

EU PAY TRANSPARENCY DIRECTIVE IMPLEMENTATION TRACKER

7 June 2026



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JURISDICTION	ACT OR STATUTORY INSTRUMENT	SUMMARY AND IMPACTS	IMPACT DATE
Austria	Draft legislation expected.	<p>Austria is still in the process of fully transposing the EU Pay Transparency Directive. Although the deadline for transposition expired on 7 June 2026, Austria has not yet implemented the Directive into national law. Further, no official draft legislation has been published. However, on 6 June 2026, the Federal Minister for Labor, Social Affairs, Health, Care and Consumer Protection (SPÖ) circulated a draft for political coordination among the other political parties. While the draft is not publicly available, it reportedly reflects the outcome of the negotiations conducted so far. The draft marks the beginning of a further round of political negotiations. So far, discussions on the implementation of the Directive have progressed slowly, particularly as employers' associations and trade unions have been unable to reach an agreement on several key issues, including the role and significance of job classifications and pay groups under the various collective bargaining agreements. Against this background, it is difficult to predict when a formal draft will be submitted to the Austrian Parliament for consideration and approval.</p> <p>Austria already has some existing pay transparency legislation, including pay gap reporting requirements for large employers and the obligation for employers to indicate in their job advertisements both the minimum salary under the applicable collective bargaining agreement and the remuneration intended to serve as the baseline for salary negotiations. However, the implementation of the Directive will significantly expand these obligations requiring greater public disclosure and imposing stricter compliance measures.</p>	tba

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Belgium	Partial implementation	<p>Belgium was at the forefront of implementing the EU Pay Transparency Directive, becoming the first EU member state to (partially) transpose the directive into national law which became effective in January 2025. This initial implementation, while limited to public sector employers under the French Community's jurisdiction, serves as an example of how the directive may be fully adopted across the country by the June 2026 deadline.</p> <p>Belgium's French Community's implementation deviates from certain of the EU's requirements. For example, it contains no threshold for unexplained pay gaps nor an explicit reference to mandatory joint assessments and corrective action plans. Employees who have been victim of discrimination may opt to claim damages on a lump sum basis. Criminal and administrative fines may also be imposed on employers found in breach.</p> <p>In the meantime, a draft Decree implementing the directive for the Flemish public sector has been approved by the Flemish government and is set to be discussed within the Flemish parliament.</p> <p>On 26 January 2026, the Federal parliament also approved a <i>non-binding</i> resolution asking the Federal government to limit the transposition to what is strictly necessary to comply with the directive (no gold-plating). The Federal government has however not yet taken other initiatives to implement the directive. Neither have the other regional or community authorities.</p>	Partial implementation in January 2025
Bulgaria	Draft legislation published for consultation	On 19 May 2026, draft legislation was published proposing amendments to the existing legal framework, including the Protection against Discrimination Act and the Labour Code, with the aim of aligning Bulgarian law with the Directive.	tba

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		<p>The public consultation on the draft legislation is open until 18 June 2026.</p> <p>Overall, the proposed amendments appear to be largely in line with the requirements of the Directive. However, certain deviations can be identified at this preliminary stage. In particular, the draft legislation assesses work of equal value by reference to the complexity and intensity of work, instead of the skills and effort criteria set out in the Directive. Furthermore, while employers will be required to provide salary information to job candidates during the recruitment process, the disclosure of salary ranges in job vacancy notices is not expressly mandated.</p> <p>Reporting obligations are expected to apply from 7 June 2027 to employers with 150 or more employees.</p> <p>As the draft legislation is still undergoing public consultation, its final wording and effective date are unknown.</p>	
Croatia	No action yet	Croatia needed to transpose the EU Pay Transparency Directive into national law by 7 June 2026. Draft legislation is expected but nothing has been published yet.	tba
Cyprus	Draft legislation published	<p>Cyprus will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026.</p> <p>The draft bill, which was published for public consultation in December 2025 and revised in January 2026, is currently undergoing legal-technical review by the Legal Service of the Attorney General.</p>	tba

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		<p>Once this review is completed, the bill must be submitted to the Council of Ministers and subsequently to the House of Representatives for approval.</p> <p>At this stage, it is not known when the above steps will take place. Normally, once the bill is submitted to the House of Representatives, it becomes possible to monitor its progress until its final publication.</p> <p>Given that the last session of the Plenary of the House of Representatives has already taken place pending the parliamentary elections scheduled for 24 May 2026, the transposition of the Directive is not expected to take place before 7 June 2026.</p>	
Czech Republic	Draft legislation expected	<p>The bill implementing EU Pay Transparency Directive in the Czech Republic is currently in the preparation phase at the governmental level. However, it has not yet been submitted to Parliament and therefore, the final wording of the bill and its effective date are still unknown.</p> <p>At the same time, the Ministry of Labour and Social Affairs has indicated that it intends to adopt a rather minimalistic approach to the implementation changes.</p>	<p>Ban on pay secrecy from 1 June 2025.</p> <p>Further legislation is awaited.</p> <p>The earliest currently anticipated effective date is January 2027.</p>
Denmark	Draft legislation has been published for consultation	<p>On 26 February 2026, the Danish Ministry of Employment released the long-awaited draft bill for public consultation with a deadline of 27 March 2026.</p> <p>Nevertheless, the general election held on 24 March 2026 and the government formation negotiations have suspended the work of the Danish Parliament, and the draft bill is therefore awaiting formal presentation (again) after the formation of a new government was formally presented on 3 June 2026. Additionally, the summary of the public consultation has yet to be released. However, as the bill implements an EU directive and has been the subject of discussions with the labour market partners, it is expected that the bill</p>	Expected 1 January 2027

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		<p>will be presented and adopted with any amendments received during the consultation process, regardless of the composition of the new government.</p> <p>The draft bill implements the Pay Transparency Directive, with certain deviations, particularly regarding the proposed date of entry into force.</p> <p>The new legislation is proposed to enter into force on 1 January 2027, even though the deadline for implementing the Directive was 7 June 2026.</p> <p>Denmark already has equal pay legislation in place requiring employers to provide equal pay for the same work or work of equal value. The existing legislation includes a requirement of preparation of gender-based statistics for certain companies based on size.</p> <p>According to the draft bill, the current gender-segregated pay statistics (based on DISCO codes) will be replaced by a pay reporting requirement. Employers will still be able to report pay information to Statistics Denmark or an employers' organisation, which will then prepare and send a pay report to the employer. However, as such pay reporting will continue to be based on DISCO codes, it will often be necessary for the employer to submit supplementary pay reporting. The reason is that categorisation under the pay transparency rules cannot be based solely on job functions (DISCO codes), but must be based on a concrete assessment of whether the employees perform equal work or work of equal value.</p> <p>If the proposal is adopted in its current form, the new rules will have a significant impact on Danish employers, employees and job applicants, as they introduce a number of new obligations for employers and rights for employees in accordance with the Pay Transparency Directive.</p>	

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Estonia	<p>The draft law implementing selected elements of the EU Pay Transparency Directive was published and sent for consultation by the Ministry of Economy and Industry in April 2026. The related amendments are currently included in the draft law and the bill is at second reading stage in the Estonian Parliament</p>	<p>The current Estonian approach is intentionally partial and phased. The draft legislation focuses primarily on pay transparency in recruitment and on clarifying existing equal pay principles, while deferring the more administratively burdensome obligations under the Directive (such as detailed pay structures, mandatory pay gap reporting, and joint pay assessments). The Estonian government has publicly stated that it intends to discuss with the European Commission the timing and scope of implementing these additional requirements, with a view to minimising administrative burden for employers. The government wishes to have an extension for the full implementation for 2 years.</p> <p>Key measures included in the draft law are: (a) mandatory disclosure of the expected salary or salary range to candidates before the job interview; (b) an explicit ban on asking candidates about their previous or current pay; (c) an explicit right for employees to discuss their own pay; (d) clearer statutory wording of the principle of equal pay for equal work or work of equal value; (e) establishment of a voluntary “Pay Mirror” (Palgapeegel) tool allowing employers to analyse gender pay gaps based on existing state-held data, without additional reporting obligations.</p> <p>By contrast, the draft does not yet transpose the Directive’s provisions on: (a) mandatory remuneration policies and pay structures; (b) employee rights to detailed comparative pay information; (c) gender pay gap reporting obligations; (d) joint pay assessments triggered by pay gaps.</p>	<p>The draft law is currently undergoing parliamentary proceedings and, according to the standard legislative process timeline, is expected to be adopted and enter into force in the second half of 2026 (most likely after summer), although no fixed date has been confirmed..</p>
Finland	<p>Draft legislation expected in week 25 (mid-June 2026).</p>	<p>Finland has initially planned to implement the EU Pay Transparency Directive (Directive) in accordance with its minimum standards. The current plan is to amend the existing equality legislation, which already includes provisions that require employers to promote equal pay at work and sets specific obligations for employers with</p>	<p>tba</p>

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		<p>at least 30 employees to regularly conduct pay surveys to ensure there are no unjustified pay differences between women and men doing the same or equivalent work.</p> <p>A draft government proposal was published on 22 December 2025 and comments on it could be submitted until 9 February 2026. The preparation work related to the implementation legislation has continued and the official government proposal is expected to be submitted to Parliament in mid-June (in week 25). As the Parliament will start their summer break around the same time, it is likely that the implementing legislation will not be adopted within the timeframe of the Directive. It is expected to be postponed at least until September 2026.</p>	
France	Draft legislation published.	<p>On 5 June 2026, the French Ministry of Labour shared with the social partners a revised version of the draft bill transposing the EU Pay Transparency Directive. The new draft introduces several adjustments to the initial version circulated on 6 March 2026.</p> <p>The government has also updated its indicative timetable for the legislative process. The draft bill is expected to be submitted to the remaining mandatory consultative bodies in the coming days and could then be presented to the Council of Ministers before the summer recess.</p> <p>According to the Minister of Labour, the effective entry into force of the transposition law is now expected on 1 January 2028, assuming that the bill is definitively adopted by Parliament at the end of 2026 or in early 2027.</p> <p>This revised timetable reflects both delays in the transposition process and the government's stated intention to give companies and HR departments</p>	Expected entry into force: January 2028

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		<p>additional time to prepare for the significant changes introduced by the new framework.</p> <p>While the legislative timetable remains indicative and may still evolve, the latest draft provides further insight into the government's approach to implementing the Directive in France.</p> <p>Key Provisions of the Upcoming Reform:</p> <p>1 A key measure is the replacement of the current Gender Equality Index with a new pay transparency reporting mechanism for companies with at least 50 employees.</p> <p>Employers would be required to declare seven remuneration indicators, to be defined by decree.</p> <p>One indicator would measure the gender pay gap between women and men performing the same work or work of equal value. The reporting frequency for this indicator would vary by company size:</p> <ul style="list-style-type: none"> • Every year for companies with 250 employees or more • Every three years for companies with 50 to 249 employees <p>In companies with 50 to 99 employees, employers may be exempt from reporting this indicator if a collective agreement provides for it.</p>	

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		<p>The revised draft bill also introduces a phased implementation schedule for the calculation of the gender pay gap indicator:</p> <ul style="list-style-type: none"> • Companies with 100 to 149 employees would be required to calculate the indicator no later than three years after the promulgation of the law; • Companies with 50 to 99 employees would be required to calculate the indicator no later than six years after the promulgation of the law. <p>In addition, for companies with at least 100 employees, employers would not be required to respond to abusive requests for information relating to the gender pay gap indicator, notably where such requests are systematic or repetitive.</p> <p>2 Mandatory Pay Transparency at every stage of the relationship: Pay transparency requirements would apply at every stage of the employment relationship, including both recruitment and employment.</p> <p>For companies with at least 50 employees, disclosure of objective remuneration criteria would be mandatory.</p> <p>3 Equal Pay for Work of Equal Value: employers would have to apply objective and gender-neutral classification criteria (skills, effort, responsibility).</p>	

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		4 Sanctions: Failure to comply with the reporting obligation would result in a financial penalty of up to 1% of the company's payroll.	
Germany	Update to Pay Transparency Act expected in 2026	<p>Germany has not yet implemented Directive (EU) 2023/970 on pay transparency. While the EU transposition deadline remains 7 June 2026, the German government has now indicated that this deadline will not be met. The responsible ministry has announced that the implementing legislation is expected to enter into force only in early 2027, with the first reporting obligations and employee information rights expected to become due in June 2028. The delay is being justified by the need for further inter-ministerial coordination and the government's stated intention to implement the Directive in a targeted, effective and low-bureaucracy manner.</p> <p>From an employer perspective, the deferral should not be read as a substantive relaxation of the forthcoming regime. Germany's existing Pay Transparency Act will require significant amendments to align with the Directive, including in relation to pay transparency in recruitment, the prohibition of salary history questions, broader employee information rights, objective and gender-neutral pay and career progression criteria, gender pay gap reporting, and potential follow-up obligations where unjustified pay gaps are identified. The delayed legislative timetable may therefore create a period of legal uncertainty rather than a genuine postponement of compliance readiness. Employers should use the additional time to review pay structures, job architecture, remuneration governance and data availability, particularly as future reporting obligations are likely to require robust historic pay data.</p>	Expected early 2027
Greece	Draft legislation expected	On 6 May 2026 the Minister of Labour and Social Security met with representatives of Greece's national	tba

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		<p>social partners. The main topic of the meeting was the incorporation of EU Directive 2023/970 on strengthening the principle of equal pay between men and women, with the aim of presenting the social partners' proposals for the drafting of the relevant bill.</p> <p>According to the announcement, in order to achieve this goal, transparency rules are introduced at three levels:</p> <ul style="list-style-type: none"> • during job postings and recruitment procedures, • during the employment relationship, particularly regarding employees' right to access salary information, and • regarding companies' obligation to publish pay-related data. <p>The report of the Labour Legislative Committee concerning the incorporation of EU Directive 2023/970 on strengthening the principle of equal pay between men and women was submitted to the Minister of Labour and Social Security on 24 March 2026. Subsequently, the Minister sent the report to the national social partners, inviting them to submit their own proposals.</p> <p>The purpose of the consultation process is to make use of both the committee's findings and the social partners' proposals in shaping the upcoming bill.</p> <p>On 3 June 2026 the Ministry of Labour and Social Security officially announced that it has launched a public consultation on the draft law entitled <i>"Strengthening the Implementation of the Principle of Equal Pay Between Men and Women for the Same Work or Work of Equal Value – Transposition of Directive (EU)2023/970 into National Law"</i>. This 14-day public consultation closed on 17 June 2026.</p>	
Hungary	No action yet.	Hungary will need to transpose the EU Pay Transparency Directive into national law by 7 June	tba

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		2026. No transposition activity has yet been reported, but there are existing obligations in place.	
Ireland	Draft legislation published	<p>The Minister for Children, Disability and Equality confirmed on 26 May 2026 that the EU commission has been informed that Ireland will not meet the 7 June 2026 deadline for full transposition of EU Directive 2023/970 and will implement the Directive on a phased approach. The Minister also confirmed that employers will not be penalised for failing to comply with the requirements of the Directive that have not yet been introduced into Irish law.</p> <p>The Minister provided this update in response to concerns raised by the Law Society of Ireland’s Employment and Equality Law Committee which were tabled as parliamentary questions submitted by a TD (Member of Parliament).</p> <p>In response to the questions raised the Minister reiterated that in the case of Ireland parts of the Directive had already been implemented in Ireland through the Gender Pay Gap Information Act, 2021 (2021 Act) which introduced gender pay gap reporting on a phased basis and now applies to all organisations that employ over 50 employees. The Minister confirmed that it is intended that the Gender Pay Gap Reporting portal will be operational from November 2026 and all employers will be expected to upload their gender pay gap data from the ‘snapshot’ date in June 2026 to the centralised portal (subject to an amendment to the 2021 Act being introduced). Currently uploading to the portal is voluntary only.</p> <p>The Minister confirmed that work is ongoing at pace to transpose the remaining provisions of the Directive. A dedicated Irish employer gender-neutral job evaluation toolkit based on the European Commission’s toolkit is being drafted by the Department. Once the legislation is published it is expected that workshops will be set up</p>	<p>EU Pay Transparency Directive to be implemented by 7 June 2026 but likely to be on a “phased basis”. No draft legislation or guidance/toolkits have yet been published.</p> <p>Employers are reminded of their on-going gender pay gap reporting obligations for 2026 which requires employers of 50 or more employees to choose a ‘snapshot’ date in June 2026 and report their gender pay gap data in November 2026. It is expected that employers will be required to upload their data through the new gender pay gap reporting portal which is expected to be operational by November 2026 for all employers.</p>

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		<p>for employers to assist employers understand the toolkit and their new obligations under the Directive particularly in relation to job evaluation.</p>	
Italy	<p>Italy implemented Directive (EU) 2023/970 through Legislative Decree No. 96/2026, which entered into force on 7 June 2026</p>	<p>Italy implemented Directive (EU) 2023/970 through Legislative Decree No. 96/2026, which entered into force on 7 June 2026.</p> <p>Overall, the Italian implementing legislation is broadly consistent with the Directive. However, it set out a few of significant differences. In particular, the Legislative Decree: (i) provides that employers applying a national collective labour agreement entered into by the comparatively most representative trade unions are presumed to comply with the principles of equal pay and pay transparency, unless discriminatory treatment is established in the individual case; (ii) limits the definition of "pay level" to remuneration items that are predetermined and continuous, excluding those individual remuneration items awarded on a personal, discretionary or temporary basis, provided they are awarded according to objective criteria; (iii) adopts a narrower scope by excluding domestic workers and on-call workers.</p> <p>As regards timing, the core transparency obligations - such as the requirement to disclose the criteria used to determine remuneration and employees' right to request pay-related information - have been in force since 7 June 2026, whereas more sensitive obligations, including pay gap reporting and consultation with trade union representatives, will apply as of June 2027.</p> <p>In addition, the Legislative Decree provides that, within six months of its publication, the Ministry of Labour will adopt implementing measures providing further detail and guidance on the application of the new framework.</p>	7 June 2026

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		It should be noted that Italy already has existing legislation on gender pay gap reporting.	
Latvia	Draft legislation published	<p>On 26 March 2026, the draft legislation implementing the Directive (EU) 2023/970 (Directive) was published.</p> <p>Overall, the draft legislation appears consistent with the Directive, however, given that it is the first draft, there might be minor changes as it is still under review.</p> <p>The draft law: (a) starting with the recruiting stage, it sets a mandatory requirement to disclose the salary ranges in job advertisements, including a prohibition on asking candidates about their pay history, (b) requires employers to ensure transparency of pay-setting and career progression criteria (employers under 50 employees are exempt), based on objective and gender-neutral criteria, (c) grants employees the right to request and receive information on their individual pay and average pay levels broken down by gender, for employees who perform the same work or work of equal value, (d) introduces pay reporting obligations for employers with at least 100 employees, (e) requires employers to take corrective measures if pay gaps are identified and mandates a joint pay assessment, (f) provides rights to employees and their representatives, provides for the reversal of burden of proof in cases of discrimination, compensation rights to employees, administrative fines for employers, etc.</p> <p>The reporting process shall be regulated in detail by secondary legislation, which shall be introduced no later than 1 May 2027.</p>	Implementation has not been completed by the initially planned date of 7 June 2026. Currently, there are no official announcements or decisions regarding the potential implementation timeline.
Lithuania	The legislation has been adopted	Lithuania already had some existing pay transparency legislation in place (only partially implementing the Directive). Previous laws require employers to provide pay information in all job postings, publish remuneration	The legislation formally entered into force on 7 June 2026, but some requirements will only become mandatory from 1 January 2027.

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		<p>policies with salary ranges, provide gender pay gap data to employee representative bodies upon their request, etc. These requirements remain unchanged.</p> <p>The adopted legislation: (a) provides stricter requirements for job classification and preparing remuneration policies (which become mandatory for all employers, regardless of headcount), (b) prevents employers from asking job applicants or their employees about salary history, (c) requires monthly pay and working time reporting via state social security authorities for all employers, (d) requires remedial action to be taken if the gender pay gap is over 5% (following the Directive requirements); (e) excludes salary information from confidentiality undertakings etc.</p> <p>The adopted legislation provides that the gender pay gap reports will be prepared not by employers but by the State Social Insurance Fund Board, based on the monthly pay data submitted by employers. The detailed requirements of pay reporting should be provided in secondary legislation, which has not been provided to the public yet, but shall be adopted by 31 July 2026.</p> <p>Some requirements under new legislation will become mandatory not immediately, but only from 1 January 2027, such as: a) updating or introducing remuneration systems (including the classification of positions into groups based on objective, gender-neutral criteria), (b) reporting data on working time and remuneration to state social insurance authority and (c) employees' right to obtain information about their own pay and that of other employees in the same category. Other requirements will come into effect from 7 June 2026.</p>	
Luxembourg	No activity yet	<p>Luxembourg will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported. While there are currently no gender pay gap reporting requirements, there are existing obligations in place</p>	tba

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		<p>requiring employers to share gender-based statistics with its equal opportunities officer twice a year (where applicable).</p>	
<p>Malta</p>	<p>Full implementation</p>	<p>Malta published legislation partially implementing the Directive in June 2025 which came into effect on 27 August 2025, requiring employers to disclose salary ranges to job applicants and pay information to employees on request.</p> <p>On 5 June 2026 the Government of Malta implemented the Pay Transparency Directive through the Equal Pay (Transparency and Reporting) Regulations 2026.</p> <p>The Regulations came into force immediately (just ahead of the 7 June 2026 implementation deadline) as the Government did not opt for the usual 2 month 'transitional period' as we have seen in other legal notices published earlier this year.</p> <p>This means that the main provisions in relation to categorisation for establishing equal value, the right to information (RTIs) and pay progression criterion come into effect immediately for employers of all shapes and sizes.</p> <p>The Regulations also contain new provisions on transparency in recruitment, although the rules which came into force in August of 2025 (see above) have not yet been repealed.</p> <p>The Regulations include reporting provisions, which start in 2027, as well as extensive provisions on enforcement which are set to change the way in which litigation in this area is handled.</p> <p>There are interesting provisions on collective agreements, the use of the single source argument in claims of equal value and rules in connection with claims which arose prior to the 7 June 2026 are of particular interest.</p>	<p>Pay information legislation came into effect on 27 August 2025.</p> <p>Equal Pay (Transparency and Reporting) Regulations 2026 came into force on 5 June 2026.</p>

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Netherlands	Draft legislation published	<p>The Netherlands published draft legislation in March 2025 by way of amendments to existing legislation bringing it in line with the Directive. The proposed amendments represent a near-literal transposition of the Directive with some minor deviations. The most striking difference is that the Dutch legislature grants the works council several rights of consent, whereas the Directive would have allowed for less intrusive forms of co-determination, such as a mere right to be consulted on specific matters.</p> <p>The public internet consultation on the draft legislation was open until 7 May 2025 and is now closed.</p> <p>The Dutch government has just announced that it has amended its implementation timetable as the original date of 7 June 2026 is no longer considered feasible. The timeline has been amended as follows:</p> <ul style="list-style-type: none"> • It is proposed that the Dutch legislation will be submitted to the Council of State for advice before the end of 2025. • The parliamentary debate is scheduled for 2026. • The implementation legislation will come into force on 1 January 2027. • There will be a revised timeline for gender pay gap reporting obligations for employers with 150+ employees, the first report should be prepared for 2027. For employers employing 100-150 employees, the timeline remains the same. <p>However, on 18 December 2025, the European Commission announced that it will not accept any postponement of the implementation of the Directive by the Netherlands. All Member States must have</p>	Planned implementation date remains 1 January 2027 (even though the European Commission rejected this timeline).

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		<p>implemented the Directive into national legislation by June 2026 at the latest.</p> <p>The Minister of Social Affairs and Employment stated, in response to parliamentary questions on 16 March 2026, that an earlier date than 1 January 2027 will not be feasible.</p> <p>The Council of State (Raad van State) issued its opinion on the legislative proposal on 1 April 2026. Among other things, the Council of State advised that further attention should be paid to the position of non-binary persons. The legislative proposal further indicates that the deadline for the reporting obligation will most likely be 7 June 2028. However, the Council of State advised bringing this deadline forward to 7 June 2027.</p> <p>Following the advice of the Council of State, the legislative proposal was amended on several (minor) points. With regard to the deadline for the reporting obligation, the legislator maintains the previously established date of 7 June 2028. The proposal was submitted to the House of Representatives on 21 May 2026.</p>	
<p>Poland</p>	<p>Partial implementation and new (second) draft legislation published</p>	<p>Amendments to the Polish Labour Code partially implementing the Directive in part related to recruitment requirements came into effect on 24 December 2025.</p> <p>On 4 May 2026, the Polish Ministry of Family, Labour and Social Policy published a second draft bill to strengthen the enforcement of equal pay for men and women, aiming to implement remaining requirements of the Directive.</p> <p>The first proposed draft bill represented a near-literal transposition of the Directive with some minor deviations and few additional requirements. The second draft addresses most of the comments and concerns raised during the public consultation process on the first</p>	<p>Legislation on recruitment requirements came into effect on 24 December 2025</p> <p>Full implementation: Early legislative stage; draft implementing bill has not been presented to the Polish parliament for further works yet. The Act ensuring full implementation is scheduled to come in force 6 months after its announcement in the official Journal of Laws – beginning of 2027 at the earliest but mid-2027 is more probable.</p>

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		<p>draft bill implementing the Directive, but at the same time it overcomplicates various procedures and contains imprecise and inconsistent wording, which may prove problematic in practice.</p> <p>Key significant amendments (in comparison to the first draft act) comprise of:</p> <ul style="list-style-type: none"> • delay in the entry into force of the Act - the implementing legislation will come in force 6 months after its announcement in the official Journal of Laws. • indication that the newly established Commission for Counteracting Discrimination, chaired by the Chief Labour Inspector, will act as the equality body. The Government Plenipotentiary for Equal Treatment will serve as the monitoring body. • clarification how to calculate the employment level for threshold for gender pay reporting purposes (employers will calculate an employment level based on annual work units (AWU)). Employers (user-entities) using temporary (agency) workers will be obliged to include them in the above employment level calculations and generally comply with the pay transparency obligations towards their temporary workers. • introduction of more detailed procedures and deadlines for cooperating with trade unions/employee representatives by complying with certain employer's duties, providing for solutions should the consultations / reaching an agreement with trade unions respectively within the statutory deadlines fail. • clarification that when an employee requests information on their individual pay level in comparison with average pay level in the same job category (split by gender), the data provided 	

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		<p>should refer to remuneration received within 12 months preceding the month when the request was made (and not previous calendar year).</p> <ul style="list-style-type: none"> • extending the list of breaches (non-compliance) of the employer's pay transparency duties that will be penalised with the criminal fine. Fines themselves will be higher (up to PLN 60,000 – approx. EUR 14,200). • introduction of an exclusion (refusal to participate in) from tenders under public procurement procedure or awarding a concession contract for construction works for public entities for organisations which have an objectively unsubstantiated pay gap exceeding 5%. <p>The public consultation process on the second draft bill was completed on 3 June but as of 7 June 2026 the draft implementing bill was neither finalised nor approved by the Council of Ministers, and consequently – it was not submitted to parliament for legislative works. There are (unofficial) voices that the final draft bill may be adopted by the Council of Ministers still in June (but to date the ministry officials have not openly committed to any fixed date); the official governmental website indicates the expected date of approving (adopting) the final draft bill in Q4 2026.</p>	
Portugal	No activity yet	<p>Portugal will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported, however under the existing framework employers are required to provide annual employee pay data to the Labour Authority for analysis, which may subsequently require the employer to submit a pay gap evaluation plan if gender-based disparities are detected. In addition, employers must also ensure a transparency pay policy, based on objective and non-discriminatory criteria. A working group was established in early 2025</p>	tba

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		<p>to prepare for the implementation of the Directive, and a two-year EU-funded project (“Equal Pay Transparency”), coordinated by CITE, the national equality body, is supporting technical capacity building, including the development of a gender-neutral job evaluation tool.</p>	
<p>Romania</p>	<p>Draft legislation published.</p>	<p>Romania will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. The Romanian Government, through the Ministry of Labor, officially published the draft law on pay transparency and the strengthening of the application of the principle of equal pay between women and men for equal work or work of equal value, as well as for the amendment and completion of certain normative acts (the Draft Law) in its first version, for public consultation, on 30 March 2026. Following this stage, the Draft Law will be approved by the Government and sent to Parliament in order to meet the European deadline. Once the Draft Law reaches Parliament, it may undergo further changes during the legislative process.</p> <p>The Draft Law introduces measures to enhance pay transparency and reinforce the principle of equal pay for women and men performing the same work or work of equal value. These provisions will apply to all employers in both the public and private sectors, as well as to employees and job candidates during recruitment processes.</p> <p>Specifically, the Draft Law: (a) requires employers to make pay criteria and pay structures accessible and to provide initial salary information to candidates prior to the interview; (b) prevents employers from requesting information regarding job applicants' previous salaries; (c) requires periodic pay gap reporting to the National Agency for Equal Opportunities for Women and Men (ANES) for employers with at least 100 employees (the</p>	<p>The Draft Law on pay transparency and the strengthening of the application of the principle of equal pay between women and men for equal work or work of equal value, as well as for the amendment and completion of certain normative acts aiming to transpose into national law the Directive (EU) 2023/970 was officially published on March 30, 2026 and it remained open for public consultation until 8 April 2026. The public consultation phase regarding the draft law has been completed, however the authorities have not yet made public any feedback, opinions, or amendment proposals submitted by the interested parties during this stage of the legislative process.</p> <p>At the moment, the legislative process has not yet been finalised, and no updates from the authorities have been published. Romania was required to transpose the EU Pay Transparency Directive into national law by 7 June 2026. However, due to recent Romanian governmental changes, the EU Pay Transparency Directive has not yet been transposed, and the process is expected to be delayed.</p>

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		<p>draft law imposes specific reporting requirements based on company size. Employers must report pay gap data to ANES as follows: annually for those with at least 250 workers starting June 2027; every three years for those with 150–249 workers starting June 2027; every three years for those with 100–149 workers starting June 2031; (d) requires a joint evaluation of remuneration and remedial action to be taken within six months if the average gender pay gap in a worker category is at least 5% and cannot be objectively justified; (e) excludes salary information from confidentiality undertakings by ensuring that individual employment contracts cannot prohibit or limit the ability of employees to disclose information about their remuneration.</p> <p>Failure of employers to comply with transparency and reporting obligations, including asking about salary history or refusing to provide pay data is sanctioned by the Territorial Labor Inspectorates with fines between RON 10,000 and 20,000 (approx. EUR 2,000 to EUR 4,000) increasing to RON 30,000 (approx. EUR 6,000) for repeated offences.</p>	
Slovakia	<p>The Slovak Parliament approved the Act on Equal Pay on 15 April 2026. The Act was subsequently promulgated in the Collection of Laws as Act No. 76/2026 Coll. and will enter into force on 7 June 2026.</p>	<p>The Slovak Parliament approved the Act on Equal Pay on 15 April 2026. The Act was subsequently promulgated in the Collection of Laws as Act No. 76/2026 Coll. and will enter into force on 7 June 2026.</p> <p>The Act implements Directive (EU) 2023/970 of the European Parliament and of the Council, which strengthens the application of the principle of equal pay for men and women for equal work or work of equal value through pay transparency and enforcement mechanisms. The objective is to transpose these provisions into Slovak law in order to enhance the enforcement of the equal pay principle in employment relations. The significant gender pay disparities in the Slovak Republic necessitate the introduction of effective pay-transparency instruments.</p>	<p>The Slovak Parliament approved the Act on Equal Pay on 15 April 2026. The Act was subsequently promulgated in the Collection of Laws as Act No. 76/2026 Coll. and will enter into force on 7 June 2026.</p>

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		<p>The Act introduces a comprehensive pay-transparency system with clearly defined obligations for employers and corresponding rights for employees. The main instruments include gender-neutral job evaluation criteria, mandatory disclosure of remuneration information, and systematic monitoring of pay differences.</p> <p>The key newly introduced elements are:</p> <ul style="list-style-type: none"> • the obligation to disclose pay ranges in job advertisements; • a prohibition on requesting information about previous remuneration from job applicants; • the right of employees to information on the average pay of colleagues in the same category; and • regular reporting on gender pay gaps for larger employers. <p>The Act introduces a gradual system of corrective measures. If unjustified pay differences exceeding 5% are identified, a joint pay assessment mechanism will be triggered, requiring the adoption of specific corrective actions. Legal protection includes an extended right to compensation and procedural advantages for affected employees, including a shift of the burden of proof to the employer.</p> <p>Compliance with the obligations imposed on employers by the Act will be monitored by labour inspectorates. The Ministry of Labour, Social Affairs and Family of the Slovak Republic will coordinate the entire system and ensure regular evaluation of the effectiveness of the adopted measures. In connection with the Act, amendments are also introduced to the Labour Code, Act No. 5/2004 Coll. on Employment Services, and Act No. 125/2006 Coll. on Labour Inspection, as well as</p>	

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		related provisions of Act No. 82/2005 Coll. on Illegal Work and Illegal Employment, all as amended.	
Slovenia	Draft legislation expected	<p>Slovenia has yet to finalise the transposition of the EU Pay Transparency Directive, despite the 7 June 2026 deadline having passed. No draft legislation has yet been published.</p> <p>The Ministry of Labour, Family, Social Affairs and Equal Opportunities of the Republic of Slovenia has initiated procedures by establishing working groups and preparing a new piece of legislation.</p> <p>In support of the implementation of the Directive a project titled Pay Day has also been launched in December 2024, the objective of which is to: establish a free online tool to identify gender pay gaps; develop guidelines and a methodology for gender-neutral job evaluation systems; conduct a national awareness campaign; and provide training for various relevant parties.</p> <p>Although the Pay Transparency Directive has not yet been transposed, and Slovenia does not yet require private employers to submit gender pay gap reports, the current Employment Act (ZDR-1), in force since 12 April 2013, includes an “equal pay for equal work” provision. Article 133 ZDR-1 states that (i) an employer shall pay equal pay to workers for equal work and work of equal value, irrespective of their gender; and that (ii) provisions of an employer’s employment contract, collective agreement or general regulation which are contrary to the preceding paragraph shall be invalid. At the same time, the prohibition of discrimination (including on the basis of gender and in relation to pay) is a fundamental principle of ZDR-1, and specifically included in Article 6</p>	tba

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Spain	Draft legislation expected.	<p>Spain has not met the 7 June 2026 deadline for the Directive to be transposed into national legislation. However, the Spanish legislator has already introduced obligations regarding pay transparency, such as the gender pay register for all companies and the gender pay audit for companies with 50 or more employees.</p> <p>That said, while Spain is ahead of the Directive in certain areas, the transposition of this Directive will require most organisations to review their pay models and define their remuneration policies in a much more precise manner.</p> <p>On 24 April 2026, the Ministry of Labour and Social Economy launched a Prior Public Consultation in relation to a Draft Royal Decree for the transposition of the Directive into national law to gather the views of stakeholders ahead of the formal drafting and approval process. The consultation closed on 8 May 2026. We awaited further developments.</p>	tba
Sweden	Suspended for an indefinite period.	<p>The Swedish Government published a proposal referred to the Council on Legislation for consideration in January 2026, with a planned implementation date of 1 January 2027. However, in March 2026, the Government announced that the implementation would be suspended for an indefinite period due to the proposal and Directive's heavily administrative consequences for employers. It was also announced that a final government bill would not be published. In the meantime, the Government intended to initiate renegotiations regarding the Directive with the EU. Despite the initiative, on 22 May 2026 the European Commission announced that it would not consider any stop-the-clock measures and that the Directive must be implemented in each EU member state by 7 June 2026. For Sweden, this means that there is no implementing legislation (or government bill) in place, despite the deadline having passed. Recently, the Swedish</p>	N/A

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		<p>government assigned the Swedish Discrimination Ombudsman to prepare support and promotional activities, with the aim of minimising the administrative impact of the Directive on Swedish employers. A report on these activities is due on 1 November 2027.</p> <p>The following information is based on the proposal referred to the Council on Legislation for consideration.</p> <p>Sweden has a strong record of equality with an existing framework for equal pay and gender pay gap surveys. The proposal aims to build on existing legislation which is already broadly in line with the requirements of the Directive.</p> <p>The proposal introduces new measures on pay transparency for job applicants and pay information for existing employees. Further, Sweden plans to maintain its current gender pay gap survey requirements with some minor amendments so that the new legislation is compliant with the Directive. In addition, Sweden will implement requirements relating to the Directive's gender pay gap reporting obligations which includes, inter alia, requirements on employers with more than 100 employees to submit their gender pay gap report to the Swedish Equality Ombudsman. The proposal also emphasises the importance of cooperation between employers and employees (and where applicable, union representatives) in terms of e.g. gender pay gap surveys and its analysis.</p>	
Northern Ireland	No activity yet	<p>Although the UK is not part of the EU, however, Northern Ireland is devolved for the purposes of employment law and there are calls for the Directive to be implemented in Northern Ireland based on article 2 of the Northern Ireland Protocol, which requires Northern Ireland to keep pace with developments in certain equalities laws in the EU. This could include the EU Pay Transparency Directive on the basis that the EU is amending or updating the EU equality laws set</p>	We await further developments.

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		<p>out in annex 1 of the Northern Ireland Protocol. The Equality Commission for Northern Ireland and the Northern Ireland Human Rights Commission have jointly called for the NI government to give a commitment to enact legislation to align with the EU Pay Transparency Directive's gender pay requirements by 7 June 2026.</p> <p>Separately, the existing gender pay gap reporting requirements in the rest of the UK for employers with 250+ employees do not extend to Northern Ireland. The Employment Act (Northern Ireland) 2016 introduced the concept of gender pay gap reporting and the publication of pay gap action plans in Northern Ireland, but it still requires regulations to be enacted. In November 2024, Northern Ireland consulted on the draft regulations to progress gender pay gap reporting requirements in Northern Ireland and the Department for Communities responded to the consultation in October 2025.</p> <p>We now await the Department for Communities draft Gender Pay Gap Information Regulations, which we had expected to receive early 2026. This will then be followed by NI Assembly consideration to determine the extent to which these Regulations will align with the EU Pay Transparency Directive. It is unlikely that implementation will take place before 2027.</p> <p>The Regulations in NI are due to follow implementation of the proposed 'good jobs' legislation which has now been delayed due to political opposition. The result is that the equal pay legislation is likely to be delayed for a considerable period of time.</p>	

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