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EU Pay Transparency Directive

Local country transposition status (as at 20 November 2026)

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Jurisdiction	Transposition of the EUPTD status	Key Information	Gold-Plating comments	Likely date of implementation
Austria	**DRAFT BILL**	• Draft sent for implementation by a Minister on 6 June 2026 and is currently undergoing negotiations between parties. • Four federal states now have pay transparency rules for their own public services. There is still no federal instrument, so no private-sector employer is covered.		• Unknown
Belgium	**PARTIAL** *(Public sector only and private sector proposal submitted)*	• EUPTD only implemented for the public sector • In January 2026, a parliamentary proposal set out a minimum-transposition approach for private sector but that is still TBC and the subject of debate	• Awaiting details	• Unknown – no draft legislation for the private sector • Requested 6-month extension due to stalled labour negotiations
Bulgaria	**DRAFT BILL**	• Bill submitted to Parliament on 11 September 2026 and is now subject to review by the commissions and afterwards to two stages of voting. • Legislation is broadly in line with the Directive. • Previous 14-day deadline for clarification of responses to right to information requests has been amended to 2 months	• Mandatory justification for any 5% pay gap. • For reporting thresholds, employees of a temporary agency engaged by an end user are included in the end user's headcount.	• Reporting and joint pay assessment obligations take effect on 7 June 2027 for employers with 150 or more employees, and on 7 June 2031 for employers with 100–149 employees.
Croatia	**DRAFT BILL**	• The Ministry of Labour has published a detailed job evaluation methodology that is not mandatory. Notably, the methodology offers three models tailored to different employer sizes. • On 2 November 2026, Croatia published a draft bill transposing the Directive for public consultation, which is open until 2 December.	• Reporting obligations for employees with at least 150 employees will begin from 7 June 2028 as opposed to 7 June 2027 as required by the Directive. • Employees may ask the employer to compare the value of their job with a comparable employee of the opposite sex and to explain the criteria applied. • There is a proposed creation of a National Pay Transparency System operated by FINA in which employer's submit pay information to generate the gender pay gap report.	• Expected adoption in spring 2027 - public consultation for the newly published draft bill will close on 2 December 2026.
Cyprus	**DRAFT BILL**	• Broadly in line with the EUPTD • On 6 September, the Labour Minister stated he expected the bill to be submitted to Council of Ministers in September.	• Broadly in line with the EUPTD	• Unknown
Czech Republic	**PARTIAL** *(Flexi- amendment, draft bill approved)*	• Has only implemented a very small part of the EUPTD – the prohibition against contractual terms that restrict workers from disclosing information regarding pay. • For the other aspects of the Directive, the Government approved a draft implementing legislation on 31 August 2026 which is now proceeding through the legislative process.	• Intended to also apply to *dohody* (employees working under flexible work agreements which extends beyond standard employment relationships). • Employers must implement a mandatory internal remuneration system with prescribed content. • Must include agency workers in the end user's GPG report from 1 Jan 2031 – cooperation and information sharing obligations in place.	• Establishment of remuneration system proposed to take effect 1 Jan 2027. • Employee information rights, pay gap reporting and pay assessments proposed to take effect 1 Jan 2028.
Denmark	**DRAFT BILL**	• Draft bill introduced on 8 October 2026. The previously introduced bill lapsed due to the calling of a general election. • The new bill is largely derived from the previous proposal but elaborates on and clarifies how a range of obligations are to be understood • The committee adopted a timetable on 11 November 2026 which set a question deadline of 17 November, a reply deadline of 9 December, and amendment deadline of 11 January 2027 and committee deliberation/report on 20 January 2027.	• Pay gap reporting extended to employers with 50 – 99 employees where there are at least 8 employees of each gender in the same employee group as determined by the 6-digit DISCO code.	• Expected to come into force on 1 March 2027
Estonia	**PARTIAL**	• On 17 June 2026, the Parliament of Estonia partially transposed the Directive which came into force 13 July 2026. • Partial adoption: salary range included on job adverts and a prohibition on asking about prior salary and salary secrecy.	• Pay information must be provided in vacancy notice or before job interview.	• Partly in force 13 July 2026 but the deadline for the remainder is unknown.

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Finland	**GOVERNMENT PROPOSAL**	• Government proposal submitted to parliament on 9 July 2026 broadly in line with EU PTD minimum requirements. • Finland's Income Register has published guidance on pay transparency reporting. • The Finnish Parliament approved the draft bill on 11 November 2026, and it is now pending confirmation by the President. The bill remains scheduled to take effect 1 January 2027.	• None currently	• 1 January 2027
France	**DRAFT BILL** *(submitted to Senate)*	• On 10 September 2026, a new version of the draft law was issued and was introduced to the Senate under the accelerated procedure initiated by the Government. • The draft bill will then be submitted to Parliament, with the examination expected to begin in the Senate before moving on to the National Assembly. • Future implementing decrees will govern the detailed provisions of the transposition.	• "Work of equal value" definition wider: collective bargaining agreement preferred • Works Council expansion – formal opinion carries weight • Enforcement with heavier sanctions: penalties up to 1% of payroll, 2% for repeat, fixed penalties of EUR 450 / breach & burden of proof in favour of employees • RTI requests and responses do not need to be in writing • Job adverts must specify the salary range and collective agreement provisions. • Mandatory reporting for employers with 50+ employees. • The results of the gender pay gaps indicators are declared every year even for those with 50+ employees.	• The Minister of Labour hopes that the law can be voted on before the 2027 presidential election (April/May 2027) and considers that the draft law could come into force in 2028.

Germany	**DRAFT BILL EXPECTED**	• Committee recommendations only at this stage, which indicate:
		  • Pay data reference: GPG reporting based on actual pay not targets
		  • Pay comparators: Comparative group of at least 6
		  • Right to request information: to be introduced from either January / June 2027 (TBC) and limited to once per year
		  • If collective agreement, no right of co-determination of pay assessment
		• The Federal Cabinet had been expected to consider the draft implementation act on 27 May 2026. According to the latest political commentary, the government has postponed the discussion of a draft bill.
			• Commission recommends staying close to the EUPTD i.e. unlikely to be gold-plating	• Ministry confirmed legislation will come into force in early 2027 at the earliest with pay reporting duties and RTI not expected until June 2028 (**not yet published)**

Greece	**LEGISLATION PASSED**	• On 2 July 2026, the transposition was passed by the Plenary Session of Parliament and was enacted on 6 July 2026. • Implementation has occurred and all provisions became operative on 1 November 2026.	• Expanded "work of equal value" criteria: academic achievements and prior service. • 1 year timeframe for corrective measures after joint pay assessment. • Employers can refuse requests for information that are 'manifestly disproportionate or abusive' (including repetitive).	• 1 November 2026
Hungary	*None*	• No draft yet		• Unknown
Ireland	**DRAFT BILL** *(On selective parts of EUPTD)*	• Not yet transposed in Ireland, but the initial steps in the transposition process are underway. In Jan 2025, a draft Bill was published with two provisions aimed at enhancing transparency prior to employment.	• The draft Bill suggests pay level / range must be in the job advert rather than before interview, but this may change	• Deadlines unclear – phased implementation likely
Italy	**LEGISLATION PASSED**	• On 30 April 2026 the draft decree was given final approval by the Italian Council of Ministers • The official text of the decree was published on 1 June and took effect on 7 June • Collective bargaining agreements are reference point for work of equal value - important to map to local structures, which is likely to widen comparator groups so potentially higher equal pay exposures	• Pre-hire information must be provided in job notices and announcements through which employment opportunities are made known • Includes executive-level contracts and apprenticeships but excludes domestic service and on-call contracts.	• 7 June 2026

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Latvia	**DRAFT BILL**	• Draft bill published March 2026, currently subject to public consultation • The draft law stipulates the Cabinet of Ministers must adopt regulations governing the procedure for gender pay gap reporting by 1 May 2027	• Must include pay information in the job advert.	• Unknown
Lithuania	**LEGISLATION PASSED**	• Most requirements entered into force on 7 June 2026, but employer pay system compliance will come into force on 31 December 2026, and data submission to national social insurance authority will take effect on 1 Jan 2027. • RTI provisions not entering into force until January 2027	• Must include pay information in the job advert. • Current requirement for monthly gender pay gap reporting	• 7 June 2026 / Jan 2027 for RTI
Luxembourg	**CONSULTATION PHASE**	• An initial draft bill has been drawn up following consultation. • As a next step it will be discussed with social partners		• Unknown
Malta	**LEGISLATION PASSED**	• Malta has enacted significant amendments to pay transparency regulations already, applicable both prior to and during employment, which took effect as of 27 August 2025. The rest took effect on 7 June 2026.	• Must respond to RFI **within 8 days** rather than 2 months • Worker representatives are union representatives, elected representatives or 'other representative acting…in defence of that worker's interests.' This may expand the scope for unions to secure greater representation.	• 7 June 2026
Netherlands	**DRAFT BILL**	• On 19 June 2026, a revised draft bill was published for consultation on pay concepts, reporting, right to information. • On 2 September, the Dutch government published a guidance note to accompany its draft legislation. • On 19 November, Dutch Minister of Social Affairs and Employment confirmed that implementation by 1 Jan 2027 is no longer feasible and is now targeting 1 July 2027 for entry into force.	• The Dutch have gold plated Works Council and PVT rights to be consulted when determining pay criteria and classification of employees. • Temporary agency workers are explicitly included and should be counted in the pay data of the hiring company • Those identifying as non-binary can request comparison between both men and women.	• Targeted for 1 July 2027 • GPG will start from 1 June 2028
Poland	**PARTIAL** *(Transparency in recruitment by **24 Dec 2025** AND REVISED **DRAFT BILL** on remaining obligations released in April 2026)*	• From 24 December 2025, employers operating in Poland, regardless of size, are required to comply with new obligations around pay transparency in recruitment practices. • There is a draft bill relating to the remainder of the EUPTD, although delays are likely. • On 4 May 2026, a new version of the draft bill was published replacing the December 2025 bill transposing the remaining provisions. Currently being reviewed by Council of Ministers before parliamentary approval.	• Must respond to RFI within 30 days rather than 2 months (or 14 days if < 50 employees in an entity) • Extensive consultation obligations with worker reps to agree gender pay gaps are justified based on objective, gender neutral criteria • Temporary agency workers are explicitly included and should be counted in the pay data of the hiring company. End user employer must perform the EUPTD's obligations to temp workers, the temp agency is only responsible for recruitment obligations and obligations regarding pay secrecy clauses • Remediation following a joint remuneration assessment required within 10 months (rather than EUPTD's "reasonable period")	• Informal announcement of delay. New date unknown but a six month "grace period" is likely after the legislation is passed, meaning we expect the legislation to be in force no earlier than March 2027

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Portugal	**DRAFT BILL**	• On 5 August 2026, a draft bill partially transposing the Pay Transparency Directive into Portuguese law was published for public consultation. • At a parliamentary hearing on 26 October, the Labour Minister reaffirmed the Government's commitment to transposition and indicated legislative changes were envisaged for 2027.	• Right to information expressly includes temporary agency workers • GPG reporting applies to employers with 50+ employees • Obligation to implement a transparent pay policy agreed with employees' representatives. • Ancillary sanctions for repeat offences e.g. withdrawal of public benefits, public procurement exclusion. • Anti-retaliation: Presumption of unfair dismissal in the three years following a pay discrimination complaint. • Shorter period and defined process for remediating unexplained gender pay gaps.	• Unknown
Romania	**DRAFT BILL**	• Draft bill under discussion as of 17 June 2026 although it has a negative opinion from the Legislative Council and so the bill will likely require significant revision. • Broadly in line with the EUPTD except for procedural aspects such as deadlines for information requests/remediation • The Senate rejected the bill on 14 October 2026, and it is now before the Chamber of Deputies which is the decisional chamber for the proposal.	• 30-day deadline to respond to right to information requests. • 90-day remediation period for unjustified pay gaps. • 6-month deadline to implement remedial actions following joint pay assessment	• Unknown
Slovakia	**LEGISLATION PASSED**	• Broadly in line with the EUPTD • Came into force on 7 June 2026	• The Slovak Act requires employers to have a functioning pay structure capable of assessing work of equal value by 31 July 2026 for existing employers.	• Fully transposed on 7 June 2026
Slovenia	None	• No draft yet		• Unknown
Spain	**LEGISLATION PASSED**	• An official draft was published in August 2026. This draft has not yet been approved by the Council of Ministers. The draft Royal Decree, dated 3 August 2026, effects only a partial transposition of the Directive. • The existing pay audits will continue through 2027 with the new system coming into force from 2028. • Despite the recent dissolution of Parliament, Spain have approved the Royal Decree-law to transpose the Directive, and this came into force on 19 November 2026. • The text clarifies recruitment obligations not covered in earlier announcements, including requirements for job adverts to include initial pay information and for vacancy notices and job titles to use gender-neutral language.	• The remuneration register obligation under Article 5 of Royal Decree 902/2020 applies to employers with 50+ employees. Companies with 50–249 workers must report on the previous three years and, on request, provide pay gaps by category for the previous four years. • Job adverts must state initial pay, not merely a range, and use gender-neutral language. The pay history ban covers employers and public and private recruitment agents. • Pay information must include annual and hourly averages, split by base salary and each supplement. Clarification requests require reasoned replies within 15 days. Former employees retain information rights for one year after termination. • New serious infringements cover pay registers, information to the Commission and pre-contractual applicant information. Very serious infringements cover retaliation for enforcing labour rights and breaches concerning equality plans and measures.	• Fully transposed on 19 November 2026.
Sweden	**DRAFT BILL** *(indefinitely delayed)*	• Although the Swedish government had previously published a draft bill, they announced in March that they would not be submitting this for approval and instead they will seek a renegotiation of the Directive at an EU level. • On 8 June 2026, the Government asked the Equality Ombudsmen to continue with preparations for implementation of Directive despite intention to postpone but signals a softening of previous stance.	• Employers with fewer than 100 employees still need to complete a salary survey as per existing legislation	• Postponement announced but deadline unknown – challenging the implementation of the EUPTD and seeking to renegotiate

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