

A woman in a business dress is standing in a modern office, looking at a tablet. The office has large windows that offer a view of lush green trees outside. The interior features a ceiling with horizontal wooden slats. A yellow banner is overlaid on the left side of the image, containing the title and date of the guide.

Pay transparency – Global labor and employment law strategic guide

August 2024



Building a better
working world

Editor's letter



Paula Hogéus

EY Global Labor and Employment Law Leader
paula.hogeus@law.se.ey.com

As organizations worldwide navigate the shift toward greater transparency and equity in the workplace, pay transparency has emerged as a focal point.

With a growing movement for equality and openness, several jurisdictions globally are developing and enforcing laws that require employers to disclose their compensation practices – introducing a new era in pay transparency regulations expected to shape the global workforce landscape well into the future.

While these changes imply the potential for positive workplace transformation, fostering equity and fair pay, they also pose challenges for multinational corporations. Companies must adeptly steer through applicable regulations to reduce risks, such as potential litigation, damage to employer reputation, and demoralization among the workforce resulting from inequities or missteps in pay transparency.

By adopting pay transparency policies and practices, corporations will not only be able to comply with statutory requirements but also advance their company culture

and employer brand. As part of their work toward pay transparency, employers will need to evaluate pay structures and remuneration policies, provide training to HR and management and ensure that there is alignment between corporate values and real pay outcomes.

As corporations forge ahead, the effective implementation of pay transparency strategies will be instrumental. However, the legal nuances of pay transparency are as varied as they are complex, with regulations differing from jurisdiction to jurisdiction. For multi-national corporations operating across several jurisdictions or regions, a one-size-fits-all approach to pay transparency must be carefully considered.

In this edition of the EY Global Labor and Employment Law Strategic Guide, we survey legal regulations on pay transparency in 38 jurisdictions globally.

Pay transparency overview

Jurisdiction:(A-D)	Are there any current legal requirements in your jurisdiction for performing regular salary mappings or joint pay assessments?	Is the salary mapping/ join pay assessment required to be made publicly available? Will it be shared with trade unions/work councils?	In a recruitment situation: Are employers allowed to ask prospective employees about their pay history?	Upon request from an employee, is an employer obliged to share information on the employee's individual pay level and on average pay levels within the organization?	Upon request from a trade union/works council, is an employer obliged to share information on individual pay levels and on average pay levels within the organization?	Can an employee claim damages due to pay discrimination?	For EU countries: has the legislator communicated changes to local law with respect to the Pay Transparency Directive?
Albania	✗	✗	✓	✗	✗	✓	N/A
Argentina	✗	✓	✗	✗	✗	✓	N/A
Armenia	✗	N/A	✓	✗	✗	✓	N/A
Australia	✓	✓	✓	✗	✓	✗	N/A
Austria	✓	✓	✓	✗	✓	✓	✗
Belgium	✓	✓	✓	✗	✓	✓	✗
Bolivia	✗	✓	✓	✗	✗	✓	N/A
Bulgaria	✗	N/A	✗	✓	✗	✓	✗
Colombia	✗	✓	✗	✗	✓	✓	N/A
Croatia	✗	N/A	✗	✓	✗	✗	✗
Cyprus	✗	N/A	✓	✗	✗	✓	✗
Czech Republic	✓	✓	✓	✗	✓	✓	✗
Denmark	✓	✓	✓	✗	✗	✓	✗

Pay transparency overview (cont.)

Jurisdiction: (E-M)	Are there any current legal requirements in your jurisdiction for performing regular salary mappings or joint pay assessments?	Is the salary mapping/ join pay assessment required to be made publicly available? Will it be shared with trade unions/work councils?	In a recruitment situation: Are employers allowed to ask prospective employees about their pay history?	Upon request from an employee, is an employer obliged to share information on the employee's individual pay level and on average pay levels within the organization?	Upon request from a trade union/works council, is an employer obliged to share information on individual pay levels and on average pay levels within the organization?	Can an employee claim damages due to pay discrimination?	For EU countries: has the legislator communicated changes to local law with respect to the Pay Transparency Directive?
Estonia	✗	✗	✓	✗	✓	✓	✓
Finland	✓	✓	✓	✗	✓	✓	✗
France	✓	✓	✓	✗	✓	✓	✗
Georgia	✗	N/A	✓	✗	✗	✓	N/A
Germany	✓	✓	✗	✗	✓	✓	✗
Greece	✗	✗	✗	✗	✗	✗	✗
Indonesia	✓	✓	✓	✗	✗	✗	N/A
Ireland	✗	N/A	✓	✗	✗	✓	✗
Italy	✗	✓	✗	✗	✓	✓	✓
Japan	✓	✓	✓	✗	✗	✓	N/A
Latvia	✗	N/A	✗	✗	✓	✓	✗
Luxembourg	✗	N/A	✓	✗	✗	✓	✗
Mainland China	✗	N/A	✓	✗	✗	✓	N/A

Pay transparency overview (cont.)

Jurisdiction: (N-V)	Are there any current legal requirements in your jurisdiction for performing regular salary mappings or joint pay assessments?	Is the salary mapping/ join pay assessment required to be made publicly available? Will it be shared with trade unions/work councils?	In a recruitment situation: Are employers allowed to ask prospective employees about their pay history?	Upon request from an employee, is an employer obliged to share information on the employee's individual pay level and on average pay levels within the organization?	Upon request from a trade union/works council, is an employer obliged to share information on individual pay levels and on average pay levels within the organization?	Can an employee claim damages due to pay discrimination?	For EU countries: has the legislator communicated changes to local law with respect to the Pay Transparency Directive?
Netherlands	✗	✓	✓	✗	✗	✓	✓
New Zealand	✗	N/A	✓	✗	✓	✓	N/A
Norway	✓	✓	✓	✓	✓	✓	N/A
Peru	✓	✓	✓	✗	✓	✓	N/A
Romania	✗	N/A	✓	✓	✓	✓	✓
Singapore	✗	N/A	✓	✗	✗	✗	N/A
South Africa	✓	✓	✓	✗	✓	✓	N/A
Spain	✓	✓	✓	✓	✓	✓	✗
Sweden	✓	✓	✓	✗	✓	✓	✗
Switzerland	✓	✓	✗	✗	✗	✓	N/A
United Kingdom	✗	N/A	✓	✗	✓	✓	N/A
Vietnam	✗	✓	✗	✓	✓	✓	N/A

Contacts

Albania

Krisela Qirushi

krisela.qirushi@al.ey.com

Argentina

Nicolas Nigrelli

nicolas.nigrelli@ar.ey.com

Armenia

Alexey Markov

alexey.markov@am.ey.com

Australia

Andrew B. Ball

andrew.ball@au.ey.com

Austria

Helen Pelzmann

helen.pelzmann@eylaw.at

Belgium

Barbara Francois

barbara.francois@be.ey.com

Bolivia

Juan Pablo Vargas

juan.vargas@bo.ey.com

Bosnia and Herzegovina

Adela Rizvic

adela.rizvic@ba.ey.com

Brazil

Tatiana Carmona

tatiana.carmona@br.ey.com

Bulgaria

Rebeka Kleytman

rebeka.kleytman@bg.ey.com

Canada

Tracy A. Kay

tracy.kay@ca.ey.com

Chile

Juan Andres Perry

juan.andres.perry@cl.ey.com

Colombia

Carlos Sandoval

carlos.sandoval@co.ey.com

Costa Rica

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

Croatia

Marija Saravanja

marija.saravanja@hr.ey.com

Cyprus

Andria Koukounis

andria.koukounis@cylaw.ey.com

Czech Republic

Ondrej Havranek

ondrej.havranek@cz.eylaw.com

Denmark

Julie Gerdes

julie.gerdes@dk.ey.com

Dominican Republic

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

El Salvador

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

Estonia

Maris Merilo

maris.merilo@ee.ey.com

Finland

Maiju Kurvi

maiju.kurvi@fi.ey.com

France

Anne-Elisabeth Combes

anne.elisabeth.combes@ey-avocats.com

Gabon

Fatima-Kassory Bangoura

fatima-kassory.bangoura@ga.ey.com

Georgia

Elene Sulkhanishvili

elene.sulkhanishvili@ge.ey.com

Germany

Bärbel Kuhlmann

baerbel.kuhlmann@de.ey.com

Greece

Maria Rigaki

maria.rigaki@gr.ey.com

Guatemala

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

Honduras

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

Hong Kong

Sunny Liew

sunny.liew@cn.ey.com

Hungary

Ivan Sefer

ivan.sefer@hu.ey.com

Indonesia

Fahrul Yusuf

fahrul.yusuf@id.ey.com

Ireland

Deirdre Malone

deirdre.malone@ie.ey.com

Italy

Maria Teresa Iannella

maria-teresa.iannella@it.ey.com

Japan

Junya Kubota

junya.kubota@jp.ey.com

Kazakhstan

Dinara Tanasheva

dinara.s.tanasheva@kz.ey.com

Contacts

Latvia

Liene Cakare

liene.cakare@lv.ey.com

Lithuania

Inga Pakalniskyte

inga.pakalniskyte@lt.ey.com

Luxembourg

Laurence Chatenier

laurence.chatenier@lu.ey.com

Mainland China

William WL Zhang

william-wl.zhang@cn.ey.com

Mexico

Jacqueline Alvarez

jacqueline.alvarez@mx.ey.com

Netherlands

Laila Berrich

laila.berrich@hvglaw.nl

New Zealand

Tori Sullivan

tori.sullivan@nz.ey.com

Nicaragua

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

North Macedonia

Jana Nikodinovska

jana.nikodinovska@mk.ey.com

Norway

Helga Aune

helga.aune@no.ey.com

Panama

Fernando Vargas

fernando.vargas.winiker@cr.ey.com

Paraguay

Gustavo Colman

gustavo.colman@py.ey.com

Peru

Jose Ignacio Castro Otero

jose-ignacio.castro@pe.ey.com

Poland

Zuzanna Zakrzewska

zuzanna.zakrzewska@pl.ey.com

Portugal

Rodrigo Lourenco

rodrigo.lourenco@fnlaw.pt

Romania

Anca Atanasiu

anca.atanasiu@bdattorneys.ro

Saudi Arabia

Dana Al Shawwa

dana.al.shawwa@sa.ey.com

Serbia

Adela Rizvic

adela.rizvic@ba.ey.com

Singapore

Kenneth Cheow

kenneth.cheow@atlasialaw.com.sg

Slovakia

Peter Bobcik

peter.bobcik@sk.ey.com

Slovenia

Matej Kovacic

matej.kovacic@si.ey.com

South Africa

Sarika Singh

sarika.singh@za.ey.com

Spain

Raúl Luis García Gonzalez

raulluis.garciagonzalez@es.ey.com

Sweden

Paula Hogeus

paula.hogeus@law.se.ey.com

Switzerland

Marc P Gugger

marc.gugger@ch.ey.com

Taiwan

Helen Fang

helen.fang@tw.ey.com

Turkey

Mehmet Kucukkaya

mehmet.kucukkaya@tr.ey.com

Ukraine

Halyna Khomenko

halyna.khomenko@ua.ey.com

United Arab Emirates

Chris Sioufi

chris.sioufi@ae.ey.com

United Kingdom

Virginia Allen

virginia.allen@uk.ey.com

Uruguay

Germán Gómez

german.gomez.bonaglia@uy.ey.com

Vietnam

Michael Beckman

michael.beckman@vn.ey.com

EY | Building a better working world

EY exists to build a better working world, helping to create long-term value for clients, people and society and build trust in the capital markets.

Enabled by data and technology, diverse EY teams in over 150 countries provide trust through assurance and help clients grow, transform and operate.

Working across assurance, consulting, law, strategy, tax and transactions, EY teams ask better questions to find new answers for the complex issues facing our world today.

EY refers to the global organization, and may refer to one or more, of the member firms of Ernst & Young Global Limited, each of which is a separate legal entity.

Ernst & Young Global Limited, a UK company limited by guarantee, does not provide services to clients. Information about how EY collects and uses personal data and a description of the rights individuals have under data protection legislation are available via ey.com/privacy. EY member firms do not practice law where prohibited by local laws. For more information about our organization, please visit ey.com.

© 2024 EYGM Limited.
All Rights Reserved.

EYG no. 005377-24Gbl

BMC Agency
GA 21327297
ED None

This material has been prepared for general informational purposes only and is not intended to be relied upon as accounting, tax, legal or other professional advice. Please refer to your advisors for specific advice.

ey.com