

Robert—
—Walters

The impact of the EU Pay Transparency Directive

Robert Walters

robertwalters.nl



Global Talent Solutions

Robert Walters

- Our Talent Solutions deliver a fully integrated approach to workforce management, supporting the entire talent lifecycle.



- Our local and international coverage enables us to support companies in the search for the best talent across the globe.



40
Years of
expertise

3100
Employees

30
Locations

Global Talent Solutions

We deliver end-to-end talent solutions

Robert Walters is the world's most trusted talent solutions partner. Across the globe, we deliver recruitment, recruitment outsourcing and talent advisory services for businesses of all shapes and sizes, opening doors for people with diverse skills, ambitions and backgrounds.

We help organisations find the skills and solutions to reach their goals and assist talented professionals to power their unique potential.

[See our full talent solutions offering](#)



Specialist professional recruitment

Leverage our specialised industry expertise, extensive local insights and global reach to champion your story and connect with the best professionals for your organisation.

- Permanent recruitment
- Temporary recruitment
- Interim management
- Executive search



Outsourcing

Experience agile recruitment solutions tailored to your unique requirements, seamlessly scalable to match your evolving needs and objectives.

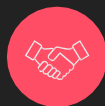
- Recruitment process outsourcing
- Contingent workforce solutions
- Statement of work



Consultancy

Go beyond traditional talent solutions to solve your biggest challenges, and access skilled consultants, support for critical projects or more value from service providers.

- Emerging talent
- Experienced talent
- Project solutions
- Services procurement



Talent advisory

Elevate your hiring strategy with our data-driven market intelligence and ESG solutions, empowering your business to cultivate talent, foster growth and future-proof your success.

- Market intelligence
- Talent development

Progress in different countries

Ireland

Draft (partial) bill in January 2025.
No timeline for enactment or remaining transposition.

Netherlands

Amended draft bill with Council of State but **enactment not expected before January 2027**.

Germany

Draft bill **expected early 2026**.

Italy

Draft law issued in February, now under a review and consultation phase.

France

Draft bill in discussion with representative bodies, expected to be debated in Parliament summer 2026.

Spain

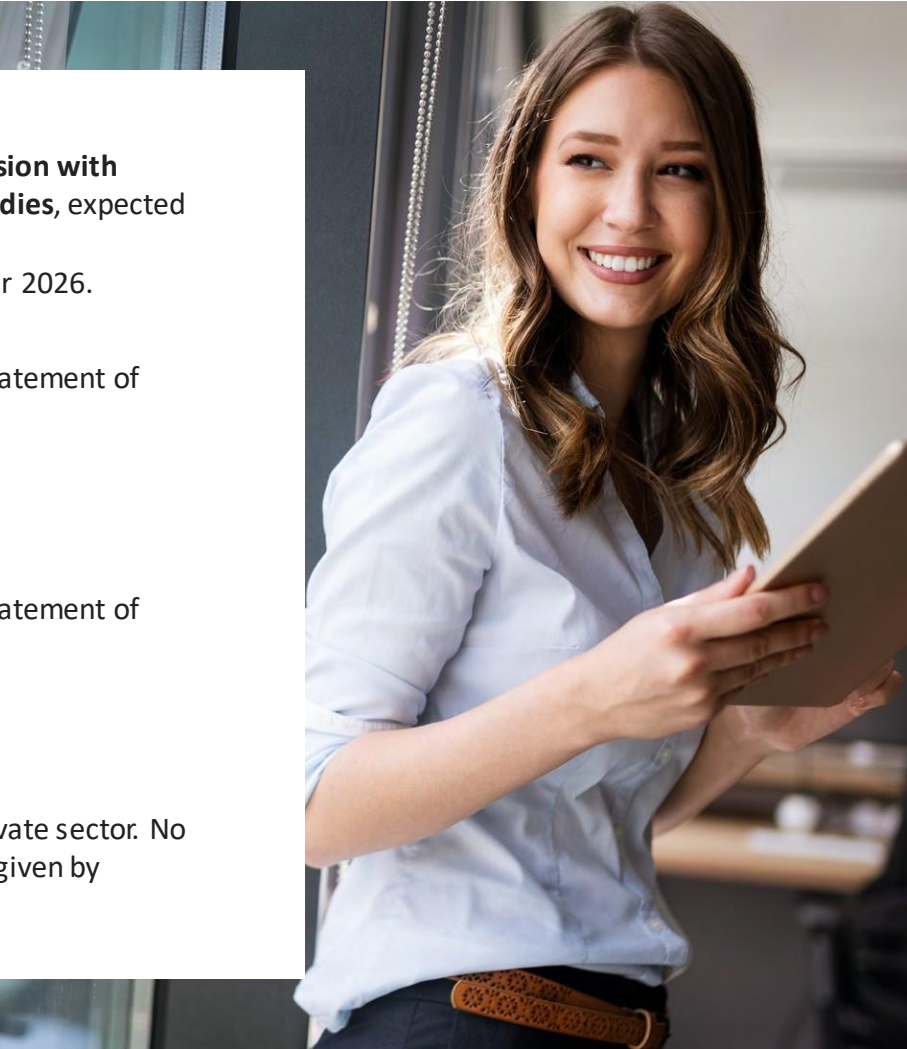
No Government statement of expected timeline.

Portugal

No Government statement of expected timeline.

Belgium

No draft bill for private sector. No expected timeline given by Government.



A woman with dark hair and glasses, wearing a light blue denim jacket over a white t-shirt, is looking down at a laptop screen. A man with short dark hair, wearing a grey blazer, is leaning in and looking at the same screen. They are in a modern office environment with large windows in the background. A red rectangular overlay is on the left side of the image, containing white text.

What the EU Pay Transparency Directive means for candidates

During the recruitment process

When and how should the **pay range** and relevant provisions of the collective agreement (if applicable)?

“Such information shall be **provided in a manner such as to ensure an informed and transparent negotiation on pay**, such as in a published job vacancy notice, prior to the job interview or otherwise.”

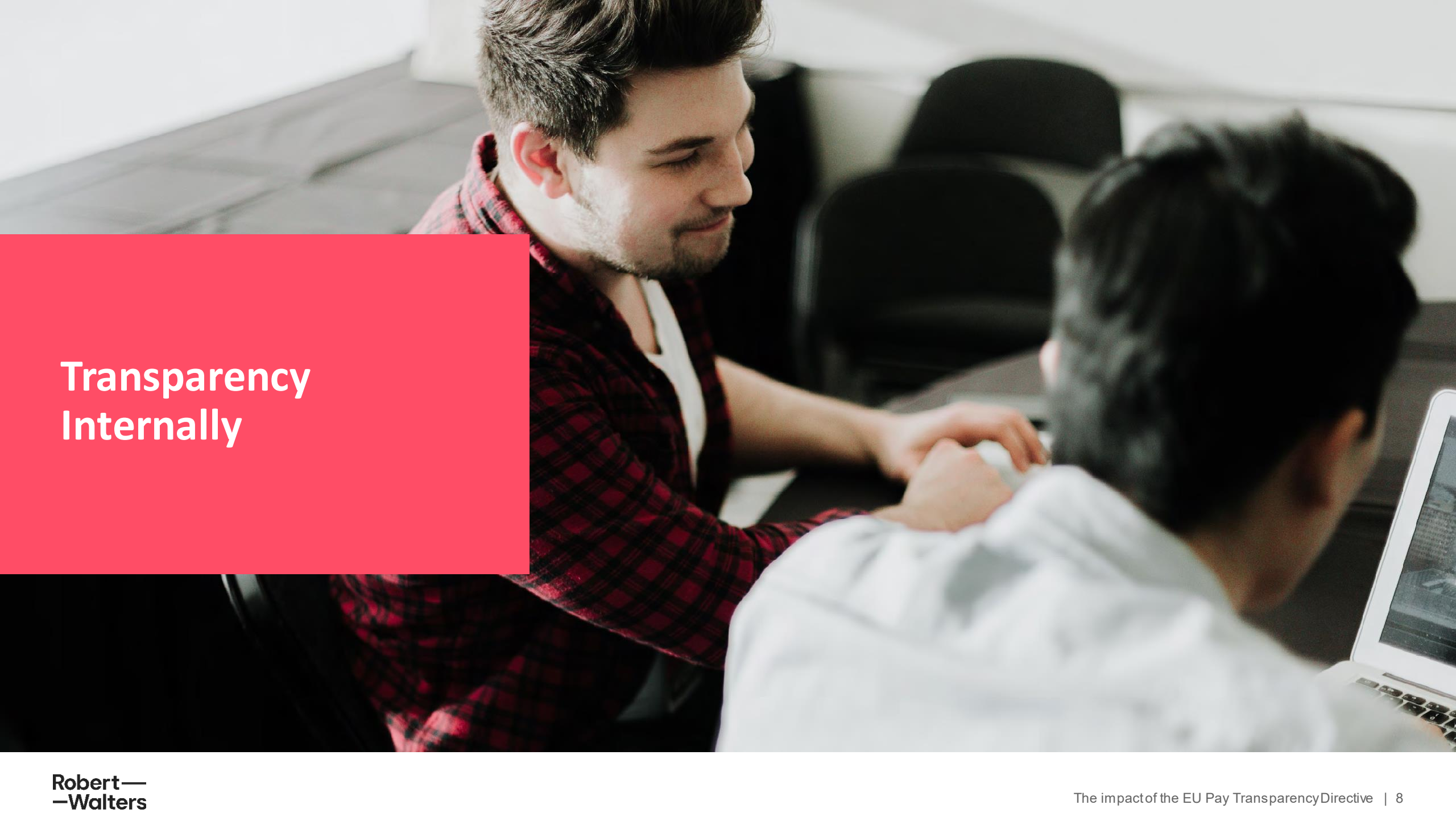
(article 5(1))

Asking for the candidate’s **pay history** is forbidden

“**An employer shall not ask applicants about their pay history** during their current or previous employment relationships.”

(article 5(2))



A photograph of two men in an office environment. The man in the foreground, wearing a red and black plaid shirt, is pointing at a laptop screen. The man in the background, wearing a light blue shirt, is looking at the laptop. The laptop screen displays a document with text and a small image. The background is slightly blurred, showing office chairs and a desk.

Transparency Internally

Categories of workers

How can the “categories of workers” be defined?

“Workers performing **the same work or work of equal value** grouped in a non-arbitrary manner based on the **non-discriminatory and objective gender-neutral criteria** referred to in Article 4(4), by the workers’ employer and, where applicable, in cooperation with the workers’ representatives in accordance with national law and/or practice.”

(article 3(1)(h))

“[...] They shall include **skills, effort, responsibility and working conditions**, and, if appropriate, **any other factors which are relevant** to the specific job or position. [...] In particular, **relevant soft skills shall not be undervalued.**”

(article 4(4))





Information workers will have the right to access

Information that must be made available to workers:

“Employers shall make easily accessible to their workers the **criteria** that are used to determine workers’ pay, pay levels and pay progression. Those criteria shall be objective and gender neutral.”

(article 6(1))

“‘[P]ay’ means the **ordinary basic or minimum wage or salary and any other consideration**, whether in cash or in kind, which a worker received **directly or indirectly (complementary or variable components)** in respect of his or her employment from his or her employer”.

(article 3.1(a))

Information workers can request:

“[...] information on their **individual pay level and the average pay levels, broken down by sex**, for categories of workers performing the same work as them or work of equal value to theirs.”

(article 7(1))

Workers' right to compensation



Shift of burden of proof

The employer must prove that there has been no direct or indirect discrimination in relation to pay:

- Once the worker establishes facts from which it may be **presumed** that there has been direct or indirect discrimination,
- If the employer has not complied with its obligations in terms of pay transparency, reporting or implementation of corrective measure, except if the employer can prove this was manifestly unintentional and of a minor character.



Amount of compensation

- Cannot be capped.
- Can include full recovery of back pay and related bonuses or payments in kind, compensation for lost opportunities, non-material damage, any damage caused by other relevant factors which may include intersectional discrimination, as well as interest on arrears.



Reporting obligations

Reporting obligations and corrective measures

Depending on the size of the workforce:

>250

June 2027, then annually

150 to 249

June 2027, then every 3 years

100 to 149

June 2031, then every 3 years

<100

no required by the directive

What information needs to be reported on:

1

The gender pay gap

2

The gender pay gap in variable components*

3

The median gender pay gap

4

The median gender pay gap in variable component*

5

The proportion of female and male workers receiving variable components*

6

The proportion of female and male workers in each quartile

7

The gender pay gap between workers broken down by ordinary basic salary and variable components*

*or complementary components

Reporting obligations and corrective measures

Depending on the size of the workforce:

>250

June 2027, then annually

150 to 249

June 2027, then every 3 years

100 to 149

June 2031, then every 3 years

<100

The directive does not require it*

* unless national legislation decides otherwise

1

Gap in variable pay components** (women/men)

2

Median gender pay gap

3

Median gap in variable pay components (women/men)

4

Proportion of women/men receiving variable pay components

5

Proportion of women/men in each pay quartile

6

Gender pay gap by category of workers, by basic salary and by variable pay components

**Or supplementary pay components.

Reporting and remediation obligations

Who the information need to be reported to:



Consult with workers' representatives



Communicate data to the authority in charge of compiling and publishing it



Publish on website
(on a voluntary basis and only for point 1 to 6)



Communicate information in point 7' to workers and their representatives (+ labour inspectorate upon request)

Corrective measures employers have to take:

If pay reporting demonstrates a **gender pay gap of at least 5 %** in any category of workers:

- **Justify** it on the basis of objective, gender-neutral criteria.
- **Remedy** unjustified gaps within six months.
- Failing this, **carry out a joint pay assessment** with the workers' representatives and remedy the situation within a reasonable period of time



Penalties

Directive's requirements for penalties:
(that need to be defined by EU member states)



Effective, proportionate
and dissuasive penalties



Specific penalties in the
case of repeated
infringements



Including fines



Take into account any relevant
aggravating or mitigating factor
(which may include intersectional
discrimination)

**Case studies:
Companies already
acting on
pay transparency**

**Informs candidates
about compensation
upfront**



- Provides detailed, fixed salary ranges in its job postings even in regions where no current pay transparency legislation requires it.

Credit Relationship Manager – Special Asset Management

Bristol/London/Edinburgh

About the role

Who we are:

Triodos Bank is an award-winning organisation and one of Europe's leading sustainable banks, whose mission is to make money work for positive social, environmental, and cultural change. We offer a wide range of banking services for people who want to use their money consciously – from current accounts through to investments and savings. We only finance companies, organisations and projects that benefit people and the environment.

What we offer

In return for your hard work and expertise, you will receive a competitive full time equivalent salary of between £52,000 and £57,000 depending on experience, plus access to our extensive benefits package, where most of our benefits are non-contributory.

Informs candidates
about compensation
upfront

NETFLIX

For roles posted in U.S. states with pay transparency legislation, Netflix includes a salary range.

Senior Manager, Sales Solutions (Programmatic)

New York, New York, United States of America

APPLY NOW

Job Posting Date	Job Requisition ID	Teams	Work Type
10-16-2025	JR36689	Advertising	Onsite

Netflix is one of the world's leading entertainment services, with over 300 million paid memberships in over 190 countries enjoying TV series, films and games across a wide variety of genres and languages. Members can play, pause and resume watching as much as they want, anytime, anywhere, and can change their plans at any time.

About the Role

We are seeking a dynamic and strategic Sr. Manager, Sales Solutions to lead and scale our programmatic sales strategy while overseeing a team of Sales Solutions Leads. This role will drive programmatic revenue acceleration by equipping advertisers and partners with data-enabled programmatic solutions, deepening customer impact, and ensuring seamless technical integrations in partnership with our Tech Integrations Leader.

Generally, our compensation structure consists solely of an annual salary; we do not have bonuses. You choose each year how much of your compensation you want in salary versus stock options. To determine your personal top of market compensation, we rely on market indicators and consider your specific job family, background, skills, and experience to determine your compensation in the market range. The range for this role is \$70,000 - \$420,000.

Informs candidates about compensation upfront



Proposes an earnings calculator that shows how insurance sales representatives can earn their pay based on the volume of sales calls, scheduled appointments, and cases submitted.

Income Calculator

How much would you like to earn?



Calculate

How can you achieve this?



Calls
49 Per week



1st Appointments
17 Per week



2nd Appointments
7 Per week



Cases submitted
3 Per week

Here's what you can earn



Total annual income
HKD 864,000

Total monthly income
HKD 72,000

Removes reference to previous salary during interviews



- Elimination of salary history questions in hiring, shifting from remuneration based on prior pay to aligning pay with on market data and experience.

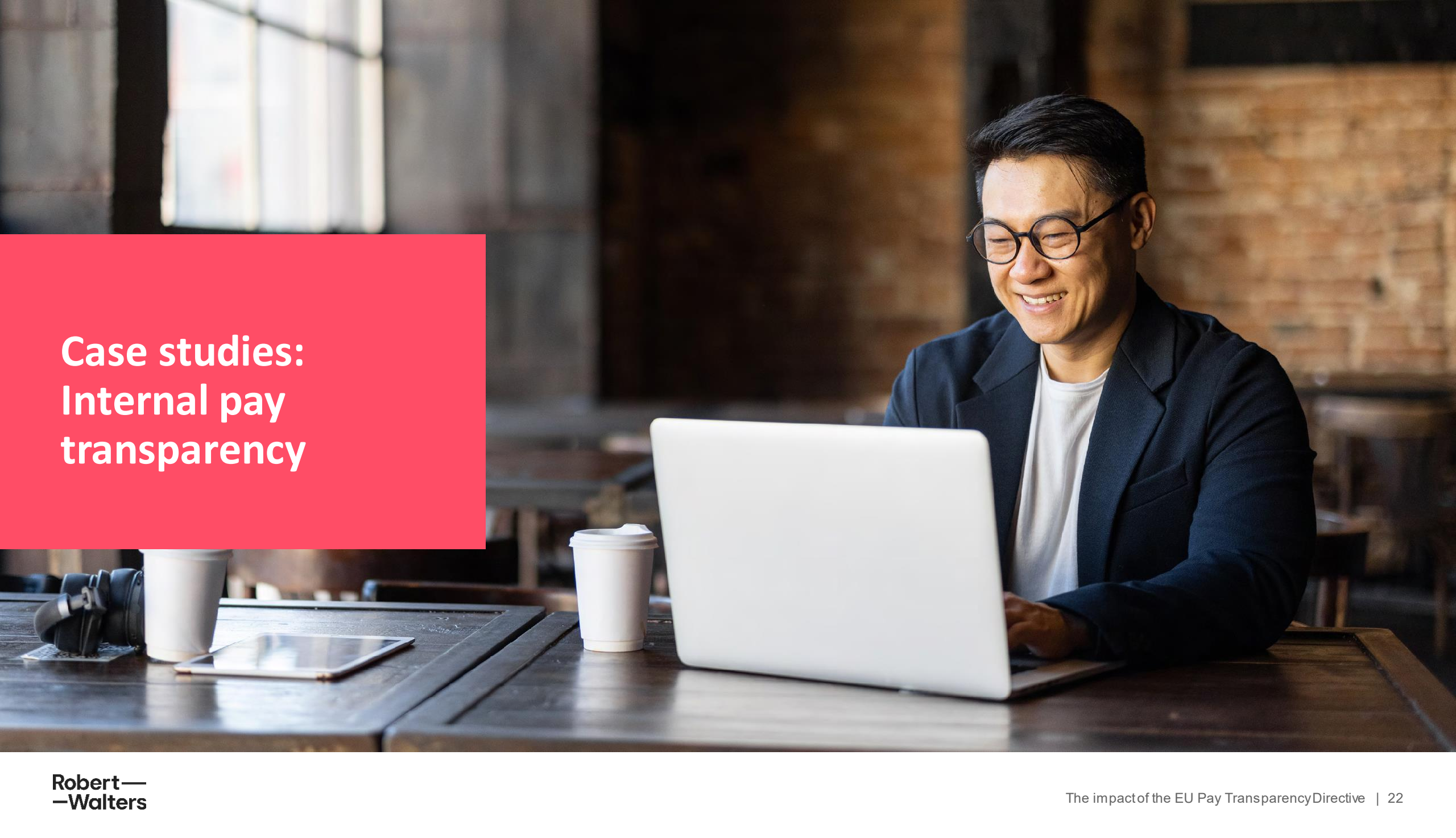
Policy and process

- Removal of salary history fields from recruitment scripts and application workflows
- Anchoring offers on market benchmarks and candidate experience, rather than on previous remuneration

Pay equity reviews

- Regular pay equity audits and targeted adjustments to address identified gaps



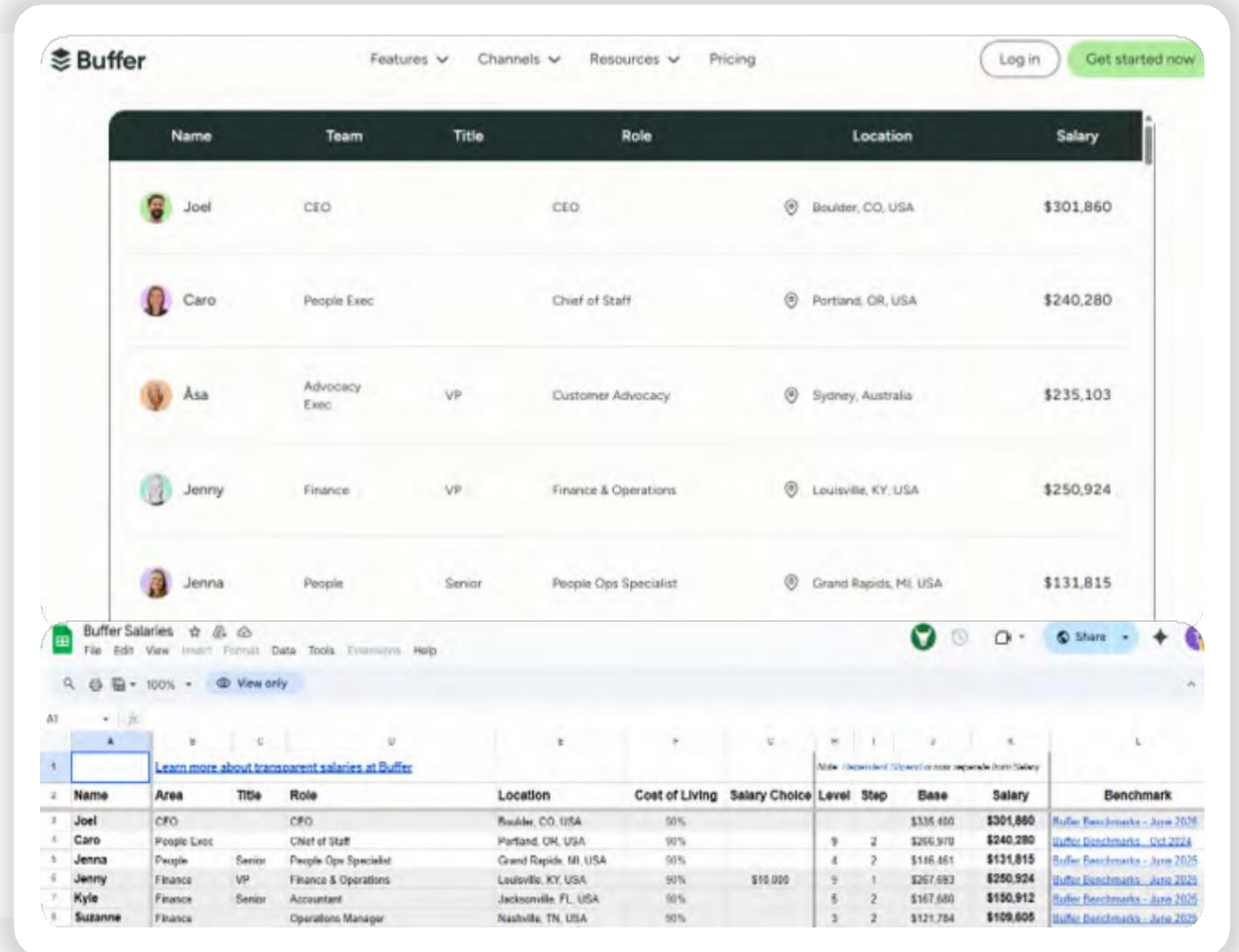


Case studies: Internal pay transparency

Internal communication about pay



- Since 2013, all employee salaries have been publicly available on Buffer's website. The information published includes name, team, role, work location, and salary.
- This approach is not feasible in Europe due to GDPR requirements.



The screenshot shows Buffer's public salary transparency page. At the top, there's a navigation bar with 'Features', 'Channels', 'Resources', and 'Pricing'. Below this is a table listing employees with columns for Name, Team, Title, Role, Location, and Salary. The table includes entries for Joel (CEO, \$301,860), Caro (Chief of Staff, \$240,280), Åsa (Customer Advocacy, \$235,103), Jenny (Finance & Operations, \$250,924), and Jenna (People Ops Specialist, \$131,815). Below the table is a spreadsheet view of the same data, with columns for Name, Area, Title, Role, Location, Cost of Living, Salary Choice, Level, Step, Base, Salary, and Benchmark. The spreadsheet also includes a link to 'Learn more about transparent salaries at Buffer'.

Name	Team	Title	Role	Location	Salary
Joel	CEO		CEO	Boulder, CO, USA	\$301,860
Caro	People Exec		Chief of Staff	Portland, OR, USA	\$240,280
Åsa	Advocacy Exec	VP	Customer Advocacy	Sydney, Australia	\$235,103
Jenny	Finance	VP	Finance & Operations	Louisville, KY, USA	\$250,924
Jenna	People	Senior	People Ops Specialist	Grand Rapids, MI, USA	\$131,815

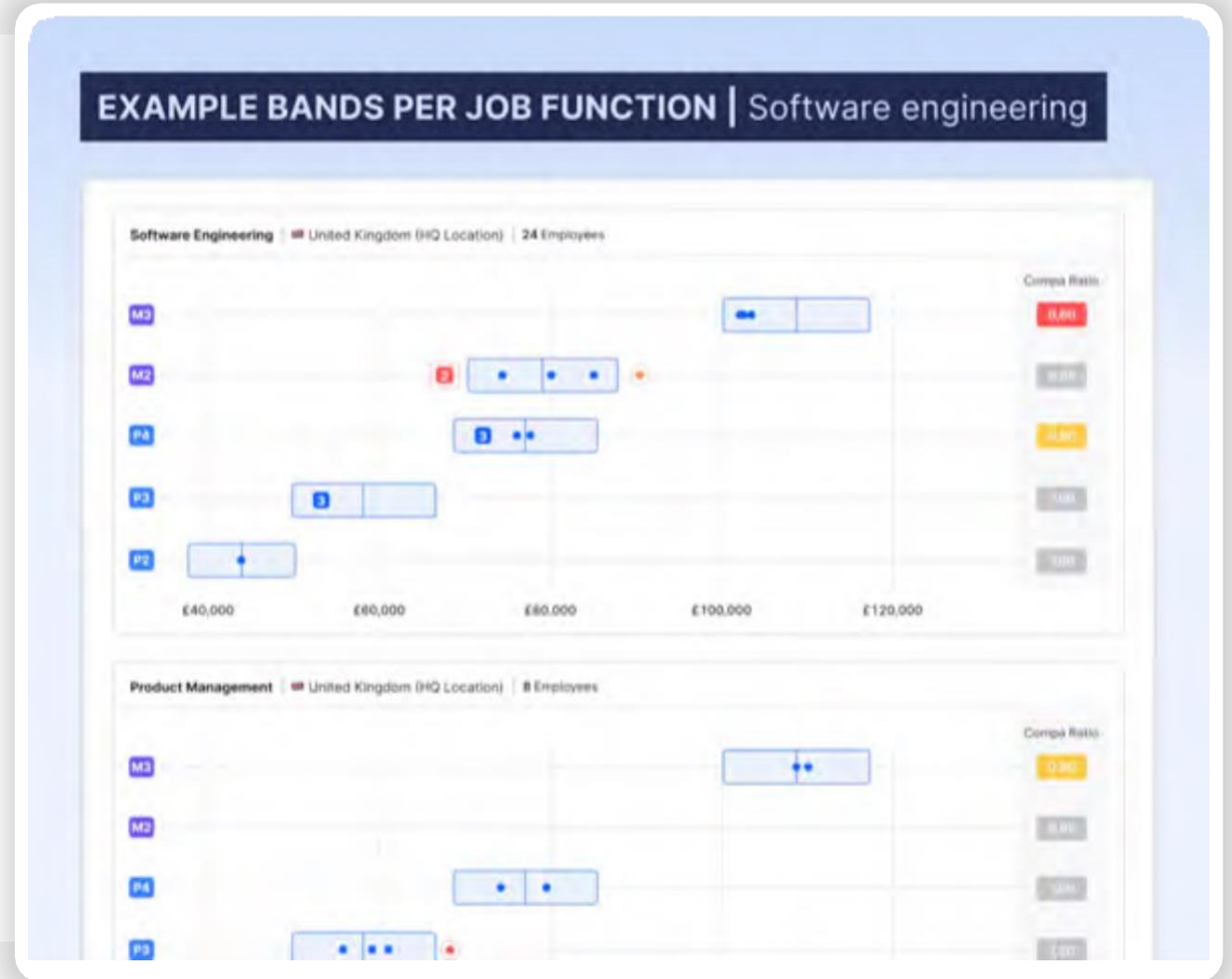
Name	Area	Title	Role	Location	Cost of Living	Salary Choice	Level	Step	Base	Salary	Benchmark
Joel	CFO		CFO	Boulder, CO, USA	90%				\$335,400	\$301,860	Buffer Benchmarks - June 2024
Caro	People Exec		Chief of Staff	Portland, OR, USA	90%		9	2	\$266,970	\$240,280	Buffer Benchmarks - Oct 2024
Jenna	People	Senior	People Ops Specialist	Grand Rapids, MI, USA	90%		4	2	\$116,461	\$131,815	Buffer Benchmarks - June 2025
Jenny	Finance	VP	Finance & Operations	Louisville, KY, USA	90%	\$10,000	9	1	\$267,693	\$250,924	Buffer Benchmarks - June 2025
Kyle	Finance	Senior	Accountant	Jacksonville, FL, USA	90%		5	2	\$167,680	\$160,912	Buffer Benchmarks - June 2025
Suzanne	Finance		Operations Manager	Nashville, TN, USA	90%		3	2	\$121,784	\$109,605	Buffer Benchmarks - June 2025

Internal communication about pay

Typeform

Transparency helps make pay gaps visible and explains the rationale behind them. Typeform has committed to:

- Defined salary ranges across all professional grade levels.
- Implementation of a structured internal transparency framework covering pay structures, gaps, and the reasoning behind the pay/benefits.
- A progressive approach aimed at strengthening equity and understanding, without disclosing the pay of individuals by name.



A woman with glasses and a denim jacket is smiling at a laptop. A man is in the background, also smiling. The scene is set in a modern office or cafe.

A practical example showcasing obligation and risk

Access to information about pay - Safran

- 2025: Class action against Safran Helicopter Engines.
- Ruling: The court required the company to provide payslips and comparative pay data.
- The court acknowledged that without access to comparative salary data, women are unable to realistically demonstrate pay discrimination.

Past - trade unions and employees had to litigate for years just to obtain access to data.

Present - what previously involved lengthy and complex litigation has become a structural obligation for companies.





How do executives and companies view pay transparency?

How do executives view pay transparency?



65%

of executives view the pay transparency directive as a positive change

23%

do not have any thoughts about the directive

According to executives surveyed, the key benefits of the directive include:



Improved trust in management



Improved equity across the organisation

The impact of the directive:

13%

Was the reported gender pay gap between women and men in France in 2024, for work of equal value.

(Source Insee)

28%

of women report that they do not know how to negotiate pay compared to 13% of men.

(Source Robert Walters)

41%

Of executives believe that the compensation for senior leaders is too costly.

(Source Robert Walters Management de Transition)

Our advice to candidates



- Continue to disclose current pay and benefits
- Negotiation disparities usually show at the pre-qualification stage, especially for women. Thus, candidates should be willing to discuss salary early on in the recruitment process.

There is a clear need to:



Assess your market value

- Review existing market studies
- Engage in exploratory discussions with a recruitment firm.
- Benchmark job offers.

If there is a gap versus the market, consider objective criteria (*such as benefits, industry practices, etc.*).



Expect to discuss salary expectations

- Turn the question around: *“Based on my profile, what level of compensation do you believe would be appropriate?”*
- Agree to receive feedback before the first interview, rather than during the pre-screening stage.

How do companies view pay transparency?



44%

of companies do not know what to think about this directive, reflecting a genuine lack of information on the subject.

36%

of companies view the directive as a positive change

What companies are concerned about:



Challenging salary negotiations



Administrative complexity



Tensions among employees in the event of disparities.

54%

Of companies do not believe they are ready for the implementation of the directive by June.

- 55% have not yet started taking any action toward transparency
- 20% have begun mapping the actions to be implemented
- 19% have started implementing certain measures
- 16% are at the discussion stage
- 1% are at the finalisation stage

Our recommendations for companies in response to the directive

Key concerns raised:

- Litigation
- Administrative complexities
- Reputational risk
- Internal/external pay disparities
- Performance-based differences in remuneration

Our observations

- Asking about past remuneration is deeply ingrained in hiring practices
- There is a notion of age-based remuneration (i.e. younger people "should earn less")

Our recommendations:



Review existing market studies



Develop partnerships with recruitment firms and industry peers to guide compensation offers



Clearly communicate the job evaluation to stakeholders to anticipate and prepare for negotiations.



If there are internal pay disparities, consider appropriate adjustments

A man with grey hair and a beard, wearing glasses and a dark blue button-down shirt, is seated at a desk. He is looking down at a stack of white papers in front of him. The background is a blurred office environment with large windows.

**Which solutions
are available for
organisations?**

Our solutions



Internal pay audit & assessment

Lay the foundation for compliance by understanding the current state of pay equity with an analysis of gender pay gaps, identifying high-risk gaps, evaluating pay structures and scoring compliance readiness.



Job grading & framework

Establish a consistent, transparent foundation for pay decisions by applying a gender-neutral job evaluation framework, mapping and levelling job families, and developing consistent criteria for role comparison.



Market benchmarking

Enable salary range disclosure, ensure pay is competitive and defensible, and identify compression and outliers for adjustment.

Recommended actions for organisations



Management training

Managers should be training teams to enable clear and more effective communication about pay across the organisation.

1

Set up sensitive discussions around pay and perceptions of fairness

Provide the necessary tools to navigate difficult conversations, manage reactions, and respond constructively.

2

Maintain employee engagement where pay gaps cannot be addressed

Help managers retain and motivate talent by leveraging development, career progression, and non-financial engagement levers.

3

Empower managers to address bias and pay-equity issues

Advise leaders on their approach around bias and equity to ensure consistency in communication across the organisation.

Recommended actions for organisations



Inclusive recruitment

Is your recruitment process fair and equitable for everyone? Can you confidently say that it is unbiased and merit-based?

Diagnose

Equity & Diversity (with a focus on gender equality)

Analyse

Attraction and retention practices

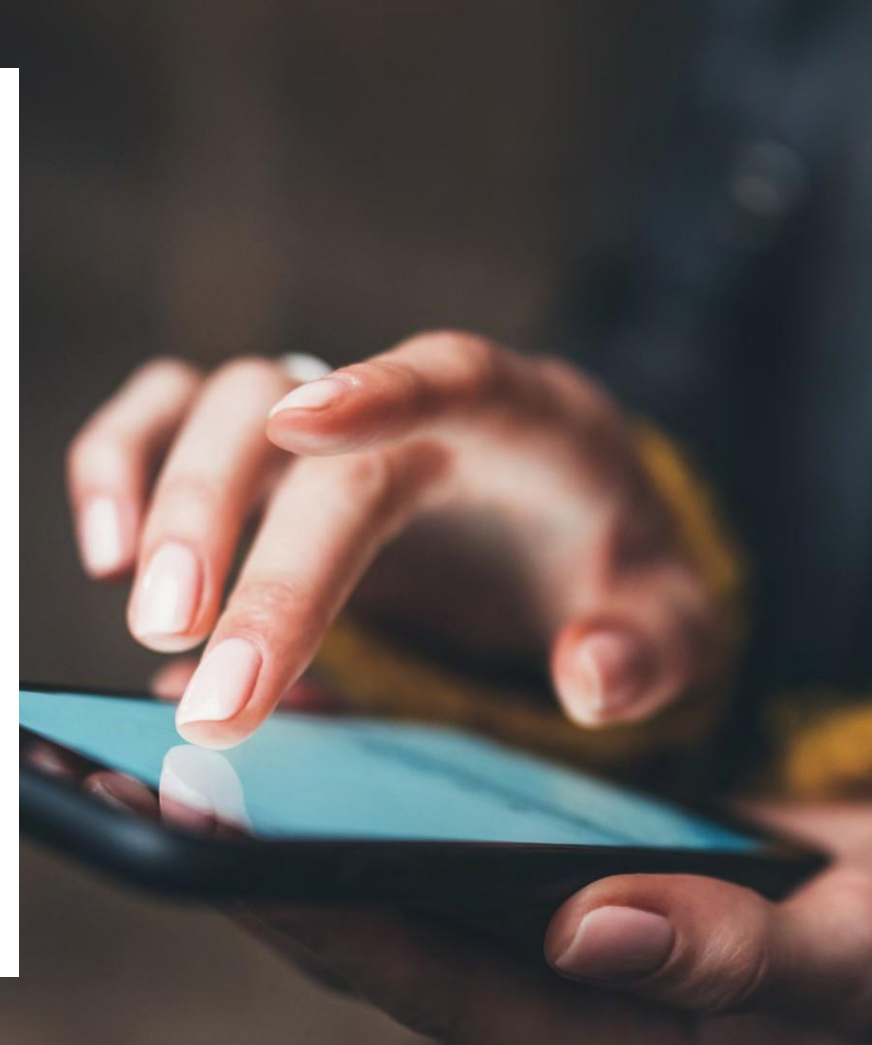
Benchmark

Competitors' practices

Recommendations

Implement recommendations that are actionable and measurable

The goal: A credible, visible, and attractive equity policy in the market.



How Robert Walters can support organisations

Challenges

- Difficulty in attracting qualified talent
- High turnover following hiring efforts
- Underrepresentation of women
- An employer brand that lacks differentiation in certain markets

Our approach

Multi-country diagnostic (Europe & international), combining:

- Analysis of attraction and sourcing practices
- Assessment of pay gaps and representation imbalances
- Benchmarking of talent competitors and their winning strategies



Book a meeting with our experts

[Book pay transparency consultation](#)

[Book recruitment consultation](#)