

# PREPARING FOR EU PAY TRANSPARENCY

HR POLICY ASSOCIATION NETWORK MEETING, BRUXELLES

29 February 2024

# Agenda

Introduction

2 Latest Insights from Mercer on Pay Transparency & Pay Equity

Group discussion

Client success stories



### Introductions

#### **Today's speakers**



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# Latest Insights from Mercer



# Update from the EU and comparison of Directives



#### The European Directive on Equal Pay and Transparency

#### **Timeline** March 2021 රුදු Commission's proposal (COM/2021/93 final) December 2022 2022 Political agreement between the Council and the European **Parliament** March to May 2023 2023 Formal adoptions **June 2023** Entry into force 2026 2026 Implementation by Member States into national law at the latest 2027 2027 First reporting to be submitted by companies with +250 employees

#### Pay Transparency Regulations included in the Directive



Pay transparency for job-seekers.

Pay range information to be published in all job ads



Pay and career progression transparency. This right could exist for all employees, irrespective of the size of the company



**Employee right to request information.** This right exists for all employees, irrespective of the size of the company



**Employers** (legal entity) with at least **100 employees** will have to publish information on the pay gap between female and male workers and reporting frequency depends company size



Requirement to explain pay gaps exceeding 5% and take action accordingly

Mercer Source: AG (europa.eu)

#### Overview on the EU Directives

#### **CSRD, EU Pay Transparency, Board Representation**

#### Corporate Sustainability Reporting Directive (CSRD)



EU Directive on Equal Pay and Pay Transparency



EU directive on gender balance on corporate boards

Effective since 7 June 2022<sup>2</sup>

Final approval from all EU bodies  $^{\rm 1}$  on 5 January 2023

Who does it affect?

Large undertakings, and small and medium-sized undertakings in EU Member States

What should companies be aware of?

Mandatory disclosure on ratio of basic salary and remuneration of women to men - global or broken by category

Mandatory disclosure on annual total compensation ratio

Mandatory assessment of adequate wage

Methodology needs to be documented with quantitative and qualitative information

Final approval from all EU bodies<sup>1</sup> on 24 April 2023 Who does it affect?

All companies in EU Member States

What should companies be aware of?

Mandatory gender pay gap reporting

Increased pressure to close unexplained gender pay gaps

Increased obligations to make pay determination and pay range information transparent

Who does it affect?

**Listed** EU companies

What should companies be aware of?

Increased monitoring of non-executive and executive boards' gender compositions

Consequences when proportion of underrepresented sex does not increase past 2026

<sup>1</sup>EU Parliament & Counci

<sup>3</sup>Gender Pay Gap: What women earn less compared to men (in %); Raw gender pay gap for EU countries (without UK) (source: https://ec.europa.eu/eurostat/databrowser/view/sdg 05 20/default/table?lang=en)



#### Update from the EU

#### Mercer discussion with EU Representatives



#### **Implementation**

- Series of country workshops throughout 2024 and into 2025
- Implementation by 2026, with reporting in 2027
  - Reminder directive set's out minimum requirements!
- Work in progress on job evaluation guidance and tools (working with EGIE)



#### Interpretation

- **Definition of pay** is anything paid by the employer in cash or benefit in kind which is directly or indirectly provided (Cost of benefit should be included)
- Category of Workers to be determined by a job evaluation methodology (rather than a job levelling approach). Companies may have their own methodology as longas they covers skills, effort, responsibilities
- **Included employees** are all employees under EU contract (part time / contractual workers, expats, demotions)
- Objective factors can be company specific (performance, tenure, grade, location) and a regression methodology is one way to consider multiple factors



- This directive relate to other directives, CSRD, Monitoring Bodies, Parental Leave, Representation on Corporate Boards
- New EU commission will be elected in 2024 and they will begin 5-year agenda planning



### **2024 Global Talent Trends**













Drive human-centric productivity

Solve the productivity equation with AI, Assessment and work design



Anchor to trust & equity

Foster a climate of trust through fair pay, equity, and inclusion



Boost the corporate immune system

Build resilient cultures with teams that are risk aware and healthy at the core

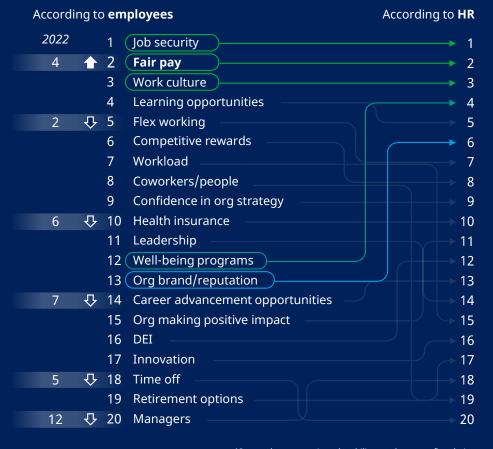


Cultivate a digital-first culture

Design an adaptive, digitally fluent organization where people can thrive

#### Why do people stay?

After job security, the #2 reason to stay is fair pay, up from #4 in 2022\*



**High growth companies** are more likely to use these insights in decision making:

1.6X underlying causes of pay inequities

1.6x extent of pay inequities

How organizations are evolving the DEI agenda:

- ✓ Using internal labor maps to understand career and pay trajectories of different groups
- ✓ Boosting employee advocacy by understanding and creating a fairer Employee Experience
- ✓ Implementing tech to enable ongoing pay equity decision making
- ✓ Fostering an inclusive culture with strong leadership accountability and transparency



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#### Embed DEI in the employee promise, and live it in the dayto-day employee experience

Thriving employees work for organizations committed to DEI, where they feel like an equal partner in something worth doing and feel fairly valued through the growth opportunities and Total Rewards offered to them

Thriving employees are more likely to say their company:

**1.4x** refrains from practices that deepen inequality

**1.7x** considers diversity when forming teams and making rewards and growth decisions

**2x** makes fair and equitable pay and promotions decisions



76% of employees have witnessed age discrimination in the last year

Companies are making progress on the DEI agenda:



**Only** 1 in 3 executives are very confident that they will **deliver on their DEI commitments** this year

More can be done:

Anchor to trust and equity







# Client Poll and Survey Results on Pay Transparency



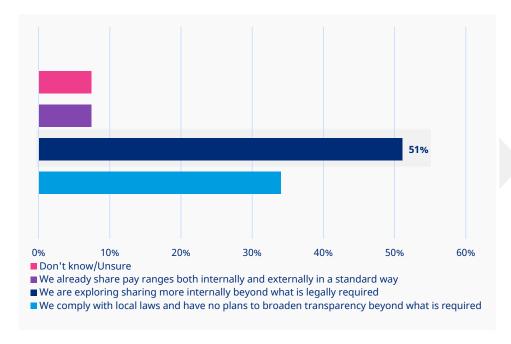
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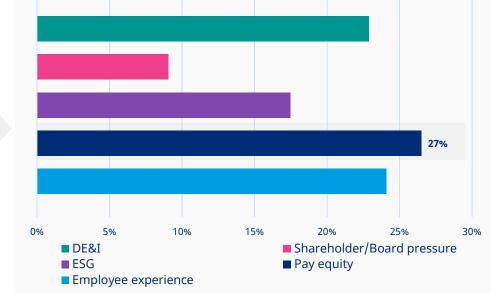
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# What is your company's philosophy when it comes to pay transparency?

# For those looking beyond compliance, what else is motivating you?



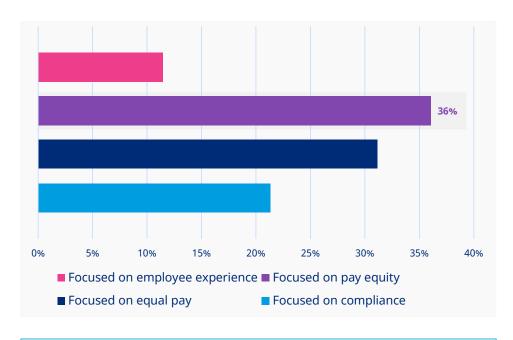


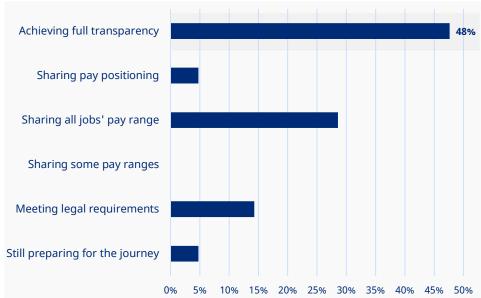
We can observe a general trend of companies being very compliance focused. However, it is noticeable that many companies are also looking beyond compliance, striving to further explore transparency beyond what is formally required. As explored in the next graph to the right.

Overall, the leading answer is pay equity, i.e., a focus on pay fairness – likely something which companies aim to leverage to boost their overall employee experience and Employer Value Proposition (EVP). Perhaps, this is also motivated by the possibility to expand and provide a foundation for further work within the DEI space.

# Where are you on your pay equity journey today?

# By 2027 where do you aspire to be on your pay transparency journey?

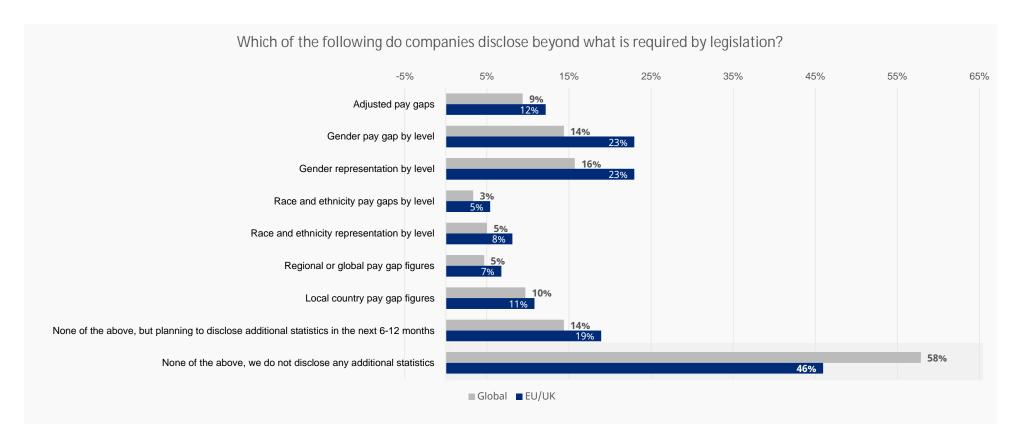




Currently, we can see that the parts of pay equity that companies are focusing on in today's climate are greatly focused on dealing with the current form of legislation that we find across Europe; i.e., parts that touch upon pay equity, equal pay as well as compliance. Over time, we believe more focus is likely to shift toward employee experience, as pay equity facilitates employers to build upon their EVP.

Despite the legislative-heavy focus of many companies, we can also observe many organizations with high aspiration when it comes to transparency, as most companies aim to achieve "full transparency". Again, as employers are likely to reap employer benefits from having a deep understanding of pay equity transparency, many may have the aspiration for full transparency to ultimately enhance their EVP.

#### Companies are looking into disclosing additional pay equity statistics



# So, what are the gaps? And how do we measure?



#### Europe 2023 Gender **Pay Gap Summary**

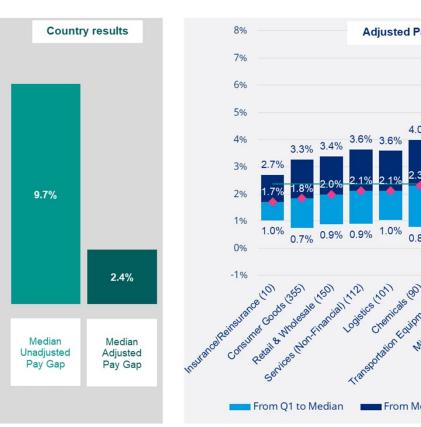


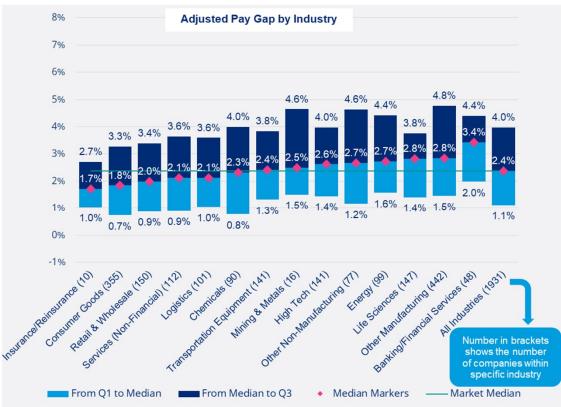
Positive values of gender pay gap indicate difference in pay in favour of men.

#### 7.3% of the unadjusted pay gap can be explained by objective factors such as:

- general experience (proxy by age)
- tenure within organization
- if newly hired
- job family
- position class

Mercer TRS participants have pay gaps lower than the European average. However, gaps above 5% may exist when drilling down to the category of worker level.





Source: Mercer's TRS 2023 for the following countries: Austria, Belgium, Bulgaria, Croatia Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Hungary, Ireland, Italy, Latvia, Lithuania, Luxembourg, Moldova, Netherlands, North Macedonia, Norway, Poland, Portugal, Romania, Serbia, Slovakia, Slovenia, Spain, Sweden, Switzerland, Ukraine, United Kingdom Copyright © 2023 Mercer LLC. All rights reserved.

#### Regional and industry benchmark gaps

#### Pay gaps by job family in the Technology Industry

Low risk (Adjusted pay gap <3%)
Moderate risk (3-5%)
High risk (>5%)

	Europe		High Tech	
Job family	Unadjusted Pay Gap	Adjusted Pay Gap	Unadjusted Pay Gap	Adjusted Pay Gap
Administration, Facilities & Secretarial	9.5%	1.4%	10.1%	-0.4%
Communications & Corporate Affairs	6.5%	3.7%	6.2%	3.8%
Creative & Design	6.8%	2.3%	6.7%	1.2%
Customer Service & Contact Center Operations	9.8%	3.2%	5.9%	1.5%
Data Analytics/Warehousing, & Business Intelligence	7.3%	4.0%	8.9%	3.5%
Engineering & Science	7.3%	3.9%	6.1%	3.9%
Finance	21.2%	5.4%	16.0%	4.1%
General Management	16.8%	2.7%	20.1%	3.8%
Healthcare/Pharmacy Services	11.1%	6.5%	9.2%	-6.5%
Hospitality (Food Service & Lodging)	8.0%	6.2%	4.9%	-2.8%
Human Resources	8.4%	3.9%	7.2%	4.0%
IT, Telecom & Internet	7.2%	2.6%	12.6%	4.2%
Legal, Compliance & Audit	5.4%	2.6%	7.8%	4.2%
Production & Skilled Trades	6.0%	3.3%	11.8%	4.0%
Project/Program Management	11.5%	3.4%	11.9%	2.3%
Quality Management	8.3%	3.4%	6.8%	1.9%
Real Estate Management, Property Development & Investment	11.5%	4.6%	25.0%	8.9%
Sales, Marketing & Product Management	18.0%	4.8%	19.2%	5.5%
Supply Chain	-0.7%	1.3%	4.3%	0.0%
Transportation Services	1.4%	3.3%	-0.5%	2.8%



#### Next steps in your Pay Equity journey

#### Mercer's suggested next steps

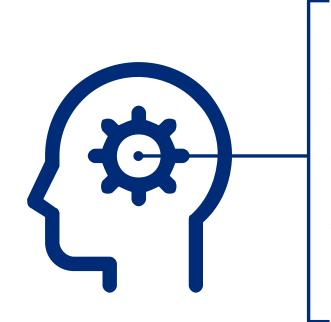




### Let's discuss



#### Let's discuss – in table groups 15 mins



How ready is your company for the EU Pay Transparency Directive?

What do you consider to be your role in supporting your company?

Who are the other individuals you will need to work with to succeed?

What other information do you need or wish to have on the directive?

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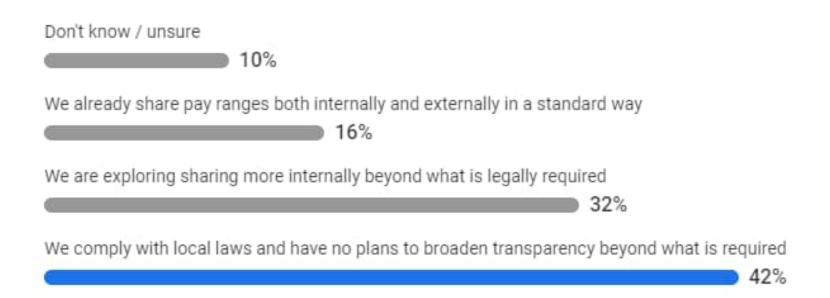
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# What is your company's philosophy when it comes to pay transparency?



What is your company's philosophy when it comes to pay transparency? 31 &



### Who are your most important Pay Transparency stakeholders?

# Employment Law Leadership LRIS

Talent Aquisition Employee Relations/Labour Total Rewards Partners

Human Resources

### Client success stories



#### Pay Transparency

#### **Global High Tech (telecommunication)**

#### US HQ - 180,000 employees

#### **Client Challenge**

- Talent acquisition led move towards pay transparency in response to candidate expectations and legislative requirements
- Pay ranges were already communicated externally, in line with legislation, and their objective was to be able to provide the same level of transparency (and communication) internally
- Total rewards team needing to establish ownership and alignment of pay transparency strategy

#### **Activities / Outcomes**

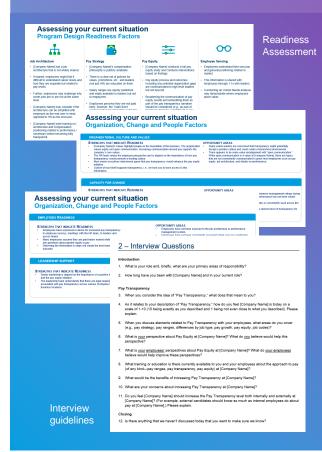
- The readiness assessment process helped uncover inconsistencies and a lack of rationale behind different application related to pay practices and communication of pay ranges.
- There was high nervousness and concern with overcoming such practices and Mercer's analysis helped to identify possible areas of alignment across the enterprise and gaining ensuing alignment
- Helped to formulate a strong narrative on pay transparency, in alignment with the organisations' stated culture of transparency
- The compensation analysis helped uncover discrepancies between the company's performance-based pay philosophy and employee's actual placement in pay ranges
- Development and alignment of long-term Rewards Transparency strategy, including global expansion plans

#### Collaboration / Method / Tools -

- Conducted Readiness Assessment for long-term pay transparency, identifying business unit-specific approaches requiring deviation from standard governance
- Conducted interviews and cross-functional alignment workshops to align talent acquisition, rewards, and HR Business Partners and their pay transparency roadmap.
- Supplemented with a market compensation analysis to understand where employees are placed in the pay ranges and if this is in line with policy and compensation philosophy

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Mercer helped the client to address Rewards Transparency from different angles and ensured that various stakeholder groups were aligned and jointly committed to the long-term Rewards Transparency strategy



#### Pay Equity, EU Transparency & Living Wage

#### **Professional Services**

#### SIG – Switzerland HQ - 9,000 employees

#### Client Challenge

- Global alignment with internal DEI strategy and focus on ESG required
- Strong focus on fair pay via a globally consistent and externally-proven approach
- Wish to be prepared in time for the EU Equal Pay and Pay Transparency Directive
- · Aim to ensure all employees are paid according to Living Wage standards

#### Activities / Outcomes

- Phased approach, starting with 5 EU countries, followed by other global locations
- Conducting Equal Pay Compliance Analysis for the 5 EU countries from 2023-2024 to understand "as-is" situation with regards to compliance
- Simultaneously, performing a Global Pay Equity analysis in phases, from 2023-2027, covering SIG's major global locations to ensure a unified approach and methodology towards fair pay
- Integration of Living Wage benchmarks in the Pay Equity calculator to understand their fair pay gaps beyond legal requirements and to get a holistic overview of potential needs for adjustment
- Handover of integrated reports per country, covering all three elements (two for non-EU countries)
- Support in high-level communication and change management to accompany analyses

#### Collaboration / Method / Tools -

- Virtual workshops to educate on EU Directive, discuss methodology and workforce segmentation as well as results and potential remediation strategies
- Mercer's Pay Equity Calculator as an integrated remediation tool covering Pay Equity and Living Wage



Pay Equity & Living Wage to further strengthen the organization



Pay Equity methodology steps, including workforce segmentation and analysis of drivers of pay per segment

EU Directive results report





Remediation scenario, including Equal Pay and Living Wage adjustments

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#### Pay Transparency and Pay Equity

#### **Global High Tech**

#### Netherlands HQ - 11,000 employees

#### **Client Challenge**

- Client would like to be a leader in its industry when it comes to rewards transparency, to help enhance its employer brand and ensure compliance
- Preparing for the EU and global legal requirements related to Pay Equity and Pay Transparency
- · Pressure from employees for greater pay transparency and equal opportunity

#### Activities / Outcomes

- Establishment of a combined Mercer and client project team to conduct a Full Readiness Assessment process, which helped uncover the current strengths, weaknesses, opportunities and threats within i.e. the job architecture, employee perspective, organization's capacity for change and the external position.
- Creation of Global Equal Pay and Pay Transparency Legislative overview, for alignment between current state and future requirements
- Workshop for stakeholder alignment and explore the overall Rewards Transparency ambitions through different perspectives within the company
- Conducted Pay Equity Analysis in parallel to ensure alignment between data-based facts and company ambitions

#### Collaboration / Method / Tools -

- Mercer provided its Rewards Transparency Journey Roadmap and Readiness Assessment set up to get the needed insight for the company to be able to assess their current state and the possibilities and challenges to move towards Rewards Transparency
- Mercer facilitated an in-person, HR leadership workshop to share the risks and opportunities of the EU directive and guided the company's People Leadership team towards setting their Rewards Transparency ambitions

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Mercer supported the client in their Rewards Transparency journey from different angles and guided them through their readiness assessment and stakeholder management to create long-term commitment in setting the ambition for Rewards Transparency.



Readiness Assessment

Pay Equity Analysis





Transparency ambition setting

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#### **EU Pay Transparency**

#### **Global High Tech (telecommunication)**

#### Sweden HQ - 105,000 employees

#### **Client Challenge**

- Pressure for the organization to address pay equity, ensure fair pay and prepare for EU directive on Pay Transparency and Equal Pay, that went into effect in June 2023
- **Decentralized structure with multiple legal entities**, complex organization and rewards structure, newly implemented HRIS system with challenges around data accuracy and access across the organization

#### **Activities / Outcomes**

- Mercer supported client with three key deliverables in order to facilitate the preparation of a tailored roadmap
  - **Gender pay compliance review** assessing four countries where gender pay reporting is currently required and looking for risk areas with regards to Gender Pay Gaps, Gender Representation and DEI / Pay Policies and Procedures
  - **EU Equal Pay study** preparing "dry-run" calculations for the EU directive requirements in order to determine areas of risk and remediation needs in advance of 2026 and assessment of benefits
  - HR leadership workshop to gain solid internal understanding of the directive requirements and identify risk and opportunities with a focus on People, Systems, Process, Culture/Leadership and KPIs

#### Collaboration / Method / Tools -

- Mercer used it's **Gender Equal Pay Analysis** tool to assess gaps across 12 countries in a consistent manner
- Mercer facilitated a in person, HR leadership workshop to assess risks and opportunities of the EU directive and develop a tailored roadmap for the organization and plan of action







We are leaders in risk, strategy and people. One company, with four global businesses, united by a shared purpose to make a difference in the moments that matter.

Marsh GuyCarpenter Mercer OliverWyman

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