

# COMPLY ADVANTAGE<sup>®</sup>

## Gender Pay Report 2024/25

2024/25 marks the fourth year of gender pay reporting at ComplyAdvantage, allowing us to compare progress against 2023/24 and benchmark against averages in the UK. Reducing our gender pay gap remains a key priority within our wider Diversity, Equity and Inclusion (DEI) strategy. While mid-2024 did not deliver the results we had hoped for, we have since refined our approach, and we are confident that our renewed focus will drive meaningful and sustained progress.

### What is the gender pay gap, and how is it calculated?

The gender pay gap refers to the difference between the average earnings of all men and women across all jobs. This includes base salary, bonuses, commission, allowances, and share awards.

### How is “gender” defined?

The UK Government’s Gender Pay Gap regulations do not define the terms “*men*” and “*women*”. In line with official guidance, we do not ask employees to declare or confirm their gender solely for pay gap reporting purposes.

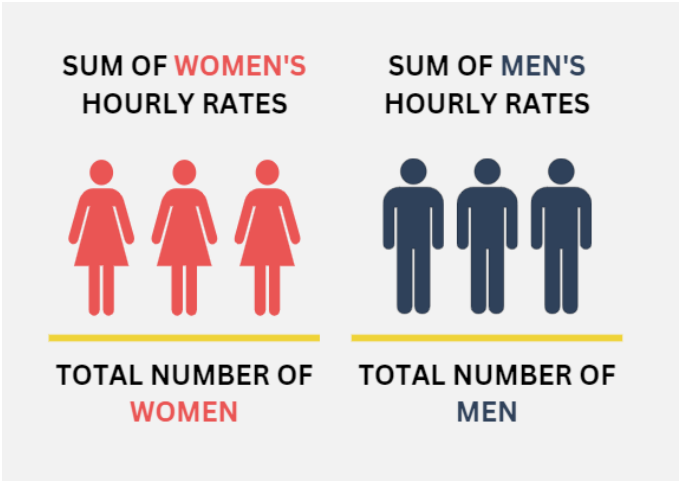
So for the purposes of Gender Pay Gap reporting, gender is based on the information our employees provide in HiBob.

### How is gender pay different from equal pay?

Equal pay is the legal requirement to ensure that men and women doing the same roles or roles of equal value are paid equally. Equal pay doesn’t always mean the same pay, as there are many legitimate factors why colleagues carrying out the same roles might be paid a little differently. Factors could include different expertise, competency, and performance levels. We have a gender-neutral approach to determining pay for our roles and regularly monitor this via equal pay audits.

### How is the hourly rate calculated?

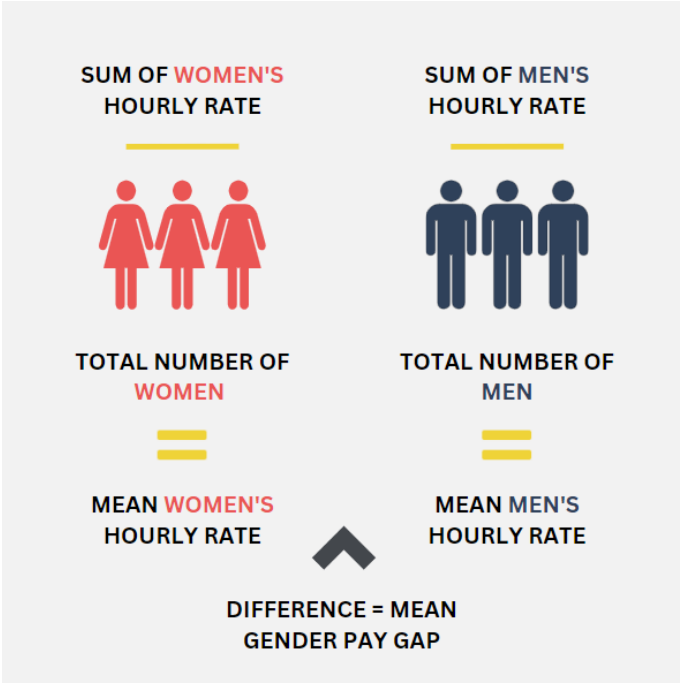
Hourly rate is calculated by taking the total sum of the relevant gender’s hourly rate and dividing this by the total number of that same gender.



How is the mean gender pay calculated?

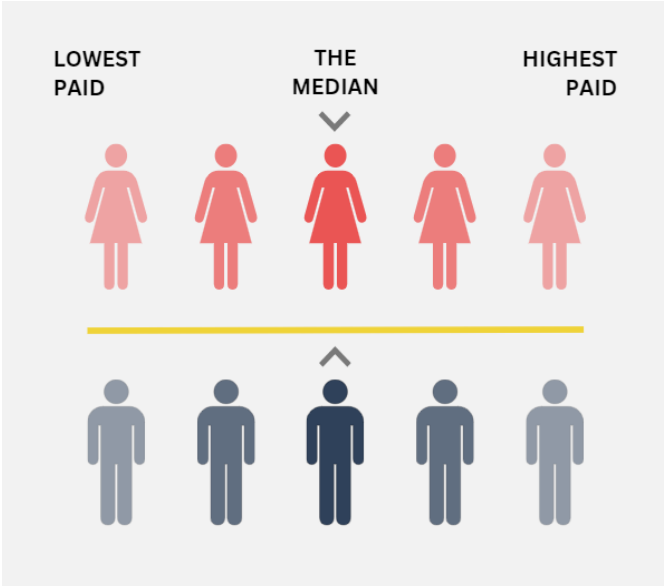
The mean gender pay gap (the average) is calculated by adding up the hourly rate of all female colleagues and dividing this figure by the number of female colleagues – then doing the same with male colleagues.

The mean gender pay gap is the difference between the mean male and the mean female hourly pay.



## How is the median gender pay calculated?

The median gender pay gap (the middle) is calculated by ordering hourly rates for all colleagues in a female line and a male line in order of their pay from highest to lowest and calculating the difference in pay between the female and male in the middle of their respective lines.



## ComplyAdvantage gender pay reporting - Our results

### UK Gender Representation

|        | As of 5th April 2025 |      | As of 5th April 2024 |      |
|--------|----------------------|------|----------------------|------|
|        | #                    | %    | #                    | %    |
| Female | 64                   | 28%  | 61                   | 23%  |
| Male   | 162                  | 72%  | 203                  | 77%  |
| Total  | 226                  | 100% | 264                  | 100% |

Overall headcount reduced by 14% during the reporting period, but female representation increased by 5%.

UK Hourly Rate of Pay

| 2024          |         |              |              |         |
|---------------|---------|--------------|--------------|---------|
| Pay Quartiles | Lower   | Lower Middle | Upper Middle | Upper   |
| Female/Male   | 39%/61% | 24%/76%      | 15%/85%      | 14%/86% |
| 2025          |         |              |              |         |
| Pay Quartiles | Lower   | Lower Middle | Upper Middle | Upper   |
| Female/Male   | 42%/44% | 17%/68%      | 17%/70%      | 21%/64% |

In 2025, we observed meaningful shifts in gender distribution across our UK workforce pay quartiles, particularly at the Upper pay spectrum.

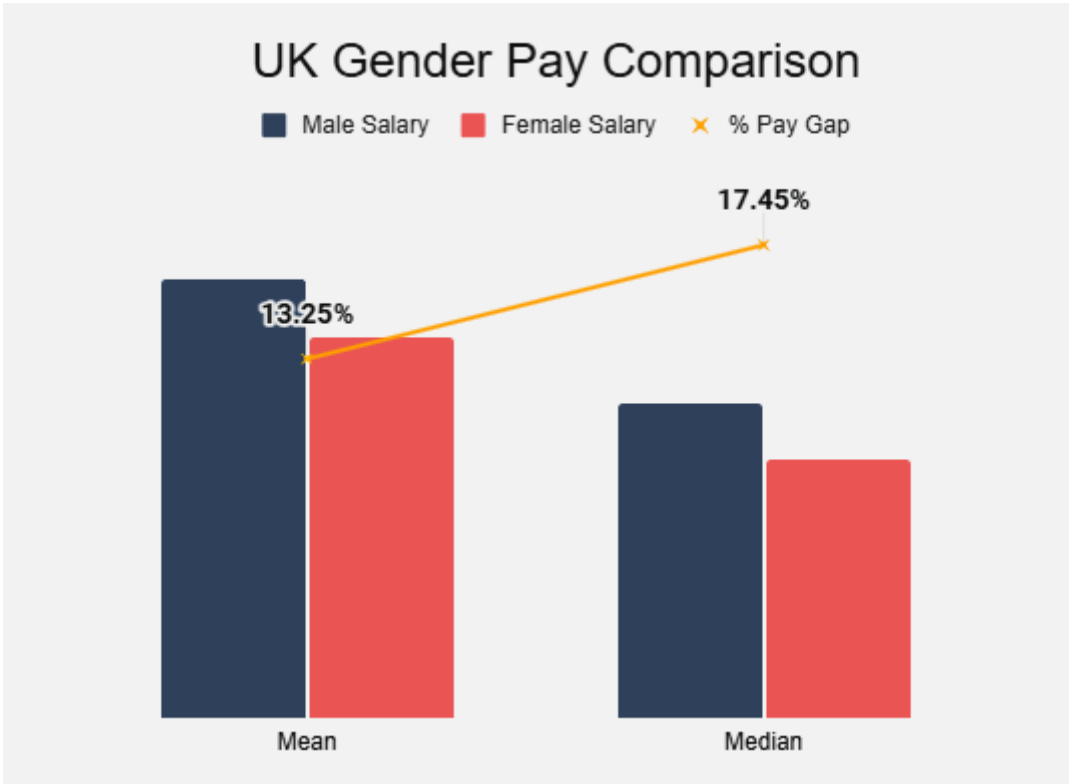
Female representation in the Upper quartile increased from 14% in 2024 to 21% in 2025, marking a 7 point rise that reflects early progress toward greater gender pay equity in senior and higher-paid roles.

Similarly, the Upper-mid quartile saw a modest increase in female representation (from 15% to 17%), further supporting the trend of improved access to mid-to-higher paid roles.

While we have seen a slight increase in the representation of the Lower quartile, the gender gap here has narrowed, indicating a more balanced gender distribution in lower-paid roles.

Overall, while gender representation in the top quartile remains below parity, the year-on-year improvements show promising steps towards closing the gap, particularly in historically male-dominated, higher-paid roles.

Mean and Median Gender Pay

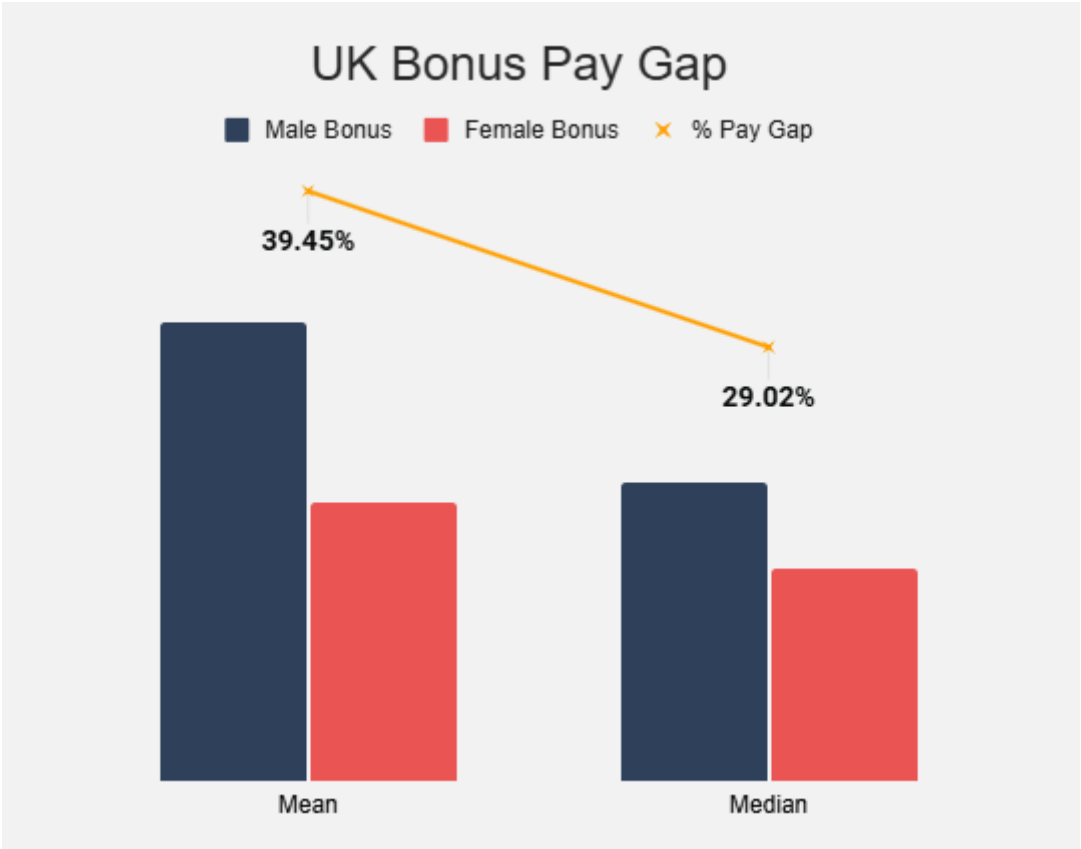


Our **mean average** gender pay gap is **13.25%**, representing a decrease from 35.69% in 2024. Our **median average** gender pay gap is **17.45%**, another decrease compared to 21.71%. This reflects improved female representation in higher-paid roles and more balanced distribution of pay across the organisation.

**Bonus/Commission Eligibility**

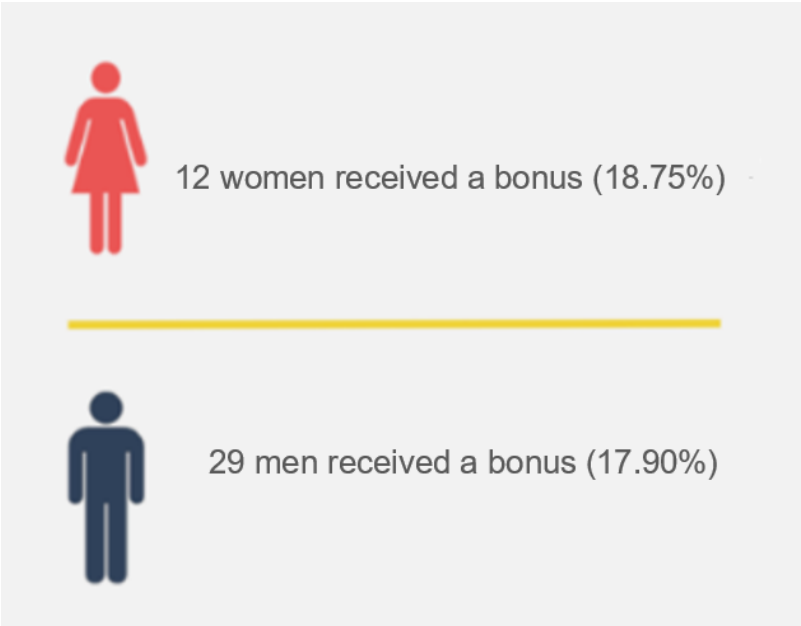
Bonus/commission is a compensation vehicle used within ComplyAdvantage’s Commercial organisation to incentivise sales and positive client acquisition and retention behaviors. The scheme is reviewed and paid out on an annual basis. Payout levels are subject to yearly changes as they are based on the performance of the company and individuals.

**UK Bonus Pay Gap**

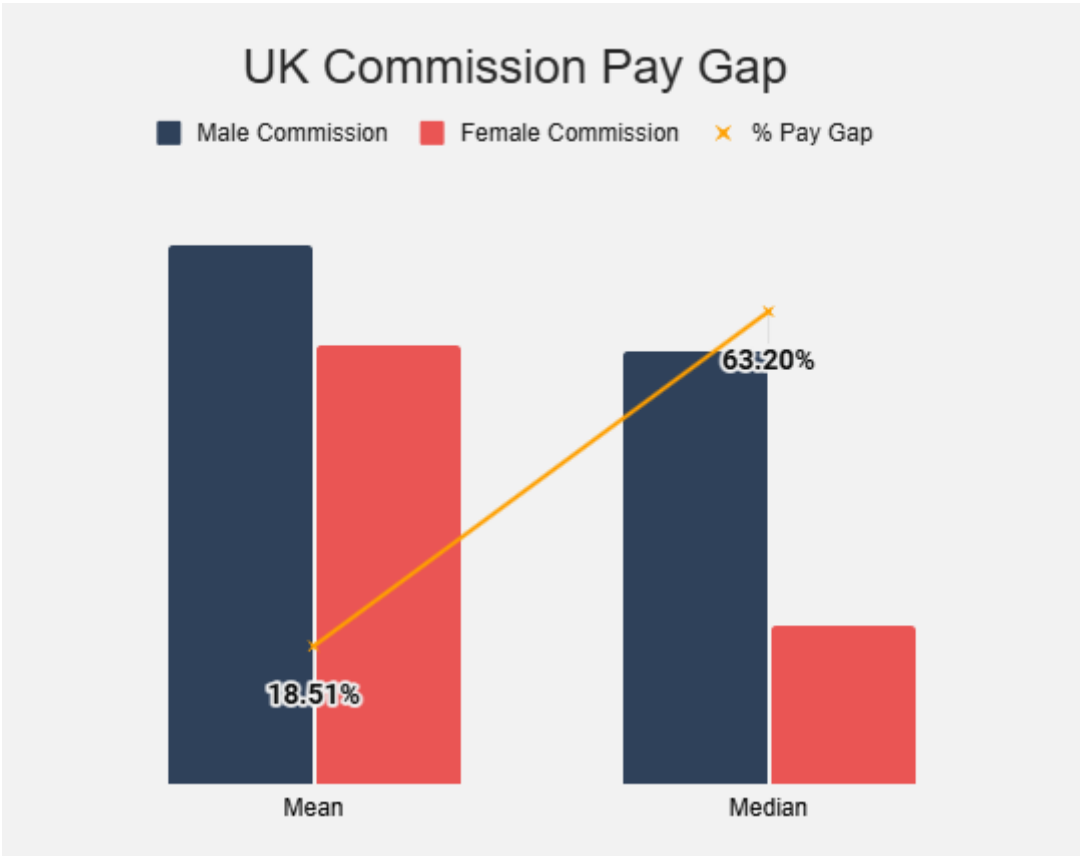


For 2025, we have seen an overall reduction in both mean and median bonus pay gap, driven by a more even distribution of bonus awards, with our **mean bonus** pay gap at **39.45%** and our **median bonus** pay gap at **29.02%**. Previous figures in 2024 show the mean bonus pay gap at 75.43% and our median bonus pay gap at 32.26%.

This improvement reflects a more balanced distribution of bonus payments and comparable eligibility rates, with 18.75% of women and 17.90% of men receiving bonuses.

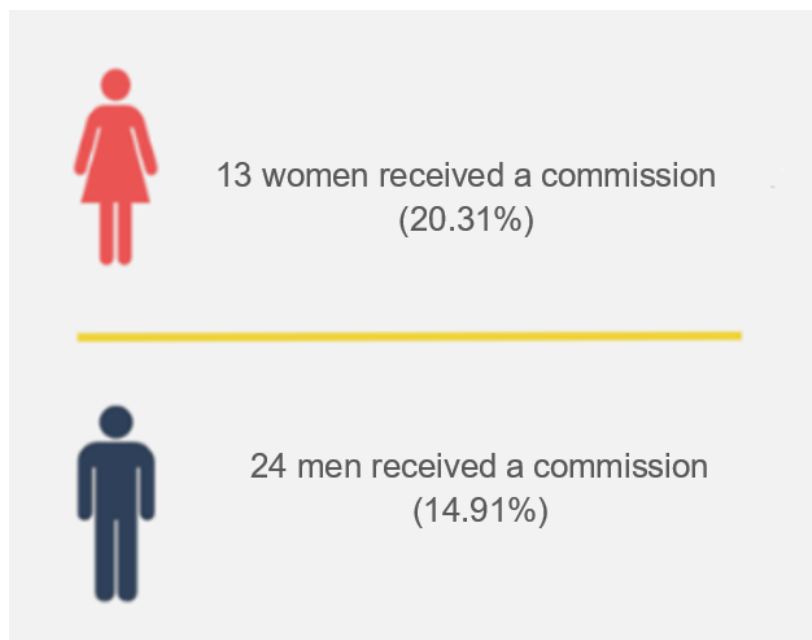


UK Commission Pay Gap



Our mean commission pay gap decreased to **18.51%** in 2025, reflecting a more even distribution of commission among female employees. However, the median gap rose to **63.20%**, highlighting ongoing differences in typical commission earnings.

**Commission eligibility was higher for women this year (20.31%) than men (14.91%). This suggests improved access to commission-based roles for female employees.**



## OUR ACTION PLAN

At ComplyAdvantage, we are encouraged by the progress we've made in 2025 toward closing the gender pay gap. This year, we saw a significant reduction in both our mean gender pay gap and our mean bonus gap, reflecting the impact of our ongoing efforts to create a more inclusive and equitable workplace.

However, we recognise that meaningful change takes sustained action, particularly in areas like median bonus and commission gaps, and senior-level gender balance. As we look ahead, we remain committed to embedding equity and inclusion into every part of the employee experience.

**Our refined focus will continue to align to five key pillars:**

- **Attract more women into underrepresented functions and senior roles:**
  - Continue proactive sourcing strategies to engage with experienced women across our workforce.
  - Begin to publish hiring and promotion rates by gender
- **Ensure fair, inclusive hiring practices:**
  - Maintain our gender-neutral language in all job adverts and role profiles.
  - Continue to mitigate any potential bias through our Interviewer Enablement training.
  - Build all target pipelines to match representation for the role in the market.

- **Increase representation and visibility of female role models:**
  - Track and increase female representation at leadership levels, specifically at Director+ levels within the company
  - Expand on mentoring and L&D programs for women and underrepresented groups across all levels.
  - Amplify internal and external visibility of women leaders through events.
- **Strengthen our existing bias-free internal processes:**
  - Continue to educate and provide transparency on our performance, promotion and compensation processes.
  - Run biannual global equal pay reviews
  - Use data analytics to track patterns in bonus and commission awards by gender.
- **Build a culture where everyone can thrive:**
  - Promote the continued usage of enhanced parental leave and unlimited annual leave to support life balance.
  - Continue to improve visibility and manager enablement on flexible working policies.
  - Invest in our Women in Tech and DEI initiatives, to foster inclusion activities and cross-company mentorship.

New Priorities for 2025-2026:

- Educating and transparency on compensation philosophy for the wider company
- Career pathways and levelling clarity to help mid-career development.
- Leadership accountability - gender balance goals in senior objectives
- Manager enablement to continue.

At ComplyAdvantage, closing the gender pay gap is not just about compliance, but about building a workplace where fairness, opportunity and transparency/representation? are part of who we are. While we are encouraged by the positive shifts in this year's data, we know there is more to do. We are committed to creating a long-term change by embedding equity into how we hire, reward, promote and support all employees. We will continue to challenge bias, increase transparency and invest in a culture where everyone, regardless of gender or background, can thrive and succeed.

## DECLARATION

We confirm that the gender pay calculations are accurate and meet the requirements of the legislation.

Signed by:

*Shivatsa Narasimha*

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Vatsa Narasimha  
Chief Executive Officer