

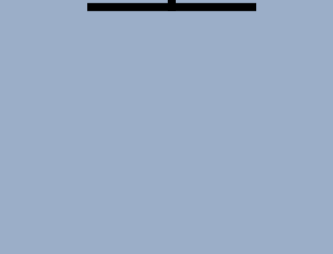
Gender Pay Report

2021/2022 was the first year in which ComplyAdvantage exceeded 250 UK employees, and as a result, have begun gender pay reporting. While we don't have historic data on previous years, we have included for reference the average UK results to provide some context. We look forward to continuing to improve our results year-on-year and are confident the organization has put in place actions and initiatives to continue to address the global issue of gender pay disparity.

2021 ————— 2022

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.

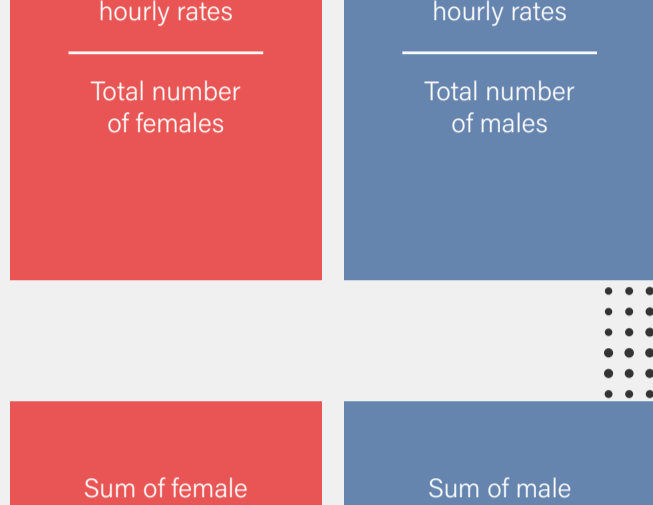


How is gender pay different from equal pay?

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.

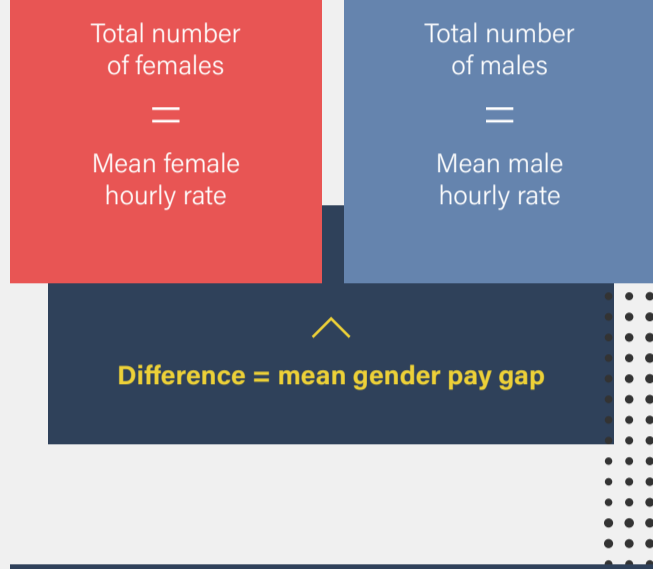
How is the hourly rate calculated?

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.



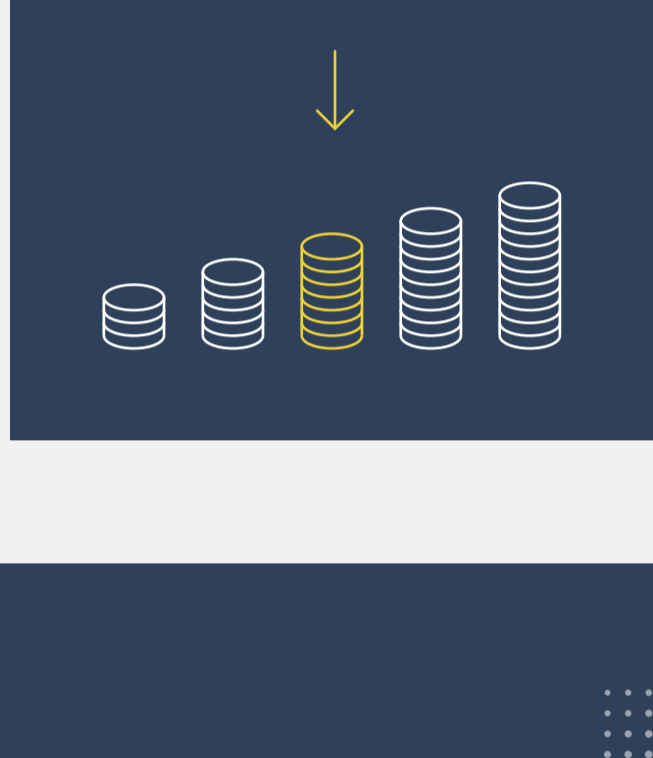
How is the mean gender pay calculated?

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: Results

Snapshot December 31st, 2020 & December 31st, 2021:

	2020		2021	
	#	%	#	%
Female	76	26%	81	25%
Male	221	74%	237	75%
Total	297	100%	318	100%

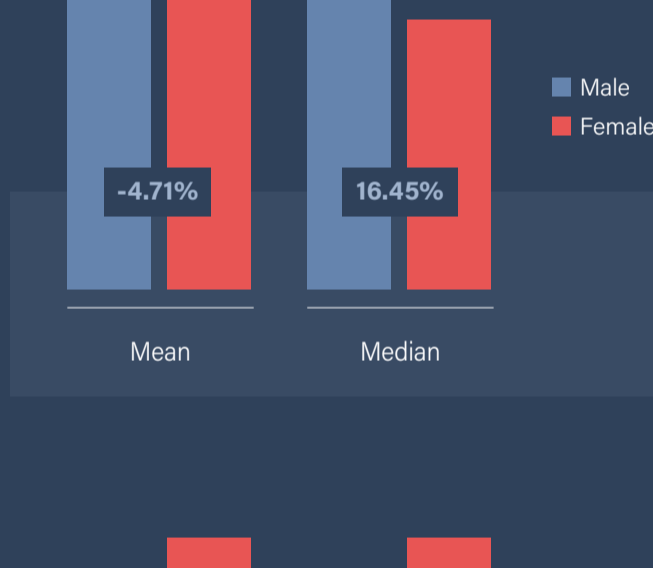
UK Hourly Rate of Pay

Pay Quartiles	Lower	Lower Middle	Upper Middle	Upper
Female	37%	21%	14%	16%
Male	63%	79%	86%	84%

Mean and Median Gender Pay

Our mean average gender pay gap is **-4.71%**

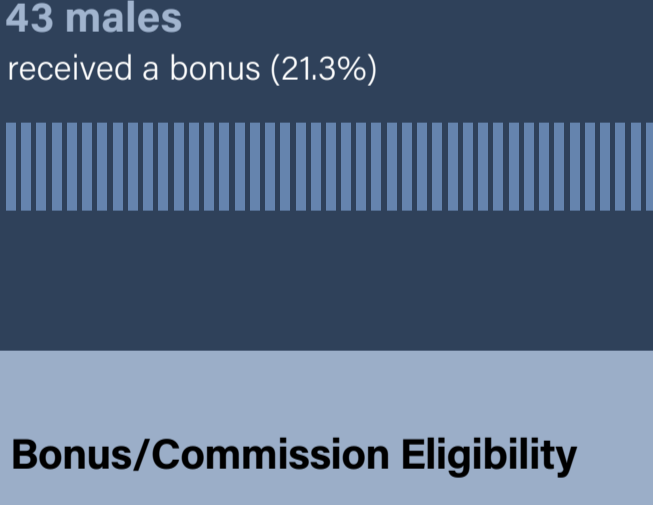
Our median average gender pay gap is **16.45%**



UK Bonus Pay Gap

Our mean bonus pay gap is **-39.8%**

Our median bonus pay gap is **-25.2%**

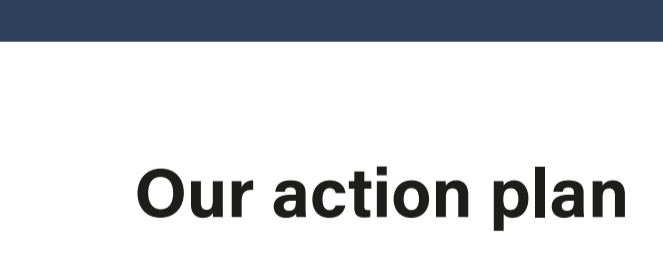
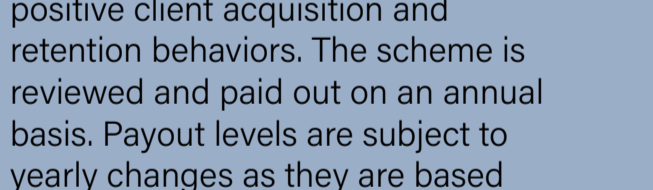


% of Gender receiving a bonus

9 females received a bonus (16.3%)



43 males received a bonus (21.3%)



Bonus/Commission Eligibility

Bonus/commission is a compensation vehicle is a compensation vehicle used within ComplyAdvantage's Commercial organization to incentivize 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.

Our action plan

Our long-term goal is to close our gender pay gap. We are committed to minimizing the gap each year, remaining transparent about our data, and being accountable for balancing the representation of women at all levels.

We will continue to:

- Attract women to our organization** - We will continue to increase our reach to engage with women in the technology community.
- Hire diverse talent from a range of backgrounds** - Our job adverts and role profiles are gender-neutral to encourage qualified applicants regardless of gender to apply to relevant roles. Our Talent Acquisition team has committed to posting our jobs on female-oriented online job boards.
- Maintain bias-free selection and promotion practices**
- Maintain representation** - Seek to have female representation in our Executive Team and on our Board.
- Foster an inclusive culture where everyone can thrive** -
 - We have recently launched our adjusted Parental Leave Policy designed to offer our colleagues better parental leave pay as well as a more holistic approach to support before and after leaving.
 - Continue to support Women in Tech Initiatives from attending and speaking at events to participating in women in tech cross-industry forums.
 - We are launching a forum for Women in ComplyAdvantage to discuss and be empowered to take action to drive inclusivity and engagement amongst our female colleagues.
 - We continue to support our global engagement squad group whose remit remains to get people talking, mentoring and sharing ideas to make ComplyAdvantage an inclusive workplace for all colleagues.

We take equality & inclusivity seriously at ComplyAdvantage. In addition to monitoring our gender pay gap, we conduct regular equal pay reviews across the globe, ensuring men and women performing equal work receive equal pay.

We understand that the focus of UK legislation is pay, but at ComplyAdvantage we are also committed to a culture that enables people to be their authentic selves and thrive. Therefore, in addition to initiatives to focus on gender parity, we will also continue to work to create an environment where everyone feels they can have a voice, that their opinions matter, and that they can be successful.

Declaration

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

Vatsa Narasimha

Vatsa Narasimha
Chief Executive Officer

Amanda Ward

Amanda Ward
VP HR