



COMMERZBANK

Commerzbank London Gender Pay Gap Reporting



April 2024 Data

Introduction by our London CEO



In this document, we're reporting on our Commerzbank London gender pay gap (GPG) figures for April 2024, and we're again reporting earlier than legally required.

We still have a GPG at Commerzbank London largely due to having fewer women than men in leadership and management roles. Fluctuations are expected from year-to-year, however, the momentum we witnessed in last years' report hasn't continued during this reporting period.

GPG reporting first became mandatory for all companies in the UK with over 250 employees in 2018 (for data April 2017). Since then, the implementation of structural and strategic changes at Commerzbank, has led to headcount adjustments generally, but also across all levels of seniority, which has resulted in fewer senior roles based in London. This has impacted our GPG data. Although, the longer-term trend in our GPG remains positive.

Throughout our structural changes, we've retained many more senior level females in relative terms. We continue to attract female talent in our junior intake which will help us in the longer-term to build a pipeline of future female leaders and develop a more diverse workforce. We'll continue to action tangible and effective measures to tackle the gap.

Commerzbank's 2027 Strategy, clearly defines our responsibility to current and future staff and to be an attractive employer. As a Branch, we pledge to create an environment where growth and success are inevitable. With this in mind, we've reviewed our Women in Leadership Target increasing it to **30% of Women** in Leadership Positions by 2030. We've committed to this with concrete action planning and progress monitoring. This will help us to narrow London's GPG and is confirmation that we want to strengthen female representation.

Diversity and inclusion play an integral role in the Bank's sustainability strategy, corporate values and our social responsibility, and is vital to achieving our business goals as well as enhancing a positive corporate culture.

We're not standing still!

David Clapham, IC Regional Board Member and London CEO



What is the GPG?



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 average and mean earnings** of men and women, expressed relative to men's earnings. Reporting is required hourly pay, bonus pay and gender representation in pay quartiles.
- 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 equality pay gap**. GPG is a representation issue, unequal pay is when women are paid less than men for doing the exact same work.
- The primary driver for the GPG and bonus gaps is the difference in representation of women and men in an organisation.



		Commerzbank London Gender Pay Gap	2017	2023	2024
			%	%	%
Hourly Pay	Diff Mean Hourly %		36	29	33
	Diff Median Hourly %		34	29	38
			%	%	%
Bonus Pay	Diff Mean Bonus%		55	36	33
	Diff Median Bonus %		39	36	33
			%	%	%
Bonus Paid	Male Bonus %		96	100	100
	Female Bonus %		99	100	100
			%	%	%
Pay Quartiles	Male Top Quartile		86	83	82
	Female Top Quartile		14	17	18
	Male Upper Middle Quartile		79	74	71
	Female Upper Middle Quartile		22	26	29
	Male Lower Middle Quartile		75	74	77
	Female Lower Middle Quartile		25	26	23
	Male Lower Quartile		56	47	44
	Female Lower Quartile		44	53	56

Commerzbank London GPG Data

- The primary driver for the GPG and bonus gaps is the difference in representation of women and men in the organisation.
- Commerzbank London's Gender Pay Gap** data is narrowing over the longer term, though we recognise that year on year we have witnessed a set back (See hourly pay data).
- We have fewer women than men in leadership and management roles. We set ambitious targets for increasing female representation in our leadership cohort. In 2019 we signed up to the Women in Finance Charter to publicly commit to targets to increase the percentage of female leaders in our management team.
- There is and remains lower representation of women in financial services, specifically in business units which compose the largest employee populations in our branch (Capital Markets and Technology). Our efforts to attract female talent and to retain those already in our organisation continues.
- We have succeeded to retain and promote more women into leadership positions against a backdrop of historic structural change: a 4% increase of female representation in the top pay quartile in 2024 (18%) vs 2017 (14%).
- The lower pay quartile data change (2017: 44% female staff in lower pay quartile vs 2024: 56%) reflects our success in attracting a more gender balanced junior cohort and will lay the foundations for building a pipeline of future female leaders in financial services

What are we doing and how do we move forward?



Our Gender Pay Gap Reporting:

- Reported annually and provides an opportunity to highlight potential challenges and progress. We continue to implement a significant number of initiatives to help us progress since first reporting and signing the Women in Finance Charter in 2019.
- We maintain the full engagement from our senior branch management team, enhanced our regular Diversity and Inclusion metrics, communicate our goals and share information about who we are as a branch.
- We devised best practice hiring guidelines, outsourced recruiting, established the London Branch Interview Panel, measure our performance against external benchmarks, continue with the mentoring programs, witness ever more increased engagement from staff in our culture survey. Our voluntary diversity data disclosure rates have also increased to an all time high.
- We enjoy high levels of employee engagement in diversity and corporate and social responsibility initiatives despite lower staff levels and we often demonstrate our creativity through innovation in this space. **We are not standing still!**



01

Commerzbank's corporate strategy – Moving Forward – firmly positions diversity and inclusion at the center of our strategic approach.



02

In 2024 the London CEO office initiated a branch-wide succession planning management exercise for senior management, specific considerations of which will include the overall diversity of our senior management population.



03

The overwhelming majority of our staff is content with our current flexible working provisions. We monitor this through our annual culture survey.



04

During 2024 we incorporated questions on inclusion into our annual culture survey.



05

We have implemented an enhanced shared parental leave policy during 2024.



06

The 2024 London Branch Culture Survey noted record staff participation with an encouraging level of positive responses. We are implementing a number of resulting actions, including initiatives for career progression, including ideas generated by our Early Talent Network.



07

MI continues to be regularly reported and enhanced as required. Along side medium term targets, interim targets for WiLP have been set and performance will continue to be monitored regularly to ensure we remain on track. We monitor hiring statistics from advertising to recruitment through the London Branch Interview Panel and HR.



08

A Deep Dive into our Women in Leadership Data was conducted. Our existing measures will continue to operate into the new target period (2030), but we will supplement these with additional actions in cooperation with business heads, HR and our D&I lead to ensure that we achieve our ambitious new targets.



09

At the start of 2024 we amalgamated all our ESG and DEI workstreams under a single "Diversity Inclusion Social Responsibility Council", affording greater cooperation and coordination across all workstreams to promote greater visibility on intersectionality.



10

Our gender focused network has introduced career and skills training for mid career level female staff and further skills workshops and training will continue to play an important part in achieving our goals.

We are determined to achieve our goals and strive to create an environment where growth and success are inevitable. Our Moving forward strategy clearly defines our responsibility to current and future staff and to be an attractive employer.



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