

Gender Pay Gap Reporting

From April 2018, companies with 250 or more employees, including our main trading company, **Whistl UK Ltd** are required to publish certain statistics relating to Gender Pay. This report covers data for the **@APRIL 2020** reference periods.

General Statement Regarding this Report/Data

Given the snapshot reference period for this data is April 2020 – the first full month of the Coronavirus C-19 pandemic – we accept that the outcome of the analysis for this gender pay gap year is not an accurate reflection of pay across our employee population.

- For example, for the Pay gap data, we would normally have c1250 employees in the “full-pay relevant employee” population as defined by the Government. In April 2020, we had a good proportion of employees on Furlough up to a maximum of 80% of pay through the Coronavirus Job Retention Scheme and, like many businesses, we had a larger than normal proportion of employees off unwell receiving SSP. As a result the total number of employees qualifying as “full pay relevant employees” was reduced by c28%.
- In addition, of those full pay relevant employees, c12% of this population were contractually working on reduced hours and related pro-rata reduced pay. This means that we have a larger than normal population working part time as at April 2020.
- For the Bonus Gap calculations, c66% of the Government defined relevant population were not eligible for a bonus in the reference period as this population is covered by a collective bargaining agreement and, as part of the FY2019 negotiations, a higher base hourly rate was agreed in lieu of a discretionary bonus. Also, due to the pandemic crisis and with the aim to manage costs in order to retain jobs, the business made the decision to pay 1/3rd of any annual bonuses due in March 2020 (this reference period) with the balancing 2/3^{rds} deferred until September 2020 (next year’s reference period). This means that of all employees receiving a bonus/commission, c85% received a lower bonus than they would normally have been paid in the period.

Pay Gap

Based on the Government’s hourly rate methodology, Whistl UK Ltd.’s women’s mean pay rate was 0.54% higher vs men and the median rate was lower than men by 3.80%.

Mean	Median
Women’s pay is 0.54% HIGHER than men’s	Women’s pay is 3.80% LOWER than men’s

Whistl is committed to ensuring pay is fair, equitable and competitive regardless of gender. Our policies, including our compensation framework, union negotiated operational pay structure, and salary benchmarking pay guidance approach, effectively promote equal pay and support gender pay aims.

Pay Quartiles

The gender pay metric is influenced by the proportion of men and women in each pay quartile. The table below shows the percentage of men and women in each quarter of our pay profile.

Top quartile	68.3% MEN	31.7% WOMEN
Upper middle quartile	75.3% MEN	24.7% WOMEN
Lower middle quartile	74.0% MEN	26.0% WOMEN
Lower quartile	65.8% MEN	34.2% WOMEN

Bonus Gap

Bonus awards for this reference period are linked to individual performance and or company targets, which supports a pay-for-performance culture. The mean disparity favours men (42.2%) however the median disparity favours women (4.0%).

As noted in the opening statement above, part of the average gap can be explained by the decision by the Company to defer March 2020 annual bonus payments meaning those with an annual bonus, 85% the population, did not receive their full bonus whereas those eligible for sales commission 15% of the population received their full year bonus amounts.

Also, the lower proportion of men receiving a bonus is based on the fact that they are a large proportion of the overall population which is covered by a collective bargaining agreement and as part of the agreement the population was not eligible for a bonus in the relevant period as noted above.

Mean	Median
Women's bonus is 42.2% LOWER than men's	Women's bonus is 4.0% HIGHER than men's

Proportion of men and women receiving bonus	
25.8% OF MEN received a bonus	42.0% OF WOMEN received a bonus

Ongoing actions to support the principles of Gender Pay Equality

Reward principles

One of our key reward principles is to ensure pay and bonuses are fair, equitable and competitive regardless of gender. Eligibility or not for a bonus or commission scheme is based on role not gender.

Employee Engagement

We conduct an annual engagement survey and for FY2020 published in Q12021, the Whistl Group of companies had an overall engagement score of **76%**, based on a high employee response rate of 82%.

As part of the engagement feedback process, the question "*Whistl actively encourages equality, diversity and inclusion across the company*" was identified as a first-priority area for focus. This year we launched an employee-led EDI charter and set up a regular forum for volunteer EDI champions across the business to meet, share ideas and put in place strategies to deliver our commitment within the charter. We are also supporting a number of external initiatives e.g. Valuable 500 and the Disability Confident employer scheme and we are working towards the pledges and principles relating to these initiatives. In addition, EDI training continues to be mandatory for all people managers.

Declaration

We confirm that Whistl UK Limited's gender pay gap calculations are accurate and meet the requirements of the mandatory Regulations under The Equality Act 2010 (Gender Pay Gap Information) Regulations 2017.

A handwritten signature in black ink, appearing to read "Lynn Dillon".

Lynn Dillon
HR Director