



# DIVERSITY & INCLUSION POLICY



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

**DIVERSITY AND INCLUSION POLICY**

**Effective Date: 15<sup>th</sup> January 2025**

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## **1.0 Introduction**

- 1.1 Diversity, Equity, and Inclusion (DEI) play a crucial role in evaluating the effectiveness of corporate governance within a well-functioning organisation and fostering a sense of belonging for all. Insights Analytics Berhad ("the Company") and its subsidiaries (collectively known as "the Group") embraces a Diversity, Equity, and Inclusion Policy ("Policy") to guarantee that the organisation is guided by a diverse workforce, encompassing individuals of different ages, ethnicities, and genders.
- 1.2 At the Group, diversity encompasses all the unique attributes and characteristics that differentiate individuals from one another, including but not limited to age, gender, experience, education, background, expertise, origin, disability, race, nationality, culture, language, and perspectives.
- 1.3 Equity, on the other hand, involves promoting justice, impartiality, and fairness in all procedures, processes, programs, and resource distribution to ensure that every individual has an equal opportunity for favorable outcomes.
- 1.4 In this context, inclusion refers to the practice of making sure that all employees at the Group feel a sense of belonging. It involves behaviors that address individual needs, ensuring that employees are included, engaged, and connected in workplace activities.

## **2.0 Objectives**

- 2.1 A diverse group of employees provides the necessary range of perspectives, experience and expertise required in promoting better corporate governance to enhance prudent business decision-making processes and to ensure sustainable growth.
- 2.2 Effective implementation of the Policy will enable the group to be better equipped to respond to challenges that may arise and deliver value which requires various perspectives and is free of conscious or unconscious bias and discrimination.
- 2.3 This Policy also aims to ensure no discrimination occurs in the Group, on any grounds listed as our Protected Characteristics defined as all the attributes or characteristics that make individuals different from each other which includes, but is not limited to age, gender, religion, physical appearance, experience, education, background, expertise, origin, disability, race, nationality, culture, language and perspectives. , and that, in line with the Federal Constitution, ensure that all persons are treated equally and entitled to equal protection.
- 2.4 The philosophy outlined in this Policy applies across the Group's operations for ensuring the successful promotion of all aspects of the Policy and appropriate behaviour in the workplace.

## **3.0 Scope and Applicability**

- 3.1 This policy is applicable to all Board of Directors, Senior Management and employees of the Group regardless of their level, including individuals under contract, secondment, apprenticeship, attachment, or any other category working under the supervision of the

Company and its Group of companies, whether compensated or not. The principles outlined in this Policy are relevant throughout the Group's operations to promote all aspects of the Policy and appropriate conduct within the workplace.

- 3.2 A diverse workforce is essential as it can offer a wide range of perspectives, experiences, and expertise necessary to enhance corporate governance, support prudent decision-making, and ensure sustainable growth.
- 3.3 Efficient policy implementation equips the organisation to better address challenges and deliver value that considers various viewpoints while being free from conscious or unconscious bias and discrimination.
- 3.4 This Policy should be read together with the relevant enumerations encapsulated in the following Malaysia's authoritative declarations:
  - (a) Companies Act 2016 ("CA 2016");
  - (b) Malaysian Code on Corporate Governance ("MCCG");
  - (c) Employment Act 1955 (Act 265) ("Employment Act"); and
  - (d) ACE Market Listing Requirements of Bursa Malaysia Securities Berhad ("ACE LR").

#### **4.0 Practicing Diversity, Equity and Inclusion in All Aspects**

- 4.1 In alignment with the above philosophy, the Group is committed to endorsing and applying all aspects of the Policy in various workforce practices across all levels, including the Board and Senior Management. These practices encompass but are not limited to career opportunities, training and development, recruitment, compensation and benefits, talent identification, retention, performance management, promotions, job assignments, succession planning, and engagement activities.

4.1.1. The concept of diversity on Board includes the following aspects

4.1.1.1. Independence

The Board comprises of a balanced composition of Executive, Non-executive Directors and Independent Non-executive Directors so that there is a strong element of independence in the Board composition. Practice 5.2 of the MCCG recommends that at least half of the board comprises independent directors. Meanwhile, Rule 15.02(1) of the ACE LR stipulates that a listed corporation must ensure that at least two (2) directors or one-third of the board, whichever is higher, are independent directors. It is the intention of the Board to comply with Practice 5.3 of the MCCG which recommends that the tenure of independent directors does not exceed a term limit of nine (9) years. Upon completion of the nine (9) years, the director concerned may continue to serve on board as a non-independent director. As recommended by Practice 5.8 of the MCCG, the NC shall be chaired by an independent director or the senior independent director (if applicable). At least one Audit and Risk Management Committee must be a member of the Malaysian Institute of Accountants or alternative financial qualifications as envisaged under Rule 15.09(i)(c)(ii) of the ACE LR. The Nomination Committee will review the composition annually or as and when the need arises.



**4.1.1.2. Skills and Experience**

The Board possesses a balance of skills appropriate for the business of the Company and the Group which collectively provides the Company and the Group with considerably high level of experience and expertise. The Nomination Committee will review and assess the appropriate mix of diversity, skills, experience and expertise required on the Board annually and the extent to which the required skills are represented on the Board and to make the necessary recommendations to the Board.

**4.1.1.3. Gender**

The Company will evaluate suitable candidates for gender diversity on Board. The selection process via the Nomination Committee in reference to the Practice 5.5 of the Malaysian Code on Corporate Governance 2021 ("MCCG") will be exercised with due care and careful assessment will be based on merits, skills, knowledge, appropriate experience and time commitment. Practice 5.9 of the MCCG further recommends the board to comprise at least 30% of women directors while Rule 15.02(1)(b) of the ACE Market Listing Requirements of Bursa Malaysia Securities Berhad ("ACE LR") stipulates that a listed corporation must ensure that at least 1 director of the listed corporation is a woman. The Nomination Committee will carefully and actively work towards having woman Director(s) on the Board, as required under the ACE LR and MCCG.

**4.1.1.4. Ethnicity**

Company aspires to have a Board comprising member(s) of different ethnicity and who can contribute positively in respect of knowledge, experience and expertise. The Nomination Committee will conduct the selection exercise with due care and careful assessment will be based on merits, skills, knowledge, appropriate experience and time commitment.

**4.1.1.5. Age**

The Board is fully committed to promoting age diversity, valuing the contribution of its members regardless of age and to eliminate age stereotyping and discrimination.

- 4.2** Employees should be treated equitably and respectfully, without judgments based on gender, age, race, religion, cultural background, ethnicity, or disability.
- 4.3** Any discrimination, harassment, or victimisation will not be tolerated.
- 4.4** Any violation of this Policy may result in disciplinary action, including potential termination, following a proper inquiry in accordance with the Group's Management of Misconduct Policy.

## **5.0 Disclosure**

Pursuant to the ACE LR on the disclosure of Statement on Overview of Corporate Governance based on the MCCG in the Annual Report, the Board shall disclose in the Annual Report a summary of the Policy. A copy of the Policy shall also be published on the website of the Company.

## **6.0 Review and Assessment**

6.1 The Group will continue to prioritise diversity, equity, and inclusion and assess their advantages when evaluating the effectiveness of its Policy objectives by:

6.1.1. Regularly measuring the progress of the Policy through consistent reporting and analysis, as needed.

6.1.2. Ensuring that the measurable objectives remain effective and relevant for the Group.

6.1.3. Implementing DEI principles across all workforce practices, including the Board and Senior Management, irrespective of gender, age, race, religion, cultural background, nationality, ethnicity, or disability.

6.2 This Policy is to be read alongside all related Group policies and practices.

6.3 Any modifications to this Policy will be subject to deliberation and approval by the Board.

This policy was adopted by the Board on 15th January 2025.