



COMMERZBANK

# Commerzbank London Gender Pay Gap Reporting



September 2023  
(April 2023 data)



# Introduction by our London CEO

In this document, we're reporting on our Commerzbank London gender pay gap (GPG) figures for April 2023, and for the third consecutive year we're reporting earlier than legally required.

We still have a GPG at Commerzbank London, but we're delighted to see progress. Our 2023 GPG results not only show further overall annual improvement in all reporting lines, but also a positive reduction in the pay gap.

In the future, we know there will be fluctuations from year-to-year as we're still implementing a Bank-wide strategic transformation process. This has led to headcount adjustments across all levels of seniority and means fewer senior roles based in London. Our GPG data is, in the majority, driven by the number of women in leadership positions at the Branch so it will be a challenge to achieve our GPG ambitions.

However, we'll continue to action tangible and effective measures to tackle the GPG by implementing and modifying our Branch Diversity and Inclusion strategy to respond to the changing environment. Our commitment to promoting from within remains unchanged and we're determined to strengthen female representation at all management levels across the London Branch.

I'm encouraged by our current figures which show we're on the right path. Diversity plays an integral role in the Bank's sustainability strategy, corporate values and our social responsibility, by continuing to address the imbalance we're strengthening our business and enhancing our culture.

**David Clapham**  
IC Regional Board Member and London CEO



# What is the gender pay gap (GPG)?

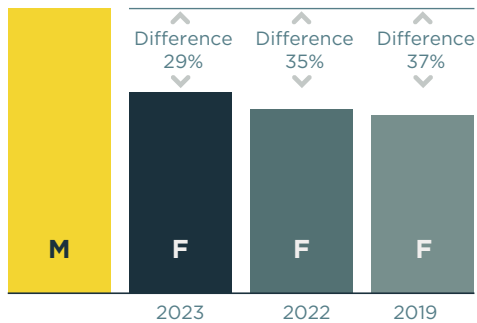
- UK gender pay gap (**GPG**) reporting requirements came into effect in 2017. The GPG is the difference between the **average hourly earnings** of men and women, expressed relative to men's earnings.
- All UK companies over 250 employees are required to annually disclose the mean and median GPG, the mean and median bonus gap, the proportion of males and females receiving a bonus as well as the proportion of males and females by quartile pay band.
- It should be noted that the **GPG isn't the same as an equal pay gap**. GPG is a representation issue, unequal pay is when women are paid less than men for doing the exact same work.
- Why do we have a gender pay gap at Commerzbank London? At Commerzbank London the primary driver for the GPG and bonus gaps is the difference in representation of women and men in the organisation. We have fewer women than men in leadership and management roles in the organisation. Reasons for this include the historical composition of the workforce in financial services. In 2019 we therefore signed up to the Women in Finance Charter to publicly commit to targets to increase the percentage of female leaders in our management team.
- Commerzbank London first published its GPG in April 2018 (data set April 2017).



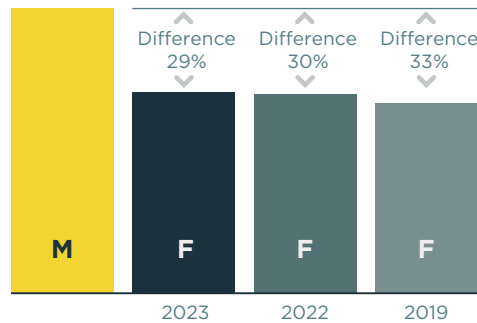
# Commerzbank London Branch Figures. Where are we?

(2023 vs. 2022 & 2019)

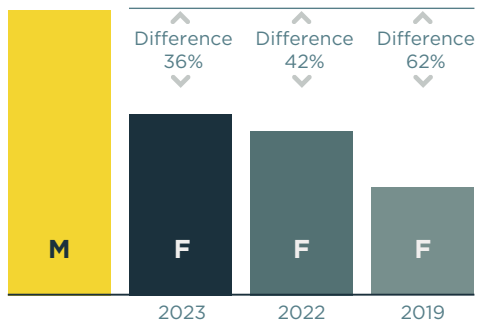
Mean Hourly Rate of Pay Gap



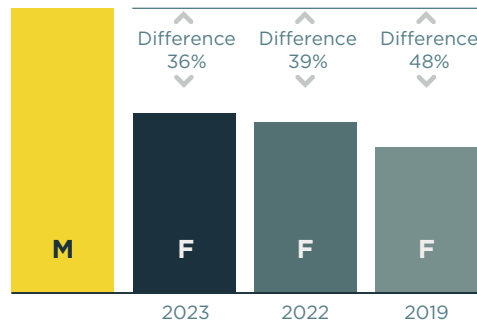
Median Hourly Rate of Pay



Mean Bonus Pay



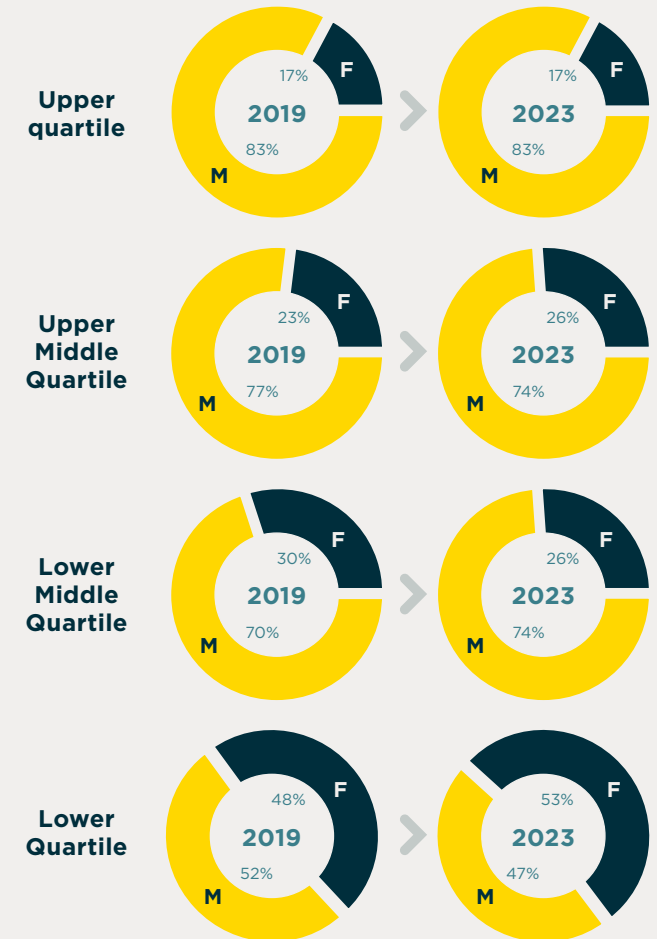
Median Bonus Pay



Data as of April 2023



Proportion of male/female by pay quartile bands:



Female staff moving up the pay quartiles, somewhat distorted by increased hiring of female juniors at the lower quartile.



# What are we doing?

Since we last reported our GPG figures the Branch has appointed a dedicated Diversity and Inclusion Lead to oversee and implement strategic diversity and inclusion projects, ensuring regular reporting and hold London business heads accountable for improving diversity and inclusion in the Branch. We believe we're doing more than ever to achieve results and drive change:

- All Management Committee London members continue to have specific DEI responsibility roles, as senior sponsors for an employee network or DEI project work.
- All London based hiring managers have received mandatory D&I training as part of the roll out of our Best Practice Hiring project during Q4 2022 and Q1 2023.
- We're continuing with our 'social listening tools' such as CEO open hour and in 2023 held a series of inclusion round tables.
- We conducted an in-depth review of the WiFC commissioned Bain Blueprint, which was published to provide financial services firms with practical steps to increase diversity in leadership teams.
- In December 2022, we introduced a London Branch Interview Panel. The panel consists of a diverse group of colleagues from various business units, varying levels of seniority and who are actively engaged in our social responsibility or diversity initiatives.
- Structural changes have meant that we have outsourced our recruitment function earlier this year. It was important to us to ensure that the procurement process included screening for diverse resourcing practices and policies.
- An updated best practice hiring guide was issued to all hiring managers accompanied by an info session.
- Our colleagues participated in the annual London branch culture survey which further deepened our understanding areas we can improve, in which we are performing well and what actions we will take next.
- We've promoted our new shared parental leave policy introduced in 2022 and maintained the hybrid working policy.
- We've once again published our GPG ahead of the required deadline and are pleased to see some significant progress in 2023, especially when compared to 2019 when we signed up for the WiFC.



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