

FAQs on reports on benchmarking of diversity practices (hereinafter referred to as diversity benchmarking) under the EBA Guidelines EBA/GL/2023/08

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Changes vis-à-vis the version of 22 January 2025 are indicated by a bar on the left-hand side.

General information

The diversity benchmarking forms are directed at CRR credit institutions and (medium-sized and large) investment institutions alike, with all reporting institutions¹ being required to use the same forms.

Reports pursuant to the Banking Act (*Kreditwesengesetz – KWG*) are based on the definitions in the Banking Act and the Remuneration Regulation for Institutions (*Institutsvergütungsverordnung*); reports pursuant to the Investment Institutions Act (*Gesetz zur Beaufsichtigung von Wertpapierinstituten – WpIG*) are based on the definitions in the Investment Institutions Act and the Remuneration Regulation for Investment Institutions (*Wertpapierinstituts-Vergütungsverordnung*).

As a rule, complete all the forms. However, it may be the case that certain forms cannot be filled in properly. In such instances, please refer to the supplementary information below.

1. What types of numerical values should be entered in the forms?

- Enter data points of the “monetary” data type in euro; decimal places are permitted.
- Report data points of the “percentage” data type to a minimum precision of four decimal places. For example, the value 63.72% would be reported as “0.6372” or “63.72%”, depending on the XBRL software.
- Report data points of the “integer” data type as whole numbers, i.e. with no decimal places.

2. What exchange rate should be used for remuneration in currencies other than euro?

Where data are reported by firms reporting financial figures in a currency other than euro, the exchange rate used by the European Commission for fiscal and budgetary planning for December of the reporting year shall be used to convert the data to be transmitted.²

¹ Only a restricted group of institutions consisting of CRR credit institutions and medium-sized and large investment institutions is subject to reporting requirements.

² https://commission.europa.eu/funding-tenders/procedures-guidelines-tenders/information-contractors-and-beneficiaries/exchange-rate-infoeuro_en

3. What data should the report be based on?

For institutions whose financial year corresponds to the calendar year, the report is likewise based on data as at the reporting date (31 December 2024).

If institutions have a financial year that differs from the calendar year, the data on which the report is based depend on the type of data. For financial information (forms R 13.00.a and .b and R 23.00), use the end of the financial year preceding the reporting date (31 December 2024), e.g. 31 March 2024 or 30 September 2024.

The reporting date for qualitative data (all other forms) is the end of the calendar year (31 December 2024). This also means that members of the management board or the administrative or supervisory board who have left during the year should not be included in the report.

R 13.00.a and .b – Corporate information

4. How should the field “Category of institution” (row 0110) be completed?

Classification is based on the type of institution and its total assets. Investment institutions must always select the category “investment firms” and credit institutions must select the size category that applies to them as at the reporting date or, in the case of a different financial year, as at the end of the last completed financial year (see question 3). The selected category must match the total assets reported in row 0070.

5. For reporting purposes, what is considered a significant institution (row 0120)?

For reporting purposes, significant institutions are those institutions that meet the definition contained in Section 1(3c) of the Banking Act as well as those institutions that, on account of their size, internal organisation and the nature, scope, complexity and risk content of their transactions are required to set up a nomination committee pursuant to Section 25d(7) and (11) of the Banking Act,.

Medium-sized investment institutions must select the option “no” here.

R 14.00 and R 16.00 – Management board members and administrative or supervisory board members by age and gender

6. What should be kept in mind when transmitting data on management board members and administrative or supervisory board members?

- a. In rows where information on the chairperson of the management board should be entered, enter information on that person only. Report information on the vice-chair as a “regular” member of the management board.

Should no member of the management board have the role of chairperson, leave the rows for information on the chairperson of the management board blank.

- b. In rows where information on the chairperson of the administrative or supervisory board should be entered, enter information on that person only. Report information on the vice-chair as a “regular” member of the administrative or supervisory board.

Should no member of the administrative or supervisory board have the role of chairperson, leave the rows for information on the chairperson of the administrative or supervisory board blank.

- c. In an institution with a 1-Tier governance system (e.g. Europäische Gesellschaft SE), report executive members of the management body as members of the management board for reporting purposes. If external executive directors have been appointed, also report these as members of the management board. For reporting purposes, only assign the member of the management body who holds the position of chairperson in such a system to the management board and report them as chairperson of the management board if said member is an executive member. Otherwise, leave the rows for information on the chairperson of the management board blank.

Assign non-executive members to the administrative board. Provide information on the chair as per the provisions set out in point b.

For reporting purposes, it is not possible to assign a member of the management body to both the management board and the administrative board.

These modalities should also be applied to the calculation of the gender pay gap in form R 23.00.

R 15.00 – Composition of the committees of the administrative or supervisory board

7. What should be kept in mind when it comes to information on the composition of committees?

Enter information on the committees set up within the institution. If combined committees have been set up, it is not possible to provide information on the individual committees separately. The same applies the other way around. Enter data in whole numbers. For example, if a risk committee has five members in addition to the chairperson, enter the number of these five members who are male, female or non-binary in row 0020.

R 17.00 and R 18.00 – New members of the management board and the administrative or supervisory board

8. What years should be considered in the aforementioned forms (reporting period)?

Consider the three calendar years directly preceding the reporting date. As at the reporting date 31 December 2024, these are the years 2022 to 2024. The same concept applies in the case of financial years that differ from the calendar year.

9. What happens if no new member has been appointed to the management board or the administrative or supervisory board in the reporting period (see question 8)?

If no new member has been appointed for one, or both, boards during the reporting period, enter a "0" in the relevant form in the last row (row 0040 for R 17.00, row 0070 for R 18.00).

The forms as such must nevertheless always be submitted.

10. How should the term “newly appointed” be understood in the case of mergers?

In the case of mergers of two institutions, one of which loses its legal independence, the original members of the management board and the administrative or supervisory board of the remaining institution are not deemed to be newly appointed. If, after the merger, individuals from the acquired institution become members of the management board or the administrative or supervisory board of the new merged institution, they are deemed to be newly appointed members.

R 19.00 Business activities by region and geographical origin

11. How should form R 19.00 be completed?

Fill out the form in full. Possible response options are “yes”, “no” and “not applicable”. If no information can be entered in a row, e.g. because the administrative or supervisory board does not include any staff representatives, select “not applicable”.

Specify the regions in which the institution operates in row 0010. In addition to any subsidiaries and branches, this also includes significant business activities in the respective regions. EU parent institutions should take into account the scope of all the group’s business activities.

The geographical origin of the members of the management board and the administrative or supervisory board refers to a minimum of three years’ residence for educational or professional purposes. Only report experience acquired prior to their assumption of their current position. Multiple regions can also be selected for a person if required.

R 20.00 – Educational background of the management board members and administrative or supervisory board members

12. What type of education should be entered here?

This form is for reporting the educational background of all members of the management board and the administrative or supervisory board. Each qualification counts as “1”, meaning that higher numbers can also be reported in a row if qualifications fall into the same category for multiple members. (For example, if three management board members passed a state examination in law, the number 3 would be entered in column 0010, row 0010.)

In rows 0010 to 0050 of this form, enter all completed post-secondary educational qualifications from universities, technical colleges, vocational academies, etc. (i.e. doctorate, master’s degree, bachelor’s degree or equivalent). Take into account multiple qualifications obtained by a member of the management board or the administrative or supervisory board (if applicable). The sum of the figures reported in each column can therefore be greater than the number of members in the group of individuals to which the respective columns apply.

Row 0060 is for taking into account completed banking training or a completed banking apprenticeship (of two to three years in each case) with a passed examination at a commercial college (e.g. IHK qualification). A corresponding qualification from a different sector can be entered in row 0070.

R 21.00 – Professional background of the management board members and administrative or supervisory board members

13. What type of professional background is relevant for this form?

For reporting purposes, professional background refers to a minimum of three years' professional activity in each area listed. Only report experience acquired prior to their assumption of their current position.

As in R 20.00, enter the number of individuals with the corresponding background in each row of this form.

R 22 – Diversity strategy

14. What should be kept in mind when filling out form R 22.01 (nomination and gender diversity)?

This form contains fields that must always be filled in and fields that only need to be filled in if your institution has a diversity strategy.

Mandatory fields include rows 0010, 0020, 0080, 0090, 0100, 0110 and 0120. These are yes/no questions which all reporting institutions must answer.

The remaining rows (0040, 0050, 0060, 0070, 0130 and 0140) should only be filled in if the institution has a diversity strategy (i.e. the answer in row 0020 is "yes").

15. How should forms R 22.02 and R 22.03 be completed if an institution has no diversity strategy or its diversity strategy is only qualitative?

Due to technical requirements, all forms that are part of the diversity report must be submitted (Filing Indicator = True).

However, if an institution does not have a diversity strategy, proceed as follows for forms R 22.02 and R 22.03:

In R 22.02, enter a "0" in row 0010, column 0010. Leave the remaining fields blank.

In R 22.03, select the option "no" in all rows in column 0010. Leave the remaining fields blank.

If the diversity strategy does not contain quantitative objectives, instead only containing qualitative objectives, fill in form R 22.02 in the same way as specified above. In this case, information on qualitative objectives should be provided in R 22.03.

16. What should be kept in mind when completing form R 22.02 if an institution has a (quantitative) diversity strategy?

If an institution only has a percentage diversity target, enter the target quota in row 0010. Only values between 0% and 100% are permitted (e.g. 50% should be entered as "0.50" or "50.00%" depending on the software). Row 0020 should be left blank in this case. Target achievement in row 0030 should be recorded in terms of compliance with the percentage target.

If the diversity strategy specifies a minimum number of the underrepresented gender instead of a percentage target, leave row 0010 blank. The target for the

underrepresented gender (e.g. “2”) should be entered in row 0020. Record achievement of the target minimum number in row 0030.

If an institution has both a percentage target and a minimum number for the underrepresented gender, the corresponding information should be entered in rows 0010 and 0020. When entering target achievement in row 0030, total fulfilment is important, i.e. in the case of a two-part target, both targets must be met at the reporting date in order to answer “yes”. If only one of the objectives has been met, answer “no” in row 0030.

R 23.00 – Gender pay gap

17. How is annual remuneration calculated for members of the management board?

Form R 23.00 covers remuneration for all assessment periods that ended in the previous financial year. For the reporting date 31 December 2024, this includes the fixed remuneration for 2024 and the variable remuneration for (performance in the year) 2024, even where variable remuneration is not decided and granted until 2025, and, where applicable, variable remuneration for assessment periods spanning several years ending in 2024 (see point c).

When calculating the sum of fixed and variable remuneration, the following aspects should be taken into account:

- a. Non-monetary benefits (e.g. company cars, interest-free loans, free company childcare) are to be included at their taxable monetary value.
- b. Regular employers’ contributions to social security funds and to employment promotion are not to be included. The same applies to employers’ contributions to company pension schemes if they are allocated to fixed remuneration. However, voluntary supplementary pension benefits, which count as variable remuneration, are to be included.
- c. Variable remuneration is to be allocated to the reporting year for which it is granted. Variable remuneration based on assessment periods spanning several years shall be allocated, in its total amount, to the reporting year in which the assessment period ended. This also includes variable remuneration based on non-revolving multi-year performance periods. Remuneration paid out in the financial year under review but already granted in previous years should not be included.
- d. Do not include guaranteed variable remuneration (sign-on bonuses) and severance payments in the calculation. Disregard one-off payments due to employment milestones, tax-free inflation compensation and overtime.
- e. In principle, remuneration shall be based on full-time employment (FTE) for the entire year. This means that remuneration for (i) members who were employed part-time for the entire financial year or part of it, (ii) members who were not employed for the entire financial year or (iii) those who were partly absent for reasons other than regular leave during the financial year (e.g. unpaid leave or parental leave) must be scaled up to a full annual amount of variable and fixed remuneration – i.e. as if these members had received full-time remuneration for the entire financial year (for example, the remuneration of a part-time member

working 50% would be multiplied by a factor of 2 to calculate their annual full-time remuneration).

18. How is remuneration calculated for members of the administrative or supervisory board?

Depending on the form of remuneration, use either the entire annual remuneration for the previous financial year (a.) or only the fee per meeting (b.).

- a. The total remuneration for participation in meetings of the administrative or supervisory board for a given financial year must only be taken into account if this also includes non-monetary benefits (e.g. company cars, interest-free loans, free company kindergarten). These benefits are to be included at their taxable monetary value.
- b. If members of the administrative or supervisory board (including staff representatives) receive remuneration for their function as members of the administrative or supervisory board exclusively in the form of meeting fees (daily lump sums or expenses allowances are also possible), the flat rate for one meeting shall be used to calculate the gender pay gap. The number of days for which remuneration was paid in the financial year is irrelevant.

Fees for participation in committees shall not be included in the remuneration for administrative or supervisory board members.

19. What remuneration should be recorded for staff representatives?

In the case of staff representatives on the administrative or supervisory board, only include remuneration associated with activities related to employee representation on the administrative or supervisory board. "Regular" remuneration for other activities at the institution should be excluded.

20. How should members of the management board or the administrative or supervisory board who have left their post during the year be treated?

Do not include members of the management board or of the administrative or supervisory board who have left during the financial year in question when calculating the gender pay gap.

21. How is the gender pay gap calculated?

The gender pay gap is calculated using the following formulae:

For the mean value (Ø):

Gender pay gap as a percentage =

$$\frac{(\text{Ø remuneration of men} - \text{Ø remuneration of women}) * 100}{\text{Ø remuneration of men}}$$

For the median:

Gender pay gap as a percentage =

$$\frac{(\text{median remuneration of men} - \text{median remuneration of women}) * 100}{\text{median remuneration of men}}$$

For the calculation of the gender pay gap between male and non-binary members of the management board or of the administrative or supervisory board, the values for women from the above formulae should be replaced with the values for non-binary members.

All values should be entered by converting the percentage value (calculated to two decimal places) into a decimal (e.g. "0.1723", or "-0.1723" for negative values). However, depending on the software, entering a percentage, e.g. 17.23%, may also be required.

If the gender pay gap for a category cannot be calculated because there are only male members, the result should be 100%, i.e. "1"; if there are only female or non-binary members, leave this data point blank.

22. What should be done if variable remuneration for the relevant reporting date has not yet been finalised before the report is submitted?

The gender pay gap should be calculated using the best available information ("best effort"), so the proposed variable remuneration should be used.

If you have any further questions regarding diversity benchmarking, please contact

B-remuneration-reporting@bundesbank.de.

Sample calculation for the gender pay gap

a. Remuneration of members of the management board including chairperson (sorted in ascending order):

| | |
|-----------------|-------------------|
| Man 1: €100,000 | Woman 1: €150,000 |
| Man 2: €120,000 | Woman 2: €175,000 |
| Man 3: €380,000 | Woman 3: €180,000 |
| | Woman 4: €180,000 |

Median remuneration for men: €120,000

Median remuneration for women: (€175,000 + €180,000) / 2 = €177,500

Average remuneration for men: (€100,000 + €120,000 + €380,000) / 3 = €200,000

Average remuneration for women: (€150,000 + €175,000 + €180,000 + €180,000) / 4 = €171,250

Gender pay gap

Median (row 0010, column 0010): $\frac{120,000 - 177,500}{120,000} * 100\% = -47.92\%$

Average (row 0010, column 0020): $\frac{200,000 - 171,250}{200,000} * 100\% = 14.38\%$

b. Remuneration of members of the management board excluding chairperson (sorted in ascending order):

| | |
|-----------------|-------------------|
| Man 1: €100,000 | Woman 1: €150,000 |
| Man 2: €120,000 | Woman 2: €175,000 |
| | Woman 3: €180,000 |
| | Woman 4: €180,000 |

Median remuneration for men: (€100,000 + €120,000) / 2 = €110,000

Median remuneration for women: (€175,000 + €180,000) / 2 = €177,500

Average remuneration for men: (€100,000 + €120,000) / 2 = €110,000

Average remuneration for women: (€150,000 + €175,000 + €180,000 + €180,000) / 4 = €171,250

Gender pay gap

Median (row 0020, column 0010): $\frac{110,000 - 177,500}{110,000} * 100\% = -61.36\%$

Average (row 0020, column 0020): $\frac{110,000 - 171,250}{110,000} * 100\% = -55.68\%$