



KOMPLETT SERVICES AS EQUALITY AND ANTI-DISCRIMINATION STATEMENT 2024



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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 347 employees (headcount by 31 December 2024). This report focuses solely on the company’s 330 employees in Norway.

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

This report is divided into two parts, addressing our status regarding gender equality (Part one), and outlining our efforts to ensure equality and prevent discrimination (Part two). The statistical data in Part one is extracted from our payroll and HR systems.



PART ONE: STATE OF GENDER EQUALITY

Komplett Service AS Norway has 330 employees (headcount by 31 December 2024) distributed across various departments, as illustrated in the chart shown below.

The logistics department is the largest department, comprising 30 per cent of the employees, followed by B2C (Business to Consumer) with 18 per cent, IT at 15 per cent, and B2B (Business to Business)/Itegra (wholesaler) with 11 per cent.

Number of employees in per cent	Total
B2B/Itegra	11.21%
B2C	18.48%
Commercial development and planning	3.33%
Communications	0.03%
Computing	12.73%
Finance	7.88%
HR	1.21%
IT	14.55%
Logistics	29.70%
Services	0.03%

Gender distribution

In total the company consists of 27 per cent women, 73 per cent men and <1 per cent non-binary.

The gender distribution at the management level closely mirrors the overall employee distribution at Komplett. The share of female managers is 25 per cent, while male managers constitute 75 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 in per cent	Female	Male
B2B Itegra	19%	81%
B2C	28%	72%
Commercial development and planning	27%	73%
Communications	-	100%
Computing	3%	94%
Finance	73%	27%
HR	100%	-
IT	19%	81%
Logistics	24%	76%
Services	100%	-

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 31 where there is a higher male share and the age group between 51 and 60, where there is a higher female share.

The proportion of non-binary employees is too small to be measurable, and is therefore not included as a separate column in the tables, but can impact the total numbers due to rounding effects.

Gender and age distribution in per cent	Female	Male	Total
< 31 years	11%	22%	19%
31 – 40 years	40%	27%	38%
41 – 50 years	30%	30%	30%
51 – 60 years	16%	8%	10%
> 61 years	3%	3%	3%
Total	100%	27%	100%

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 Komplett is uneven. With 27 per cent women and 73 per cent men, this distribution also influences the salary results.

Group	Women	Men	Total cash benefit	Base salary	Variable pay	Bonuses	Overtime compensation	Total taxable benefit
Group 1- Operators, customer service staff, administration staff	85	233	100%	99%	N/A	105%	108.00%	N/A
Group 2- Team leaders, coordinators, technical staff	32	115	105%	98%	100%	334%	82.00%	N/A
Group 3- Consultants, specialists, product management	15	28	105%	104%	N/A	93%	139.00%	N/A
Group 4- Managers, senior advisors, senior consultants	14	22	96%	100%	N/A	114%	38.00%	N/A
Group 5- Directors, senior managers, senior specialists	20	47	107%	101%	N/A	78%	238.00%	N/A

Total cash benefits

Total cash benefits are a compilation of the base salary, variable pay, bonuses, overtime compensation and other benefits.

For the company as a whole, the total cash benefits are equal for both women and men. There are differences both between and within the different employee groups. However, when the numbers are broken down into smaller groups, individual differences can affect the results. This is partly because a larger portion of the employees in the company are men, and this is especially noticeable with bonuses and overtime.

Base salary

Overall, across the entire company, women earn 99 per cent of men's salaries. For all categories, except group 1, women's base salary is equal to or above men's salary.

There are no systematic reasons identified for women's average salaries in this group being lower than the male employees. However, it should be noted that the share of women is lower than men in this group, and individual differences therefore have a stronger impact on the numbers.

In group 5, senior management, we see that women earn 113 per cent of men's salaries on average. Compared to the other groups, this is a small cohort, and individual differences may significantly impact the figures.

Variable pay, overtime compensation, and taxable benefits

Variable pay is mostly used for positions that are linked to on-call duties that are regulated by collective agreements. Women's share of men's variable pay is 100 per cent in group 1, for the rest of the groups, variable pay is not applicable.

The company has bonus agreements on individual and departmental level. It compiles both of sales- and performance-based bonuses. As the number of employees eligible for bonuses is below 30 per cent, individual differences impact the results significantly.

In total for the company, women's share of men's remuneration for overtime work amounts to 108 per cent. The use of overtime varies as some departments have had projects running requiring the use of overtime.

The salary analysis does not reveal any discrimination between the genders when it comes to compensation. However, the company will continue to monitor differences in compensation closely to make sure that every employee regardless of gender are compensated fairly and according to their competence.

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

Part-time

Komplett has 4.5 per cent of employees in part-time positions. The percentage of involuntary part-time is zero per cent.

Temporary positions

Employees in temporary positions:

- ▶ Apprentices/ Internship: 2
- ▶ Temporary positions: 2

Komplett also uses variable seasonal hires via recruiting companies. These are not formally employed by the company and are thus not included in this report.

Parental leave

	On leave	Average number of weeks on leave
Women	5	18.9
Men	8	7.5

Sick leave

Average sick leave in 2024 was 4.36 per cent. This includes 100 per cent sick leave or partial sick leave, including self-reported sick leave. For women the sick leave was 5.65 per cent, and for men it was 3.88 per cent.



PART TWO: OUR WORK FOR GENDER EQUALITY AND AGAINST DISCRIMINATION

Principles, procedures, and standards for gender equality and against discrimination. Our gender equality efforts are anchored in various strategies, tools, and guidelines within Komplett.

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

The consideration for gender equality and non-discrimination is also included in the overall personnel policy. Equality and non-discrimination should be an inherent and natural element in our company where everyone has equal rights and responsibilities in all areas, regardless of gender, age, ethnic or cultural background, ability, sexual orientation, or identity.

WORK ON ENSURING GENDER EQUALITY AND NON-DISCRIMINATION

Recruitment

All vacant positions are announced internally at a minimum, providing all employees the opportunity to apply. In most cases, vacancies are also externally advertised using the recruitment tool Jobylon, in addition to being posted on platforms such as finn.no, and LinkedIn.

Job advertisements are crafted with specific requirements for the position, but efforts are made to keep qualifications open enough to make the position accessible for applicants with diverse backgrounds.

There are predefined procedures for the hiring process, where all candidates are evaluated by the manager and HR before potential candidates are invited to an interview with the manager. For candidates invited for a second interview, assessments are conducted using the Aon evaluation tool, followed by a discussion with the manager's superior before the final candidate is offered the position. All assessments in the hiring process are to be based on factual competence and suitability, while Komplett works towards achieving a well-balanced gender distribution. Komplett seeks to have at least one person from the underrepresented gender presented in the final stages of the interview process.

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

Employees are encouraged to pursue internal mobility to ensure talent development.

WAGE AND EMPLOYMENT CONDITIONS

Komplett practices collective remuneration for employees within collective bargaining agreements and individual compensation for employees that 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 two times each year with a focus on social aspects and development opportunities. The Link tool is used for these conversations, documenting both performance and development goals.

All positions are required to be advertised internally. Out of the recruitments conducted in 2024, 67.8 per cent of the advertised positions were filled by internal candidates. This demonstrates Komplett's strong commitment to providing opportunities for employees, both for horizontal and vertical development.

Accommodation

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 spaces are a mix of individual offices and open office landscapes. 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 taken into account.

Opportunity to combine work and family life

The company facilitates employees to combine 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 revealed any obvious risks and barriers that impede equality and lead to discrimination. The assessments have, however, showed 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 such as violence, verbal or physical harassment, or sexual harassment in the workplace. No incidents are registered in 2024, however specific comments from employees on the topic are handled appropriately by manager and/or HR.

- ▶ Also, HR monitors the work environment by conducting workplace surveys every 14 days. If issues are reported through our deviation reporting system, this is reported to the Working Environment Committee (Arbeidsmiljøutvalget - AMU). There have been no reports of unwanted incidents through the reporting system at Komplett in 2024.

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

The company admits 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 requires a broad range of skills. As indicated in the analysis, the proportion of women varies significantly across different departments. We observe that most of our employees work in areas traditionally dominated by men, such as warehouse/logistics, IT, and sales. This contributes to the gender composition in the company.

MEASURES AND AMBITIONS

Komplett is aware of the unequal gender balance in the company and will actively work to improve the 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.

- ▶ Recruitment
 - Continuously review the recruitment process to ensure that women and men are treated equally in this process.
 - Employer branding: Assess whether further measures need to be implemented to ensure and subsequently promote Komplett Services as a "female-friendly" workplace.
- ▶ Enhance opportunities for developing individual competencies through the competency program Komplett Academy.

- ▶ Review and potentially revise the company's guidelines on procedures that promote gender equality and prevent discrimination and communicate these internally.
- ▶ Monitor and follow up 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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