



Instructions to assist completion of the Remuneration Benchmarking 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 2015, 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 to all employees of all consolidation group entities in the last completed financial year.

3) Reference year of data collected and currency conversion

- a) Data should be submitted using accounting year-end figures in EUR. All amounts should be reported as full amounts, i.e. not rounded amounts, in euro (e.g. EUR 1 234 567 instead of EUR 1.2 million). Where remuneration is disclosed in a currency other than EUR, the exchange rate used by the Commission for financial programming and the budget for December of the reporting year should be used for the conversion of the consolidated figures to be reported¹.
- b) Data should comprise fixed and variable remuneration awarded for performance during the performance year preceding the year of submission of the information.
- c) Remuneration awarded based on multi-year accrual periods that do not revolve on an annual basis, i.e. where institutions do not start a new multi-year period every year, should be fully allocated to the performance year in which the remuneration was awarded, without consideration of the point in time when the variable remuneration is effectively paid. These amounts should be reported separately to allow a further analysis of fluctuations of the variable remuneration and should not be deducted from the amount of variable remuneration reported.
- d) The information to be provided on ex-post adjustments (which adjusts remuneration for crystallisation of specific risks events), including clawback and malus, refers to the application of these arrangements for remuneration already awarded. These amounts should be reported separately and should not be deducted from the amount of variable remuneration reported.
- e) Only the amounts of variable remuneration awarded in the performance year should be reported as deferred. Deferred variable remuneration for previous periods that has not yet vested should be reported separately.
- f) Where numbers should be reported in terms of the headcount, the number of natural persons should be entered independent of the number of working hours on which their contract is based. Where numbers should be reported in terms of the full-time equivalent, the number should be based on the percentage of time that a staff member is employed compared to a full-time contract.
- g) Staff should be classified under the function or business area where they carry out the predominant part of their business activities. The full amount of their remuneration awarded to that staff member within the group or institution should be reported under this function or business area.

4) Data elements

Data elements are referred to by column first and then by row, so data element C3 will be in column C and row 3.



5) Definitions

For the purpose of completing the Benchmarking 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 g 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.

- **Senior management**
 Senior management as defined by point 9 of Article 3(1) of Directive 2013/36/EU.

- **Identified Staff**
 Staff whose professional activities have a material impact on the institutions risk profile according to Article 92(2) of Directive 2013/36/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**
 Cash or instruments in accordance with Article 94(1)(l) Directive 2013/36/EU.

- **Deferred variable remuneration in other types of instrument**
 Instruments referred to in 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.

- **Discretionary pension benefits**
 As defined under Article 3(53) of Directive 2013/36/EU.

6) Specific background information on rows

Information on remuneration of all staff

Row	Row Name	Background information on row
3	Number of staff (headcount)	Number of members of the management body in its supervisory function.



		Number of members of the management body in its management function.
4	Total number of staff in (FTE)	The total number of staff should be expressed in full time equivalents (FTE) and be based on year end numbers.
5	Total net profit in year N (in EUR)	Net profits should be based on the accounting system used for regulatory reporting. For groups, it is the profit (or loss) based on the consolidated accounts.
6	Total Remuneration (in EUR)	Total remuneration comprises the fixed and variable remuneration. The amounts of remuneration provided should be gross numbers, including all costs for the institutions, except mandatory contributions by the institutions to social security and comparable schemes.
7	Total Remuneration of which: variable remuneration (in EUR)	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.

Information on remuneration of identified staff

Row	Row Name	Background information on row
8	Members of management body (headcount)	Number of natural persons; year-end numbers.
9	Number of identified staff (FTE)	Staff whose professional activities have a material impact on the institutions risk profile according to Article 92(2) of Directive 2013/36/EU (identified staff); year-end numbers.
10	Number of identified staff in senior management positions	Senior management as defined by point 9 of Article 3(1) of Directive 2013/36/EU; year-end numbers.
11	Total fixed remuneration (in EUR)	Fixed remuneration includes payments, proportionate regular (non-discretionary) pension contributions, or benefits (where they are without consideration of any performance criteria).
15	Total variable remuneration (in EUR)	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.
18	Total variable remuneration of which: variable in other types of instruments	Cash or instruments in accordance with Article 94(1)(l) Directive 2013/36/EU.
19	Total amount of variable 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



	awarded in year N which has been deferred (In EUR)	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.
22	Total amount of variable remuneration awarded in year N which has been deferred of which: deferred variable in other types of instruments in year N	Instruments referred to in Article 94(1)(l)(ii) of Directive 2013/36/EU.

Additional information regarding the amount of total variable remuneration

Row	Row Name	Background information on row
23	Total amount of outstanding deferred variable remuneration awarded in previous periods and not in the year N (in EUR)	This position includes the deferred variable remuneration which was awarded in previous periods and which has not yet vested. Amounts should be reported gross, without any reduction due to the application of the discount rate for deferred variable remuneration.
24	Total amount of explicit ex post performance adjustment applied in year N for previously awarded remuneration(In EUR)	Explicit ex post performance adjustment in accordance with Article 94(1)(n) of Directive 2013/36/EU.
25	Number of beneficiaries of guaranteed variable remuneration (new sign-on payments)	Guaranteed variable remuneration in accordance with Article 94(1)(d) of Directive 2013/36/EU.
31	Total amount of contributions to discretionary pension benefits (In EUR) in year N	As defined under Article 3(53) of Directive 2013/36/EU.

Information on identified staff remunerated EUR 1 million or more in year

Row	Row Name	Background information on row
33-46	Total	Number of natural persons within the category 'identified staff



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	remuneration payment band (in EUR)	remunerated EUR 1 Million or more per financial year'.
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