is not limited to intellectual property, such as trademarks, copyrights, patents, designs, and trade secrets, as well as business or marketing strategic plans, ideas, databases, records, salary information and any unpublished financial data and reports.
- 9.7 Any unauthorized use or distribution of this information is a violation of the Code of Conduct and this Code and therefore may attract disciplinary proceedings

10.0 Proprietary and Confidential Information

- 10.1 Employees are required to protect the Group's confidential information and guard them against unauthorised disclosure or use.

- 10.2 Employees are also required to protect confidential information of third party which Employees have access to in the course of their work.
- 10.3 Confidential information includes, but are not limited to, data and technical know-how, business plan and budget, product design, customer list and information, information on current and future projects and work processes, and any non-published financial or other data.
- 10.4 Unless required by law or authorised by the Group, Employees shall not disclose confidential information or allow such disclosure or use confidential information for unauthorised purposes.
- 10.5 This obligation continues beyond the termination of employment.

SECTION C: DUTIES OF GOOD FAITH, DILIGENCE AND INTEGRITY

11.0 Conflict of Interest

- 11.1 Employees have an obligation to act in the best interest of the Group at all times.
- 11.2 Employees are prohibited from using their position or knowledge gained directly or indirectly in the course of their duties and responsibilities or employment for private or personal advantage.
- 11.3 If Employee at any time thinks that he or she may have a potential or actual conflict of interest, Employee is obliged to disclose the conflict promptly to the Chairman of the Board (in the case of any Director) or the Group's Head of Human Resources Department or Employee's Head of Department (in all other cases) so that a determination can be made as to the existence and seriousness of an actual conflict.
- 11.4 When in doubt, Employees shall adopt the highest standard of conduct.

12.0 Accepting & Providing Gifts and other Benefits

- 12.1 As a general rule, Employees are discouraged from giving or accepting gifts, entertainment or other benefits to or from business partners.
- 12.2 Notwithstanding this, the Group recognises that the occasional acceptance or offer of modest gifts and entertainment may be a legitimate custom or practice in business relationships.
- 12.3 The following guidelines shall be observed:
- Employees should not give or accept gifts or any other benefit or privilege that would in any way influence or appear to influence any business decision or gain an unfair advantage.
 - The situation in which the gifts, entertainment and other benefits is received or given should not relate to contractual negotiations, tender awards or similar circumstances.

13.0 Bribery and Corruption

- 13.1 The Group is committed to acting professionally, fairly and with integrity in all its business dealings and relationships wherever it operates and in implementing and enforcing effective systems to counter bribery and corruption.
- 13.2 Employees shall not offer, give, solicit or accept any bribes to achieve any business or personal advantage for themselves or others or engage in any transaction that contravene any applicable anti-bribery or anti-corruption laws.

14.0 Insider Trading

- 14.1 Employees who have access to market sensitive information are not allowed to trade in securities of the Company or another listed company if that information has not been made public.
- 14.2 Employees are also prohibited from disclosing any non-public price sensitive information to any third party.

15.0 Anti-Money Laundering

- 15.1 Money laundering is a process by which persons or groups try to conceal the proceeds of illegal activities or try to make the sources of their illegal funds look legitimate.
- 15.2 Employees should always ensure that they are conducting business with reputable customers, for legitimate business purposes and with legitimate funds.
- 15.3 Employees need to be mindful of the risk of the Group's business being used for money laundering activities and if they suspect money laundering activities, they should report it to their respective Head of Department or the relevant person designated by the Group.

16.0 Whistleblowing

- 16.1 The Group has put in place its Whistleblowing Policy to uphold the highest standards of professionalism, integrity and ethical behaviour in the conduct of its business and operations.
- 16.2 The policy sets out procedures which enables Employees and members of the public to raise genuine concerns regarding actual or suspected unethical, unlawful, illegal, wrongful or other improper conduct and also sets out the process for managing any action, intimidation or harassment against a whistleblower.

17.0 Compliance with Laws

- 17.1 The Group is committed to doing business the right way, by acting ethically and consistently with this Code of Conduct and Ethics ("**Code**"), its policies and all applicable laws, rules and regulations.

- 17.2 Employees have a continuing obligation to familiarize themselves with applicable laws relating to their job responsibilities and the Group's policies.

This Code of Conduct and Ethics was adopted by the Board on 15th January 2025.