

Gender pay disparities at ING Bank Śląski



An important area of diversity, inclusion, and belonging (DIB) is gender equality. ING is a fair employer, which is why we systematically address pay differences, including disclosing the gender pay gap between women and men.

Our remuneration system is open and transparent, and its principles are communicated to all bank employees. The remuneration policy is primarily aimed at supporting the processes of attracting, motivating, and retaining talented employees, as well as their development, while ensuring that all employees are treated fairly, regardless of gender.

We determine remuneration with reference to the scope of tasks and the level of responsibility defined in the job description, which is evaluated according to the adopted methodology. The Bank also implements a number of diversity and inclusion initiatives aimed at equalizing opportunities for women and men and raising awareness among managers and employees regarding the Bank's non-discriminatory policy toward any gender.

Gender pay gap

At ING Bank Śląski S.A., we have been analyzing gender pay differences since 2022. The difference in pay between women and men (the so-called gender pay gap) involves comparing the overall remuneration of men and women across the entire bank. Obtaining a complete picture of these differences is complex, as many factors influence the pay gap, such as the employment structure within the bank, within a given job grade, or in a specific position.

Year-to-year changes within the organization may significantly impact the level of the gap. It is worth noting that gender pay differences exist in most, if not all, companies, as they reflect a broader societal challenge related to gender equality. Importantly, they do not necessarily mean that women are paid less for the same work, but rather that men more often occupy higher-valued positions within the organization.

A key determinant of differences between women’s and men’s pay is the employment structure. This is a general market issue and is in no way specific to our bank. In order to maintain both the attractiveness of remuneration at ING Bank Śląski compared to the market and the cost competitiveness of our services, we benchmark our salaries against market data twice a year. In light of these benchmarks, we have observed in recent years, for example, a very strong increase in the remuneration of IT specialists, the majority of whom in the market are men. There also remains a structural imbalance unfavorable to women—visible in our bank as well—with female overrepresentation in lower job grades.

These and similar trends significantly affect the gender pay gap when it is calculated collectively across highly diverse professional groups.

The method of calculating the indicator results from the implementation of the EBA Guidelines and the obligation to report the gender pay gap to the Polish Financial Supervision Authority and the National Bank of Poland in accordance with these guidelines.

At the same time, we continue to calculate the gender pay gap indicator based on the previously developed approach in order to enable comparisons over time, also taking into account the Bank’s ambitions for the coming years as part of the key priorities of its business strategy.

We calculate the gender pay gap indicator using two methodologies:

Unadjusted pay gap

▶ The gap as a comparison of the average remuneration of all women and all men, regardless of the positions held.

Other assumptions adopted for the calculation include converting the remuneration of part-time employees into full-time equivalents and annualizing the remuneration of employees included in the analysis.

29%


However, this does not constitute a reliable comparison. In such a situation, it is difficult to speak about the level of **pay for the same work**. Therefore, in our analyses, we focus on comparing the remuneration of women and men employed in the same positions.

Adjusted pay gap

▶ The gap as a weighted average—based on the number of employees—of the average remuneration of women and men working in the same positions.

Other assumptions adopted for the calculation include converting the remuneration of part-time employees into full-time equivalents and annualizing the remuneration of employees included in the analysis.

2,3%

 This approach better reflects the actual extent of differentiation.

Over the years, the gap has developed as follows:

	Unadjusted pay gap	Adjusted pay gap
2022	-	4%
2023	32%	5%
2024	31%	3%
2025	29%	2%

At the bank, we do not accept unjustified pay disparities between women and men. This does not mean, however, that everyone must earn exactly the same amount in the same position. We differ in terms of performance, level of competencies—including those resulting from differences in experience—and contributions to the overall results of individual projects, processes, and the bank as a whole. However, we do not accept discriminatory practices, i.e., those in which gender would be the sole or one of the reasons for differences in remuneration. We have analyzed the internal regulations in force at our bank. We have not found any discriminatory rules, nor have we identified any intentionally discriminatory practices.

However, the reality of remuneration is dynamic. Each new recruitment, promotion, departure from the bank, well-deserved pay rise, or changes in remuneration within a given organizational unit—especially for positions present in multiple units—continues to affect and will continue to affect the variability of pay relationships between women and men. Therefore, our monitoring of remuneration is not an ad hoc exercise aimed at ensuring pay balance only in the short term. We review these pay relationships several times a year and treat these reviews as a permanent element of our activities, also in the future.

Following our analyses, within this process we take actions consisting either in identifying objective, non-discriminatory justifications for pay differences or in granting pay increases where such fair justifications cannot be found. We provide managers with data on remuneration and pay gaps, enabling them to incorporate the perspective of pay equality between women and men both in annual salary review processes and in a range of individual HR decisions that influence pay balance throughout the year.

We are also preparing, with next year in mind, solutions that will allow us to actively respond to undesirable pay differences. In recent salary review processes, we have ensured that mothers and fathers absent due to maternity and parental leave were included in pay increase decisions. Starting from this year’s salary review process, we are introducing a new benefit—upon returning to work after a long absence related to parental duties, mothers and fathers will receive a one-off adjustment equal to the amount of the pay increase granted during the period of their absence.