



On your radar

Key employment issues
to be aware of internationally

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Welcome to the latest edition of CMS On your radar

If you want to get in touch to find out more about a development in a particular country, please do speak to your usual contact within CMS or alternatively email employment@cmslegal.com. The information set out is correct at the time of writing in October 2026.

The CMS Employment team



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On your radar 

Development and date	Description	Impact and risk	Future actions
Presidential Decree 95/26 – Legal Regime for Family Benefits under Mandatory Social Protection 22 May 2026	The Presidential Decree sets out new rules for maternity, breastfeeding and family allowances, and increases the amounts to reflect the higher cost of living. The funeral allowance rules set out in Presidential Decree 8/11 remain in force until further notice, but the allowance increases from Kz 25,000 to Kz 100,000.	The new regime expands the scope and amount of family benefits, increasing the administrative burden on employers in relation to employee registration, contribution reporting, documentary verification and the payment of family allowances. Errors in these processes may affect employees' entitlement to benefits and create compliance exposure for employers.	Employers should assess whether their existing HR, payroll and social security procedures adequately support the new benefits regime. This includes reviewing the registration of employees, contribution reporting and the procedures for maternity payments and reimbursement of claims. Employers may also consider updating employee-facing policies and guidance to reflect the revised entitlements and eligibility criteria, to reduce the risk of administrative errors, disputes and compliance issues.
Joint Executive Decree 2/26 – Catalogue of Professions and Reference Qualifier of Professions for the Tourism Sector 17 April 2026	The Ministries of Public Administration, Labour and Social Security and of Tourism have approved a sector-specific catalogue of professions and a reference qualifier (standard job profiles) for the tourism sector.	The catalogue applies to all businesses operating in the tourism sector, which must use its job titles. Job advertisements must state the job title as it appears in the catalogue; the company's internal job title may follow in brackets. Any registration that uses job titles not included in the catalogue is null and void. Larger or more complex businesses may adopt their own professional qualifiers, which must use the catalogue's common terminology when they are revised.	Tourism sector employers should review their job titles, employment contracts, job descriptions, recruitment advertisements and internal qualifiers to align them with the catalogue. Employer and employee representative bodies may request that new professions be added to future catalogues.



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On your radar 

Development and date	Description	Impact and risk	Future actions
Presidential Decree 157/26 – National Policy for Gender Equality and Equity (PNIEG) 1 September 2026	The Presidential Decree approves the PNIEG and its Implementation Plan. It applies to all central and local public administration bodies and serves as a guiding framework for private entities, civil society organisations and social partners.	The PNIEG does not impose direct legal obligations on private employers. However, it identifies the following labour rights measures as priorities: a) mechanisms to audit pay and recruitment in public companies and the private sector, to reduce gender inequalities; b) policies to reconcile work and family life, including equitable parental leave; c) protection against discrimination at work across all sectors and levels, including the prevention of all forms of workplace harassment.	The state is expected to introduce incentives aimed at promoting the implementation of gender equality practices in the private sector, including measures relating to work-life balance, gender parity, harassment prevention, diversity and gender-sensitive indicators. In anticipation of further legislative and regulatory developments, employers may wish to assess existing workplace practices, including through gender pay gap reviews and updates to anti-harassment, diversity and work-life balance policies.
Law 9/26 – Cybersecurity Law 28 September 2026	The new Cybersecurity Law establishes the legal framework for cybersecurity in Angola. Its aim is to protect citizens and public and private institutions against cyber threats and cyberattacks, and to ensure the integrity, availability, authenticity and confidentiality of networks, information systems, critical infrastructure and essential services. It applies to all individuals and legal entities, public or private, that use Angolan cyberspace, including acts carried out abroad that are directed at Angolan cyberspace.	Although it is not a labour statute, the Law contains several provisions that affect employment relationships. For critical infrastructure operators, staff training and awareness are expressly listed among the minimum security requirements. Failure to implement the security requirements is a very serious offence, punishable, in the case of legal entities, by fines of 2,000 to 4,000 times the national minimum wage.	Employers should review and update IT policies, as well as employment contracts, to reflect the new cybersecurity obligations. They should also ensure that employee monitoring practices comply with privacy and data protection requirements and provide regular cybersecurity training and awareness programmes, maintaining records to evidence compliance.



Austria

On your radar 

Development and date	Description	Impact and risk	Future actions
Removal of tax benefits for remote working allowances 1 January 2027	Austrian legislation requires employers to provide digital equipment (including internet access) for remote work or working from home, or to pay an allowance where the employee provides their own digital equipment. The allowance can be paid out as a lump sum payment. Currently, such a lump sum payment is tax free for up to EUR 3 per day, up to 100 days per year, provided that the employer keeps records of full remote working days. Due to budget cuts, this tax benefit will end from 1 January 2027.	The legislative requirement for employers to pay an allowance for digital equipment provided by the employee remains, as does the option to pay a lump sum allowance. However, following the removal of the tax benefit, employees will suffer no financial disadvantage if the allowance is included in their overall salary (all-in salary) rather than paid separately. Also, the requirement to record full days of remote work/work from home as a requirement for the tax benefit is expected to be cancelled by the end of 2026.	When drafting or amending contracts, a lump sum allowance no longer needs to be agreed as a separate payment in order to obtain the tax benefit but can be included as part of a comprehensive payment (all-in agreement). The expected removal of the requirement to record telework days for tax purposes will reduce documentation requirements.



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On your radar 

Development and date	Description	Impact and risk	Future actions
Part-time work 1 June 2026	The Act of 18 May 2026 containing various amendments relating to employment will reduce the minimum weekly working time for part-time employees from one-third to one-tenth of a full-time schedule, effective 1 June 2026. It means that a part-time employment contract may not, in principle, have a weekly working time of less than one-tenth of the weekly working time of full-time workers. The King retains the power to derogate from this one-tenth limit for certain sectors, categories of undertakings, branches of activity or categories of workers.	The reduction of the minimum working time threshold from one-third to one-tenth of a full-time schedule will give employers greater flexibility to engage employees for very limited workloads and to better adapt staffing levels to operational needs. This may be particularly useful in sectors requiring occasional or flexible labour. However, the reform may also increase the administrative burden associated with managing employees working very short schedules.	Employers should review their existing part-time employment practices and assess whether the new flexibility could be beneficial for their operations. They should also monitor any implementing measures or sector-specific exceptions that may be adopted and ensure that employment contracts and internal policies remain compliant with the new legal framework.
Temporary work 1 June 2026	From 1 June 2026, the regulations governing temporary agency work will remove the requirement to draw up a separate declaration of intent prior to the worker's first day of work. From that date, the temporary agency work contract will therefore suffice, although it must still be set out in writing no later than the time the temporary agency worker commences work. This change represents an administrative simplification. The other rules relating to temporary agency work (such as permitted grounds, maximum duration and the procedure to be followed) remain in force.	The removal of the requirement to issue a separate declaration of intent before the start of a temporary agency assignment will reduce administrative formalities and simplify the hiring process for employers using temporary agency workers.	Employers using temporary agency workers should review their onboarding and recruitment procedures to reflect the removal of the declaration of intent requirement.



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On your radar 

Development and date	Description	Impact and risk	Future actions
Bonus Scheme “CBA 90” 1 June 2026	From 1 June 2026, bonus plans adopted by way of an accession document may only be drawn up and submitted via the online application www.plansbonus.be, made available for this purpose by the FPS. This is a user-friendly application that is already used in 90 per cent of cases today. Consequently, from 1 June 2026, it will no longer be possible to submit a paper-based accession document.	The move to mandatory online submission represents a welcome administrative simplification for employers.	Employers intending to implement a CBA No. 90 bonus plan should ensure that they are registered on the www.plansbonus.be platform and familiar with the online submission process.

Brazil | 1

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Development and date	Description	Impact and risk	Future actions
The Supreme Federal Court upholds Brazil's gender pay equality and salary transparency law May 2026	In May 2026, the Brazilian Supreme Federal Court unanimously upheld the constitutionality of Law No. 14,611/2023, which establishes mechanisms to promote equal pay between women and men performing the same role or work of equal value. The law requires private companies with 100 or more employees to submit and publish salary transparency and remuneration criteria reports, under penalty of a fine, and to prepare an action plan with goals and deadlines if unjustified gender pay disparities are identified. The STF considered that the law is compatible with the constitutional duty to combat gender discrimination and promote substantive equality in employment relations. The Court also addressed concerns regarding confidentiality and data protection, reinforcing that the reports must preserve anonymity and comply with Brazilian data protection rules.	The STF ruling confirms that salary transparency is no longer merely a policy trend in Brazil, but an enforceable compliance obligation for larger employers. Companies may face administrative exposure if they fail to submit or publish the required reports, and the identification of unexplained pay gaps may trigger the obligation to prepare and implement a mitigation action plan. The decision also increases reputational and litigation risks, as pay disparities may become more visible to employees, unions, authorities and the public. For multinational employers, the main challenge will be ensuring consistency between Brazilian reporting obligations, internal compensation structures, job architecture, diversity and inclusion commitments and data privacy requirements.	Employers should review their pay structures, job classifications, remuneration criteria and promotion practices before each reporting cycle, rather than treating the report as a purely formal filing. Companies should also prepare internal explanations for lawful pay differences, ensure that salary data is accurate and anonymised, align HR, legal, compensation and data privacy teams, and develop a clear governance process for any action plan that may be required. This preparation is important not only to comply with the law and reduce administrative exposure, but also to manage employee relations, reputational risk and potential equal pay claims.



Brazil | 2

Development and date	Description	Impact and risk	Future actions
The Supreme Federal Court sets new criteria for granting legal aid in labour claims September 2026	In September 2026, the Brazilian Supreme Federal Court (STF) set new criteria for granting legal aid in judicial proceedings, including Labour Court claims. The decision affects the interpretation of Article 790 of the Brazilian Labour Code and declared unconstitutional the Superior Labour Court (TST) precedent that allowed legal aid to be granted based solely on an individual's statement of financial hardship. Under the new standard, individuals earning up to BRL 5,000 per month benefit from a rebuttable presumption of insufficient resources. Those earning above this threshold must prove, in concrete terms, that they are unable to bear litigation costs. The STF also clarified that judges may deny legal aid even below the threshold if there is evidence of income or assets incompatible with the alleged financial hardship. The decision will apply prospectively to claims filed after publication of the judgment minutes.	The ruling may affect the economics of labour litigation in Brazil. Historically, the broad granting of legal aid in Labour Court claims reduced the financial risk for employees to litigate, including in cases involving high earners or weak claims. The new criteria may lead to greater scrutiny of legal aid requests and may reduce the automatic filing of claims by employees who cannot demonstrate actual financial need. For employers, this could gradually affect litigation volume, settlement dynamics and provisioning strategy. However, the impact should not be overstated: employees earning up to BRL 5,000 will still benefit from a presumption of insufficient resources, and judges will retain discretion to assess each case. The decision also creates an adjustment period, as the TST and lower Labour Courts will need to align their case law and procedural practice with the STF's new standard.	Employers should monitor how Labour Courts apply the new standard in practice, particularly in claims filed after the publication of the judgment minutes. The decision may create opportunities to challenge unsupported legal aid requests, especially where the claimant's remuneration, assets or other evidence are inconsistent with alleged financial hardship. Companies should also reassess litigation strategy and settlement parameters in cases involving higher-paid employees, while remaining cautious not to assume an immediate or uniform reduction in claims. Over time, the decision may contribute to a more balanced allocation of litigation costs and may help discourage claims with limited factual or legal basis, but its practical effect will depend on how consistently the Labour Courts apply the STF's criteria.

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On your radar 

Development and date	Description	Impact and risk	Future actions
Brazil bans fixed-odds betting operations September 2026	On 25 September 2026, the Brazilian Federal Government issued a Provisional Measure (MP) prohibiting the operation, offering, arranging and advertising of fixed-odds betting (“bets”) throughout Brazil. The prohibition covers both sports betting and online gaming and also applies to state and Federal District authorisations. Other lottery products expressly authorised by law are not affected. The MP entered into force upon publication and immediately prohibited new deposits into betting accounts. A short transition period was established for existing operators: customers may voluntarily withdraw their balances until 5 October; betting websites and applications must become unavailable from 6 October; and remaining balances must subsequently be returned through financial institutions, with Caixa Econômica Federal acting as an alternative payment channel where necessary. Existing advertising and physical sponsorship materials must also be removed by 5 October. As a Provisional Measure, the rule has immediate legal effect but remains subject to review by the Brazilian Congress.	The measure represents a significant and immediate change for companies operating directly or indirectly in the Brazilian betting industry. Licensed betting operators will need to discontinue their Brazilian operations within the transition period, while companies that provide services to the sector – including technology, payment, marketing, advertising and other suppliers – may face the termination or restructuring of commercial arrangements. Companies and organisations with sponsorship or advertising agreements with betting operators will also need to assess the impact of the prohibition on existing contracts and campaigns. From an employment perspective, the measure may result in significant workforce restructuring, particularly for companies whose Brazilian activities are predominantly or exclusively connected with betting operations. Depending on the size and structure of the workforce, this may involve individual or collective dismissals, internal transfers, changes in activities or the closure of Brazilian operations. Employers should therefore carefully assess applicable collective bargaining agreements, union requirements, protected employees, outstanding variable compensation and other termination-related obligations before implementing restructuring measures. The regulatory environment is also likely to remain fluid. The MP must still be considered by Congress and may be amended or cease to have effect if it is not converted into law within the constitutional timeframe. At the same time, enforcement has already started: according to the Federal Government, a joint task force identified and blocked hundreds of websites suspected of illegally offering betting services following the MP.	Companies directly or indirectly exposed to the betting industry should promptly map the practical impact of the MP on their Brazilian operations, including existing licences, commercial agreements, sponsorships, advertising arrangements, payment flows and workforce structure. Employers contemplating workforce reductions should conduct a specific employment assessment before taking action, particularly where collective dismissals, union negotiations, job-protected employees, incentive plans or contractual severance arrangements may be involved. Companies should also review employment and contractor arrangements for employees whose roles may disappear or materially change as a consequence of the prohibition and evaluate whether reassignment or other restructuring alternatives are available before implementing terminations. Finally, developments in Congress and implementing measures issued by the relevant authorities should be closely monitored. Given the immediate effectiveness of the MP and the short transition period, companies should address current compliance requirements now rather than wait for the congressional process, while remaining prepared to adjust their strategy if the legal framework changes during consideration of the MP.



Bulgaria

On your radar 

Development and date	Description	Impact and risk	Future actions
Draft law transposing the EU Pay Transparency Directive Submitted to Parliament on 11 September 2026	The bill amends the Protection Against Discrimination Act and would introduce pay transparency duties, including salary range information for applicants, a ban on asking about pay history, employee information rights, transparent pay setting criteria and restrictions on pay confidentiality clauses. Most provisions are expected to apply upon publication in the State Gazette; reporting and joint pay-assessment duties will phase in from 7 June 2027 and 7 June 2031, depending on workforce size.	All employers will face new recruitment, information and pay-governance duties. Key risks include inconsistent job architecture, unexplained gender pay differences, incomplete remuneration data and increased exposure to discrimination claims. The final wording may change during the parliamentary process.	Track the bill and implementing legislation. Map worker categories and equal-value criteria; review recruitment wording, pay-setting and progression rules, confidentiality clauses and HR data; prepare a response process for employee information requests; and assess readiness for gender pay gap reporting.
New mechanism for determining the national minimum wage Published in State Gazette on 29 September 2026	The previous automatic link to 50% of the average gross wage is replaced by a mechanism based on purchasing power and cost of living, wage levels and distribution, wage growth and long-term labour productivity. Adequacy will be assessed every three years against 60% of the gross median wage and the cost of living. Detailed indices and procedure will be set by secondary legislation.	The new model creates greater uncertainty for annual pay budgeting and may produce a lower minimum wage than the previous automatic formula. Employers with pay scales, allowances or benefits linked to the statutory minimum wage should avoid assuming an automatic year-on-year increase.	Monitor the adoption of the ordinance setting the indices and procedure for determining the minimum wage, as well as the amount set for 2027. Model alternative payroll scenarios; identify contractual, collective-agreement and policy links to the minimum wage; and update budgets and employee communications once the final rate and methodology are confirmed.
Hourly calculation of length of service Effective from 1 January 2027	Length of service will be calculated proportionately to hours worked. Under an eight-hour standard day, four hours worked will count as half a day of service, rather than a full day under the current rule. The amendment was adopted on 24 July 2026.	Part-time employees will accumulate their continuous length of service more slowly. This may affect service-related additional remuneration, eligibility for roles requiring minimum service, compensation and severance linked to service, annual-leave entitlements and other service-based rights. Employers will need accurate hourly records and revised calculations.	Adapt HR and payroll systems. Review internal salary rules, collective agreements, benefit policies and templates that refer to length of service. Recalculate affected entitlements consistently and monitor amendments to the ordinance on labour service and related secondary legislation.



Czech Republic | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Draft Pay Transparency legislation Government bill submitted to the Chamber of Deputies on 8 September 2026. Proposed effective date: 1 January 2027 (reporting and pay-assessment obligations from 1 January 2028)	The bill introduces a mandatory pay system classifying work by complexity, responsibility and strenuousness, with a separate system if other monetary benefits and benefits of monetary value are provided. Employers will be prohibited from asking applicants about their pay history and must disclose minimum pay rates before a contract is signed. Employees may ask for gender-split pay data once a year; the employer must reply within 2 months and inform employees of this right annually. Information revealing another employee's pay shall be provided only to a trade union designated by the employee. If no trade union operates at the employer, the employee will not receive the information. Pay gap reports are prepared by the Ministry based on the JMHZ (Unified Monthly Employer Report) data: annually for 250 or more employees, every 3 years for 150–249 employees, lowering to 100 or more employees by 2031. Employers must prepare their own work-category reports on the same schedule. Where an unjustified gap of 5% or more is identified in any work category and not remedied within 6 months, the employer must carry out a pay assessment and consult with trade unions and the works council (if they exist). A reversed burden of proof applies in pay-discrimination litigation where transparency obligations are breached.	It is expected there will be an increased risk of equal pay claims due to data transparency. The Ministry will publish anonymised pay-gap data, enabling comparison by employer size, sector and region, including data for the preceding 4 years. The reversed burden of proof significantly strengthens employees' position in pay discrimination litigation. Non-compliance carries fines of up to CZK 1,000,000 (approx. EUR 40,000) for the most serious breaches (failure to establish a remuneration system, failure to prepare the report, failure to conduct the pay assessment); up to CZK 400,000 (approx. EUR 16,000) for other pay transparency violations.	Employers should: – identify unjustified gender pay gaps across all work categories; – establish or update remuneration systems by 1 January 2027; – prepare processes for handling employee information requests; – ensure JMHZ data accuracy; – update recruitment processes and ensure disclosure of minimum pay before employment contract conclusion.



Czech Republic | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
KOBRA 26 Initiative: measures against illegal and undeclared work Introduced in the Government bill implementing Pay Transparency. Proposed effective date: 1 January 2027	The bill redefines dependent work as work performed personally, in the name of the employer, in a relationship of superiority and subordination. The superiority and subordination relationship arises only when all four characteristics are met: (a) employer organises work, (b) work during working hours, (c) following employer instructions, (d) employer supervises performance. Persons who commit the offence of illegal or undeclared work must pay, in addition to the fine for the relevant offence, a penalty amount corresponding to the missed insurance contributions. The bill also introduces the concept of joint and several liability in the supply chain for the payment of the penalty amount. Additionally, in case of illegal work, any person in the supply chain who received services from the offender and who knew or could have known about the illegal work shall become a guarantor for the fine imposed.	Fines for illegal or undeclared work of up to CZK 10,000,000 (approx. EUR 408,000). Supply-chain companies face potential joint and several liability for insurance-contribution penalties arising from illegal or undeclared work of their subcontractors. In case of illegal work, the supply-chain companies may also become guarantors for the relevant fine. Employers charged with final fines for enabling undeclared or illegal work may be deemed unreliable for immigration purposes, which can block foreign workers' permit applications.	Employers should: – review supply-chain arrangements and subcontractor relationships for joint-liability exposure; – assess worker classifications against the revised dependent-work definition; – ensure all employees are registered in the JMHZ system; – review foreign workers' permits.



Czech Republic | 3

On your radar 

Development and date	Description	Impact and risk	Future actions
Platform Work Act Government bill submitted to the Chamber of Deputies on 8 September 2026. Proposed effective date: 1 January 2027.	The bill defines the concept of a digital platform and platform work and introduces key rules for platform work. A platform refers to a person providing a service remotely by electronic means at the request of a service recipient, which includes the organisation of work performed by natural persons for remuneration and the use of automated systems. The Act provides, in particular: (i) a rebuttable presumption of an employment relationship – if the facts indicate that the characteristics of dependent work are met, the presumption of an employment relationship applies, which the platform may rebut; (ii) shared liability of the platform and the intermediary for the fulfilment of obligations towards workers and state authorities; (iii) restrictions on automated processing of specific personal data; and (iv) restrictions on automated decisions – significant decisions (e.g. termination of a contractual relationship, cancellation or restriction of a user account) must be made by a human.	Fines up to CZK 3,000,000 (approx. EUR 122,000) or prohibition of activity for the most serious breaches. Failure to ensure human decision-making: up to CZK 2,000,000 (approx. EUR 81,000). Certain data-protection breaches: up to EUR 20,000,000 or 4% of annual turnover, whichever is higher. Reclassification risk with associated social-security, leave and employment-protection costs.	Platforms should: – register as a digital platform in the JMHZ system by 31 January 2027; – assess whether the employment presumption could apply; – map all automated systems and prepare data protection impact assessments; – set up processes for human review and oversight; and – designate qualified persons authorised to reverse automated decisions.



France | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Pay Transparency Directive The bill to transpose the Pay Transparency Directive was introduced in the Senate on 10 September 2026. The timeline for the bill's consideration by Parliament remains uncertain.	The employer must provide job applicants with a salary range and may not ask them for information about their current or past salary. The company must classify jobs of equal or comparable value based on the criteria defined by law (professional knowledge, experience, technical and non-technical skills, responsibilities, working conditions, and physical and mental strain). A collective agreement – or, if no such agreement is reached, a unilateral decision – defines these categories. Any employee may ask their employer – who must respond within two months – for information on their pay level and the average pay levels, broken down by gender, within their category. Companies with at least 50 employees must report several indicators related to the gender pay gap, including a new indicator that shows the average pay for men and women in each job category of equal value.	When a disparity exceeding a regulatory threshold is identified in a category, the employer must demonstrate that it is based on objective criteria unrelated to any discrimination based on sex. Otherwise, the employer must implement corrective measures. A penalty of up to 1% of the compensation paid – and 2% in the event of a repeat offence within five years – applies when an employer fails to meet certain obligations, such as the obligation to report key performance indicators. Fines of up to EUR 450 are also imposed for minor violations, such as failing to inform job applicants about the position's salary or failing to respond to individual requests from employees.	Given the shortened timeline due to the upcoming presidential elections, which will take place on 18 April and 2 May 2027, it is uncertain whether the bill will be definitively adopted before the end of the parliamentary session. The requirement to report the new indicator regarding pay gaps among employees performing work of equal value will take effect no later than one year after enactment. The new indicator will be phased in gradually: 3 years for companies with 100 to 149 employees and 6 years for those with 50 to 99 employees.



France | 2

Development and date	Description	Impact and risk	Future actions
A bill providing a comprehensive response to the issue of sexual and gender-based violence against women and children Introduced in the National Assembly on 11 August 2026.	Mandatory negotiations within the company and the industry must address the prevention of sexual assault, sexual harassment and sexist behaviour in the workplace. The single risk assessment document must include preventive measures against sexual assault, sexual harassment and sexist behaviour. The threshold at which an employer must appoint a designated representative to assist employees in combating sexual harassment and sexist behaviour has been lowered from 250 to 50 employees. When an employee informs their employer that they believe they have been a victim of sexual assault, sexual harassment, or sexist conduct, the employer must immediately inform the employee of their rights and available remedies, document the report, and promptly conduct an internal investigation.	In the event of a violation, the employer may be subject to a financial penalty of up to 1% of the gross payroll. Any person who has filed a report may refer the matter to the labour inspectorate if they believe that the investigation was not conducted in accordance with legal or regulatory requirements, or that its conclusions are manifestly insufficient.	The bill was passed by the National Assembly on first reading on October 13 and was sent to the Senat.

Hong Kong

On your radar 

Development and date	Description	Impact and risk	Future actions
Hong Kong: Employment measures announced in the 2026 Policy Address 16 September 2026 The Chief Executive's 2026 Policy Address introduces a number of employment-related initiatives, including proposed statutory work-injury compensation for digital platform delivery workers, tighter controls on imported labour under the Enhanced Supplementary Labour Scheme (ESLS), reforms to strengthen recovery of default MPF contributions, and enhanced occupational safety measures.	Key developments include: – The Government is developing legislation to provide statutory compensation for work injuries suffered by delivery workers engaged through digital platforms. – A tiered vetting mechanism has been introduced under the ESLS, imposing stricter recruitment and compliance requirements for certain imported labour applications, with the possibility of expansion to additional sectors. Imported workers must be paid no less than the median wage of comparable local workers. – The Government plans to introduce legislation by the end of 2026 to strengthen recovery of default MPF contributions, while implementation of MPF Full Portability continues. – Occupational safety enforcement will be enhanced through increased inspections and greater use of technology, particularly in higher-risk sectors such as construction.	While the measures do not fundamentally alter Hong Kong's employment framework, they signal a continued policy focus on worker protection, employer accountability and regulatory enforcement. The proposed delivery-worker compensation regime could create additional statutory obligations and costs for platform operators and may represent a broader trend towards increased protection for gig economy workers. Employers relying on imported labour should expect increased scrutiny of recruitment practices and workforce planning. The enhanced ESLS requirements may increase compliance burdens and reduce flexibility in managing labour shortages. The proposed MPF reforms will increase enforcement risk for employers with inadequate payroll or contribution processes, while enhanced workplace safety initiatives indicate continuing regulatory attention on occupational health and safety compliance.	Employers should monitor the development of the proposed delivery-worker legislation and assess whether existing workforce models could be affected by expanded statutory protections. Businesses using imported labour should review local recruitment procedures, remuneration arrangements and compliance processes under the ESLS, particularly if operating in sectors likely to be brought within the enhanced vetting regime. All employers should review MPF contribution processes and workplace safety compliance frameworks to ensure they remain robust in anticipation of increased regulatory scrutiny and enforcement.



Hungary

On your radar 

Development and date	Description	Impact and risk	Future actions
Tripartite salary negotiations begin in the autumn	Following the renewal of the Permanent Consultation Forum of the Competitive Sector and the Hungarian Government, negotiations started in the autumn, with the focus on the 2027 minimum base salary.	The three-year salary agreement originally provided for a 14% gross increase for January 2028. Employers, however, say it is uncertain whether they can afford a gross increase of that size in the current economic climate. One solution could be to cut the personal income tax on the minimum base salary from 15 to 9%. This would give employees double-digit net salary growth while keeping the gross increase borne by companies below 10%.	The interest groups are pushing for more than pay rises, however. They are also calling for a review of several key pieces of legislation, including Act I of 2012 on the Labour Code, and for Hungary to transpose the EU Minimum Wage Directive and the Pay Transparency Directive.
Proposal to make Christmas Eve a public holiday On 23 September 2026, a new draft law (the “Draft Law”) was submitted to the Hungarian National Assembly that would make 24 December, Christmas Eve, a public holiday.	The Draft Law would amend eight different pieces of legislation at once: the Act on Commerce, the Act on Civil Servants, the Act on Government Administration, and other acts that apply in the public sector and to categories of employees with special legal status.	Another important element of the Draft Law is the mandatory closure of shops on 24 December. Under the Draft Law, only a narrow range of business types would be exempt, such as hospitality venues, florists, confectioners and petrol stations, as well as retail units at railway stations, bus stations and airports. If the Hungarian National Assembly passes the Draft Law, the number of public holidays will rise from eleven to twelve.	Employers would therefore be well advised to start reviewing their working-time schedules for the 2026 holiday period now, together with the payroll tasks for public holidays, so as to avoid last-minute organisational and operational difficulties.
Recent judgment from the supreme court of Hungary, the “Curia” affecting employers	On two occasions, the employee failed to attend work without notifying the employer. On the second occasion, the employer terminated the employment by summary notice. The employee only later submitted the certificate of incapacity covering the two days when it was attached to their statement of claim.	In the view of the supreme court of Hungary, the Curia, failing to report incapacity for work breaches the principle of good faith and fair dealing, as well as the duties to cooperate and to provide information. The cumulative conditions for summary notice were therefore met. The Curia also stressed that if an employee neither reports nor justifies their absence, the employer cannot be expected to keep waiting.	Employers should communicate their sickness absence notification procedures and ensure employees submit their certificate of incapacity on time.



India | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Changes to Provident Fund Coverage and Social Security Contributions On 29 June 2026, the Ministry of Labour and Employment (“MoLE”) notified the Employees’ Enrolment Campaign, 2026 (“EEC 2026”), the VISHWAS, 2026 scheme, and provisions for retrospective regularisation of Provident Fund (“PF”) Trust exemptions under the Employees’ Provident Funds Scheme, 2026 (framed under the Social Security Code, 2020 (“SS Code”)). Further, on 17 September 2026, the government increased the PF wage ceiling from INR 15,000 to INR 25,000 per month, with effect from the same date.	The EEC 2026 allows employers to enrol employees who joined between 1 April 2009 and 31 March 2026, remain employed and were not previously registered under the Employees’ Provident Fund (EPF). (The EPF is broadly similar to a workplace pension). Employers have until 31 October 2026 to register them. Unpaid employee contributions are waived if not deducted from wages, and penalties are reduced to INR 100. Outstanding employer contributions, interest and administrative charges remain payable. Cases where a government assessment has been completed are excluded. VISHWAS 2026 allows employers to settle outstanding EPF penalties for contribution defaults before 14 June 2024, including disputed cases. It excludes penalties already paid in full. Employers have until 28 December 2026 to pay revised penalties and interest. Any related appeals will end, and employers must agree not to appeal further. Eligible Provident Fund Trusts recognised for tax purposes but lacking formal EPF exemption can apply for retrospective approval by 28 December 2026. Compliance and audit requirements apply, and the deadline may be extended by six months. From 17 September 2026, the monthly wage ceiling for mandatory EPF coverage increased from INR 15,000 to INR 25,000. This may bring more employees into the scheme, increasing employer costs and reducing employee take-home pay.	These changes may increase PF contribution costs and employee deductions for employees who become covered pursuant to the revised wage ceiling. They may also result in additional historical PF liabilities where previously uncovered employees or past defaults are identified. Failure to correctly assess PF coverage, make the required contributions or comply with the applicable requirements may result in interest, damages, penalties and other compliance exposure. Further, failure to utilise the time-bound EEC 2026, VISHWAS, 2026 or retrospective PF Trust exemption schemes may result in loss of the benefits available under these schemes.	Employers should review their existing PF coverage, payroll and contribution practices, PF Trust arrangements and historical EPF compliance to assess the applicability of these changes. In particular, employers should: – identify employees who may be impacted by the revised PF wage ceiling and assess the resulting contribution and payroll impact; – assess whether existing employees who are currently treated as excluded employees may be impacted by the revised wage ceiling and whether any onboarding, membership or contribution practices require amendment; – assess whether any employees are eligible for enrolment under EEC 2026 before 31 October 2026; – identify any outstanding PF damages or disputes that may be eligible for settlement under VISHWAS, 2026; – review the status of existing PF Trust exemptions and assess eligibility for retrospective regularisation; and – make the necessary payroll, contribution, registration and other compliance changes within the prescribed timelines. Accordingly, employers should assess the applicability of these measures and take the necessary steps to mitigate potential PF liabilities and ensure ongoing compliance.



India | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
State of Karnataka updates workplace and employer requirements On 4 September 2026, the Karnataka Shops and Commercial Establishments (Amendment) Act, 2026 ("Amendment Act") came into force, introducing changes to registration requirements under the Karnataka Shops and Commercial Establishments Act, 1961 ("KSECA") and aligning certain provisions with the labour codes (including the Occupational Safety, Health and Working Conditions Code, 2020 ("OSH Code"), the Code on Wages, 2019 and the Code on Social Security, 2020).	The Amendment Act simplifies registration requirements by exempting establishments with 10 or more workers that are already registered under the OSH Code from the operation of (and separate registration under) the KSECA and aligns certain provisions of the KSECA with the Code on Wages, 2019 and the Code on Social Security, 2020. No separate registration is required for godowns or storage facilities within 100 metres of the principal employer. It also enables digital registration, renewal, certificate issuance and notices to the Inspector through electronic or digital modes and makes registration valid until closure or cessation of business. The Amendment Act also introduces changes to workplace requirements, including a requirement to issue service certificates, a prohibition on employers retaining employees' original educational, experience and other documents, and changes to conditions applicable to women working night shifts. The Amendment Act further increases penalties and introduces compounding of offences at 50% (first offence) or 75% (subsequent offences) of the prescribed fine.	The exemption, as currently worded, may extend beyond registration requirements to the substantive provisions of the KSECA, creating uncertainty as to whether employers registered under the OSH Code continue to be subject to the rights, protections and obligations prescribed under the KSECA. This issue is particularly relevant because the OSH Code primarily applies to "workers", whereas the KSECA has a broader scope and applies to employees who may not fall within the definition of a "worker". Accordingly, uncertainty may arise regarding the applicability of KSECA protections to non-worker employees where an employer relies solely on its registration under the OSH Code and no longer maintains a separate registration under the KSECA. Further, the enhanced penalties and introduction of additional employer obligations, including the requirement to issue service certificates and the prohibition on retaining employees' original documents, may increase compliance exposure for employers operating in Karnataka.	Employers with operations in Karnataka should review their existing OSH Code and KSECA registrations and assess the applicability of the registration exemption. In particular, employers should evaluate the implications of the exemption for employees who may not fall within the definition of a "worker" under the OSH Code and monitor any further guidance or clarification from the authorities regarding the continued applicability of the KSECA to such employees. Employers should also review their onboarding, record-retention, service certificate and other workplace practices in light of the amendments introduced by the Amendment Act.



Italy

On your radar 

Development and date	Description	Impact and risk	Future actions
Pay Transparency in Italy Since the Decree implementing the Pay Transparency Directive came into force on 7 June 2026, the first employee pay information requests are emerging.	The new rules apply to all public and private sector employers, including executives (<i>dirigenti</i>), but exclude domestic and intermittent workers. Employers must include a pay range in job adverts and cannot ask candidates about their pay history. Pay secrecy clauses will also be void. Employees will be entitled to request information on average pay by sex for their category once a year, with employers required to respond in writing within two months. Employers must also make their pay criteria accessible. Compliance with national collective bargaining agreements (CCNLs) signed by representative trade unions will create a presumption of compliance with equal pay requirements. Gender pay gap reporting will be introduced in stages. From 2027, employers with 250 or more employees must report annually, while those with 150–249 employees must report every three years. From 2031, the three-year reporting requirement will extend to employers with 100–149 employees.	Where a pay gap of 5% or more cannot be justified or is not corrected within six months, employers must carry out a joint pay assessment with workplace trade union representatives. Pay comparisons may also be made across different employee groups. The new rights to pay information are expected to lead to more employee requests for pay data and an increase in equal pay claims as pay differences become more visible.	Employers should: – review their job adverts and recruitment practices, including those used by recruitment agencies, and remove pay-secrecy clauses from employment contracts. – document their pay and progression criteria, ensuring these are aligned with the relevant national collective bargaining agreement (CCNL) levels. – introduce a process to respond to employee requests for pay information within two months. – consider carrying out a legally privileged pay gap audit before June 2027 to identify and address any unjustified gaps of 5% or more. – monitor further ministerial decrees and guidance expected in the final quarter of 2026.



Luxembourg

On your radar 

Development and date	Description	Impact and risk	Future actions
Changes to the framework on the posting of workers 23 September 2026	The posting of workers regime applies where an undertaking established abroad temporarily assigns employees to work in Luxembourg in the context of a cross-border provision of services. Under the current framework, the posting employer must comply with a number of administrative and documentary requirements, including the filing of a posting declaration with the Labour and Mines Inspectorate (ITM), the designation of a local contact person and the retention of certain employment and social security documents. The Bill which was presented to the Labour Committee on 23 September 2026, responds to European Commission concerns about Luxembourg's implementation of the Posting of Workers Directive, aiming to improve EU compliance while preventing abuse and social dumping. Among the key proposed changes are: – the removal of certain obligations currently imposed on service recipients; – the introduction of exemptions from declaration requirements for specific short-term activities of up to 40 hours per month; – clarifications regarding posting declarations submitted through the Internal Market Information (IMI) system, an EU electronic platform; – the extension of certain road transport rules to transport operators established in third countries, thereby extending the scope of Luxembourg posting of workers requirements to additional transport operators carrying out relevant transport activities in Luxembourg; – an increase in the maximum administrative fine from EUR 50,000 to EUR 75,000.	Although the Bill would simplify certain aspects of the current framework, employers will continue to face significant compliance obligations when posting workers to Luxembourg and must ensure ongoing compliance with Luxembourg labour law and posting of workers legislation. Companies posting workers to Luxembourg or engaging foreign service providers should pay particular attention to the scope of the new exemptions and the revised administrative requirements. The proposed increase in administrative sanctions also confirms that the enforcement of posting rules remains a priority for the Luxembourg authorities and may result in greater financial exposure in the event of non-compliance.	As the legislative process progresses, the proposed measures may still be amended before adoption. Employers posting workers to Luxembourg or engaging foreign service providers should therefore monitor developments closely and assess whether updates to their posting and compliance procedures may be required once the final text is adopted.



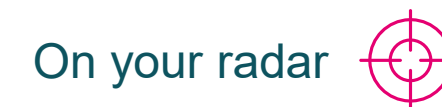
Mexico

On your radar 

Development and date	Description	Impact and risk	Future actions
Gradual reduction of the working week to 40 hours and new overtime rules Federal Labour Law reform published in the Official Gazette of the Federation and in force since 1 May 2026. The transition period applies until 31 December 2026; the first reduction applies from 1 January 2027.	The maximum ordinary working week falls from 48 to 40 hours, two hours per year: 46 (2027), 44 (2028), 42 (2029) and 40 (2030). Salaries, wages and benefits cannot be reduced as a result. The weekly overtime cap rises from 9 hours (2026 and 2027) to 10 (2028), 11 (2029) and 12 (2030). Overtime can be worked up to 4 hours a day on no more than 4 days a week and is paid at double rate. Overtime beyond these limits (maximum 4 extra hours a week) is paid at triple rate, and ordinary plus overtime hours can never exceed 12 hours a day.	Higher labour costs for businesses running long or continuous shifts, through more overtime or additional hiring. Shifts designed around 48 hours will become non-compliant year by year, increasing exposure to unpaid overtime claims and fines in labour inspections. The Ministry of Labour (<i>Secretaría de Trabajo y Previsión Social</i>) will collect and assess data on implementation, so closer scrutiny is expected.	Map current schedules and overtime and budget the impact of each annual reduction. Redesign shifts and rotas using the adjustment period before 1 January 2027. Update employment agreements, internal work rules and collective bargaining agreements, keeping pay and benefits unchanged.
Right to digital disconnection Bill approved by the Chamber of Deputies on 3 March 2026. Pending in the Senate.	Currently only teleworkers have a right to disconnect. The bill would extend it to all workers: they could decline any work communication outside working hours, including rest periods, holidays and leave. Employers would have to respect this right and issue internal disconnection policies, with exceptions limited to genuinely extraordinary or urgent situations.	Out-of-hours contact could support overtime claims, particularly as overtime limits tighten under the 40-hour reform. Businesses with an always-on culture, teams working across time zones or on-call roles are most exposed.	Prepare a disconnection policy defining working hours, response expectations and what counts as an emergency. Review on-call arrangements and how they are paid. Train managers and adjust communication tools.



Monaco



Development and date	Description	Impact and risk	Future actions
Mutual termination of an employment contract Following a long wait since the draft bill was first introduced (see On your radar, July 2025), Monegasque law now provides a new, amicable way to end an employment contract: termination by mutual agreement. Published in the Journal de Monaco on 12 December 2025, the Act entered into force on 13 March 2026, in accordance with its transitional provisions. This framework enables the mutual termination of indefinite-term employment contracts without dismissal or resignation.	The process is strictly regulated to ensure genuine consent, which may never be imposed. In practice, several steps must be followed. A written agreement on a standard form is required, including party identification, mutual termination indemnity details, meeting records, and the anticipated termination date. The process begins with at least one preliminary meeting. The employee may be assisted by a staff representative or colleague (2 working days' notice required); and if so, the employer may then also be assisted (1 working day's notice). During these meetings, the parties agree on termination terms and the mandatory indemnity. Minimum: 1/4 month's salary per year of service. Payment is due within one month; failure to pay incurs criminal penalties (Art. 8), as does fraud, violence, or coercion. Once the agreement is signed, each party has at least seven calendar days to withdraw. After the withdrawal period expires, the agreement is submitted to the Labour Inspectorate, which has fifteen working days to verify compliance. Silence equals approval (except for protected employees, where silence equals refusal).	Mutual termination should be attractive to employees: indemnity is exempt from social contributions, no notice period applies, and unemployment benefits remain accessible (subject to conditions). Employee requests for such agreements are therefore likely to increase. For employers, the mechanism ends employment without requiring dismissal grounds, with an indemnity generally lower than statutory severance under Article 6 of Law No. 729 (dismissal without stated grounds) and no notice period. Moreover, challenges are limited to consent defects (difficult to prove given procedural safeguards), with a short six-month limitation period, reducing termination litigation (though performance disputes remain). The process is not without risk for employers. In particular, retaliation against an employee who withdraws is prohibited. As a result, any subsequent dismissal must be objectively justified and independent of the failed process, or it may be deemed retaliatory. Additionally, procedural failures have serious and multiple consequences: nullity if no preliminary meeting is held, refusal of approval by the Labour Inspectorate for non-compliance with the Act's requirements, or criminal penalties for coercion or non-payment of the mutual termination indemnity. Finally, timing requires careful planning: the termination date cannot precede the day after Labour Inspectorate approval, and the approval period may be suspended pending additional information requests.	The Act sets out mandatory legal requirements that employers and employees cannot contract out of. Any contractual terms that conflict with the Act will have no legal effect. In light of these requirements and risks, employers should: – Ensure genuine employee consent by, for example, requesting written confirmation of the employee's wish to initiate the process, holding several meetings to allow time for reflection, and considering an extended withdrawal period beyond seven days; – Not set a termination date before the day after approval and anticipate deadlines; – Monitor Labour Inspectorate practices and prepare required documents in advance; – Keep evidence of compliance at each stage.



The Netherlands | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Key takeaways from the Dutch Budget – The 2027 Dutch Budget outlines key employment reforms and anticipated legislative developments for 2027 and 2028			
Transitional arrangement under the Labour Provision Admission Act 1 November 2026 – 31 December 2026	Existing labour suppliers may continue their activities under the transitional regime, provided they register with the NAU and hold a valid SNA certification, including the module for the supply of workers, by 30 June 2027.	See On your radar January 2026 and the blog .	Labour suppliers may register for the transitional arrangement from 1 November to 31 December 2026.
Flexible work Dates from 31 December 2026 to 1 January 2028	The right of agency workers to equivalent employment conditions will come into effect on 31 December 2026. On the same date, a six-month transitional period for labour suppliers will begin, in which they can adapt their processes and documentation to the new legal requirements. From 1 January 2028 zero-hours contracts will be replaced by bandwidth contracts; temporary agency phases will be shortened and revolving-door arrangements restricted. From 1 January 2028 labour suppliers that have not obtained admission may no longer be permitted to supply workers, with the impact extending beyond agency work to payroll, contracting, outsourcing and cross-border labour arrangements.	Flexible staffing may become more costly and administratively demanding. Structural reliance on temporary labour will be harder to justify, and non-compliant arrangements may create employment and financial exposure. After 1 January 2028, continued use of zero-hours arrangements may create compliance risks and increase exposure to claims relating to working hours and pay. From 1 January 2028, the Netherlands Labour Authority will begin enforcement action.	Labour suppliers must organise their administrative processes to ensure that temporary workers receive the same pay as they would if they were employed directly by the client company. Employers should map the use of on-call and agency workers. Review workforce planning, contract templates, scheduling practices and the business rationale for long-term flexible deployment. For more information, please refer to our newsletter. From 1 May to 30 June 2027, labour suppliers may submit an application for admission to the labour supply market to the Dutch Labour Market Authority (NAU); for further details, please refer to our blog.
Act introducing a legal presumption of an employment contract based on an hourly rate 31 December 2026	A statutory presumption of employment applies to workers earning less than EUR 38 per hour.	Contractor models for self-employed individuals will face increased reclassification risk, especially at lower hourly rates. The burden of proof may shift to the hiring company, with potential wage, tax and social-security consequences.	Review existing self-employed and freelance arrangements involving workers earning below EUR 38 per hour. Assess whether the actual working relationship supports independent contractor status and, where necessary, adjust contracts and working practices to reduce reclassification risks.
Proposed Self-Employed Persons Act Proposal stage – legislation yet to be published.	The proposed Self-Employed Persons Act is intended to clarify the boundary between self-employment and employment.	This law has an impact similar to that described in the 'impact and risk' assessment for the Act introducing a legal presumption of an employment contract based on an hourly rate.	Before the Act comes into force, employers should audit their contractor population looking at roles, rates and working practices. Reassess high-risk engagements and ensure that contracts reflect the actual operating model



The Netherlands | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
Key takeaways from the Dutch Budget			
Pay transparency measures The first stage of measures are expected to come into force 1 January 2027	As a result of implementing the Pay Transparency Directive, employers in the Netherlands will need to review their pay structures, recruitment practices and transparency procedures to ensure compliance with the new rules.	Non-compliance may expose employers to legal, financial and reputational risks, particularly where pay differences cannot be objectively justified, recruitment practices lack transparency, or job evaluation systems are not gender-neutral.	Audit pay structures, job architecture and recruitment practices. Prepare for employee-representative involvement. Engage the works council early in the development and implementation of the new processes.
Reform of non-competes Proposal stage – legislation yet to be published.	Proposals have been published to reform non-compete clauses. The reforms are expected to reduce the use of these clauses while preserving protection of legitimate business interests, for further details, please refer to our blog .	Employers may face additional costs if future legislation requires compensation for employees who are held to post-termination non-compete clause. Broad or routinely used non-competes may become more difficult to maintain.	No immediate action is required, as the proposal is still under consideration.
Sickness and dismissal Expected date is January 2028	The planned abolition of compensation for statutory severance payments after long-term sickness has been postponed to 1 January 2028. The proposed reduction of maximum unemployment-benefit duration has been postponed to 1 January 2029.	Employers retain substantial financial and operational responsibility for long-term sickness.	No immediate action is required. As the legislative proposal has been delayed, employers should continue to monitor developments and any revised implementation timeline.
Collective bargaining reform No implementation date announced yet	The government is reviewing the collective bargaining and extension framework. EU initiatives on pay transparency, platform work and algorithmic management also strengthen information, consultation and dialogue rights for employee representatives.	Employment-law compliance increasingly requires a collective approach. Late engagement with works councils or trade unions can delay implementation and create procedural risk.	Map consultation and consent requirements at an early stage. Build employee-representation engagement into pay, workforce and technology projects.



Norway | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Overtime pay for part-time employees Joint working group report of 15 September 2026	A tripartite working group has assessed part-time employees' right to overtime pay for work beyond their agreed position percentage, following two district court judgments which found that the overtime threshold for full and part-time employees constitutes unlawful discrimination. A report was delivered on 15 September 2026, with no agreed proposals and strong disagreement in principle. Following EU Court rulings, employee organisations argue that part-time workers must receive overtime compensation on equal terms with full-time workers. They believe the current system is discriminatory and must be replaced with a legally compliant, practical Norwegian model. This change will promote a culture of full-time employment, improve staffing predictability, and enhance gender equality. Employer organisations argue against changing current rules, claiming the EU Court rulings offer limited guidance. They warn that this would discourage full-time work, harm business competitiveness, and raise operational costs. Furthermore, they argue this change would actually harm inclusion and gender equality by raising the barrier to entry for the labour market.	The Ministry of Labour and Social Inclusion will review the report and prepare a consultation paper; its view is that much of the suggested amendments are necessary. The independent research foundation Fafo estimates an annual cost of NOK 10–11bn if additional hours must be paid as overtime (60% in public sector). Expected adaptations are less use of additional hours, more temporary agency workers, temporary employees, on-call temps or independent contractors and changed incentives to adjust position sizes.	The final outcome is still uncertain. Employers should monitor developments, including the consultation paper and appeals of the district court judgments. Employers should also map total part-time work in the business and the extent of part-time employees' additional hours, as well as assess whether current position percentages and staffing plans reflect real needs or should be changed.



Norway | 2

Development and date	Description	Impact and risk	Future actions
Employment terms on ships Legislative change effective from 1 July 2026	Amendments to the Norwegian Ship Labour Act, which entered into force on 1 July 2026, aim to ensure more transparent and predictable working conditions for seafarers. The changes largely mirror the requirements introduced for employees under the Norwegian Working Environment Act from 1 July 2024. Implementing the EU Transparent and Predictable Working Conditions Directive in the maritime sector, the new regulations impose stricter requirements on the content of written employment contracts through statutory provisions and accompanying regulations. These updates restrict probationary periods for temporary employees to a maximum of half the contract's duration, introduce a legal presumption regarding employment terms if mandatory information is missing, and strengthen employment protections for seafarers held in captivity due to piracy or armed robbery.	The aim is to provide seafarers with the same clearer and more predictable working conditions that were introduced for onshore employees in 2024. Employers should distinguish between information given to meet the duty to inform and terms meant to be binding. The rules do not change the limits of managerial prerogative, but unclear wording can create doubt about what has been agreed.	Employers should update contract templates to ensure new agreements contain all required information.

Norway | 3

On your radar 

Development and date	Description	Impact and risk	Future actions
“Particularly independent position” – project manager Supreme Court judgment of 14 October 2026	The Supreme Court has ruled in a case on the conditions for a “particularly independent position” under section 10-12 (2) of the Norwegian Working Environment Act. The employee was a “project manager” in a construction company and had an employment contract stating that overtime was included in his fixed salary. Contrary to the lower courts, the Supreme Court unanimously ruled that the project manager did not hold a “particularly independent position” and was entitled to overtime pay. The ruling shows that the exemption in section 10-12 (2) is narrow. Flexible hours are not sufficient; the position must entail clear and obvious independence, in particular freedom to decide the extent and timing of the work, assessed against all framework conditions, including those set by customers. Despite extensive responsibility, the project manager was considered to have limited real control over his workload and working hours, mostly due to project deadlines.	This marks the first time the Supreme Court has provided a principled ruling on the legal boundaries of “particularly independent positions” under section 10-12 (2) of the Working Environment Act. The judgment narrows the scope for “particularly independent” positions compared with current practice in many Norwegian companies. It clarifies the extent to which project managers and specialist roles can be legally exempted from standard working hours and overtime regulations. It has significant practical and financial implications, particularly for the construction industry, but also for any business subject to delivery deadlines set by others, such as customers.	All employers with employees in “particularly independent” positions must assess whether those positions meet the conditions set out by the Supreme Court. Employers must consider whether the employees have freedom to determine the extent and timing of their work, considering customer and project framework conditions, and assess their potential exposure to overtime claims. Employers should also take proactive steps to mitigate legal risks by reviewing their current workforce classifications and the wording of employment contracts where this exemption is used.



Poland | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Implementation of Women on Boards Directive New rules on mobbing came into force on 18 August 2026	The legislation requires large listed companies to ensure that the underrepresented gender holds at least 33% of management and supervisory board seats combined, with representation in each body. Companies must apply objective, non-discriminatory selection criteria and adopt and publish a gender balance policy.	Non-compliance with selection and annual reporting obligations may result in KNF fines of up to PLN 500,000. Candidates may also seek compensation for breaches of the selection rules, with the burden of proof shifting to the company in certain cases.	Companies should review board composition, update selection procedures and adopt the required gender balance policy. They must also implement annual reporting on gender representation and corrective measures, publish the report online and submit it to the competent authority. The first report is due by 31 October 2026.
Anti-mobbing law reform New rules on mobbing will enter into force on 5 November 2026.	The reform simplifies the definition of mobbing. Mobbing will mean persistent harassment of an employee, including repeated, recurring or continuous conduct. Employers will be required to systematically prevent, identify and respond to mobbing, as well as take corrective measures and support affected employees. The minimum compensation for mobbing will increase to six times the statutory minimum wage. In cases of repeated discrimination, the minimum compensation will be set at three times the minimum wage.	Employers will need to take a more active and structured approach to preventing mobbing. This may require changes to internal procedures, reporting channels and the way complaints are investigated and handled. The higher minimum compensation amounts will also increase employers' financial exposure.	Employers with at least 10 employees must introduce anti-mobbing and anti-discrimination rules by 5 May 2027, with the participation of trade unions or employee representatives. Existing policies should also be reviewed and updated where needed.
Minimum wage increase in 2027 The new rate will take effect on 1 January 2027	The minimum wage will increase to PLN 4,950 per month and PLN 32.30 per hour in 2027. This is the annual increase of the minimum wage. The current minimum wage is PLN 4,806 per month.	Employers must prepare to implement the new minimum wage. The increase also affects other benefits calculated based on the minimum wage, such as night shift allowances and the maximum severance pay. Incorrect calculations may result in compliance risks and disputes with employees.	Employers will have to update payroll systems to reflect the new minimum wage. Recalculate all related benefits and allowances. Review and, if necessary, amend employment documents.



Poland | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
Maximum workplace temperatures New rules will come into force on 11 January 2027	Occupational health and safety (BHP) regulations will introduce maximum workplace temperature limits. Indoor temperatures must generally not exceed 35°C, while a 32°C limit will apply to specified physically demanding outdoor work; preventive measures will be required at lower temperature thresholds.	Employers may need to introduce technical or organisational measures when temperatures exceed specified thresholds, including from 28°C indoors and 25°C in certain physically demanding work or outdoor work. Where the applicable maximum temperature is exceeded due to weather conditions, work may not be performed, subject to the exclusions provided in the regulation.	Employers should identify workplaces and roles exposed to high temperatures and review available technical and organisational safeguards. Procedures for temperature monitoring and response should be developed, while organisational measures should be consulted with employees in accordance with the new requirements.
Digital platform work Legislative works ongoing at government level	The draft legislation establishes a comprehensive regulatory framework for platform work. It covers, among other areas, employment-status determination, reporting obligations, automated monitoring and decision-making systems, personal data protection, health and safety, and protections for individuals performing platform work.	The proposal may significantly affect B2B and civil-law models where the platform or intermediary exercises direction or control over how work is performed. It also introduces extensive compliance duties concerning PIP reporting, automated decision-making, human oversight and data protection, with fines of PLN 2,000–60,000 for specified infringements.	Potentially affected companies should review their cooperation models, automated monitoring and decision-making systems, and intermediary agreements. They should also prepare an implementation plan for key obligations subject to the six-month transitional period.
Temporary residence permits Legislative works ongoing at government level	The draft amendment introduces a simplified procedure allowing temporary residence permits for nationals of selected countries to be granted through a “silent conclusion” of proceedings. If the authority does not issue a decision or other final ruling within 60 days, the application may be deemed approved.	The new procedure may significantly shorten and increase predictability of residence permit processing for eligible foreign nationals. However, its application will depend on a government-issued list of qualifying countries and specific exclusions.	Employers should monitor the final legislation and the list of countries eligible for the simplified procedure, and identify employees or candidates who may benefit from it.
Simplified access to the Polish labour market Legislative works ongoing at government level	The draft introduces simplified access to the Polish labour market for nationals of selected third countries, who may be exempted from the requirement to obtain a work permit. Their employment would instead be subject to an electronic notification, with the notification mechanism also extended to other categories of foreign nationals already exempt from work permit requirements.	The changes may simplify and accelerate the hiring of eligible foreign nationals, particularly from selected highly developed countries. Employers will, however, have to notify the competent labour office, allowing the authorities to monitor employment under the simplified regime.	Employers should monitor the list of countries qualifying for permit-free employment and identify employees or candidates who may benefit from the new regime.



Portugal | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Social security contribution changes 9 December 2025 (ongoing)	Introduces the Simplified Contribution Cycle (SCC). Social Security now calculates each employer's monthly contribution obligation using the data it holds, and the employer confirms, corrects or supplements those values and pays accordingly. It applies to all employers with employees and sole traders who employ staff. Joining is voluntary during 2026 and becomes mandatory on 1 January 2027.	Key changes: (1) if the employer does not respond by the 20th of the following month, the calculated values are deemed accepted; (2) each correction fully replaces the previous version; (3) the payment window for monthly contributions based on data from Social Security goes from the 1st to the 25th of the first subsequent month thereof; (4) variable pay (bonuses, commissions, allowances, etc.) must be reported actively; (5) corrections for past months require a reasoned special request; (6) joining is irreversible and therefore returns under the old regime are rejected. Errors in Social Security records flow directly into the contributions it calculates.	Check that payroll/HR software is PSi-compatible; audit and reconcile the employee records held by Social Security; set up a monthly review to be completed by the 20th of the first subsequent month thereof; map who reports which variable-pay elements; consider joining voluntarily before 31 December 2026 for controlled transition ahead of the mandatory start.
Changes to meal allowance 30 January 2026	Updates the meal allowance payable to Public Administration employees, setting the amount at EUR 6.15, with effect from 1 January 2026. Although this amount is set for the public sector, it is also used as a benchmark in the private sector.	Private sector employers should review their existing meal allowance arrangements to establish whether an increase is required under their contractual or collective bargaining obligations. Employers that voluntarily follow public sector rates may also face pressure to increase payments.	Review and update meal allowances.



Portugal | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
Working conditions for administrative workers 22 July 2026	Eighth amendment to the Ordinance, regulating working conditions for administrative workers not covered by specific collective agreements. Key measures: (1) average overall increase of 6.2% in minimum pay scales; (2) meal allowance set at EUR 6.15 per full working day; (3) pay tables and pecuniary provisions apply retrospectively from 1 March 2026.	Employers should check whether any administrative employees fall within the scope of the Ordinance and ensure that their pay meets the revised minimum rates. They will also need to calculate and pay any salary and allowance arrears dating back to 1 March 2026. The main risks are underpayment claims, additional payroll costs and potential enforcement action where employers fail to apply the revised rates.	Review and update salary tables and meal allowances.
Draft Government Bill partially transposing into national law the Pay Transparency Directive 5 August 2026	The proposals would require employers to provide job applicants with information about starting salaries or pay ranges, prohibit questions about previous pay, and introduce greater transparency around pay structures and progression criteria. Employees would have the right to request information about pay levels, including average pay for comparable roles broken down by gender.	Review existing remuneration policies, ensuring that they are based on objective and non-discriminatory criteria; record all criteria used in setting pay and the corresponding progression; review recruitment procedures, particularly in view of the possible public disclosure of information on pay gaps, as well as the reporting obligation to the entity responsible for data processing applicable to undertakings with 50 or more workers.	No immediate implementation required. Monitor for possible amendments in the course of the legislative proceedings and entry into force. The Government aims to conclude the parliamentary legislative process by the end of 2026.



Republic of North Macedonia

On your radar 

Development and date	Description	Impact and risk	Future actions
Amendments to the Law on Labour Engagement of Persons 6 July 2026 The amendments significantly tightens the framework for seasonal and temporary work. Key amendments introduce a 180-day annual engagement cap, stricter eligibility rules, mandatory pre-shift registration, employer quotas and enhanced enforcement mechanisms.	The amendments: – Limit seasonal engagements to 180 calendar days per year. – Prohibit engagement of individuals already employed under a regular employment relationship. – Introduce a 12-hour daily cap on total engagements across all employers. – Restrict employers to: • 10 seasonal workers (up to 100 employees); or • 15% of workforce headcount (over 100 employees). – Prohibit engagement of former employees within 12 months of termination, except in cases of retirement. – Require registration of each seasonal worker with the Employment Agency before the start of each shift. – Strengthen labour inspection powers and misdemeanour enforcement.	The amendments reduce flexibility in the use of seasonal labour and increase compliance obligations. Key risks include: – Failure to complete pre-shift registrations. – Exceeding statutory quotas or the 180-day limit. – Engaging former employees within the 12-month restriction period. – Breaching the 12-hour cumulative daily work limit. – Increased exposure to inspections and immediate sanctions due to stricter enforcement procedures.	Employers should: – Implement procedures for pre-shift registration of seasonal workers. – Review workforce planning against the new quota and duration limits. – Screen candidates to verify they are not current employees elsewhere and were not employed by the company within the previous 12 months. – Track working hours and engagement periods to ensure compliance. – Update internal policies, onboarding processes and documentation to reflect the new requirements.



Singapore

On your radar 

Development and date	Description	Impact and risk	Future actions
Probation periods are not fixed-term contracts by default Nanyang Law LLC v Ghui Meng Yang [2026] SGHC 171.	In a significant decision, the General Division of the High Court of Singapore (the “Court”) held that a probation period does not, by itself, make an employment contract a “contract of service for a specified period of time” under section 9(1) of the Employment Act 1968 (the “EA”). According to the Court, whether a probation clause provides for automatic termination at the end of probation depends on the language and construction of the contract. The Claimant was employed by the Defendant subject to a three-month probation period, during which either party could terminate on one month’s written notice. Two days before the probation period expired, the Defendant informed the Claimant that his service would not continue and maintained that no notice was required. The Court found that the contract was intended to be ongoing, as it provided for annual salary reviews and escalating leave entitlements. It held that the failure to confirm the Claimant was a termination, not a mere lapse of a fixed term. The Court rejected the Defendant’s argument as “too artificial a distinction”. The Claimant was awarded salary in lieu of notice, pro-rated to SGD 2,857.14.	This decision is significant for employers for the following reasons: – Employers cannot simply let a probation period lapse and treat employment as ended without notice (or payment in lieu), unless the contract is clearly drafted to achieve that result. – Non-confirmation at the end of probation is, in substance, a termination, and employees may be entitled to notice or salary in lieu. – Courts and the Employment Claims Tribunal (the “ECT”) will scrutinise the contract as a whole; salary reviews, escalating leave and post-probation benefits point to ongoing employment. – The ECT remains a practical and cost-effective avenue for probationary employees to claim salary in lieu of notice.	Employers in Singapore should take the following actions to mitigate risk: – Review standard-form employment contracts and offer letters to ensure probation clauses clearly address what happens at the end of probation, including whether notice (or payment in lieu) is required on non-confirmation. – If no notice or a shorter notice period is intended on non-confirmation, state this expressly, ensuring compliance with section 10 of the EA (including equal notice periods for employer and employee). – Align probation, notice and termination provisions across templates with the principles in this decision.



South Africa | 1

On your radar 

Development and date	Description	Impact and risk	Future actions
Tropic Plastic & Packaging Industry (Pty) Ltd v Lubbe and Others [2026] ZALCJHB 288 2 September 2026 The Labour Court enforced a nationwide, 12-month restraint of trade against a former senior employee, notwithstanding that her brief employment with the new employer had ended before the hearing.	The employee had worked as a Key Accounts Technical Sales Manager and Systems Coordinator and had signed restraint and confidentiality undertakings before starting employment. After resigning, she joined an entity which was associated with what was an admitted direct competitor of her former employer. The Court found that the former employee had occupied a strategically important position and had access to economically valuable confidential information, including customer and supplier information, pricing structures, technical systems and strategic business information. It was unnecessary for the former employee to prove that she had actually disclosed information or solicited customers; it was sufficient that she could use the information to the employer's detriment. The Court prohibited her, for 12 months from 27 April 2026, from working for the identified entities or competing businesses in South Africa, using or disclosing confidential information, and soliciting relevant customers.	The decision confirms that courts may examine the commercial reality of a corporate group rather than treating the nominal identity of the contracting entity as decisive. Moving an employee into a legally separate but operationally integrated associated company may still breach a restraint where the associated structure competes with the former employer. The judgment also makes clear that stopping work for a competitor will not necessarily bring enforcement proceedings to an end. If the restriction is still in place, the employee refuses to accept they have breached it and will not give assurances about their future conduct, the employer may have good reason to believe the breach could happen again.	Employers should: – Tailor restraints to identified protectable interests, competitive activities, relevant customers, reasonable geographical areas and defensible periods. – Map competing businesses by reference to actual operations, ownership, premises, personnel and commercial integration rather than legal entity names alone.



South Africa | 2

On your radar 

Development and date	Description	Impact and risk	Future actions
South African Clothing and Textile Workers Union obo Members v Padayachee N.O. and Others [2026] ZALCD 31 16 July 2026 The Labour Court reviewed and partially set aside a CCMA award which had treated labour-broker employees' cessation of work as the expiry of valid fixed-term contracts rather than dismissals.	Three low-income temporary employment services ("TES") employees were engaged on purported fixed-term contracts, but the contracts lacked valid end dates and the employer relied on a recall system. After the annual shutdown, they were not recalled when operations resumed. Although the CCMA found that their contracts had simply expired, the Labour Court held that they performed ongoing work integral to the business and that the employer's recall practice improperly shifted operational risk onto employees. The Court therefore found that they had become indefinite employees and were entitled to the protections of section 198B of the Labour Relations Act 66 of 1995 ("LRA").	This case confirms that an employer cannot evade the protections of section 198B of the LRA by using vague expressions such as "completion of tasks" or repeatedly renewing fixed-term contracts without a genuine, objectively justifiable reason. Where no valid justification exists, an employee may be deemed to be employed indefinitely and termination at the purported end of the fixed term may amount to an unfair dismissal.	Employers should: – Ensure that every fixed-term contract is in writing and expressly records the reason for fixing the term and the intended duration or end date, where applicable. – Audit TES fixed-term contracts over three months for compliance with section 198B of the LRA.
South African Clothing and Textile Workers Union obo Dazini and Others v Boss Tents and Others [2026] ZALCD 29 20 July 2026 The Labour Court applied section 200B of the LRA to hold individuals and related entities jointly and severally liable for a restructuring and liquidation that undermined employees' retrenchment (broadly equivalent to redundancy) consultation rights.	Union members were employed through Warehouse Division CC. In February 2026, the business was transferred to another individual and liquidated shortly thereafter, while the Boss Tents manufacturing operation continued at the same premises through related family-controlled entities using non-unionised employees. The Court found that the liquidation did not automatically terminate the employees' contracts and held that the transfer and liquidation formed part of a sham arrangement designed to avoid meaningful retrenchment consultation with employees and their union. Under section 200B of the LRA, the individual respondents and related entities were held jointly and severally liable, and the employees were reinstated with retrospective effect until a fair retrenchment process had been carried out.	The decision demonstrates that separate corporate personality will not necessarily protect associated entities or controlling individuals where a restructuring, outsourcing arrangement or liquidation is intended to defeat employment-law obligations. Section 200B can extend an employer's liability to persons or entities participating in a simulated or sham arrangement, making them jointly and severally liable for the underlying employer's statutory failures.	Employers should: – Ensure that any pre-liquidation restructuring or transfer of operations has a documented, genuine commercial rationale unrelated to avoiding labour-law obligations. – Not assume that liquidation automatically terminates employment contracts.



Spain

On your radar 

Development and date	Description	Impact and risk	Future actions
Spain transposes the Transparent and Predictable Working Conditions Directive In force 5 October 2026	Spain has partially transposed the Directive on transparent and predictable working conditions through a new Royal Decree. The new regulation expands employers' obligations to provide employees with detailed information regarding the essential terms of their employment. Information must be provided covering: remuneration, working time arrangements, overtime rules, fixed-discontinuous activity periods(a Spanish concept where employees work on an intermittent and recurring basis), applicable collective bargaining agreements and certain algorithmic or automated decision-making systems affecting working conditions. The reform also introduces stricter requirements regarding the timing and content of information provided to employees.	Employers will need to review employment documentation, onboarding processes and internal HR practices to ensure compliance with the expanded information requirements. The new framework increases transparency regarding employment conditions and may expose employers to greater scrutiny where contractual documentation, remuneration arrangements or working time practices are not properly documented or communicated to employees. Particular attention should be paid to flexible working arrangements, fixed-discontinuous contracts and the use of automated systems affecting employment decisions.	Employers should review employment contracts, employee handbooks and onboarding documentation to ensure that all mandatory information is provided in accordance with the new requirements. The updated terms should be given to new employees joining after 5 October 2026 Companies should also assess whether additional disclosures are required in relation to remuneration, working time arrangements, collective bargaining coverage and algorithmic management tools. Existing employees can also make a request for the additional information contained in the regulation. Employers should also prepare for employee requests for information which must be provided within 30 days.



Sweden

Development and date	Description	Impact and risk	Future actions
Voluntary termination agreements constitute “dismissals” under the EU Collective Redundancies Directive 27 May 2026	This case involved an employer without a collective bargaining agreement that entered into individual termination agreements with a number of employees as part of a restructuring programme. On 24 January 2024, the employer announced the reductions and on the same day offered individual termination packages to the affected employees. A negotiation request was submitted to the union the same day, but the employer concluded the agreements without awaiting negotiations. On 25 January 2024 the union requested supplementary information; on 1 February 2024 the employer replied that agreements had already been signed and the matter was closed. Although the agreements were labelled as voluntary, the underlying purpose was to reduce the workforce for reasons not related to the individual employees. Consequently, the agreements were regarded as “dismissals” within the meaning of the EU Collective Redundancies Directive (Council Directive 98/59/EC). The employer was found to have breached the consultation obligation under Section 13, second paragraph, of the Co-Determination Act (MBL) – which implements the Directive and applies also to employers without a collective agreement – as well as the duty under Section 15, second paragraph, to provide written information on the reasons for the planned redundancies in good time.	The ruling emphasises that the formal label attached to a workforce reduction is irrelevant – what matters is the underlying operational purpose. Where that purpose is to reduce headcount for business reasons, the measure will be treated as a dismissal under the EU Collective Redundancies Directive, regardless of whether it is structured as a voluntary agreement. The decision reaffirms that the consultation obligation under Section 13, second paragraph, of the MBL applies equally to employers without a collective agreement and cannot be sidestepped through the choice of a voluntary termination structure. Employers carrying out workforce reductions through voluntary packages without prior union consultation risk damages liability for breach of the consultation obligation.	This development is particularly relevant for technology companies, international groups, start-ups and other employers operating without collective bargaining agreements, which may not have established processes for union engagement. Employers should review their restructuring procedures to ensure that the consultation obligation under Section 13 and the written information requirements under Section 15 of the MBL are considered from the earliest stages of workforce planning. Voluntary exit programmes should not be assumed to fall outside the scope of statutory consultation obligations where the objective is to reduce headcount for organisational or economic reasons.

Switzerland

On your radar 

Development and date	Description	Impact and risk	Future actions
Registering an employee's working time According to a recent decision of the High Court of the Canton of Zurich, daily target working hours pre-entered in the official time registration system of the employer do not fulfil the duty of a Swiss employer to register the working time of its employees.	Based on public Swiss law, a Swiss employer must register the exact hours worked by its employees. Only under very narrow circumstances may the employer be exempt from such duty, in particular with regard to its top executives. All other employees must generally register in detail the hours worked on each day. According to a recent decision by the Zurich Cantonal High Court, an employer does not comply with such public law duty if the converted daily target working hours are pre-entered into the time tracking system of the employer. If the requirements for simplified time tracking are not met, then in addition to the total daily working hours, their timing (as well as the timing and duration of longer breaks) must be recorded in detail. Furthermore, such pre-entered data does not comply with the legal requirements insofar as the law mandates that the actual hours worked – and not the scheduled working hours – be recorded. As a consequence, in its recent decision, the High Court of the Canton of Zurich described such default entries as “questionable, systematic sham time records.”	Daily target working hours pre-entered in the official time registration system of the employer do not fulfil the duty of a Swiss employer to register the working time of its employees. Instead, the employees must register their actual hours worked, including their timing and the timing and duration of longer breaks.	Swiss employers should assess whether the time registration system which they have in place complies with the legal requirements.

Turkiye

On your radar 

Development and date	Description	Impact and risk	Future actions
Hybrid working model formally regulated Amendment to the Remote Work Regulation published in the Official Gazette on 25 September 2026.	The amendment formally recognises hybrid working – where part of the work is performed at the workplace and part remotely – and requires that the specific days and hours for each arrangement be set out in the employment contract.	Employers using informal hybrid arrangements must now update employment contracts to specify on-site and remote working days.	Employers should review and amend existing employment contracts and internal policies to reflect the new hybrid-work requirements.
Constitutional court: six-month seniority threshold Constitutional Court ruling of 8 April 2026, published in the Official Gazette on 29 September 2026.	The Court found a violation of the right to work where an employer dismissed an employee two days before the six-month seniority threshold (the minimum tenure required for job security protection) was met, while the employee was on sick leave.	Employers risk constitutional liability if they terminate employees close to the six-month threshold in circumstances suggesting the intent to circumvent job security protections.	Employers should ensure that dismissals occurring close to the six-month job security threshold are supported by well-documented grounds and procedural compliance. Particular attention should be paid to the timing and communication of termination notices.
Constitutional court clarifies mandatory mediation in reinstatement cases Constitutional Court ruling of 18 February 2026, published in the Official Gazette on 6 August 2026.	The Court held that refusing to hear a reinstatement case because mandatory mediation was not completed with the correct employing company before the lawsuit was filed violated the right of access to a court, particularly where the employee's error was excusable because the two companies had the same managers and the same business address.	Employers in corporate group structures should be aware that courts will apply good-faith principles when evaluating mediation compliance, reducing the scope for procedural objections.	Employers should ensure that their corporate affiliations and the identity of the “true employer” are transparent to employees and mediators.
Annual severance pay ceiling updated Circular on Financial and Social Rights for July 2026, issued by the Ministry of Treasury and Finance on 3 July 2026.	The annual severance pay (a statutory lump-sum payment owed to qualifying employees upon termination) ceiling has been set at TRY 73,729.87, effective from 1 July 2026.	Employers must apply the updated ceiling when calculating severance payments; underpayment may lead to labour court claims.	Payroll and HR teams should update their systems to reflect the new ceiling for all terminations from 1 July 2026 onwards.

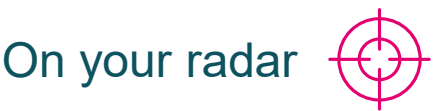


Ukraine

On your radar 

Development and date	Description	Impact and risk	Future actions
E-employment Following the June presentation of the “Obrii” (digital platform for employment services), the Ministry of Economy of Ukraine announced further steps in development of the project. By the end of 2026, the next stage of the platform’s implementation is expected to introduce electronic employment.	 The system will provide employers and employees to exchange documents digitally (via the Diia portal), conclude employment contracts electronically, and automatically transmit the relevant information to state registers. The platform is also expected to support AI-driven job matching and skills-based career recommendations.	 Key risks are the adaptation of internal HR and document management procedures, as well as ensuring compliance with personal data protection, cybersecurity and regulatory requirements associated with electronic employment and automated data exchange with state registers.	 Employers should monitor further legislative and technical developments regarding the rollout of the Obrii platform and assess whether internal HR, onboarding, document management and data protection procedures require updates to accommodate electronic employment contracts and automated data exchange with state registers.

United Kingdom



Development and date	Description	Impact and risk	Future actions
Consultation on whistleblowing reform On 12 October 2026, the Government launched a 12-week consultation on reforming the whistleblowing regime in Great Britain. The proposals include mandatory whistleblowing policies and procedures, wider access to interim relief and possible financial rewards in certain economic crime cases. Even if only some options proceed, UK employers may need to overhaul their whistleblowing policies, procedures and broader speak-up arrangements. No information has been published on the expected date of implementation.	The consultation considers a range of potential reforms to the UK whistleblowing framework. There is currently no general requirement on employers in the UK to have a whistleblowing policy. Options include stronger guidance or a statutory duty, potentially backed by civil penalties that would apply to all public-sector employers and private-sector organisations with 50 or more employees. In the UK there is an emergency employment tribunal remedy known as interim relief. Employees who claim they were dismissed for whistleblowing may apply to the employment tribunal within 7 days of dismissal for continued employment or salary pending the final hearing, which may be several years away. Extending the deadline to 14 days could increase applications and require faster employer responses. Apart from two limited exceptions, the UK has not favoured the use of financial incentives to encourage workers to blow the whistle. A much broader scheme involving financial rewards for information about economic crime reported to the Serious Fraud Office (“SFO”) is being considered, but eligibility, funding, award levels and safeguards are still to be decided. The scope of protection could be extended to groups currently excluded, including charity trustees, non-executive directors, volunteers, some job applicants and certain self-employed individuals. Categories of wrongdoing could be expanded to cover emerging risks such as AI, misuse of public funds and abuse of authority, with clearer guidance where needed. The consultation also asks whether the current higher threshold for external disclosures deters reporting and whether disclosures to trade union officials should be expressly protected.	If implemented, the reforms could increase compliance costs for employers and increase the risk of tribunal claims. For example, a statutory duty is likely to mean a review of whistleblowing processes, supported by additional systems, training and investigation resources. Employers that fail to meet the proposed procedural requirements could also face civil penalties, adding further financial exposure to the existing risks involved with whistleblowing. Extending protection to additional groups would require managers to be trained to recognise concerns raised outside traditional employment relationships and, once more, increase the risk of litigation. Making it easier to report concerns to regulators, alongside a specific disclosure route through trade unions, could increase external scrutiny before employers have had an opportunity to address concerns internally. Financial rewards could also encourage individuals to report suspected economic crime directly to the SFO. Extending the deadline for interim relief applications from 7 to 14 days could lead to more urgent applications, requiring employers to gather evidence quickly and incur legal costs at an early stage. This is on top of an existing surge in interim relief applications under current rules, which have been putting strain on an already overstretched Employment Tribunal system.	Compared with many other comparable jurisdictions, the UK regime has fallen behind international standards, particularly since the EU Whistleblowing Directive was not implemented domestically after Brexit. The statutory duty may be modelled on the EU Directive with secure channels, a 7-day acknowledgement period etc. and therefore employers operating within the EU will be familiar with this more prescriptive process and approach. However, until the final details are confirmed, we do not recommend that UK employers make substantive changes to their policies or procedures. For now, employers should monitor developments. International organisations should also consider how their UK arrangements align with their European and global processes.

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