

EU PAY TRANSPARENCY DIRECTIVE IMPLEMENTATION TRACKER

September 2025



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Austria	No action yet	Austria is still in the process of fully transposing the EU Pay Transparency Directive, with a deadline of June 2026 to implement the directive into national law. The country 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. Austrian employers should prepare for more stringent rules on pay transparency both during the recruitment process and throughout the employment relationship as well as for the implementation of a more robust gender pay gap reporting and action plan system.	tba
Belgium	Partial implementation	Belgium is 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. 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.	Partial implementation in January 2025
Bulgaria	No action yet	Bulgaria will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported.	tba
Croatia	No action yet	Croatia will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported.	tba

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Cyprus	Draft legislation expected	Cyprus will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. A tripartite technical committee has been set up (within the framework of the tripartite cooperation model) on the basis of social dialogue, and preliminary discussions have taken place. The harmonization bill is currently being prepared (i.e., drafted by the relevant department of the competent Ministry) and will be submitted to the technical committee for consultation. Once the consultation is complete, it will be submitted to the labour advisory body and then to a legal review. Once the legal review is complete, the bill will be submitted to the Council of Ministers and then to the House of Parliament. Preliminary work has been done at this stage, however, it is unclear when the draft legislation can be expected.	tba
Czech Republic	Draft legislation expected	The government has set up a working group and is working on draft legislation. In addition, an amendment to the Czech Labour Code came into effect on 1st June, 2025 which introduced a ban on pay secrecy clauses in employment documentation. On 5 May 2025, the three largest Czech business associations (the Czech Chamber of Commerce, the Confederation of Industry and Transport of the Czech Republic, and the Confederation of Employer and Business Associations of the Czech Republic) sent a joint letter to the Minister of Labour and Social Affairs, requesting a two-year postponement of the EU Pay Transparency Directive 's implementation. No official statement to this letter is available.	Ban on pay secrecy from 1 June 2025 Further legislation is awaited.
Denmark	No action yet	Denmark already has equal pay legislation in place requiring employers to provide equal pay for the same work or work of equal value. The legislation also includes a requirement to collate gender-based statistics for certain companies based on size. It has not yet published any draft legislation to transpose the Directive into national law.	tba
Estonia	Draft legislation had been expected by Summer 2025	The Government was initially expected to publish draft legislation by summer 2025. However, no updates have been reported so far, and the new timeline for publication remains unclear.	Draft legislation expected
Finland	Draft legislation expected by the end of the year.	Finland has initially planned to implement the EU Pay Transparency 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	Draft legislation expected by the end of the year.

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		equal pay at work and sets specific obligations for employers with 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. A draft government proposal was published in May 2025. However, after its publication, employer associations voiced concerns that the proposed implementation of the EU Pay Transparency Directive would not adhere to the agreed minimum standards. They also argued that it would jeopardise the independent and gender-neutral remuneration systems and salary determination of collective agreements. The preparation work related to the implementation legislation will continue, and the official government proposal is expected to be published by the end of the year (in week 51).													
France	Draft legislation expected Autumn 2025	The Directive must be transposed into French law by 7 June 2026. A bill is expected in autumn 2025 following consultation with social partners. Key Provisions of the Upcoming Reform: 1 Revision of the Gender Equality Index for companies with more than 100 employees (increase from 5 to 7 indicators) with specific phased entry into force: <table><tr><th>COMPANY SIZE</th><th>FIRST DECLARATION (7 INDICATORS)</th><th>FREQUENCY</th></tr><tr><td>≥ 250 employees</td><td>7 June 2027</td><td>Annual</td></tr><tr><td>150–249 employees</td><td>7 June 2027</td><td>Every 3 years</td></tr><tr><td>100–149 employees</td><td>7 June 2031</td><td>Every 3 years</td></tr></table> 2 Mandatory Pay Transparency at every stage of the relationship (pre-employment and during employment) and for companies with ≥ 50 employees, disclosure of objective remuneration criteria is mandatory.	COMPANY SIZE	FIRST DECLARATION (7 INDICATORS)	FREQUENCY	≥ 250 employees	7 June 2027	Annual	150–249 employees	7 June 2027	Every 3 years	100–149 employees	7 June 2031	Every 3 years	June 2026
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		3 Equal Pay for Work of Equal Value: Employers must apply objective and gender-neutral classification criteria (skills, effort, responsibility). 4 Strengthened Rights and Remedies: Complaint mechanisms and fines are provided for non-compliant companies.	
Germany	Update to Pay Transparency Act expected in 2026	Germany is preparing to update its Pay Transparency Act in line with the EU Pay Transparency Directive, aiming to enhance salary transparency and address wage disparities. While the exact implementation date is pending (expected in 2026), employers should proactively assess their remuneration systems to ensure alignment with forthcoming requirements.	Expected 2026
Greece	No action yet	Greece will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. The Government is setting up legislative preparatory groups in readiness for implementation, but no further transposition activity has yet been reported.	tba
Hungary	No action yet.	Hungary will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported, but there are existing obligations in place.	tba
Ireland	Draft legislation published	Ireland already has gender pay gap legislation in place. The obligation to carry out gender pay gap reporting extends to employers of 50 employees in 2025. Organisations who have 50 employees or more will be required to take a snapshot on a date in June 2025 and report the corresponding data before 30 November 2025. In addition to this change on reporting, Ireland will also be required to work towards implementing the EU Pay Transparency Directive by the deadline of 7 June 2026. The implementation of the directive may require significant changes to Ireland's current reporting regime including the reporting of pay gaps based on categories of employees and providing employees and potential new hires with an oversight in relation to information in relation to ensure transparency. The General Scheme of the Equality (Miscellaneous Provisions) Bill 2025 (the "Bill") has been published and includes a proposal to transpose Article 5 of the Directive, but the Bill does not deal with pay progression, pay secrecy and the right to information in relation to pay levels for employees carrying out the same work.	For gender pay gap reporting, organisations who have 50 employees or more will be required to take a snapshot on a date in June 2025 and report the corresponding data before 30 November 2025. EU Pay Transparency Directive to be implemented by 7 June 2026 and the outline for legislation is in preparation as noted in the Government's Legislative Programme for Summer 2025.

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		However, the Government's Legislative Programme for Summer 2025 includes reference to the preparation of the outline for legislation for the Pay Transparency Bill which is a " <i>bill to transpose the EU Pay Transparency Directive</i> ". It is unclear at present whether this will address the balance of the Directive or whether it will incorporate the proposals set out in the General Scheme of the Equality (Miscellaneous Provisions) Bill 2025.	
Italy	No activity yet	Italy has existing legislation on gender pay gap reporting, but it will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported.	tba
Latvia	No activity yet	Latvia will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No transposition activity has yet been reported. Latvia's current pay reporting requirements only apply to the public sector and it does not require private sector employers to submit gender pay gap reports. Latvia also has existing legislation for mandatory pay transparency in job advertisements.	tba
Lithuania	Draft legislation published	Lithuania already has some existing pay transparency legislation in place (only partially implementing the Directive). Existing laws require employers to provide pay information in all job postings, publish remuneration policies with salary ranges, provide gender pay gap data to employee representative bodies upon their request etc. In May 2025, the initial draft legislation partially implementing the Directive was first published (unofficially). The draft legislation was discussed within the Tripartite Committee (consisting of Government, employee and employer representative associations). An updated draft legislation was officially registered on 12 September 2025. The draft law: (a) provides stricter requirements for preparing remuneration policies, (b) prevents employers from asking job applicants or their employees about salary history, (c) requires monthly pay gap reporting via state social security authorities, (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.	Planned implementation date 7 June 2026.
Luxembourg	No activity yet	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	tba

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		requiring employers to share gender-based statistics with its equal opportunities officer twice a year (where applicable).	
Malta	Partial implementation	Malta published draft legislation partially implementing the Directive in June 2025 which came into effect on 27 August 2025 which requires employers to disclose salary ranges to job applicants and pay information to employees on request. Further legislation is expected to be published ahead of the Directive's implementation deadline of 7 June 2026.	Pay information legislation came into effect on 27 August 2025. Further draft legislation is expected.
Netherlands	Draft legislation published	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. The public internet consultation on the draft legislation was open until 7 May 2025 and is now closed. 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: • 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.	Planned implementation date 1 January 2027.
Poland	Partial implementation	The Act of 4 June 2025 which amends the Labour Code partially implements the EU Pay Transparency Directive in Poland. It introduces provisions requiring employers to disclose to candidates the initial remuneration or its range (based on gender-neutral, objective and non-discriminatory criteria) for the given position, along with relevant provisions of the internal remuneration policies (collective labour agreements or remuneration regulations).	The Act will take effect on 24 December 2025. Further draft legislation is expected.

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		Employers will be required to provide the information electronically or in paper form at a defined stage of the recruitment process, ensuring transparent and informed pay negotiations. Additionally, the Act mandates gender neutrality in job advertisements and position titles, as well as prohibits asking candidates about their current or past remuneration for work, reinforcing non-discriminatory hiring practices. Based on the unofficial information from the Polish Labour Ministry official, the draft bill to fully implement the EU Pay Transparency Directive in Poland should be published in the second half of September 2025; however, as there are certain key issues to be internally agreed yet with other authorities, this deadline is rather unlikely to be met by the Ministry. According to this unofficial information (to be confirmed when the official draft implementing bill is published): (i) there will be a separate legal act to fully implement the Directive in Poland (it is not yet known whether the above-mentioned provisions on recruitment introduced in the Polish Labour Code will be further amended); (ii) no additional requirements or duties, beyond what is expressly required under the Directive, will be imposed on the employers under the Polish implementing legislation; (iii) the implementing legislation is expected to come in force on 1 June 2026; however, the first reporting will be only for the period after 1 June 2026 (not for the whole 2026); (iv) the Labour Ministry will share tools to calculate the gender pay gap, but there will be no new tool for the purpose of reporting gender pay gap under the Directive.	
Portugal	No activity yet	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	tba

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		working group was established in early 2025 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.	
Romania	Draft legislation expected Autumn 2025.	Romania will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No draft legislation has yet been published. As per the Romanian 2025 annual transposition plan for EU Directives, the Government expects to approve a draft law by September 2025, with adoption by the Parliament by February 2026, ahead of the 7 June 2026 transposition deadline. A draft law is currently under development at the level of the Ministry of Labour, however, no version of the draft law has been made publicly available so far. It is expected that the law will transpose the provisions of the Directive to ensure compliance with European standards. Public discussions have indicated that the legislation will apply broadly across the private sector, with the main purpose of banning pay secrecy clauses in all employment contracts.	Draft legislation expected to be adopted by the Parliament by February 2026, however no version of the draft has been released to the public so far.
Slovakia	Draft legislation expected Summer 2025.	Slovakia has not yet published draft legislation implementing the Directive, but in May 2025 the Government published a preliminary legislative notice indicating that it is preparing a draft pay transparency law. The proposed law will introduce minimum requirements for assessing pay transparency, establish a system for data collecting, monitoring, assessing and reporting gender pay gaps as well as measures to address disparities and sanctions for breaches of equal pay rights. Two major stakeholders have already commented on the published information regarding the legislative process. Klub 500 and the Republican Union of Employers (RÚZ) both noted that the proposed law would impose a significant administrative and financial burden on the business environment through new employer obligations and therefore proposed organising consultations.	Draft legislation expected to be published in Summer 2025.
Slovenia	Draft legislation expected	Slovenia will need to transpose the EU Pay Transparency Directive into national law by 7 June 2026. No draft legislation has yet been published. 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, which is expected to be adopted by the end of 2025.	tba

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		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. 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.	
Spain	Draft legislation expected.	Spain has not yet transposed the Directive 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. 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.	tba
Sweden	Draft legislation published in May 2024	Sweden published a report in May 2024 which is part of the preparatory work to the new law implementing the Directive. Sweden has a strong record of equality with an existing framework for equal pay and gender pay gap surveys and it aims to build on existing legislation which is already broadly in line with the requirements of the Directive. New measures on pay transparency for job applicants and pay information for existing employees will be introduced. 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 report also emphasises the importance	Planned implementation date 1 June 2026.

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		of cooperation between employers and union representatives in terms of e.g. gender pay gap surveys and its analysis.	

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