



Pay transparency: from the EU Directive to the salary range

How the 27 member states are transposing Directive (EU) 2023/970, what changes in Italy and how to build the range to publish in job ads. A practical guide for HR and Total Rewards, updated 18 October 2026.

In this guide. Part 1: the Directive and the 27 countries, with the Italy focus. Part 2: how to build and publish the salary range, with a worked example and a checklist before publishing.

Part 1 · The Directive in 27 countries

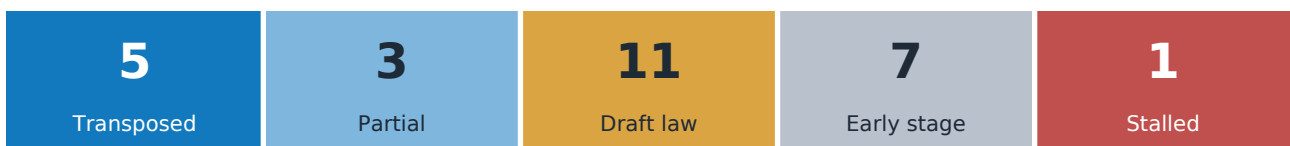
What the Directive requires

The Directive had to become law in every member state by **7 June 2026**. It sets a common minimum, which each country can strengthen:

- **Recruitment:** starting pay or the pay range must be shared with candidates, in the job ad or before the interview. Employers cannot ask about pay history.
- **Criteria:** the criteria used to set pay and pay progression must be available to workers.
- **Right to information:** every worker can ask for their own pay level and the average, by sex, for the same work or work of equal value. Answer within two months.
- **Pay gap reporting:** 250+ employees every year from 7 June 2027; 150 to 249 every three years from the same date; 100 to 149 every three years from 7 June 2031.
- **Joint pay assessment:** if the gap in a category is 5% or more, is not justified by objective criteria and is not fixed within six months, the employer reviews it with worker representatives.

The picture at a glance

More than four months after the deadline, most countries are still behind. Employers working across borders have to live with different rules, and in many cases with rules that do not exist yet.



Transposed: full law in force. Partial: only some rules in force. Draft law: text published or before Parliament. Early stage: no public text, or the text is stuck. Stalled: the government has suspended transposition.



The 27 countries

Country	Status	Act and dates	Worth knowing
Austria	Early stage	Ministerial draft stuck since June 2026	The draft provides for pay ranges in job ads, reporting from 100 employees and a one-year grace period before fines.
Belgium	Partial	Public-sector decrees (Wallonia-Brussels 2024, Flanders 7/6/2026)	Private employers still wait for the federal law, expected in the first half of 2027.
Bulgaria	Draft law	Amendment to the Protection Against Discrimination Act, in Parliament since 11/9/2026	Approved in committee on 2/10/2026; the plenary vote is still pending.
Croatia	Early stage	Labour Act amendments not yet tabled	Adoption expected in autumn 2026; the government has presented a free job-evaluation tool.
Cyprus	Draft law	Draft published 26/1/2026	Goes beyond the Directive: broad definition of pay and possible criminal liability. No date yet.
Czechia	Draft law	Government bill filed 8/9/2026; target 1/1/2027	Applies to every employer, with no size threshold. Since 1/6/2025 employers already cannot stop staff discussing their pay.
Denmark	Draft law	Bill sent to Parliament 8/10/2026	First reading on 22/10/2026; rules planned from 1/3/2027.
Estonia	Partial	Partial transposition law, in force since 13/7/2026	Already in force: pay disclosed before the interview, pay-history ban, freedom to discuss one's pay. Reporting is postponed.
Finland	Draft law	Bill in the employment committee; target 1/1/2027	First pay gap report due by 2/5/2028 for employers with 150 or more staff.
France	Draft law	Bill before the Senate since 10/9/2026	Keeps the 50-employee threshold; the Index de l'égalité is replaced by seven indicators from 2028.
Germany	Early stage	No bill approved by the government yet	Reform of the Entgelttransparenzgesetz expected in early 2027; the right to information may slip to 2028.
Greece	Transposed	Law 5316/2026, published 6/7/2026	Main obligations from 1/11/2026, including recruitment rules; ministry guidance and a pay gap calculator since 7/10/2026.
Hungary	Early stage	Law listed in the government's autumn 2026 programme	Adoption announced for October 2026, but no text published or tabled in Parliament.
Ireland	Early stage	Pay Transparency Bill at an early stage	Not a government priority. Gender pay gap reporting is already required from 50 employees.
Italy	Transposed	Legislative Decree No. 96 of 7 May 2026, in force since 7/6/2026	See the focus in the following pages.
Latvia	Draft law	Draft at adoption stage (Cabinet, then Saeima)	Makes pay in job ads mandatory, beyond the Directive; corporate fines capped at €14,000.
Lithuania	Transposed	Law No. XV-969 of 21/5/2026, in force since 7/6/2026	Right to information from 1/1/2027. The social insurance agency (Sodra) calculates pay gap indicators from payroll data.



Country	Status	Act and dates	Worth knowing
Luxembourg	Early stage	No known draft law	A biennial internal pay report to employee representatives already applies from 50 employees.
Malta	Transposed	Legal Notice 173/2026, in force since 5/6/2026	Builds on recruitment rules in force since August 2025; first reporting cycle in 2027 for 150 or more workers.
Netherlands	Draft law	Bill 36949 in the House since 21/5/2026	Debate moved to January 2027, so the 1/1/2027 target will be missed; reporting from 2028.
Poland	Partial	Act of 4/6/2025, in force since 24/12/2025; full act expected Q1 2027	Already in force: pay disclosed before hiring and a pay-history ban.
Portugal	Draft law	Government draft published 5/8/2026; consultation closed 25/8	Pay or range before the contract is signed; exempts employers under 50 from pay-progression criteria. Still needs the Council of Ministers, then Parliament.
Romania	Draft law	Passed by the Senate 14/10/2026	Now with the Chamber of Deputies, which has the final say; no date set.
Slovakia	Transposed	Equal Pay Act of 15/4/2026, in force since 7/6/2026	Job-evaluated pay structures required by 31/7/2026; first reports on 7/6/2027 for 150 or more employees.
Slovenia	Early stage	Ministry draft not yet public	Target: adoption by 31/12/2026, with minimum transposition (no reporting below 100 employees).
Spain	Draft law	Draft Royal Decree amending RD 902/2020; consultation closed 24/8/2026	Deliberately partial: pay ranges in job ads are left to a later instrument. Spain already requires pay registers and audits from 50 employees.
Sweden	Stalled	Transposition halted by the government 26/3/2026	The Commission refused the requested postponement (22/5/2026). New law unlikely before 2028; the existing annual pay survey still applies.



Focus: Italy

Italy is one of the five countries that transposed on time and in full. It did so with Legislative Decree No. 96 of 7 May 2026, published in Gazzetta Ufficiale No. 125 of 1 June 2026 and in force since 7 June. Article numbers are in brackets.

- **Recruitment (art. 5):** every job ad states the starting pay or range, set on objective, gender-neutral criteria, together with the relevant terms of the applicable national collective agreement (CCNL). Asking for current or past pay is banned, including through an agency. Job ads and titles must be gender-neutral.
- **In the workplace (art. 6):** pay and progression criteria are available to workers. Employers applying a CCNL signed by the comparatively most representative unions can refer to its criteria, grades and pay scales. Employers under 50 are exempt from the progression part.
- **Right to information (art. 7):** once a year, in writing, workers can ask for average pay levels by sex for the same work or work of equal value. Two months to answer, which can be done by publishing the data on the intranet. Workers must be told about this right every year.
- **Reporting (art. 9):** from 100 employees, on the Directive's timetable. First report on 7 June 2027 for employers with 150 or more.
- **Joint pay assessment (art. 10):** a gap of 5% or more in a category, not justified and not fixed within six months.

What is specific to Italy

- **The CCNL as the yardstick.** Same work means the same grade and category under the CCNL; equal value means different jobs at comparable grades, assessed on skills, responsibility and working conditions (art. 4). Applying a CCNL signed by the comparatively most representative unions creates a presumption of compliance, unless individual discrimination is proven.
- **Pay versus pay level.** "Pay" includes variable components, while "pay level" counts only fixed, recurring elements (art. 3). So in a job ad it makes sense to publish fixed annual base pay (RAL) as a range and show variable pay separately.
- **What to watch.** The Labour Ministry decrees on data collection, due within 90 days of entry into force, and guidance on key definitions, possible until 31 December 2026.
- **Fines.** According to law firm summaries, €250 to €1,500 for general breaches and €5,000 to €10,000 for discriminatory ones. To be checked against the decree text.

One question for your organisation

Take two roles on different grades, for example a customer service specialist and a warehouse planner. Can you explain in two sentences why they are, or are not, comparable on skills, responsibility and working conditions? If answering takes a meeting, the gap is not in your spreadsheet. It is in your job architecture.



Part 2 · The salary range in job ads

The Directive says the range must be shared, but not how to build it. This part sets out a method that holds up both against the market and with the people already in the company.

What gets published, in Italy

Externally, only the base pay range is published (fixed annual gross salary, the Italian RAL). Variable pay (bonuses, MBOs, incentives, performance awards) does not go in the ad.

The reason is practical: variable pay depends on goals, performance and company results that the candidate does not know and that the employer cannot guarantee when making the offer. Publishing it would create expectations that are hard to manage and would make ads impossible to compare. The full package (variable pay, welfare, benefits) is explained during selection, when the candidate has what they need to assess it.

- **In the ad:** the base pay range, with minimum and maximum.
- **In the interview and the offer:** variable pay, welfare, benefits and growth policies.
- **Never in the ad:** "up to" figures that add fixed and variable pay together.

How to build the range

A published range has to pass two tests: be credible on the market and not create imbalances with the people already in the same role (peer equity). The method we propose has four steps: three set the range against the market, the fourth checks it against the people already in the company.

1. Start from the midpoint

The midpoint is the reference value for the role on the market: typically the pay median, from surveys or benchmarks, for that role, level and location. It is the centre of gravity of the range, the value that matches a person who is fully competent in the role.

2. Look for the minimum about 15% below the midpoint

The bottom of the range is set at around 15% below the midpoint. This is the space for people who enter the role with the core skills and still have room to grow: below that point the position would no longer be paid in line with the market.

3. Set the maximum about 15% above the midpoint

For symmetry, the top of the range goes up to around the midpoint +15%. This space is the negotiation margin to use when the candidate brings experience or specific skills that, at the time of publication, are hot in the relevant market and therefore more sought after. It is not where the offer starts, but a reserve that has to be justified.



4. Check that current employees sit above the minimum

Before publishing, compare the minimum with the base salary of every person in the company who holds the same role at the same level. If anyone sits below it, the ad would say that a new hire is worth more than those already there: the classic peer equity problem. In that case the minimum comes down and the range is widened until it includes the lowest internal salary too; the maximum stays where it is. Before widening, though, ask why that person sits below: if there is no objective reason, the right move is to bring the person up.

As a formula

Midpoint = market median for the role

Starting minimum = Midpoint $\times$ 0.85

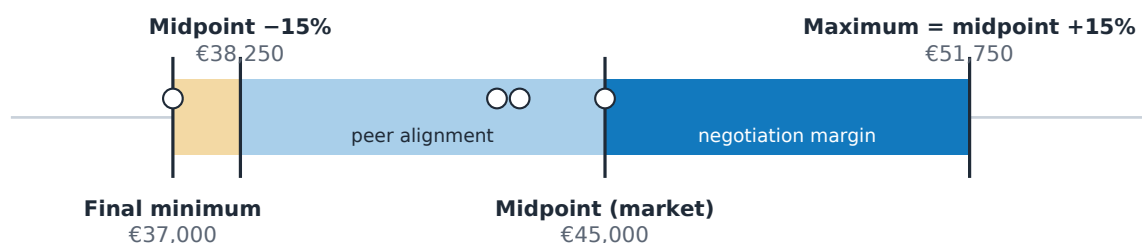
Maximum = Midpoint $\times$ 1.15

Check: if an internal base salary is below the minimum, Minimum = lowest internal salary (the range widens)

A worked example

A company is hiring a mid-level **HR Business Partner** in Milan. The starting data:

Item	Source or calculation	Value
Market midpoint	Pay survey median for role, level and location	€45,000
Starting minimum	€45,000 $\times$ 0.85	€38,250
Range maximum	€45,000 $\times$ 1.15	€51,750
Base salaries of the 4 mid-level HRBPs on staff	37,000, 43,000, 43,000 and €45,000: one person sits below the starting minimum	€37,000
Range minimum	Lowered to the lowest internal salary	€37,000
Range width	(Maximum – Minimum) / Minimum	35% $\rightarrow$ 40%



○ = base salaries of current HRBPs

Text in the ad: "Annual gross base salary for the Milan office: €37,000 – €51,750. For the same position at another location, the range will be discussed in the individual interview. The package also includes variable pay and a welfare plan, explained during the interview."



How to use the range when making an offer

- **Between €37,000 and €45,000:** candidates who fit the role and are still growing in some skills. The offer stays consistent with what colleagues earn.
- **Around €45,000:** candidates who are fully autonomous in the role.
- **Between €45,000 and €51,750:** only for experience or specific skills in high demand on the market at that moment (for example people analytics or experience on pay transparency projects). The exception must be documented.

Two cases to handle

- **Many current employees sit below the minimum.** If including them makes the range much wider, the ad signals a misalignment with the market: it is time to plan a realignment of internal salaries before or together with publication, instead of widening further.
- **Some current employees sit above the maximum.** The published maximum is not raised to chase a single case: that person is outside the range and is handled separately (for example with smaller raises over time). If there are many such cases, the chosen benchmark is worth reviewing.

When the range changes with the work location

The midpoint also depends on location: for the same role, the market in Milan does not pay like the market in Sassari, and the check on current employees is done on people at the same site. If the position can be filled at more than one site, the ad publishes the range for the **primary location** of the offer, that is, where the position is mainly open, and states that for other locations the range will be discussed in the individual interview, as in the example above.

The same applies when one ad covers positions open in more than one country: publish the range for the primary location, in its currency, and refer to the individual interview for sites in the other countries. Each country applies its own transposition of the directive, so check that this approach is accepted in each one.

If you work across several countries

- Start from the country with the strictest rules already in force and use it as your group-wide minimum.
- Publish ranges in every EU job ad, even where it is not yet required: within months it will be almost everywhere.
- Remove the pay-history question from interviews and forms now.
- Build one job architecture with written equal-value criteria and adapt it to local collective agreements.
- Calculate the gap by category now: 2026 data is the basis for the first reports in 2027.

Checklist before publishing

- The published figure is base salary only, without variable pay.
- The midpoint comes from an up-to-date market source consistent with role, level and location.



- The starting minimum is about 15% below the midpoint and the maximum about 15% above it.
- You have compared the minimum with the base salary of everyone in the same role and level: nobody is left below it.
- If you widened the range, you can explain why those people were below the minimum.
- If the position is open at more than one site or in more than one country, the ad says which location the range refers to and points to the individual interview for the others.
- It is clear who can approve an offer in the upper part of the range, and on what grounds.
- The internal message is ready: the people already in the role will see the ad.

Sources and method

The country overview comes from three public trackers by law firms and consultancies, checked on 18 October 2026: Ius Laboris (updated 5/10/2026), Corporate INTL (4/9/2026) and Figures (30/9/2026, with later entries). Where sources disagree we used the most recent information or left it out. Only the Italy focus has been checked against the decree text; for other countries always check the national text before deciding. Things change every week: this guide is updated with each edition.

Directive (EU) 2023/970: eur-lex.europa.eu/eli/dir/2023/970/oj

D.Lgs. 96/2026 (GU n. 125, 1/6/2026): ance.it/wp-content/uploads/allegati/DLgs_n96-2026.pdf

Ius Laboris: iuslaboris.com/insights/eu-pay-transparency-directive-which-countries-have-transposed

Corporate INTL: corp-intl.com/news/which-countries-implemented-eu-pay-transparency-directive

Figures: figures.hr/solutions/pay-transparency

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