CORCYM
WE TAKE LIFE TO HEART

Global Pay Equity & Transparency Policy

October 2026

Purpose

This Policy defines the commitment of Corcym (the "Company") to pay equity, salary transparency, and total legislative compliance across all global operations. We believe that equal work deserves equal pay. This Policy establishes a standardized framework to achieve compliance with local, national, and international pay transparency laws

Scope

This Policy applies to all full-time, part-time, temporary, and contract employees globally. It governs every stage of the employee lifecycle, including:

- Job postings and recruitment
- Initial compensation offers
- Performance evaluations and merit increases
- Promotions and lateral career movements

Core Commitments

1. Global Pay Equity Strategy

- **Equal Pay for Equal Work:** We compensate employees performing equal work or work of equal value equivalently. We use objective factors to determine pay, including skills, effort, responsibility, and working conditions.
- **Objective Job Evaluation Framework:** We maintain a consistent global job level framework. This framework evaluates roles objectively rather than relying on an employee's historical negotiation leverage.

2. Global Pay Transparency Compliance

We comply with the strictest global transparency standards and regional pay transparency legislation.

- **Job Postings:** Where required by applicable local legislation, external and internal job listings must include a clear, reasonable salary range and a summary of benefits.
- **Salary History Bans:** Recruiters and hiring managers may not request an applicant’s current or past salary history. We base compensation offers on the role's market value and the candidate's experience.
- **Right to Information:** Employees have the right to request information regarding their individual pay level and the average pay levels for categories of workers performing the same work. Employees will have access to Pay Transparency Reports in accordance with Pay Transparency Legislation.
- **Freedom of Disclosure:** We do not restrict employees from discussing their compensation. We prohibit contract clauses that require pay secrecy.

3. Reporting and Remediation

- **Public and Regulatory Reporting:** We calculate and publish gender pay gap metrics in compliance with local mandates.
- **Remediation Protocols:** If a pay equity audit reveals a wage gap exceeding local legal thresholds (such as the EU's 5% variance rule) that cannot be justified by objective criteria, the Company will implement a joint pay assessment and take action to comply with local legal requirements.

Permissible Pay Differentials

Pay differences between employees performing similar roles are only permitted when based on objective, non-discriminatory, and documented criteria:

- Systemic seniority or tenure systems
- Merit-based performance systems measured by objective criteria
- Geographic location and localized cost-of-living adjustments
- Relevant experience, education, qualifications, or specialized certifications

Governance and Accountability

Human Resources

- Review job postings and compensation bands to ensure local compliance.
- Train managers and talent acquisition teams to eliminate bias in pay decisions.
- Manage data collection and submission for regulatory reporting.

Managers and Leaders

- Adhere to established salary bands during hiring and merit cycles.
- Base promotions and performance ratings strictly on objective criteria.

Policy Violations

The Company prohibits retaliation against any employee who inquires about pay transparency, discloses their salary, or reports a suspected pay equity violation. Violations of this policy may result in disciplinary action.