



## POLISH BANK ASSOCIATION

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European Banking Authority

Warsaw, 21 January 2021

*Comments to Consultation Paper on Draft EBA Guidelines on Sound Remuneration Policies under Directive 2013.36.EU*

Dear Sirs,

Enclosed please find comments to the above document collected by Polish Bank Association in Polish banking sector.

Our comments are related to definitions which are not sufficiently clear and also contain a proposal of more precise wording in Section 4 to make the monitoring more practical and useful, both for the supervisory institutions, and the supervised entities.

Yours sincerely  
Krzysztof Pietraszkiewicz

  
President  
Polish Bank Association

**PBA Comments to *Consultation Paper on Draft EBA Guidelines on Sound Remuneration Policies under Directive 2013.36.EU***

*Question 1*

*Section 2, Definitions, paragraph 11:*

In the definition of “Gender pay gap” we propose to replace “earnings” with “remuneration” (earnings are not defined in the document) and “hourly” with “monthly/yearly remuneration”. Hourly earnings are not commonly used in the financial sector. Moreover, remuneration of employees is set on a monthly basis, according to the Labour law.

*Question 2*

*Section 4, Guidelines, paragraph 26:*

Instead of documenting the job descriptions we suggest to focus on categories or groups of job positions (e.g. related to particular business lines, or products, or customer categories) in compliance with the proportionality principle. The proposed solution will make the documenting more practical for all the parties involved and at the same time will not adversely influence the monitoring target.

In the statement “determine which positions are considered as equal or of equal value per unit of measurement or time rate”, the wording “per unit of measurement or time rate” is not a fully clear concept, which in practice could complicate the measurement or comparison of banks in various settings.