



Instructions to assist completion of the High Earners Report

1) Financial year for which the remuneration is awarded

A *firm's* financial year should be designated by reference to the calendar year in which it ends. For example, if a *firm's accounting reference date* is 31 March, the financial year that begins on 1 April 2014 and ends on 31 March 2015 will be the *firm's* 2015 financial year.

2) Consolidation

A firm that is a Capital Requirements Regulation (CRR) firm responsible for consolidation must complete that report on a consolidated basis in respect of remuneration awarded in the last completed financial year to all high earners who mainly undertook their professional activities within the EEA at:

- a) the EEA parent institution, EEA parent financial holding company or the EEA parent mixed financial holding company of the UK consolidation group;
- b) each consolidation group entity that has its registered office (or if it has no registered office, its head office) in an EEA State; and
- c) each branch of any other consolidation group entity that is established or operating in an EEA State.

3) Currency

The firm must ensure that the information in the High Earners Report is denominated in euro, determined by reference to the exchange rate used by the European Commission for financial programming and the budget for December of the reported year.

http://ec.europa.eu/budget/contracts_grants/info_contracts/inforeuro/inforeuro_en.cfm.

All amounts should be reported as full amounts in euro, i.e. not as rounded amounts, (e.g.

EUR 1,234,567.00 instead of EUR 1.2 million).**4) Information to be collected**

- a) A separate set of data should be provided for each EEA state in which high earners are located and for each payment bracket of EUR 1 million (e.g. EUR 1 million to less than EUR 2 million; EUR 2 million to less than EUR 3 million, etc.).
- b) The number of high earners should be reported as the number of natural persons (headcount), independent of the number of working hours on which their contract is based.
- c) High earners should be classified under the EEA state, function or business area and responsibility where they carry out the predominant part of their business activities. The full amount of remuneration awarded to the relevant high earner within the group or institution should be reported under this EEA state, function or business area and responsibility. If the predominant areas for one high earner have the same weight, the institution should allocate the high earner and his or her remuneration taking into account the allocation of other high earners, so that the report best reflects the distribution of high earners within the institution. For each



high earner, figures should only be reported once and the full amounts should be assigned to one EEA state, one function or business area and responsibility only.

- d) High earners who carry out professional activities both within and outside the EEA should be classified under an EEA state only if they undertake the predominant part of their professional activities within the EEA. Otherwise, figures should not be reported.
- e) A nil return should be submitted for all institutions that do not have any high earners in their EEA scope of consolidation. No further additional data should be submitted.

5) Data elements

These are referred to by row first and then by column, so data element 4A will be in row 4 and column A.

6) Separate templates

One template should be completed for each EEA member state in which the group is operating and for each remuneration bracket of EUR 1million within that EEA member state. **7) Definitions**

For the purpose of completing the High Earners Report, the following terms are defined:

MB Supervisory Function

Members of the management body in its supervisory function. This includes non-executive directors of any board in the scope of consolidation, according to Article 3(1)(8) of Directive 2013/36/EU. Members should be assigned to this category taking into account point 4.c above. Attendance fees should be reported as remuneration.

MB Management Function

Members of the management body in its management function according to Article 3(1)(7) of Directive 2013/36/EU who have executive functions within the management body; this includes all executive directors of any board in the scope of consolidation.

Investment Banking

Include corporate finance advice services, private equity, capital markets, trading and sales.

Retail Banking

Include total lending activity (to individuals and enterprises).

Asset Management

Include portfolio management, managing of *UCITS* and other forms of asset management.

Corporate Functions

All functions that have responsibilities for the whole institution at the consolidated level and for subsidiaries with such functions at the solo level, e.g. Human Resources, IT.



Independent Control Functions

Staff active in the independent risk management, compliance and internal audit functions as described in the EBA's guidelines on internal governance. Such reporting requirements should apply to these functions at the consolidated level and for subsidiaries with such functions at the solo level.

All Other

Staff who cannot be mapped into one of the other business areas, indicate in row 27A the function of such staff members

Senior management

Senior management as defined in Article 3(9) of Directive 2013/36/EU.

Control Functions

Control functions comprise control functions within the business units and the independent compliance, risk control and internal audit function.

Identified Staff

Staff whose professional activities have a material impact on the institutions' risk profile under Article 92(2) of Directive 2013/36/EU (for data relating to the performance year 2013 under Annex V section 11(23) of Directive 2006/49/EU as amended by Directive 2010/76/EU).

Fixed remuneration

Fixed remuneration includes payments, proportionate regular (non-discretionary) pension contributions or benefits (where they are without consideration of any performance criteria).

Variable remuneration

Variable remuneration includes additional payments or benefits depending on performance or, in exceptional circumstances, other contractual elements but not those which form part of routine employment packages (such as healthcare, childcare facilities or proportionate regular pension contributions). Both monetary and non-monetary benefits should be included. Amounts should be reported gross, without any reduction due to the application of the discount rate for variable remuneration for the categories of total variable remuneration, variable in cash, variable in shares and share-linked instruments, and variable in other types of instruments.

Variable remuneration in other types of instruments

Instruments in accordance with Article 94(1)(l)(ii) of Directive 2013/36/EU.

Deferred remuneration

Deferred remuneration in accordance with Article 94(1)(m) of Directive 2013/36/EU. Amounts should be reported gross, without any reduction due to the application of the discount rate for deferred variable remuneration for the categories of total deferred variable remuneration, deferred



variable in cash, deferred variable in shares and share-linked instruments, and deferred variable in other types of instruments.

Deferred variable remuneration in other types of instruments

Instruments referred to in Article 94(1)(l)(ii) of Directive 2013/36/EU.

Discretionary pension benefits

As defined in Article 3(53) of Directive 2013/36/EU.

8) Specific background information on data fields

Field	Field Name	Background information on data fields
4A	EEA State	One template should be completed for each EEA member state in which the group is operating and for each remuneration bracket of EUR 1million within that EEA member state.
5-A-B	Payment bracket	One template should be completed for each remuneration bracket of EUR 1million within an EEA member state.
6A-H	Number of individuals in senior management	Senior management as defined in Article 3(9) of Directive 2013/36/EU. Numbers should be reported as the number of natural persons (headcount), independent of the number of working hours on which their contract is based.
7A-H	Number of individuals in control functions	Control functions comprise control functions within the business units and the independent compliance, risk control and internal audit function. Numbers should be reported as the number of natural persons (headcount), independent of the number of working hours on which their contract is based.
10A-H	Total number of High Earners of which are identified Staff	Staff whose professional activities have a material impact on the institutions' risk profile under Article 92(2) of Directive 2013/36/EU (for data relating to the performance year 2013 under Annex V section 11(23) of Directive 2006/49/EU as amended by Directive 2010/76/EU).
11A-H	Total Fixed Remuneration	Fixed remuneration includes payments, proportionate regular (non-discretionary) pension contributions or benefits (where they are without consideration of any performance criteria).
15A-H	Total Variable Remuneration	Variable remuneration includes additional payments or benefits depending on performance or, in exceptional circumstances, other contractual elements but not those which form part of routine employment packages (such as healthcare, childcare facilities or proportionate regular pension contributions). Both monetary and non-monetary benefits should be included. Amounts should be reported gross, without any reduction due to the application of the discount rate for variable remuneration for the categories of total variable remuneration, variable in cash, variable in shares and share-linked instruments, and variable in other types of instruments.



18A-H	Variable in other types of instruments	Instruments in accordance with Article 94(1)(l)(ii) of Directive 2013/36/EU.
19A-H	Total amount of variable remuneration awarded in year which has been deferred	Deferred remuneration in accordance with Article 94(1)(m) of Directive 2013/36/EU. Amounts should be reported gross, without any reduction due to the application of the discount rate for deferred variable remuneration for the categories of total deferred variable remuneration, deferred variable in cash, deferred variable in shares and share-linked instruments, and deferred variable in other types of instruments.
22A-H	Deferred variable in other types of instruments in year	Instruments referred to in Article 94(1)(l)(ii) of Directive 2013/36/EU.

Additional information regarding the amount of total variable remuneration

Field	Field Name	Background information on data fields
24,25,26A-H	Severance payments, Contributions to discretionary pension benefits; and amounts awarded for multi-year periods.	The reporting of additional information on variable remuneration reported in these fields (24-26) should also be included in the total variable remuneration (field 15 A-H)
25A-H	Total amount of contributions to discretionary pension benefits in year	As defined in Article 3(53) of Directive 2013/36/EU.

Supplementary Information

Field	Field Name	Background information on data fields
27	Staff categorised as 'all other'	Staff which cannot be mapped into one of the other business areas, please provide the business area concerned in this field.