

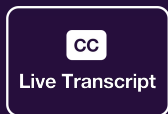


# Countdown to the EU Directive:

## Transposition Trends and Preparing for the Right to Information

We will begin shortly.

This webinar is being recorded and will be shared with all registrants.



We have live transcript enabled for this webinar. If you would like to use this feature, please turn on this setting in your Zoom toolbar now.

# Syndio: #1 Fair Pay Solution



## Fair Pay at Our Core

First to market with industry-leading software for pay equity, opportunity equity, global reporting, and responsible AI



## Proven for the Enterprise

Enterprise-grade tech with powerful performance, rigorous security, and precise analytics for all global use cases



## Powered by Global Experts

The industry's deepest fair pay experts — across our internal team, advisory board, and global customer community — fueling smarter, expert AI

10.5M+ Employees Analyzed in 100+ Countries

Seamless HRIS integrations

Secure U.S. & EU Environments

ISO 27001, SOC 2, GDPR Compliant

SIEMENS

CAMPARI

Microsoft



American Airlines



NOKIA

ConocoPhillips

Sellen

nerdwallet

bmc

NORDSTROM

Elevance Health

udemy



ASSURANT®

UCI University of California, Irvine

Match Group

United Rentals

WILEY

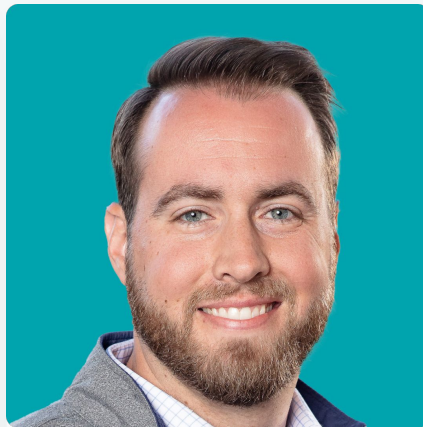
qualtrics<sup>XM</sup>

General Mills

# Speakers



**Christine  
Hendrickson**  
VP of Strategic Initiatives



**Charlie Higgins**  
Regional Vice President,  
EMEA



# Agenda

- 01 Current landscape outlook
- 02 Inside the first 7 drafts: Key signals for compliance
- 03 How to prepare now
- 03 Q&A

# Poll Question

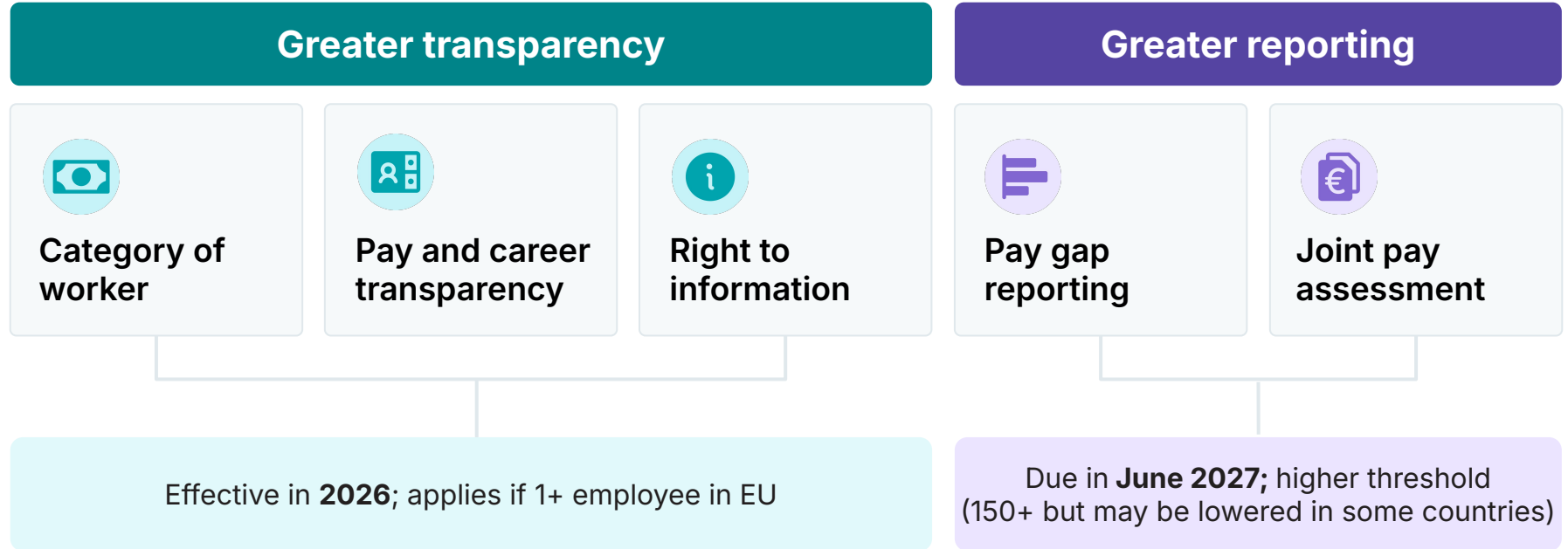
**How well do you know the EU Member State drafts released so far for the EU Pay Transparency Directive?**

- A. I could give a TED Talk on them
- B. I've skimmed a few highlights
- C. I'm up to speed on my country's draft, but that's about it
- D. That's why I am here, this is my crash course

# Current landscape outlook



# EU Pay Transparency Directive key requirements

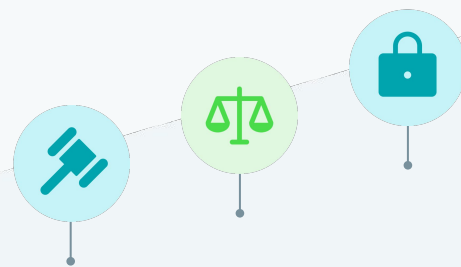


# The Directive's requirements are the floor, not the ceiling

Member states may add additional obligations, as we are already seeing with the first 7 drafts.



EU Directive



Additional member state obligations



# Inside the first 7 drafts:

## Key signals for compliance



# Still a long road to go, but current drafts offer a roadmap

There are drafts of the Directive in only **7 of 27** EU countries



**Sweden**



**Belgium** (but only for employers subject to the jurisdiction of the FWB)



**Ireland**



**Netherlands**



**Poland**

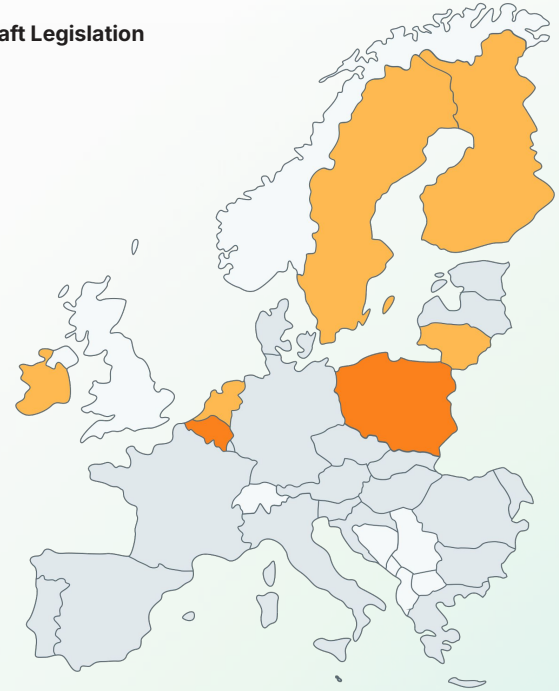


**Finland**



**Lithuania**

● Draft Legislation



1

Reporting won't be "one size fits all"

# What the Directive requires, at baseline

Overall Pay Gap	Category of Worker Pay Gap
<ul style="list-style-type: none"><li>(a) the mean gender pay gap;</li><li>(b) the gender pay gap in complementary or variable components;</li><li>(c) the median gender pay gap;</li><li>(d) the median gender pay gap in complementary or variable components;</li><li>(e) the proportion of female and male workers receiving complementary or variable components;</li><li>(f) the proportion of female and male workers in each quartile pay band</li></ul>	<ul style="list-style-type: none"><li>(g) the mean gender pay gap between workers by categories of workers broken down by ordinary basic wage or salary and complementary or variable components of pay</li></ul>

## #1 Reporting won't be "one size fits all"



**Sweden** retained its existing reporting framework, while adding overall pay gap reporting and new reporting on pay after return from leave.



**Belgium's** Fédération Wallonie-Bruxelles region requires reporting on the impact of family-related leaves.



**Finland's** government will prepare the overall pay gap information (employers are responsible for the category of worker analysis). Plus, existing reporting remains intact.

2

**Free coffee isn't driving  
your pay gaps**

## #2 Free coffee isn't driving your pay gaps



**The Netherlands** embraces a broad pay definition, only excluding employer-wide costs not tracked at the individual level (e.g. allowances for sports subscriptions or work clothes).



**Finland** sets the clearest picture of pay data expectations yet: reporting will rely on payroll data already submitted, which will be based on taxable earnings.

# Don't boil the data ocean; be strategically pragmatic on data

## Understand the data you have first



You won't get a tidy checklist of pay transparency requirements by country soon. So don't wait for clarity. **Build your cross-border data strategy now.**

## 7 key pay types



Think of **the big 7**:

Base Pay

Complementary & Variable Pay

- Bonus
- Equity
- Allowances
- Health Benefits
- Wealth Benefits
- Paid Time Off

## Focus on taxable discretionary pay



Where to start: focus first **largest discretionary, taxable pay elements** where inequities are most likely to arise



3

**Pay scale transparency  
depends on where you hire**

“

Applicants for employment shall have the right to receive, from the prospective employer, information about: (a) the initial pay or its range, based on objective, gender-neutral criteria, to be attributed for the position concerned; and (b) where applicable, the relevant provisions of the collective agreement applied by the employer in relation to the position. 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.**”

- *EU Pay Transparency Directive, Article 5, Pay transparency prior to employment*

## #3 Pay scale transparency depends on where you hire



**Ireland** mandates pay ranges in job postings, pushing beyond the Directive's minimum requirements.



**Belgium's** Fédération Wallonie-Bruxelles region requires pay ranges to be shared as soon as job offers or ads are published.



**Lithuania** already requires posting pay ranges.

4

**Privacy is the elephant in  
the room**

## #4 Privacy is the elephant in the room



**Finland** didn't set a numerical threshold of when companies should only share with works council and not with employees due to privacy considerations.



**Sweden** says that disclosure of average salary data by gender is seen as not triggering sensitive data protections. There is acknowledgment of edge cases (e.g., small groups revealing individual salaries), but the risk is seen as low.

5

**Flexibility remains on  
category of worker  
groupings**

“

[E]mployers must have pay structures in place ensuring that there are no gender-based pay differences between workers performing the same work or work of equal value that are not justified on the basis of objective, gender-neutral criteria. Such pay structures should allow for the comparison of the value of different jobs within the same organisational structure. It should be possible to **base such pay structures on existing Union guidelines related to gender-neutral job evaluation and classification systems, or on indicators or gender-neutral models.**”

- *EU Pay Transparency Directive, Preamble, Section 26*

“

There are many variations in job evaluation methodologies used worldwide. However, basic general methods of job evaluation are: **ranking, classification [job architecture], factor comparison, and points.**”

- *EU Pay Transparency Directive, Commission Staff Working Document, Annex 1, Gender Neutral Job and Classification Systems*



# The Directive doesn't say "points-based." Do you need to?

What You are Being Told	What the Directive Actually Says	What You May Already Have
<b>"You need a full redesign." Points-based. Global overhaul.</b>	<b>"Gender-neutral job evaluation or classification system."</b> <ul style="list-style-type: none"><li>• Ranking</li><li>• Classification</li><li>• Factor comparison</li><li>• Points-based methods (Annex I)</li></ul>	<b>A functioning job architecture based on job levels, job families, and consistent roles across functions.</b>
<b>High spend, long timelines. Can be €100K+ for a new job architecture.</b>	<b>No mandate for points or any specific method</b> — just that it be gender-neutral and transparent.	<b>Classification = valid method.</b> Your job architecture framework may already meet the requirement with some reinforcement.
<b>"Fix the structure, then address equity."</b>	<b>Directive focus:</b> Ensure equal pay for equal work or work of equal value. Not redesign — evaluation and transparency.	<b>You can start now.</b> Assess neutrality, fill gaps, and document rationale using existing systems.

6

**Don't forget temporary  
workers?**

“

This Directive applies to **all workers who have an employment contract or employment relationship as defined by law, collective agreements and/or practice in force in each Member State** with consideration to the case-law of the Court of Justice.”

- *EU Pay Transparency Directive, Article 2, Scope*

## #6 Don't forget temporary workers?



**The Netherlands** may require reporting on staffing agency workers.



**But note:** Significant push back on the comments. Will The Netherlands walk this back?

7

**Right to information is  
holding firm**

## #7 Right to information is holding firm



**Poland's** early draft proposed shortening the response time to 14 days, but that's since been rolled back. This is not addressed in current legislation.



**Sweden** says use what you've got: employers can rely on their existing annual pay analyses to meet employee requests.

# Right to info export

Comply with the Right to Information article 7 in the EU Pay Transparency Directive with one-click employee pay data exports

- **Select employees**

Easily select one or more employees from your PayEQ People page.

- **Configure report**

Enter in hours worked and select a language for your report.

- **Download report**

In one click, generate a report in the employee's language and currency with all the information required by article 7.

**Multilingual**  
Report can be printed in any of the EU's 24 official languages

Display Name	Employee ID	Gender	Group	Actual Comp	Job Title (active)	Job Level (active)	Grade level (active)	Time in Role (active)	Tenure (active)	Ye Ex (active)
Olivia Murphy	80310	female	Enablement	107.08K	Support Supervisor Principal	Manager	level 7	0.39	1.82	4.1
Crystal Murphy	105140	Do not wish to identify	Account Executive	75.90K	Sales Assistant III	Account Executive	level 4	0.49	3.36	9.1
Stephanie Murphy	104760	female	Account Executive	39.20K	Sales Assistant II	Account Executive	level 3	1.1	5.44	6.1
Jasmine Murphy										1.3
Lawrence Murphy										3.1
Kathleen Murphy										18

**Droit à l'information**  
21-01-2022

La directive européenne sur la transparence des rémunérations stipule que :

Les travailleurs ont le droit de demander et de recevoir par écrit, conformément aux paragraphes 2 et 4, des informations sur leur niveau de rémunération individuel et sur les niveaux de rémunération moyens, ventilés par sexe, pour les catégories de travailleurs accomplissant le même travail qu'eux ou un travail de même valeur que le leur.

Le "Niveau de rémunération" signifie le salaire annuel brut et le salaire horaire brut correspondant.

Voici vos informations :

Nom de l'employé	Christina Wilson
IDENTIFIANT	90200
Catégorie de travail	Enablement
Votre niveau de rémunération	\$114,507.27 / \$55.05
Niveau de rémunération moyen des femmes	\$86,930.87 / \$41.79
Niveau de rémunération moyen hommes	\$90,488.44 / \$43.50

# How to prepare now





# 4 steps to drive your global pay transparency & compliance strategy

## Assess

### INTERNAL

- Leaders
- Employees
- Recruiters

### EXTERNAL

- Stakeholders

## Analyze

- Country reports
- Internal postings (e.g. Employee Rights and policies)
- Manage information requests
- Consider voluntary disclosures

## Act

- Eliminate pay gaps  $\geq 5\%$
- Address all underpaid individual employees
- Manage size of overall pay gap
- Fix root causes

## Align

- Align with the Right to Information
- Communication
- Remediation planning



**Find & fix has an expiration date**

# One platform to meet all your compliance needs

## Analyze

## Act

## Align

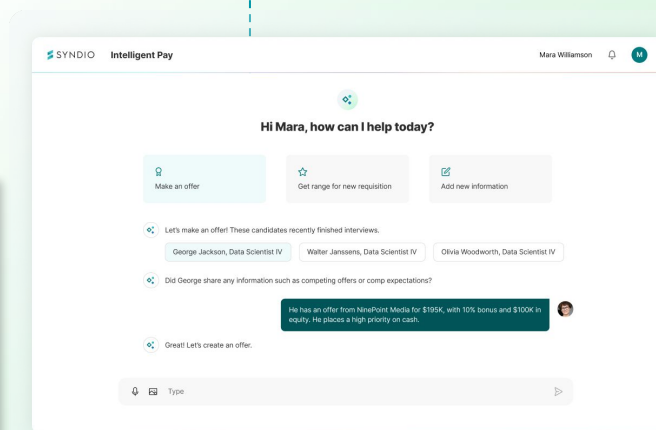
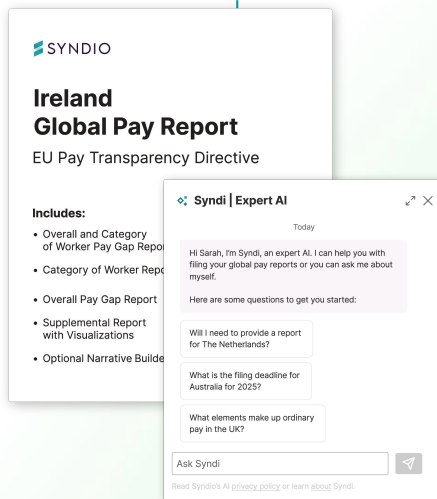
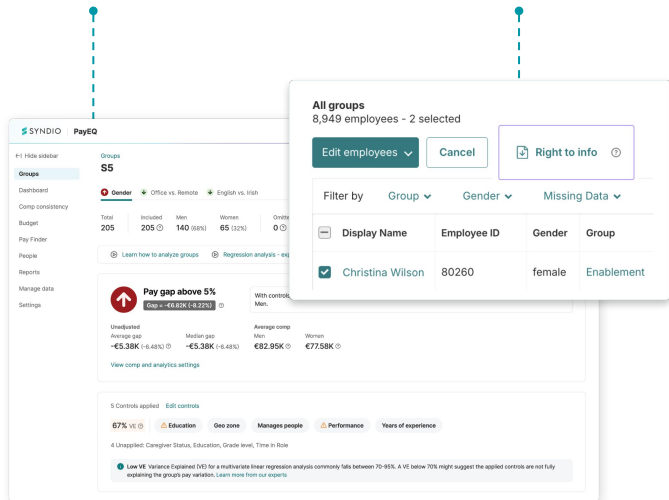
## Sustain & Optimize

Uncover, explain, and resolve gaps of greater than 5%

Comply with Right to Info in 24 languages

Centralize and streamline pay gap reporting with AI guidance

Make smart pay decisions you can trust — with built-in compliance



# Key takeaways

1

**Local nuance is smart.  
Local chaos is not.**

The 7 early drafts tell us  
you'll need an EU strategy  
and 27 local playbooks

2

**Start now**

- Ensure you have a plan for transparency obligations
- Don't miss this cycle to make corrections to plan for 2027

3

**What's next?**

Find and fix has an  
expiration date



# Q&A

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# Appendix



1

# Sweden





## Sweden

Date: 1 May 2024

[Link to Draft](#)

# Three Nuances of Sweden's Draft Transposition of the EU PTD

1. **First and extensive:** Sweden was the first to publish draft legislation, delivering 388 pages of article-by-article guidance, the most detailed proposal to date.
2. **Complex and bespoke reporting:** Sweden retains its existing reporting framework (equal work, equal value, i.e., category of worker, and hierarchical analysis) with written reports required for employers with 10+ employees. New additions include EU-mandated overall pay gap reporting for employers with 100+, and new reporting on pay after return from leave.
3. **Right to information: use what you've got:** To meet employee requests, employers can rely on their existing annual pay analyses. There's no requirement to refresh data outside the annual cycle.

2

Belgium







## Belgium

12 September 2024

[Link to Law](#)

# Three Nuances of Belgium's Draft Transposition of the EU PTD

- 1. First transposition but regionally limited:** First to transpose the Directive but only covers approx 7.5K employees subject to jurisdiction of Fédération Wallonie-Bruxelles.
- 2. Strict pay range transparency:** Goes farther than the Directive pay ranges must be shared as soon as job offers or ads are published.
- 3. Pay reporting beyond the Directive's baseline:** Mandates reporting on the impact of family-related leaves on remuneration, disaggregated by gender and leave type.

3

# Ireland





## Ireland

Date: 15 Jan 2025

[Link to Draft](#)

# Three Nuances of Ireland's Draft Transposition of the EU PTD

1. **Partial picture, gaps to fill:** Ireland's draft focuses on pre-employment transparency but omits rest, including pay gap reporting.
2. **Pay ranges in job posting:** The draft requires pay ranges to be in job postings, going beyond the Directive.
3. **Alignment on salary history ban:** Aligns with the EU Pay Transparency Directive, banning asking about prior pay.

4

# The Netherlands





## The Netherlands

Date: 25 March 2025

[Link to Draft](#)

# Three Nuances of The Netherlands' Draft Transposition of the EU PTD

1. **Stays truest to the Directive:** Complete draft, which is the closest to clean implementation of the EU PTD of any country.
2. **Pay is broad and more guidance is coming:** Takes a broad definition of pay ( Only employer-wide costs not tracked at the individual level are excluded — keeping reports standardized and comparable. More definition of wages coming soon.
3. **Temporary workers included in “host” company.**

4

# Poland





## Poland

Latest: 9 May 2025

[Link to Draft](#)

# Three Nuances of Poland's Draft Transposition of the EU PTD

1. **Piecemeal approach and accelerated timeline:** Only addresses the pay transparency obligations; Poland plans for a second process for rest. The act is scheduled to take effect 6 months after implementation.
2. **Steps back from more aggressive right to info timeline:** Steps back from earlier draft, which shortened right to information timeline to 14 days.
3. **Lingering confusion about pay scale transparency.** Draft does not mandate including ranges in job postings but confusion if this was the intent.

6

# Finland







## Finland

Latest: 16 May 2025

[Link to Draft](#)

# Three Nuances of Finland's Draft Transposition of the EU PTD

1. **Reporting nuances, galore.** Finnish government will prepare overall pay gap information, employers responsible for category of worker analysis. Plus existing reporting remains intact.
2. **Focus on taxable earnings:** As government will prepare draft based on payroll data already submitted, we have the clearest picture of data that will be required in Finland. And it's based on taxable earnings.
3. **Gives nod to but does not resolve privacy considerations:** No numerical threshold set when should only share with works council and not with employees due to privacy considerations.

7

# Lithuania





## Lithuania

Latest: 20 May 2025  
[Link to Draft Here and here](#)

# Three Nuances of Lithuania's Draft Transposition of the EU PTD

1. **Partial draft focused on pre-employment transparency**
2. **Pay scale transparency is not new:** Lithuania is a leader in pay scale transparency in Europe, as this is already an existing requirement to post pay ranges.
3. **Language neutrality is a big deal.** Lithuanian grammar encodes gender into nearly all job titles, so requiring gender-neutral language will take meaningful focus to address.