

A photograph of a male worker in a dark blue polo shirt and a dark cap, carrying a cardboard box in a warehouse setting. The background shows industrial equipment and shelving units.

# EQUALITY AND ANTI-DISCRIMINATION STATEMENT 2025

## INTRODUCTION

**Komplett Services AS (“Komplett”), a subsidiary of Komplett ASA, operates as an e-commerce player in the electronics market in Norway, Sweden, and Denmark. The company has a total of 310 employees (headcount as at 31 December 2025). This report focuses solely on the company’s 296 employees in Norway.**

According to the Equality and Anti-Discrimination Act, Komplett, as an employer, is required to describe how the company actively promotes gender equality and prevents discrimination based on defined indicators. These indicators include gender, pregnancy, parental leave, caregiving responsibilities, ethnicity, religion, beliefs or life stance, disability, sexual orientation, gender identity, gender expression, age, and other significant personal characteristics.

This report is structured in two parts: Part one presents Komplett’s current status regarding gender equality, while part two outlines ongoing efforts to ensure equality and prevent discrimination. The statistical data in part one is extracted from payroll and HR systems.



# PART ONE: STATE OF GENDER EQUALITY

Komplett Services AS Norway has 296 employees (headcount as at 31 December 2025) distributed across various departments, as illustrated in the chart shown below.

The logistics department is the largest department, comprising 19.59 per cent of the employees, followed by customer care and aftersales with 19.26 per cent, and sales at 15.20 per cent.

## DISTRIBUTION OF EMPLOYEES

	Employees
Business controlling	2.36%
Finance	5.75%
HR	2.70%
Innovation AI&CX	0.68%
IT	8.45%
Communication	0.34%
SI	14.19%
Customer Care and Aftersales	19.26%
Logistics	19.59%
Marketing	4.39%
Operations	6.42%
Sales	15.20%
Services	0.68%

## Gender distribution

In total, the company consists of 26 per cent women, 73 per cent men and less than one per cent non-binary employees. As the percentage of non-binary employees is below one per cent, the report will only include women and men to secure personal confidentiality. This may impact the total numbers due to rounding effects.

The gender distribution at the management level closely mirrors the overall employee distribution at Komplett. The share of female managers is 27 per cent, while male managers constitute 73 per cent. In this report, management is defined as employees with direct reports, as well as all members of the management team regardless of direct reports.

## GENDER DISTRIBUTION ACROSS DEPARTMENTS

	Female	Male
Business controlling	14%	86%
Finance	88%	12%
HR	100%	0%
Innovation AI&CX	50%	50%
IT	16%	84%
Communication	0%	100%
SI	2%	98%
Customer Care and Aftersales	23%	77%
Logistics	16%	84%
Marketing	54%	46%
Operations	37%	63%
Sales	24%	76%
Services	50%	50%

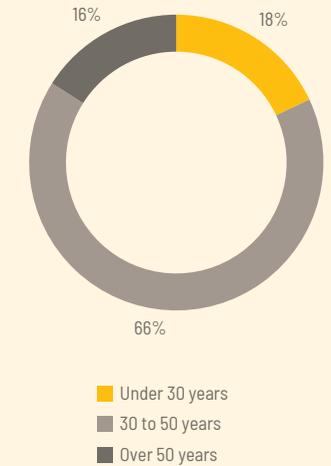
## Gender and age distribution

The table illustrates the age distribution among employees by gender across the entire workforce. The distribution between women and men in different age groups is relatively even, except for the age group under 30, where there is a higher male share, and the age group over 50, where there is a higher female share.

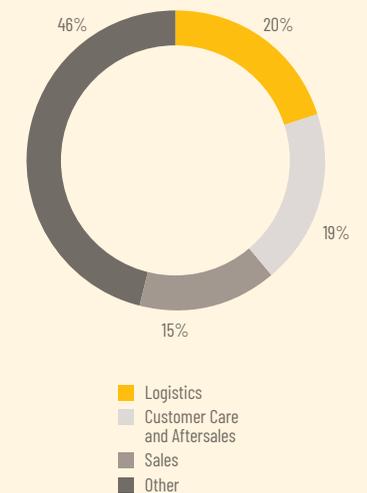
## GENDER AND AGE DISTRIBUTION

	Female	Male	Total
<30	8%	21%	18%
30-50	66%	66%	66%
>50	26%	13%	16%

## AGE DISTRIBUTION



## GENDER DISTRIBUTION



**SALARY ANALYSIS**

**Notes to the assessment**

To ensure solid grounds for comparison, salary groups have been established based on requirements for competence, responsibilities, and seniority levels.

In addition to base pay, cash benefits consist of variable pay, compensation for overtime, benefits, and bonuses. Benefits include employee insurance, holiday gifts, work phone, and other taxable benefits.

Part-time and temporary employees or trainees have been excluded to avoid statistical impacts.

As this report concludes, the gender balance at Komplet is uneven. With 26 per cent women and 73 per cent men, this distribution also influences the salary results.

The data indicate that overall pay equality between women and men is relatively strong in 2025, with women's total cash benefits and base salary both at 104 per cent of men's levels. Total taxable benefits are also higher for women (110 per cent), suggesting that, at an aggregate level, the organisation does not exhibit a systemic gender pay gap. However, the distribution across compensation elements and employee groups reveals some important nuances.

At the group level, pay outcomes vary. In Group 1 (operators, customer service, and administrative staff), compensation is essentially equal, with women earning 101 per cent of men's pay. Group 4 (managers and senior advisors) also shows favourable results for women, with total cash benefits at 103 per cent and stronger outcomes in variable pay and bonuses.

In contrast, Group 2 and Group 3 show slightly lower overall pay levels for women, both at 98 per cent in each group. Group 5 (directors and senior roles) stands out with a more notable gap, with women earning 89 per cent of men's total cash benefits and 88 per cent of base salary. Although women's bonus levels in this group exceed those of men (125 per cent), the small number of women in these roles may amplify statistical fluctuations and should be monitored over time.

Variable pay and overtime compensation display the largest overall disparities, with women receiving 56 per cent and 77 per cent of men's levels, respectively. These differences may be influenced by role distribution, working patterns, or eligibility criteria rather than unequal pay for equal work. However, they warrant further analysis to ensure that structural factors are not unintentionally disadvantaging women.

Finally, pay equality must be considered in the context of representation. Women account for 72 employees compared to 211 men, with particularly limited representation in senior leadership (3 women versus 11 men in Group 5). While pay levels are generally competitive in roles where women are represented, improving gender balance, especially at higher organisational levels, remains an important factor in strengthening overall equality.

**PART-TIME EMPLOYMENT, TEMPORARY POSITIONS, LEAVE, AND SICK LEAVE PART-TIME**

Komplet has 3.37 per cent of employees in part-time positions. The percentage of involuntary part-time is zero.

**Temporary positions**

- ▶ Apprenticeships and internships: 3
- ▶ Other temporary contracts: 1

Komplet also engages seasonal workers via recruiting agencies. As these workers are not directly employed by the company, they are not included in the scope of this report.

**Parental leave**

**PARENTAL LEAVE PARTICIPATION AND AVERAGE DURATION BY GENDER DURING 2025**

	Number of employees	Average number of weeks
Women	4	16.65
Men	13	10.15

**Sick leave**

Average sick leave in 2025 was 3.64 per cent. This includes 100 per cent sick leave or partial sick leave, including self-reported sick leave. For women the sick leave was 5.34 per cent, and for men it was 2.79 per cent.

**GENDER BALANCE**



As this report concludes, the gender balance at Komplet is uneven. With 26 per cent women and 73 per cent men, this distribution also influences the salary results.

**GENDER PAY RATIO ACROSS SALARY GROUPS**

Women as a percentage of men	Women	Men	Total cash benefit	Base salary	Variable pay	Bonuses	Overtime compensation	Total taxable benefit
Total	72	211	104%	104%	56%	124%	77%	110%
Group 1 - Operators, customer service staff, administration staff	21	108	101%	101%	50%	N/A	110%	100%
Group 2 - Team leaders, coordinators, technical staff	21	31	98%	98%	40%	57%	61%	100%
Group 3 - Consultants, specialists, product management	6	11	98%	98%	N/A	75%	29%	100%
Group 4 - Managers, senior advisors, senior consultants	21	50	103%	103%	115%	113%	68%	104%
Group 5 - Directors, senior managers, senior specialists	3	11	89%	88%	N/A	125%	N/A	116%

## PART TWO: EFFORTS TO PROMOTE GENDER EQUALITY AND NON-DISCRIMINATION

Principles, procedures, and standards for gender equality and against discrimination are embedded in Komplett's strategies, tools and guidelines.

The code of conduct and HR policy clearly state that all employees are to be treated with respect and on an equal basis. Working conditions are intended to be fair, within an environment focused on health, safety, and wellbeing.

Consideration for gender equality and non-discrimination is also incorporated into the overall personnel policy. Equality and non-discrimination are expected to be inherent elements of the company, ensuring everyone has equal rights and responsibilities in all areas, regardless of gender, age, ethnic or cultural background, ability, sexual orientation, or identity.

### WORK ON PROMOTING GENDER EQUALITY AND NON-DISCRIMINATION

#### Recruitment

All vacant positions are announced internally at a minimum, ensuring that all employees have equal opportunities to apply. In most cases, vacancies are also advertised externally through the recruitment tool Jobylon, in addition to postings on platforms such as FINN and LinkedIn.

Job advertisements are crafted with role-specific requirements, while deliberately keeping qualification criteria sufficiently open to attract candidates with diverse backgrounds.

The recruitment process follows predefined and standardised procedures. All applications are initially evaluated by the hiring manager and HR before shortlisted candidates are invited to an interview with the hiring manager. Candidates progressing to a second interview are assessed using the Aon evaluation tool, followed by an interview with the manager's superior before a final hiring decision is made.

All hiring decisions shall be based on factual competence and suitability, while Komplett works towards achieving a well-balanced gender distribution. Komplett seeks to have

at least one candidate from the underrepresented gender presented in the final stages of the interview process.

Interviews are conducted both digitally and in person. All offices are designed to provide easy access for individuals with mobility impairments.

Employees are encouraged to pursue internal mobility to ensure continuous skills development, career progression, and long-term talent retention.

### WAGE AND EMPLOYMENT CONDITIONS

Komplett practices collective remuneration for employees within collective bargaining agreements and individual compensation for employees who are not included in collective agreements.

#### Tariff-based compensation

For employees included in a collective agreement, compensation is set by the collective bargaining agreements provided by the EL og IT Forbundet. Compensation is determined based on competence and seniority.

#### Individual compensation

Salary evaluations are conducted annually for all employees in accordance with their contracts. The wage assessment is based on various criteria such as competence, responsibility, performance, and market conditions. Cross-organisational salary comparisons are also made to ensure that employees receive fair compensation based on objective criteria.

Salary conditions for individual employees are regulated through the employment contract.

The employee handbook describes terms of agreement, salary determination, salary adjustments, variable pay, bonuses, overtime, and other benefits. The employee handbook is accessible to all employees on the intranet.

New hires are informed about and encouraged to familiarise themselves with the employee handbook upon commencement.

#### Promotions, development opportunities and career advancement

Komplett places a strong emphasis on development opportunities for all employees.

Employee performance reviews are conducted twice a year, emphasising social aspects and development opportunities. The Link tool is used to facilitate these conversations, documenting both performance and development goals.

All positions are required to be advertised internally. Out of the recruitments conducted in 2025, 12.5 per cent of the advertised positions were filled by internal candidates. In 2025, there were significantly fewer internal recruitments than in 2024. This was due to a major organisational restructuring, which revealed a need to bring in new competencies from external candidates. As a result, external recruitment was prioritised over internal mobility.

#### Accommodations

Komplett makes an effort to adapt physical conditions, digital solutions, tasks, and working hours. Flexible working hours are practiced in the morning and afternoon, and there is an option for remote work for positions where feasible.

Komplett adheres to the labour laws regarding accommodating employees in various life situations, whether it be for leave related to caregiving responsibilities, religious holidays, treatments, or rehabilitation. The employee handbook outlines how accommodations are managed and the rights and obligations of employees in relation to this.

All company premises are designed to ensure that everyone, regardless of ability, can move freely within the premises. The office layout combines individual offices with open-plan areas. To mitigate noise issues, sound-absorbing partitions (soft walls) have been installed.

Komplett welcomes everyone to dress as they prefer, including religious garments or symbols. When catering, preferences related to religious beliefs or other considerations such as allergies are considered.

#### Opportunity to combine work and family life

The company facilitates the combination of family life with work at Komplett. Employees have flexibility in their workday to the extent possible given the nature of the work. For employees who require adjustments in certain situations to perform their jobs, Komplett as an employer aims to contribute to this.

#### Harassment, sexual harassment, and gender-based violence

Any form of harassment and violence is considered unacceptable behaviour at Komplett. The company conducts digital, confidential, brief surveys every other week using the Winningtemp survey tool. The tool covers everything from well-being and job performance experiences to employees' encounters with bullying, harassment, and other incidents. If an employee wishes to report unwanted situations, they can do so anonymously in Winningtemp. HR has the option to contact the employee directly, and the individual can choose whether to remain anonymous.

The company has a dedicated whistleblower policy outlining how reports on misconduct should be filed.

#### Salary disparities and gender distribution at different levels/groups

The analysis is presented at the beginning of the report (part one).

**IDENTIFICATION OF DISCRIMINATION RISKS AND BARRIERS TO EQUALITY**

The company has not identified any significant risks or barriers that impede equality or lead to discrimination. Assessments have, however, highlighted several positive aspects in this regard:

- ▶ Inspections reveal that the company’s premises are adapted for individuals with physical disabilities.
- ▶ The canteen offers a wide range of food, considering a satisfactory selection that accommodates various religious, allergy-related, or lifestyle preferences.
- ▶ Employee surveys include questions on whether employees have witnessed or experienced unwanted incidents, including violence, verbal or physical harassment, or sexual harassment in the workplace. No incidents were registered in 2025. Specific comments from employees on the topic are handled appropriately by the manager and/or HR.
- ▶ HR regularly monitors the work environment through workplace surveys conducted every 14 days. Any issues reported through the deviation reporting system are communicated to the working environment committee (Arbeidsmiljøutvalget – AMU). In 2025, Komplett received no reports of unwanted incidents through this system.

There may, however, be several inherent risks and barriers that may need to be addressed and assessed further, such as implicit bias, cultural sensitivity, and societal norms and stereotypes.

The company acknowledges that the gender balance is not satisfactory and will commit to increase the proportion of women in the organisation.

**POSSIBLE CAUSES OF RISKS AND BARRIERS**

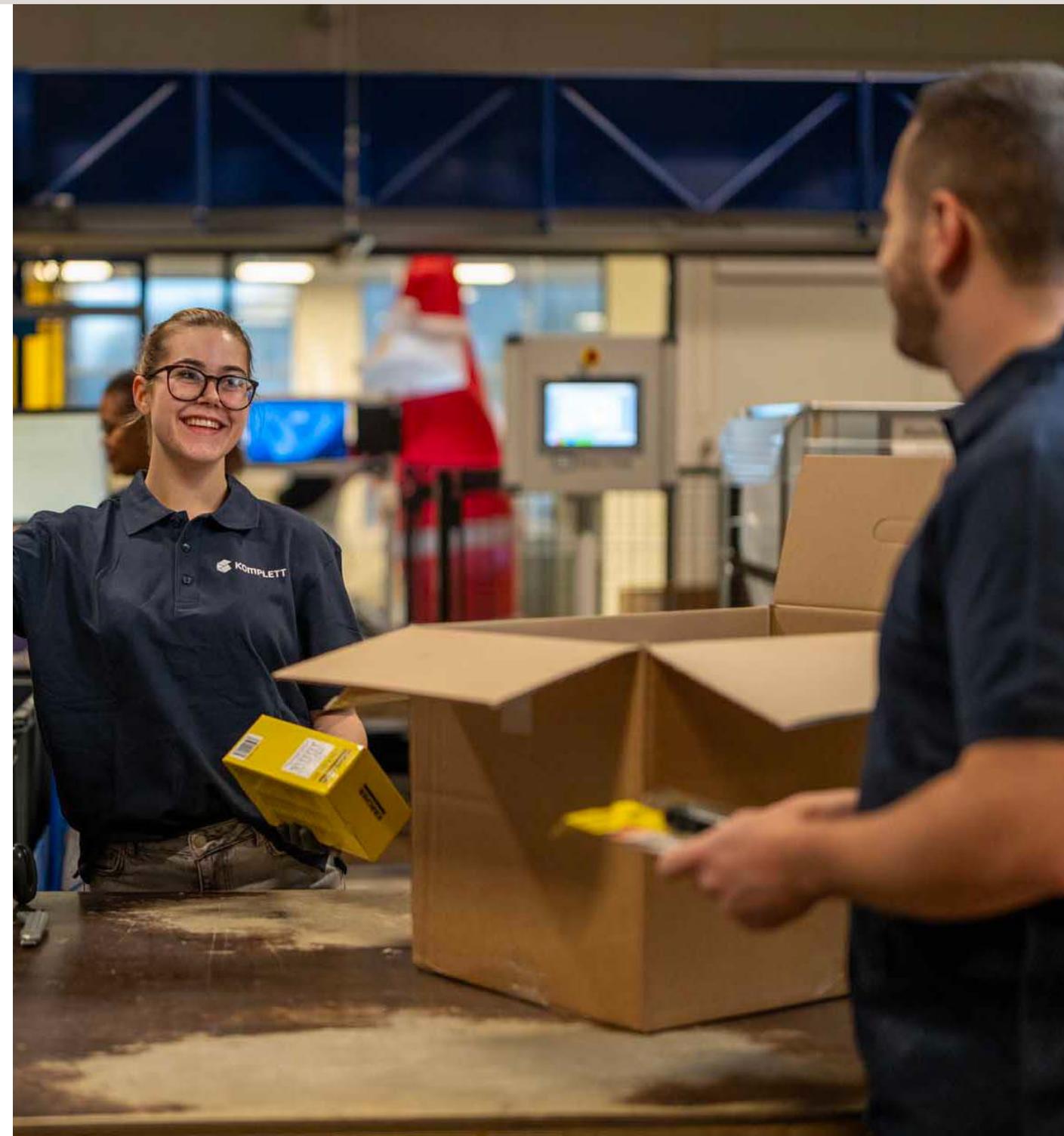
Komplett is a company that relies on a broad range of skills. As indicated in the analysis, the proportion of women varies significantly across departments. Many employees work in areas traditionally dominated by men, such as warehouse/ logistics, IT, and sales, which influences the overall gender composition of the company.

**MEASURES AND AMBITIONS**

Komplett is aware of the unequal gender balance in the company and will actively work to improve gender balance. The company aims to increase the proportion of women in the organisation to at least 35 per cent by 2030. Additionally, the company aims to achieve gender balance in management positions by the same date, with at least 40 per cent of both men and women represented in management teams.

Additionally, efforts will be intensified to promote gender equality and prevent discrimination:

- ▶ Continuously review the recruitment process to ensure equal treatment of all candidates.
- ▶ Assess whether further employer branding measures are needed to position and promote Komplett Services as an inclusive and attractive workplace for all genders.
- ▶ Enhance opportunities for developing individual competencies through the Komplett Academy competency programme.
- ▶ Review and potentially revise the company’s guidelines on procedures that promote gender equality and prevent discrimination and communicate these internally.
- ▶ Monitor trends in Winningtemp that may indicate discrimination and take appropriate follow-up actions.
- ▶ Continuously address issues related to gender equality and discrimination in the work environment committee.



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