

PAY TRANSPARENCY IN EUROPE

Country-by-country comparison of implementation status and key obligations



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INTRODUCTION

The new Directive on pay transparency in Europe is reshaping how employers approach pay reporting, fairness of remuneration and equality. While the deadline for implementing the Directive is set for June 7, 2026, countries are progressing at different speeds and with varying levels of readiness.

This overview compares the current status and key obligations across selected European markets, including **Bulgaria, Cyprus, Czech Republic, Estonia, Germany, Greece, Hungary, Italy, Latvia, Lithuania, Poland, Romania, Slovakia** and **Spain**, highlighting where legislation is already in place, where drafts are under discussion, and where implementation is still in progress.

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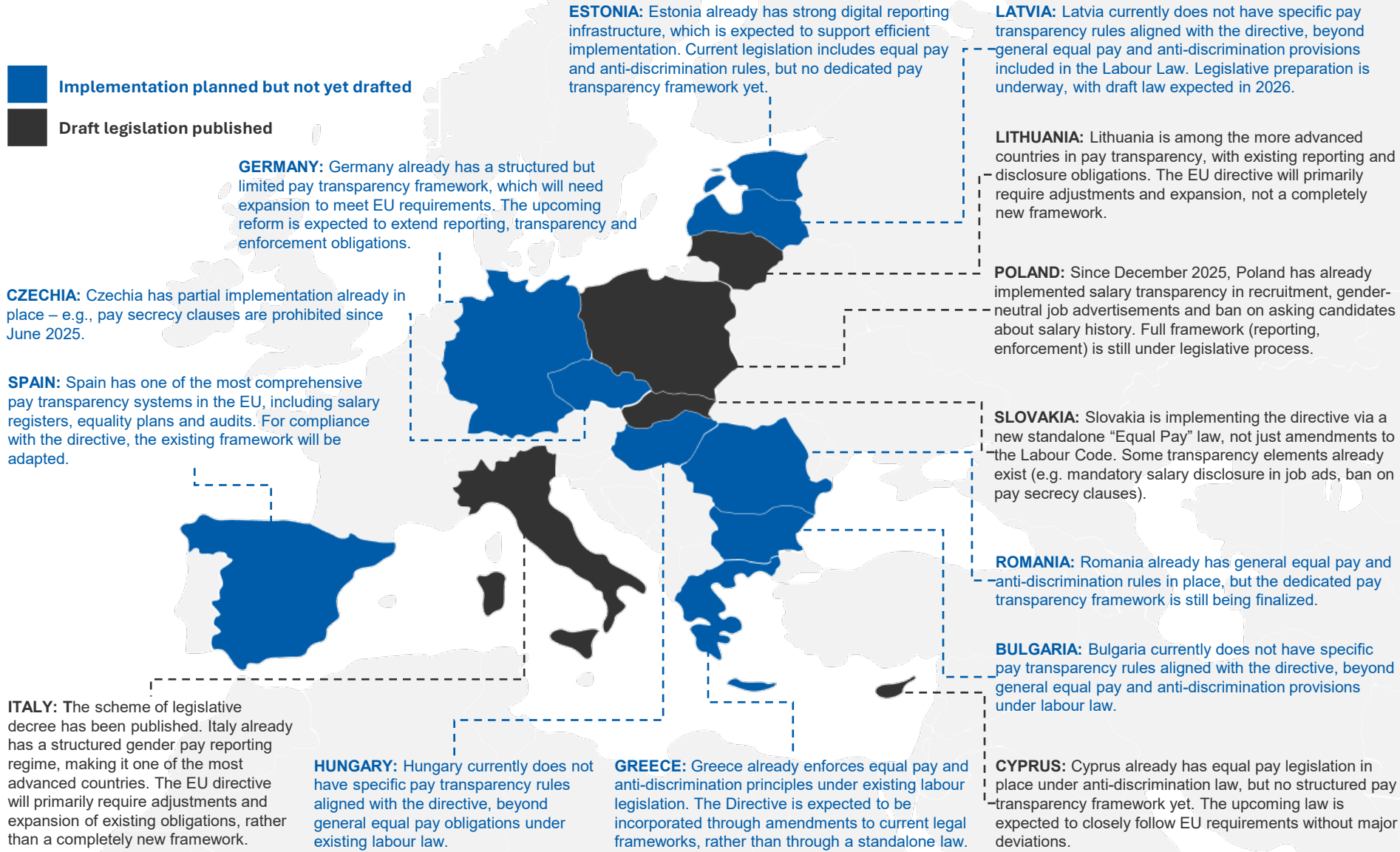
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Data in this infographic reflects the status as of March 31, 2026 and is for informational purposes only. It does not constitute legal advice.

IMPLEMENTATION STATUS

-  Implementation planned but not yet drafted
-  Draft legislation published



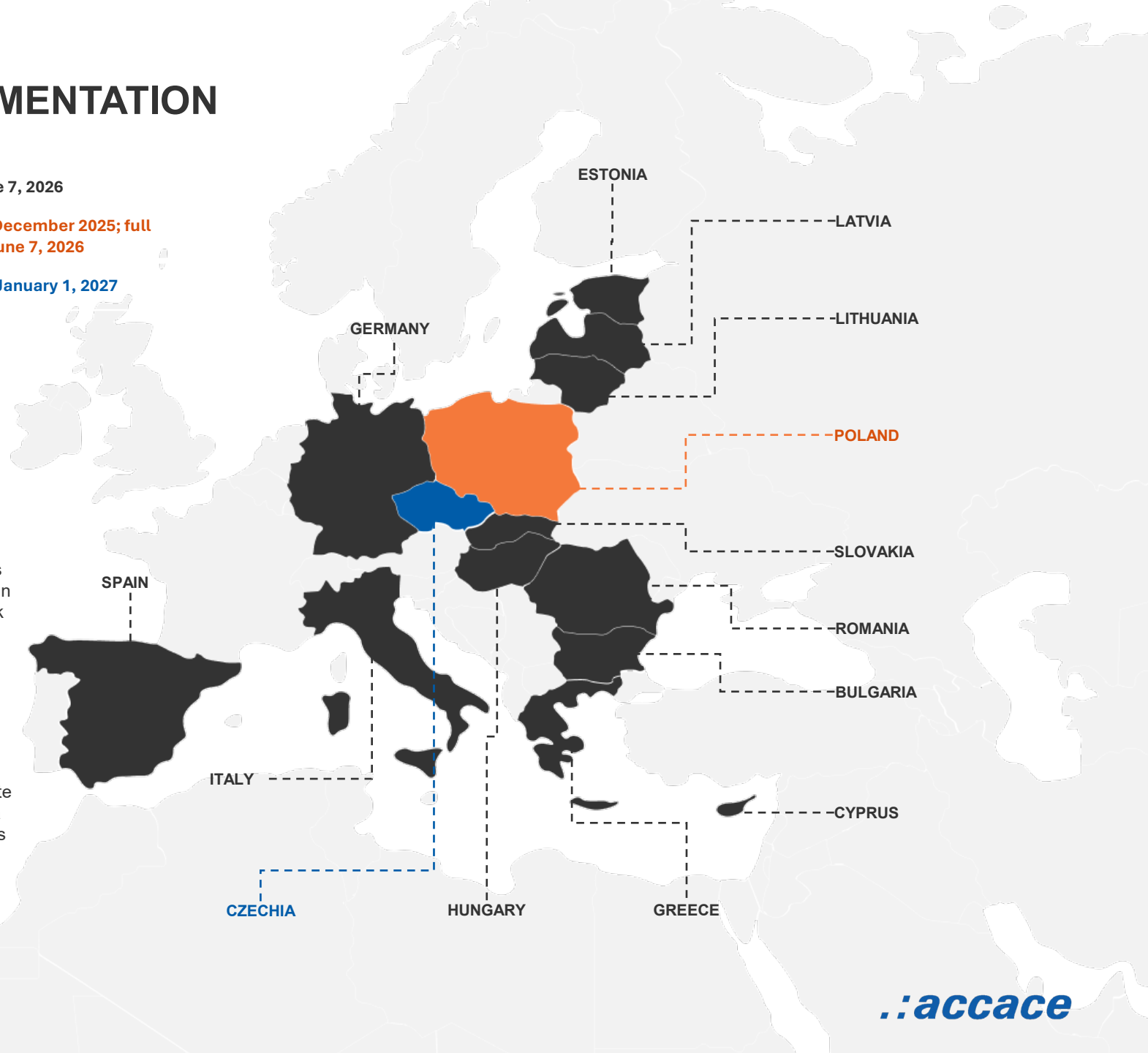
DATE OF IMPLEMENTATION

- Expected to implement by June 7, 2026
- Partial implementation since December 2025; full implementation expected by June 7, 2026
- Expected to become effective January 1, 2027

Most European countries are working towards implementing the EU Pay Transparency Directive by the official deadline of 7 June 2026, although progress varies.

While countries such as **Italy, Cyprus, Germany, Hungary, Romania, Slovakia, Spain and Poland** are expected to meet the deadline (with Poland already having partial measures in force since December 2025 and Spain already having a strong local framework that is expected to be adjusted for compliance), others like **Bulgaria, Estonia and Latvia** may face delays despite aiming for mid-2026 implementation.

Some markets are progressing through gradual alignment, like **Greece**, while **Czechia** is planning a later effective date of January 2027. Meanwhile, **Lithuania** already has pay transparency measures in place, with further adjustments expected to ensure full compliance by mid-2026.



NATIONAL DIFFERENCES FROM THE EU DIRECTIVE

- It is not known yet if the national legislation introduces any additional requirements beyond the EU directive
- The national legislation does not introduce any additional requirements
- The national legislation introduced additional requirements

CZECHIA: Czechia has partial implementation already in place – e.g., pay secrecy clauses are prohibited since June 2025.

SPAIN:

- Salary register required for all employers (no minimum threshold)
- Equality plans, remuneration audits and job evaluations mandatory for 50+ employees
- Existing law requires justification of pay gaps of 25%+, stricter EU threshold (5%) will apply after transposition

ITALY:

- Sanctions and protections: defense mechanisms for workers who suspect inequality, with the employer's obligation to respond in writing within two months of requests for clarification.
- Presumption of legitimacy under the National Collective Bargaining Agreement: Introduction of a presumption of compliance with the rules on transparency and equal pay for the CCNLs signed by the most representative trade unions

GERMANY: Existing Transparency in Wage Structures Act (2017) already in force. This includes:

- Employee right to request pay information (200+ employees)
- Reporting obligations for 500+ employees

ESTONIA: Not yet defined – current indications suggest minimum transposition without additional national requirements.

LATVIA: Not yet defined – current indications suggest minimum transposition without additional national requirements.

LITHUANIA: The draft legislation closely follows the EU directive without significant additional national requirements.

POLAND:

- Mandatory salary ranges in job postings or before interview (stricter than directive flexibility)
- Shorter deadlines for employee information requests (e.g. 14–30 days)

SLOVAKIA: The draft legislation closely follows the EU directive without significant additional national requirements.

ROMANIA:

- A joint pay assessment must be completed within 6 months after pay report submission where an unjustified gender pay gap of 5% or more is identified
- Voluntary reporting is envisaged for employers with fewer than 100 employees

BULGARIA: Not yet defined – current indications suggest minimum transposition without additional national requirements.

HUNGARY: Not yet defined – no draft legislation published, so deviations from the EU directive are unknown.

GREECE: Not yet defined – current indications suggest minimum transposition without additional national requirements.

CYPRUS: Not yet defined – current indications suggest minimum transposition without additional national requirements.

REPORTING OBLIGATION

The EU Directive outlines the following no. of employees from which gender pay gap reporting applies

- 250+ employees - annual reporting from 2027;
- 150-249 employees - every 3 years from 2027;
- 100-149 employees - every 3 years from 2031.

-  **Countries expected to follow EU thresholds.**
-  **Countries where reporting is already in place.**

- SPAIN:**
- All companies: must maintain a salary register
 - 50+ employees: must implement equality plans and remuneration audits
 - 100+ employees (EU directive): future formal reporting obligations will apply from 2027

ITALY: Reporting already applies from 100+ employees.

GERMANY: Currently: 500+ employees (reporting obligations under existing law). From 2027, it is expected to follow EU thresholds, starting from 100+ employees.

ESTONIA: Reporting expected from 2027

LATVIA: Reporting expected from 2027

LITHUANIA: Reporting expected from 2027

POLAND: Reporting expected from 2027

SLOVAKIA: Reporting expected from 2027

ROMANIA: Reporting expected from 2027

BULGARIA: Reporting expected from 2027

CYPRUS: Reporting expected from 2027

CZECHIA: Reporting expected from 2028 (for the year 2027)

HUNGARY: Reporting expected from 2027

GREECE: Reporting expected from 2027

PENALTIES

Penalties that may apply for non-compliance with the EU Directive.

Not yet fully defined; but expected to include:

- Administrative fines
- Compensation claims for employees
- Corrective obligations for unjustified pay gaps

Final sanction framework depends on national legislation.

Already defined

SPAIN:

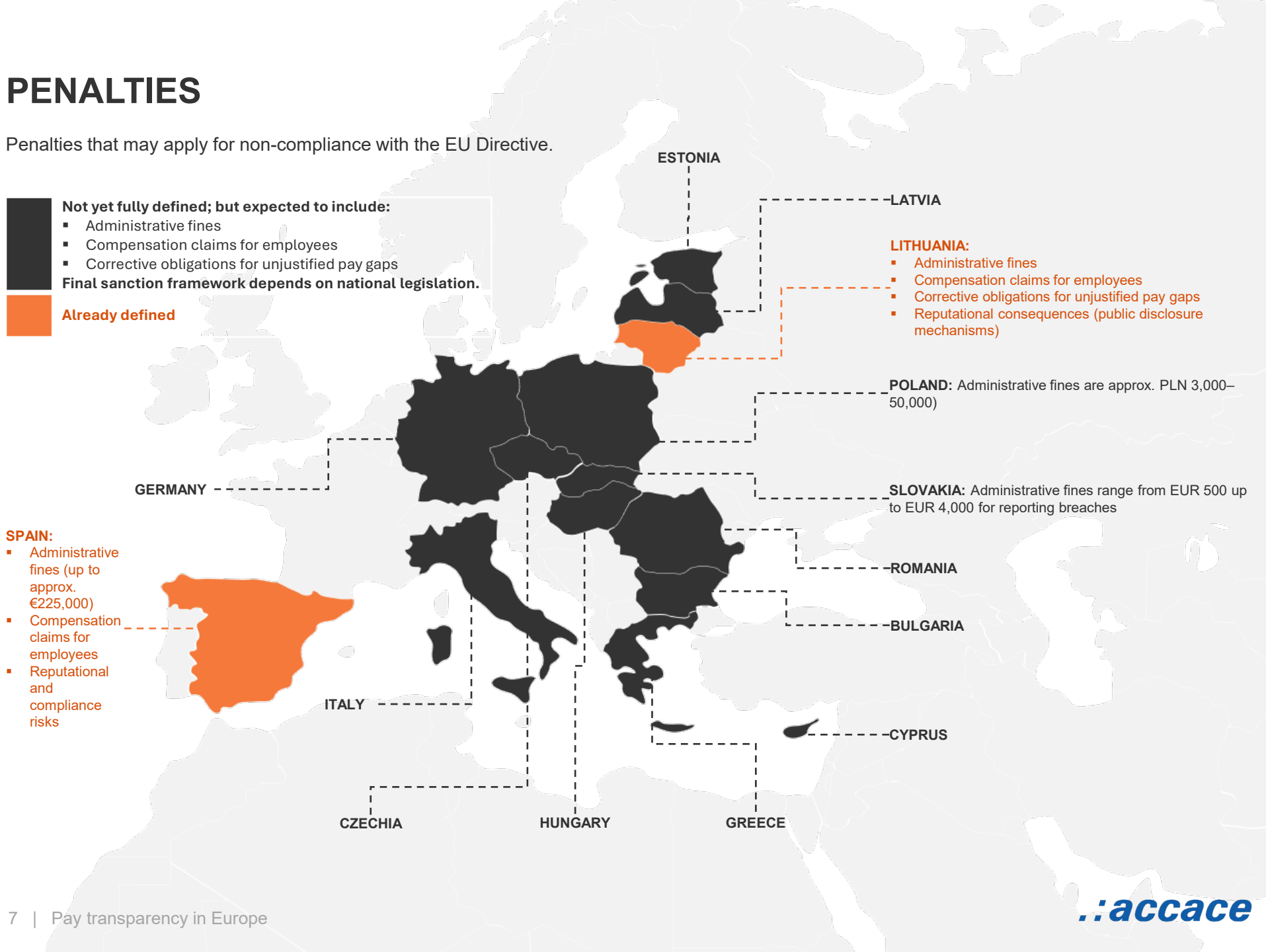
- Administrative fines (up to approx. €225,000)
- Compensation claims for employees
- Reputational and compliance risks

LITHUANIA:

- Administrative fines
- Compensation claims for employees
- Corrective obligations for unjustified pay gaps
- Reputational consequences (public disclosure mechanisms)

POLAND: Administrative fines are approx. PLN 3,000–50,000)

SLOVAKIA: Administrative fines range from EUR 500 up to EUR 4,000 for reporting breaches



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