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Diversity and Inclusion disclosures

A good practice guide

August 2014



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Foreword

We're pleased to introduce "Diversity and Inclusion Disclosures: A good practice guide".

PwC's 16th Annual Global CEO Survey highlights that workforce diversity and inclusion is the top non-financial priority for CEOs after ethical behaviour, with 50% of global CEOs focusing on this within the next 12 months.

Research has also shown that when diversity is acknowledged, managers find new ways to maximise and capitalise on the different skills, styles and sensibilities of employees. This leads to greater employee engagement, building a business case for a diverse workplace.

Hence, public listed companies in Malaysia are required to disclose their diversity policies for its board of directors and workforce in terms of gender, age and ethnicity from 2015 onwards.

With this in mind, we have published this guide to help you with this transition. We hope that you find this guide useful and interesting as you embark on disclosing your diversity and inclusion policies and measures. If you have any queries or would like to discuss any of the content in more detail, please speak to us, or your usual PwC contact.

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*Territories involved are - Singapore, Malaysia, Indonesia, Philippines, Thailand and Vietnam

Contents

5.	What's next?	2/1
	Illustrative model templates	30
4.	Selected global and local case studies	10
3.	GRI G4 indicators for D&I disclosures	9
2.	How did we get here?	8
1.	Making a case for diversity	6

Why have a diversity policy in place and talk about it?

Doing the bare minimum will have you covered in these two aspects...



Stakeholders

Meeting the requirements and expectations of stakeholders like the Government and community.



Fairness and equality

Giving everyone in the organisation equitable opportunities improves morale and motivation.

...but going one step further will help you stand out from the pack.

The Differentiating

1. The business imperative

Diverse organisations financially outperform their less diverse counterparts.

Also, decisions based on a broader palette enhance innovation and solutions.

2. Widening the talent pool

Tapping into multiple resources means more access to a high quality talent pool for your organisation.

²World Atlas of Gender Equality in Education, UNESCO, 2012.

PwC, Millennials at Work, 2012

⁴Business and Professional Women's Foundation, Gen Y Women in the Workplace, 2011

3 Improving efficiency and talent retention

Performance and productivity will improve, as will retention levels.

Factors

Employees in a diverse organisation are1:

70%

45%

more likely to see their organisation capture a new market. more likely to see their organisation improve market share.

¹Center for Talent Innovation (CTI), New York, 2013



In 93 of 139 countries², women make up the majority of students and receive more tertiary degree qualifications.

In Malaysia, millennials make up 40 - 50% of the workforce³. By 2025, one in every three employees will be a millennial⁴.





When employees feel that they have a more diverse and inclusive workforce, turnover is almost 20% lower ⁵.

Why disclose your diversity policies?

Disclosure drives awareness of 'blind spots'

Diversity must have a spotlight shone on it in order to make progress This implies that it has visibility in leadership meetings on an ongoing basis.

What could happen if you don't talk about it?

A McKinsey 2012 report found that,

"

though CEOs made gender diversity a priority in more than 80% of our 60 participating companies, only about half of employees surveyed from the same companies agreed that the CEO is committed to it.



How did we get here?

Globally, diversity has become one of the driving forces to strengthen an organisation's position in the marketplace. Bursa Malaysia is facilitating this by implementing diversity disclosure requirements for the boardroom and the workforce in terms of gender, ethnicity, and age.

The chart below shows the various initiatives undertaken to push forward with efforts to promote diversity among the PLCs:

30% Women on Board by 2016

The Prime Minister announced that women must comprise at least 30% of decision making positions in the corporate sector by 2016.

"II Code" recommendations on diversity

Principle 5 of the Malaysian Code for Institutional Investors 2014 (II Code) launched by the SC states that institutional investors should assess the quality of disclosures made by investee companies on the diversity targets and policies including gender, ethnicity, and age. 27 June 2011

09 April 2014

June

2014

Establish and disclose diversity policies, PLCs urged At the Sustainability and

Diversity Roundtable Session (organised by the Economic Planning Unit and the Securities Commission (SC)), the Prime Minister highlighted the need for listed issuers to establish and disclose diversity policies, covering gender, ethnicity, and age for board and management.

22 July 2014

02 January 2015 — Disclosure of diversity policy

Circular issued by Bursa Malaysia requiring all public listed companies to disclose diversity policies covering gender, ethnicity and age for board and workforce, for Annual Reports issued on or after 2 January 2015.

GRI G4 indicators for D&I disclosures

Beyond just complying with Bursa Malaysia's requirements to state diversity policies, your PLC may wish to consider D&I disclosures in line with the Global Reporting Initiative (GRI) G4 Guidelines for Sustainability Reports.

For each aspect below, companies need to disclose at least one indicator to achieve a 'Core' in accordance with the GRI G4 Sustainability Reporting Guidelines:

Aspect: Employment ¹

GA-LA1 – Total number and rates of new employee hires and employee turnover by age group, gender and region

✓ Total number and rate of new employee hires and/or turnover by age group, gender and region

GA-LA3 – Return to work and retention rates after parental leave, by gender

- ✓ Total number of employees that took parental leave, by gender
- ✓ Total number of employees who returned to work after parental leave who were still employed twelve months after their return to work, by gender

Aspect: Diversity and Equal Opportunity¹

GA-LA12 - Composition of governance bodies and breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity

- ✓ Percentage breakdown at governance level by gender, age, and ethnicity
- Percentage breakdown per employee category by gender, age, and ethnicity

¹ Extracted from the GRI G4 Sustainability Reporting Guidelines

Selected global and local case studies

In this section, you will find diversity disclosure excerpts from the annual reports and sustainability reports of selected Malaysian PLCs and global companies.





Selected global case study Intel (listed in the US)

D&I policy

Diversity is an integral part of Intel's competitive strategy and vision. Our goal is to be a leader in diversity, and we develop annual diversity action plans with recruitment and employee development indicators that are monitored quarterly.

Intel provides equal employment opportunity for all applicants and employees without regard to race, color, religion, sex, national origin, ancestry, age, disability, medical condition, genetic information, military and veteran status, marital status, pregnancy, gender, gender expression, gender identity, sexual orientation, or any other characteristic protected by local law, regulation, or ordinance.

Diversity policy goes beyond the standard age, gender and ethnicity metrics Shows ethnic and gender breakdown by reporting category

Gender and ethnicity breakdown in the workforce

2013 Workforce by Reporting Category								
	U.S. Wo	rkforce ¹	U.S. Officials and Managers ¹					
	Female	Male	Female	Male				
African American	411	1,389	31	106				
Asian/Pacific Islander	4,496	11,261	352	1,554				
Caucasian	5,865	22,414	742	3,508				
Hispanic	1,046	3,236	59	293				
Native American	69	206	4	12				
Other/Unidentified ³	137 372		2	28				
Total	12,024	38,878	1,190	5,501				

¹Regular U.S. Intel employees only (does not include employees of our wholly owned subsidiaries, Intel contract employees, or interns).

³ "Other" includes employees who reported as multi-racial and those who did not report race.

U.S. Hiring Data ¹								
	2009	2010	2011	2012	2013			
Minorities as a Percentage of U.S. Hires²	42%	57%	53%	52%	56%			
Females as a Percentage of U.S. Hires	24%	24%	34%	22%	25%			

¹ Regular Intel employees only (does not include employees of our software and services operating segments, Intel contract employees, or interns)

Over the past five years, diversity in our U.S. hiring has remained relatively flat.



¹ Regular Intel employees only (does not include employees of our software and services operating segments, Intel contract employees, or interns).

Over the past five years, the percentage of women in our workforce has remained relatively flat.

Compares progress across five years and summarises data in percentages

Corporate Officers and Appointed Vice Presidents ²			in Total nsation²	Board of Directors ²	
Female	Male	Female	Male	Female	Male
3	3	1	_	_	_
5	26	1	6	_	_
21	102	7	28	2	8
_	2	_	_	_	_
_	_	_	_	_	_
7	21	_	7	_	_
36	154	9	50	2	8

² These figures were reported on a global basis as of December 31, 2013.

This table provides a high-level summary of our U.S. workforce and governance bodies by reporting category.

Intel contract employees, or interns).

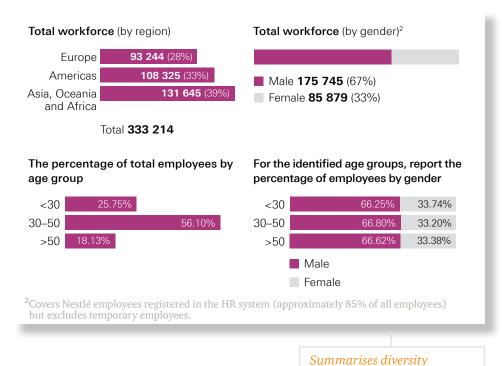
Includes African American, Hispanic, Asian American/Pacific Islander, and Native American.

Selected global case study Nestlé S.A. (listed in Switzerland)

D&I policy

"As a global organisation, diversity is high up on our agenda. We want a culture that provides equal opportunities for everyone and that ensures people are always treated with dignity and respect. We're aiming to diversify our talent pool and promote gender balance as a priority. We've still got work to do to improve gender balance, especially at management levels, so we've signed up to the UN's Women's Empowerment Principles to strengthen our commitment. We see improving all aspects of diversity, across Nestlé, as an asset, helping us harness the local insight and imagination of our people, and building our competitive advantage and responsiveness to customers' and society's needs."

Region, age and gender breakdown



composition in percentages

Source: Nestlé in society - Creating Shared Value and Meeting Our Commitments 2013

Demonstrates their high commitment towards gender balance and talks about the initiatives they have in place

Gender, age and disability breakdown



Presents actual numbers with corresponding percentages

Selected global case study PepsiCo Inc. (listed in the US)

D&I approach

As a global company, PepsiCo works in countries with a broad array of laws and regulations. Regardless of where we operate, PepsiCo takes great care to respect the diversity, talents and abilities of all.

At PepsiCo, we define diversity as all the unique characteristics that make up each of us: personality, lifestyle, work experience, ethnicity, race, color, religion, gender, gender identity, sexual orientation, marital status, age, national origin, disability, veteran status, or other differences.

Definition of diversity includes tangible and intangible characteristics

Source: PepsiCo Sustainability Report 2011/2012

PepsiCo Leadership



12

2013 Diversity and Inclusion Statistics

	Total	Women	%	People of Color	%
Board of Directorsa	13	4	31	5	38
Senior Executives ^b	12	3	25	3	25
Executives	2,818	878	31	622	22
All Managers	18,232	5,953	33	4,855	27
All Associates ^c	98,208	18,227	19	33,711	34

Data as of December 31, 2013

- a) Our Board of Directors is pictured on page 11.
 b) Composed of PepsiCo Executive Officers listed on page 24 of the Form 10-K.
 c) Includes full-time associates only.

Executives, All Managers and All Associates are approximate numbers as of 12/31/2013 for U.S. associates only. Data in this chart is based on the U.S. definition for people of color.

Provides details based on various employee positions

Source: PepsiCo Annual Report 2013

Selected global case study Royal Dutch Shell plc (listed in the UK)

D&I policy

We have a culture that embraces diversity and fosters inclusion. By embedding these principles in our operations, we have a better understanding of the needs of our varied customers, partners and stakeholders throughout the world and can benefit from a wider talent pool. We provide equal opportunity in recruitment, career development, promotion, training and reward for all employees regardless of colour, ethnicity or physical ability. Where possible, we make reasonable adjustments in job design and provide appropriate training for employees who declare a disability.

We actively monitor representation of women and local nationals in senior leadership positions, and have talent-development processes to support us in delivering more diverse representation. The proportion of women in senior leadership positions was 17.2%, compared with 16.2% in 2012.

In 32% of the countries where Shell subsidiaries, joint ventures and associates are based, local nationals filled more than half of the senior leadership positions, compared with 42% of countries in 2012. From 2014, we will no longer apply this metric, as it does not reflect expatriation of local nationals for talent development purposes. Instead, we will start using a revised metric that better represents our activities in this respect.

Senior leaders actively engage in diversity and inclusion networks, internally and externally, and we have numerous active employee interest networks representing different communities within the organisation.

Gender and regional diversity

SOCIAL DATA

Gender diversity [O]

In supervisory/professional positions (% women) In management positions (% women) In senior leadership positions (% women)

Regional diversity [P]

% countries with majority of local nationals in senior leadership positions

Source: Royal Dutch Shell plc Sustainability Report 2013

States the drive behind their D&I policy and details what their most recent statistics are. Also demonstrates how they have analysed which metrics best represent their business activities and objectives

Provides an additional 9 years of historical data to demonstrate the trajectory of progress

2013	2012	2011	2010	2009	2008	2007	2006	2005	2004
28.8	28.1	27.3	26.3	26.4	24.7	24.6	23.2	21.8	20.7
18.8	18.2	17.6	17.0	16.1	15.3	17.7	16.2	12.9	12.2
17.2	16.2	16.6			13.6	12.9	11.6	9.9	9.6
32	42	34	36	37	32	33	25	36	n/c

Selected local case study Astro

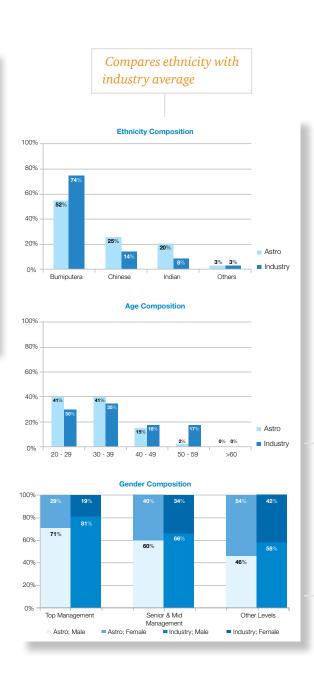
Diversity policy

"Embracing diversity

Today, Astro is in 56% of Malaysian TV households, with the commitment to serve all Malaysians.

At Astro, diversity is our DNA and our strength. Our workforce mirrors our marketplace and consumers, which makes us truly a part of the pulse of the communities we aspire to serve."

States the objective behind their diversity efforts, which is to reflect and understand their customer base



Source: Astro Malaysia Holdings Berhad Annual Report 2014

CELEBRATING DIVERSITY

The talent at Astro are as diverse as the seven million Malaysian households we aspire to serve. We count the ethnic and cultural richness of Malaysia as the most invaluable traits of Astro team members.

With 41% of our talent below 30 years old and women making up 52% of our staff and 25% of our Board of Directors, Astro is a place with equal opportunity for all to shine, regardless of age and gender. Astro is in 56% of Malaysian homes and we desire to serve 100% of them, because Astro is 100% Malaysia. Creating content IPs for a "truly Asia" nation means Astro's original programmes are ready for regional audiences.

Global Malaysians producing world-class works in Malaysia

Astro is fully supportive of TalentCorp's initiative to attract local talent abroad back to Malaysia. We believe Malaysians are a global workforce, and Malaysian brands with aspirations to be best-in-class will attract and challenge them to produce world-class works.







Compares age composition with industry average

Compares gender across levels with industry average

Selected local case study Axiata

Highlighting commitment to diversity

"We are committed to creating a dynamic and innovative workplace, necessary in the evolving telecommunications industry. Axiata cultivates a climate of diversity and inclusiveness among employees by providing equal access and opportunities to our employees in terms of recruitment, retention, training and development processes."

Includes objective on creating a diversified workplace and highlights talent management strategy Axiata is a PLC with a GRI G4 report registered on the GRI Sustainability Disclosure Database¹

¹ GRI Sustainability Disclosure Database Provides breakdown of new hires and leavers by gender

Reports actual numbers and provides breakdown based on age and gender

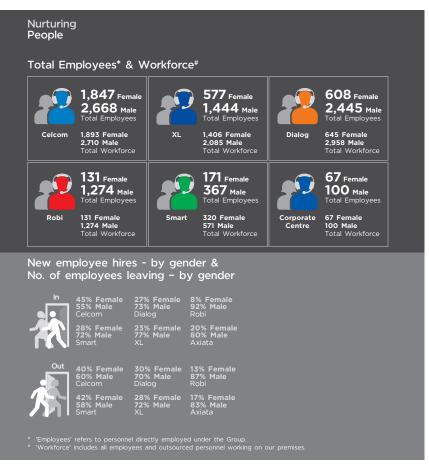
Age and gender breakdown by number

Aspect	Indicato	r Detail		
Overall Employment		Employees by Gender	Male Female	
Overall Employment		Workforce ²	Male Female	
		Joining the Group - by Gender	Male Female	
Fareleyment		Joining the Group - by Age	18 - 25 26 - 35 36 - 50 > 50	
Employment	LA1	Leaving the Group - by Gender	Male Female	
		Leaving the Group - by Age	18 - 25 26 - 35 36 - 50 > 50	

² Employees and all the outsourced personnel engaged in office premises belonging to the Group

Source: Axiata Group Berhad Sustainability and National Contribution Report 2013

Gender demographics



Celcom	XL	Dialog	Robi	Smaßmart	Axia.Aaxiata	Ovei Gil lerall
2668	1444	2445	1274	367	100	8298
1847	577	608	131	171	67	3401
2710	2085	2958	1274	571	100	9698
1893	1406	645	131	320	67	4462
370	165	262	186	60	40	1,083
300	50	97	13	23	10	493
138	50	210	47	36	2	482
423	132	127	131	39	13	866
108	29	20	21	8	30	216
1	4	1	0	0	5	11
254	150	202	145	90	5	856
172	59	85	22	65	1	406
58	29	80	13	49	0	232
230	114	179	126	92	4	754
120	60	27	27	12	2	248
18	6	1	1	2	0	28

Selected local case study Maybank

Diversity policy

An inclusive workplace is one that embraces diversity across the board. As a regional business, our workforce is ethnically diverse and comes from various age groups.

Alongside our competitive total rewards package, we constantly strive to provide work-life balance to enhance productivity and improve staff retention. We have various policies and programmes in place to promote equality, diversity and inclusion in the organisation.

Maybank's Sustainability Report 2013 has been prepared in accordance with the GRI G4 Sustainability Reporting Guidelines

Provides progress of female representation and highlights initiatives undertaken to drive this improvement

Women in senior management positions

We are aware of the need to better tap into broader range of talents, leadership styles and skill sets to manage our business and serve our customers. **Female representation has also grown by 15% since 2009** with 31% of women in senior management positions in 2013, recording 7% more than the global average of 24% in the 2013 Grant Thornton International Business Report. Maybank's People Dashboard monitoring discipline and initiatives like "Women **Mentoring**" and "**Creation of Pipeline Pools at all levels**" amongst others, have contributed directly to the results achieved to-date."

Source: Maybank Sustainability Report 2013

Ethnic demographics

G4-10
PERFORMANCE DATA:WORKPLACE

Description	2009	2010	2011	2012	2013				
Diversity (Malaysia Ops. only)									
Malay	16,499	17,735	18,201	19,560	18,578				
Chinese	5,466	6,021	5,189	5,394	5,536				
Indian	1,221	1,298	1,355	1,381	1,400				
Ohers	1,724	1,494	1,096	1,138	1,214				

Gender breakdown at senior management level



Compares
performance across
5 years in actual
numbers

Compares
percentages of
women across 5
years

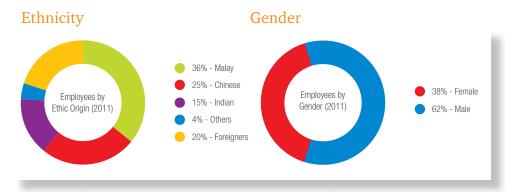
Selected local case study Sunway Group

Diversity policy



"Sunway embraces diversity at the workplace and we do not allow room for any form of discrimination practice against people from a different gender; marital status; race; nationality; ethnic origin or age. We recruit based on 70% of local content and stand strong against any form of discrimination. ...Diversity is interwoven into the Group's key business strategies, service delivery, policies, procedures, practices, mission, vision and values."

Diversity is defined beyond age and gender and is instilled in their business strategy



Summarises demographics in percentages

Source: Sunway Sustainability Report 2011

Age, ethnicity and gender

Compares performance across 3 years

	2011	2010	2009
Age group (Full time & Contract staff)			
<30	3,556	3,323	3,315
30-40	2,511	2,586	2,591
40-50	1,384	1,431	1,400
>50	689	649	660
	8,140	7,989	7,966
Diversity			
Malay	2,895	2,659	2,530
Chinese	2,070	2,116	2,146
Indian	1,248	1,295	1,203
Others	297	261	255
Foreigners	1,630	1,658	1,832
	8,140	7,989	7,966
Women in Management			
% Women in management	2.5%	2.5%	2.3%
% Women in top management	0.2%	0.2%	0.2%
Total headcount: Women in management (Manager & above (EG5-EG9))	205	206	186
Total headcount: Women in top management (General Manager & above (EG10 & above))	19	23	16

Provides breakdown of women across management level

Selected local case study UEM Group

Diversity policy

"UEM Group is committed to promoting equal opportunities and encourages diversity with non-discriminatory hiring policies. As such, we are committed to discover and develop local talent with the intention to enhance their employability as well as socio-economic status. Our local hiring is especially dominant for positions at junior to mid-level management..."

Details how they encourage diversity through nondiscriminatory hiring policies

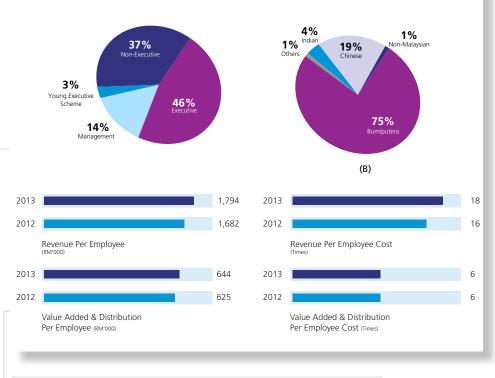
Provides actual numbers and corresponding percentages based on management level and ethnicity

Source: UEM Group Sustainability Report 2012

Employees by classification and ethnicity

(B) Employee's Ethnic Composition

GRADE	Bumiputera	Chinese	Indian	Others	Non-Malaysian	Total
Management	110	67	7	1	4	189
Executive	436	148	23	11	4	622
Non-Executive	432	38	28	9	2	509
Young Executive Scheme	30	1	1	-	-	32
TOTAL	1,008	254	59	21	10	1,352



Illustrates revenue and distribution of value added across 2 years

Source: UEM Sunrise Annual Report 2013

How to reflect workplace diversity for a Malaysian PLC

Beyond meeting the requirement to disclose diversity policies, your PLC can use the following templates to enrich your D&I disclosures, to be in line with global standards and the Government's call to focus on inclusiveness by gender, ethnicity and age in management and workforce.

Illustrative model template A

Ethnicity		2014					
	Total number	Top Management (%)	Senior & Mid Management (%)	Executive (%)	Non- Executive (%)		
Bumiputera	1,365	44	35	42	54		
Chinese	947	31	40	38	30		
Indian	601	15	18	15	6		
Others	116	10	7	5	10		
	3,029	100	100	100	100		
Age Group	Total number	Top Management (%)	Senior & Mid Management (%)	Executive (%)	Non- Executive (%)		
20-29 years	832	0	3	64	86		
30-39 years	929	0	47	26	12		
40-49 years	714	33	41	10	2		
50-59 years	496	55	9	0	0		
60 years and above	58	12	0	0	0		
	3,029	100	100	100	100		
Gender	Total number	Top Management (%)	Senior & Mid Management (%)	Executive (%)	Non- Executive (%)		
Male	1,655	79	64	54	91		
Female	1,374	21	36	46	9		
	3,029	100	100	100	100		
TOTAL (Malaysians)	3,005	16	777	1,210	1,002		
TOTAL (Non- Malaysians)	24	8	16	0	0		

Illustrative model template B

2014 Workforce by Reporting Category

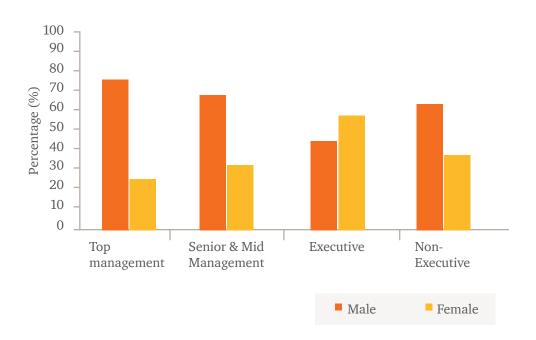
		Top gement	Senior & Mid Management		Executive		Non-Executive	
Ethnicity	Male	Female	Male	Female	Male	Female	Male	Female
Bumiputera	40	28	742	322	580	264	500	395
Chinese	240	87	652	280	428	420	715	95
Indian	52	4	236	50	175	134	253	41
Others	20	14	100	18	17	13	150	69
Total	352	133	1,730	670	1,200	831	1,618	600

		Top gement	Senior & Mid Management		Executive		Non-Executive	
Age Group	Male	Female	Male	Female	Male	Female	Male	Female
20-29 years	20	7	712	220	450	430	600	490
30-39 years	75	43	646	280	556	276	710	76
40-49 years	117	55	250	75	160	118	231	20
50-59 years	115	23	110	64	25	7	70	6
60 years and above	25	5	12	31	9	0	7	8
Total	352	133	1,730	670	1,200	831	1,618	600

How to reflect workplace diversity for a Malaysian PLC

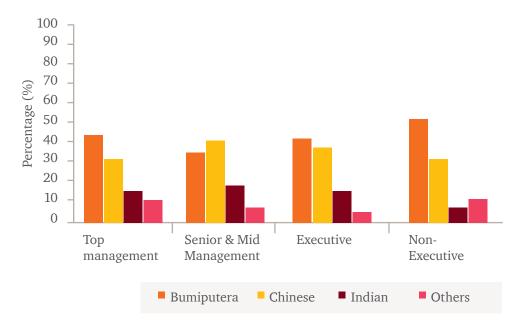
Illustrative model template C

Gender breakdown based on management level

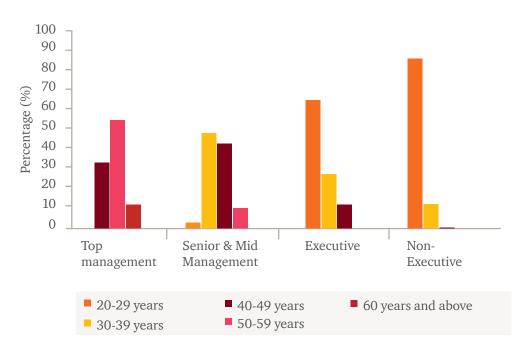


	Top Management	Senior & Mid Management	Executive	Non- Executive	Total
Total headcount by level	382	1,101	1,044	1,247	3,774

Ethnicity breakdown based on management level



Age group breakdown based on management level



What's next?

Once you have established your reporting of diversity policies, you may wish to look into a number of key areas in which your D&I policies and practices can be embedded or further improved.

Here are some of the market's best practices for embedding D&I in the organisation.



Bringing D&I policies to life

- Consider increasing your commitment to the need for D&I visibly
- Publicise D&I achievements to ensure everyone is aware of its importance

Implement measures to track D&I metrics



• Gather and track data for new hires, promotions and attrition of staff by gender, ethnicity and age



Implement D&I objectives and targets

- Develop D&I targets for every level of the workforce
- Set KPIs for senior management to strengthen the push for D&I

Implement mandatory and regular training on D&I

- Organise training for new joiners on D&I matters
- Conduct regular training for all employees to inculcate awareness and commitment to D&I

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