# Cegal AS Equality Act

Equality statement report 2024



# **Contents**

1	Sta	ite of gender equality in Cegal	
2		r work for equality and against discrimination	
		Principles, procedures and standards for equality and non-discrimination	
	2.2	How we assess risks of discrimination and barriers to equality	6

# 1 State of gender equality in Cegal

Category	Women	Men
Gender Balance		
Number of employees	157	499
Temporary Employees		
Temporarily employed	4	10
Parental Leave		
Average weeks used during parental leave	24	10
Actual Part-time Work		
Part-time employees	10	14
Involuntary Part-time		
Involuntary part-time	0	0
Recruitment		
Number of applicants	613	2708
New employees hired	20	48
Sick Leave	7.61%	3.10%

Table 1. Gender equality statistics table. This table provides an overview of gender-disaggregated workforce data, including total number of employees, temporary employment, parental leave usage, part-time and involuntary part-time work, recruitment figures, and sick leave percentages.

Level	Women	Men	Proportion of Women	Total
Total	157	499	24%	656
Level 0-2	36	130	22%	166
Level 3–5	115	324	26%	439
Level 6–8	7	45	13%	52

 $Table\ 2$ : Gender distribution by job level. This table presents the distribution of women and men across different job levels in the organization.

Job Level	Diversity Metrics and Pay Gap
Level 1	Pay ratio: 1.14
Level 2	Pay ratio: 1.01
Level 3	Pay ratio: 1.13
Level 4	Pay ratio: 1.07

ENANC ALE

Level 5 (Manager)	Pay ratio: 0.96 – Manager level
Level 6 (Director)	Pay ratio: 0.99 – Very few women in this level (5 women, 44 men)
Level 7	Only men – No women in this level
Total	Annual total remuneration ratio: 4

Table 3: Remuneration ratio. Our diversity metrics include gender representation. The remuneration ratio reflects the CEO's salary compared to the median salary of all employees in the company. All figures have been converted to NOK where relevant. We use annual salary as the sole component in calculating the remuneration ratio to ensure clarity, consistency, and comparability across the organization. This approach reflects our compensation structure, which is primarily based on fixed annual salary, with only a limited portion allocated to variable pay such as bonuses or incentives. Annual salary is a stable and contractually defined form of compensation that applies uniformly across roles, making it the most reliable and transparent basis for comparison. While some employees may receive additional variable compensation, these components are relatively modest in our overall pay structure. As such, including them would not significantly impact the remuneration ratio or materially change the outcomes of our analysis. By focusing on annual salary, we maintain a standardized and equitable approach that supports both internal benchmarking and external reporting, while minimizing distortions caused by fluctuations in performance-based or discretionary pay.

Avg. cash payments women (NOK)	Avg. cash payments men (NOK)	Differenc e in cash payments (%)	Difference in cash payments (NOK)	Avg. cash payments (all)	Avg. agreed salary women (NOK)	Avg. agree d salary men (NOK)	Differen ce in agreed salary (%)	Differenc e in agreed salary (NOK)	Avg. agreed salary (all)
764,554	831,346	92.0%	-66,791	815,361	727,748	762,08 4	95.5%	-34,336	753,866
494,740	490,750	100.8%	3,990	491,616	453,307	441,52 5	102.7%	11,782	444,080
821,704	907,031	90.6%	-85,327	884,679	787,930	833,42 2	94.5%	-45,492	821,505
1,104,058	1,220,809	90.4%	-116,751	1,205,092	1,046,480	1,129, 821	92.6%	-83,341	1,118,602

Table 4: Gender differences in cash compensation and agreed salary. This table shows the average annual earnings for women and men across four employee categories, divided into total cash compensation and agreed fixed salary. The figures include both absolute and percentage differences

Avg. irregular supplements women (NOK)	Avg. irregular supplements men (NOK)	Difference in irregular supplements (%)	Difference in irregular supplements (NOK)	Avg. irregular supplements (all)	Avg. bonus women (NOK)	Avg. bonus men (NOK)	Difference in bonuses (%)	Difference in bonuses (NOK)	Avg. bonus (all)
41,910	56,747	73.9%	-14,838	53,196	25,030	28,918	86.6%	-3,888	27,988
76,876	56,288	136.6%	20,588	60,753	17,132	19,397	88.3%	-2,265	18,906
32,200	54,671	58.9%	-22,471	48,784	25,958	29,655	87.5%	-3,698	28,687
15,614	85,116	18.3%	-69,502	75,760	46,830	61,643	76.0%	-14,813	59,649

Table 5: Gender Differences in irregular supplements and bonuses. This table displays average earnings for women and men in two additional pay categories: irregular supplements and bonuses.

Avg. overtime pay women (NOK)	Avg. overtime pay men (NOK)	Difference in overtime (%)	Difference in overtime (NOK)	Avg. overtime (all)	Avg. taxable benefits women (NOK)	Avg. taxable benefits men (NOK)	Difference in taxable benefits (%)	Difference in taxable benefits (NOK)	Avg. taxable benefits (all)
20,333	55,609	36.6%	-35,276	47,167	10,406	10,325	100.8%	80.61	10,344
12,164	30,601	39.7%	-18,437	26,602	9,456	9,135	103.5%	321.37	9,204
23,952	65,862	36.4%	-41,910	54,883	10,592	10,640	99.5%	-48.03	10,627
7,845	0	0.0%	7,845	6,789	10,746	9,802	109.6%	944.28	9,929

Table 6: Gender Differences in overtime compensation and taxable benefits This table compares overtime payments and taxable benefits received by women and men across employee categories.

The data covers gender balance, temporary employment, parental leave, part-time work, recruitment, salary growth, continuing education, sick leave, and compensation. Pay differences have been analyzed both overall and by job level.

We have assessed equal work and work of equal value when defining job levels and have collaborated with employee representatives in the planning, implementation, and evaluation of the survey:

- Example of equal work: Two advisors in the same or different departments
- Example of work of equal value: An HR advisor and IT support specialist.
- Roles that require different competencies but involve comparable responsibility, complexity, and contribution to the organization.
- Example of assessment: Former managers who have stepped down to lower roles but retained their salary are still categorized as managers.

Gender pay differences within the organization include base salary, as well as various bonuses, allowances, and in-kind benefits. The largest differences observed are in the following areas:

- Total cash compensation: On average, women receive 92% of men's total cash compensation
- Base salary: The gap is narrower here, with women receiving 95.5% of men's base salary on average
- Bonuses: On average, women receive 86.6% of the bonus amounts received by men
- Overtime pay: Women receive 63.6% of the overtime pay received by men on average

These differences are largely explained by the distribution of genders across job levels and varying work patterns. It's also important to note that some bonuses and benefits are tied to roles with greater responsibility, roles in which women are still underrepresented, so the figures may not fully capture this context.

Sick leave is higher among women (7.61%) than men (3.10%). We do not have insight into the medical reasons behind sick leave and therefore cannot comment on the underlying causes.

On average, men take 10 weeks of parental leave, while women take 24. This difference likely reflects personal choices and varying family situations. We aim to accommodate parental leave for all employees, regardless of role, and have taken steps to enable this in practice.

The numbers show that the organization recruited 20 women and 48 men over the past year. This reflects an imbalance but also aligns with broader trends in STEM-fields where women remain systematically underrepresented.

While this is not unique to our organization, it does highlight the importance of long-term efforts to support diversity in candidate pools and ensure equal opportunities throughout the recruitment process. If left unaddressed, such imbalances may contribute to further gender disparities across job levels over time.

## 2 Our work for equality and against discrimination

We aim to be a workplace where everyone feels welcome and valued, regardless of gender, identity, background, or life situation. To us, equality and diversity are not just about numbers, but about attitudes, culture, and opportunity. In this section, we share how we have worked in practice with equality and non-discrimination over the past year.

### 2.1 Principles, procedures and standards for equality and nondiscrimination

#### Strategic anchoring and policies:

Cegal is committed to eliminating discrimination and promoting equal opportunities across all areas of employment. This commitment is reflected in policies that support fairness in recruitment, training, career development, and remuneration. Discrimination or harassment based on gender, ethnicity, age, disability, religion, sexual orientation, or other personal characteristics is not tolerated.

#### Key measures in place include:

- Structured recruitment processes using DNV-certified ability and personality tests to reduce bias and support objective evaluation.
- Regular training for hiring managers on unconscious bias and inclusive decision-making.
- Policies supporting parental leave and flexible work arrangements to enable equal opportunities and work-life balance.

In line with Norwegian legislation, Cegal also implements positive action to address gender imbalances in a few cases. Qualified female candidates are prioritised for interviews, and the company has set a target that at least 40% of new hires should be women.

Diversity and inclusion are anchored in Cegal's core values and strategic priorities. These principles apply to all employees, contractors, and stakeholders, and form the basis of efforts to build a respectful, fair, and inclusive working environment that supports innovation through diverse perspectives.

#### Zero tolerance for discrimination and harassment:

Cegal maintains a zero-tolerance policy toward all forms of discrimination, harassment, sexual harassment, and gender-based violence. These expectations are clearly outlined in the company's Code of Conduct and employee handbook and apply to all employees, contractors, and business partners.

The policy is supported by formal whistleblowing procedures designed to ensure confidentiality and protect individuals who report concerns. All employees are encouraged to speak up about any incidents or misconduct without fear of retaliation.

Reports are submitted through established channels and handled by an independent third party, BDO. In cases of whistleblowing, BDO manages the process and ensures that appropriate follow-up actions are taken, involving only the necessary parties in accordance with internal guidelines and applicable legal requirements.

#### Integration into HR procedures:

Equality considerations are embedded in Cegal's HR processes, including recruitment, pay, and career development. A formal pay policy with defined criteria helps ensure consistency and fairness in salary decisions across roles and functions. Recruitment processes are structured to support objective evaluation, and career development opportunities are monitored to promote equal access for all employees.

These measures help reduce the risk of bias and support a transparent and equitable working environment.

#### Flexibility and accommodation:

Cegal offers flexible working hours and the option to work remotely, supporting employees in balancing work with personal responsibilities. These arrangements are available to all employees, regardless of gender or life situation.

In addition, individual accommodations are provided as needed to ensure that employees with disabilities or specific needs have access to appropriate adjustments in their work environment. These measures are part of Cegal's efforts to create a supportive and adaptable workplace.

#### **Continuous leadership focus:**

Cegal's executive leadership and HR team maintain ongoing oversight of equality efforts across the organisation. This includes regular reviews of relevant policies, progress towards internal goals, and evaluation of key indicators related to diversity and equal opportunities.

Employee representatives are actively involved in these follow-ups to ensure transparency, shared ownership, and input from a broad range of perspectives. This structured involvement helps align equality work with overall business priorities and operational practices.

# 2.2 How we assess risks of discrimination and barriers to equality

Cegal conducts a systematic review to identify any risks of discrimination or barriers to equality. This assessment includes a range of activities and is carried out at least once a year as part of our continuous improvement efforts. The findings form the basis for further analysis of root causes and the planning of relevant measures.

Over the past year, several activities have been conducted to identify potential challenges related to equality and inclusion:

- We have reviewed gender distribution data within the company, with particular attention to technical roles and recruitment processes.
- We have evaluated the language and content of job advertisements to assess whether they could be perceived as exclusionary.
- Through employee surveys and ongoing dialogue, we have invited reflections on diversity, well-being, and the sense of inclusion in the workplace.

As a result of this work, we have identified these specific risk areas:

- Low representation of women in technical roles. This mirrors broader industry trends but also highlights the need for long-term strategies to support inclusive recruitment and retention within our own organization.
- Potential unconscious bias in hiring and promotions. While formal processes are in place, we acknowledge that informal networks and subjective assessments may influence access to opportunities.

Although we do not currently define pay, part-time status, or accommodation needs as formal risk areas, our internal compensation data reveals gender disparities in specific categories, particularly in bonuses, overtime pay, and irregular supplements. These findings do not necessarily indicate structural discrimination, but they underline the importance of continued monitoring, transparent dialogue, and proactive efforts to promote equity.

#### **Current mitigating measures include:**

- Internal policies that promote equal treatment and non-discrimination.
- Established channels for reporting concerns, including whistleblower procedures and internal communication of these
- Training and awareness activities aimed at reducing bias and supporting respectful conduct.
- Regular monitoring of workforce composition and relevant metrics.

The assessment indicates that while systemic DEI issues have not been identified within Cegal, isolated challenges may however occur. Continued attention is required to prevent negative outcomes and to ensure equal access to opportunities across the organisation.

#### **Analysing root causes**

When we identify an imbalance, such as the underrepresentation of women in technical roles, we work to understand the underlying causes. Several contributing factors have been identified:

- Industry standards and education pathways: The overall recruitment base in IT and technology remains male-dominated.
- Previous job ad design: The language and framing of requirements in earlier job postings may have unintentionally appealed more to men than to women.
- Lack of role models: Few women in technical roles may make these positions appear less accessible or attractive to other women considering applying.

These analyses provide a stronger basis for targeted action and improvement.

#### Implementing measures

Based on the risk assessment and root cause analysis, several actions have already been implemented:

- Adjusted job advertisements: We have updated the language and structure of technical job postings to appear more inclusive and neutral.
- Gender balance target: A corporate target has been set that 40% of all new hires should be women.
- Increased awareness in recruitment: Unconscious bias has been discussed with managers and recruiters, and diversity is actively included as a consideration in all hiring decisions.
- Communicating values and culture: Our values related to equality and diversity are consistently highlighted in job postings and in both internal and external communication.

These measures aim to support a more inclusive recruitment process and work environment.

#### **Evaluating impact and adjusting further**

While progress takes time, we have already observed some positive developments:

 A modest increase in female applicants for technical positions has been noted since revising job advertisements.

EN ME ALE

- Recruitment data shows a gradual improvement toward meeting our target of 40% female new hires, though continued effort is needed.
- Topics related to equality and diversity have gained greater visibility in internal discussions, including leadership meetings and employee feedback.

This work is regularly reviewed by HR in collaboration with leadership. Measures are followed up throughout the year and adjusted as needed. Future employee surveys will include more questions on inclusion and equal opportunities.

This is long-term work, and we know there are no quick solutions. Still, we believe that consistent focus, shared responsibility, and engagement from both leadership and employees will help us move toward a more inclusive and representative organisation over time.

#### Maintaining a broad understanding of diversity and inclusion

While we work actively to prevent discrimination on all legally protected grounds, such as gender, ethnicity, age, disability, religion, and sexual orientation, we also recognise that diversity goes beyond compliance.

Diversity across other areas of the organisation is considered relatively strong. Our workforce includes employees from a wide range of nationalities, age groups, and professional backgrounds. We have geologists, mathematicians, engineers, economists, and technologists working side by side each bringing distinct ways of thinking and solving problems. This multidisciplinary approach is a prerequisite for the kind of complex challenges we work on, and it contributes to both innovation and quality in our deliveries. However, we remain aware that an inclusive work environment requires ongoing attention and continued effort across all dimensions of discrimination.

We have not identified specific risks related to ethnicity, religion, or similar grounds for discrimination. This assessment is based not only on available data but also on ongoing dialogue and experience from within the organisation. However, we remain aware that inclusion is not a static outcome, it requires continuous attention, awareness, and a willingness to listen.

We recognise that building and maintaining an inclusive environment is long-term work. There are no quick fixes. But we believe that consistent focus, shared responsibility, and active engagement from both leadership and employees are key to ensuring that everyone feels seen, heard, and valued, regardless of background.