

# September 2025

This series of infographics provides an overview of pay equity reporting laws internationally, with maps for Europe, North America, and the rest of the world.

# **Legend and Definitions**

# **Equity Types**



Equal pay for equal work (Basic)

The law requires work to be "substantially equal in job content" for equal pay to be applied, while accounting for factors such as skill, responsibility level, effort, and working conditions.



Equal pay for comparable work (Intermediate)

The law goes further and groups people for demographic comparisons when they do substantially "similar" rather than substantially "equal" work.



Equal pay for work of equal value (Advanced)

The law requires employers to pay equitably based on the value a person's work brings to the organization rather than the activities a person may be doing. This requires more complex analysis.

## **Key Points**



Employee representation required

The law requires analyses/plans to be developed with input from employee representatives.



Analysis required

The law requires some form of analysis of pay equity in the organization to be performed.



Pay equity plan required

The law requires a plan of action to be created once an analysis has been performed.



Reporting required

The law requires reports to go to a specific entity.



Certification

The law requires companies to certify or declare their compliance.



Specific penalties

The law has specific penalties for failing to work toward pay equity by some standard.

# Focus of Pay Equity Reporting Requirements



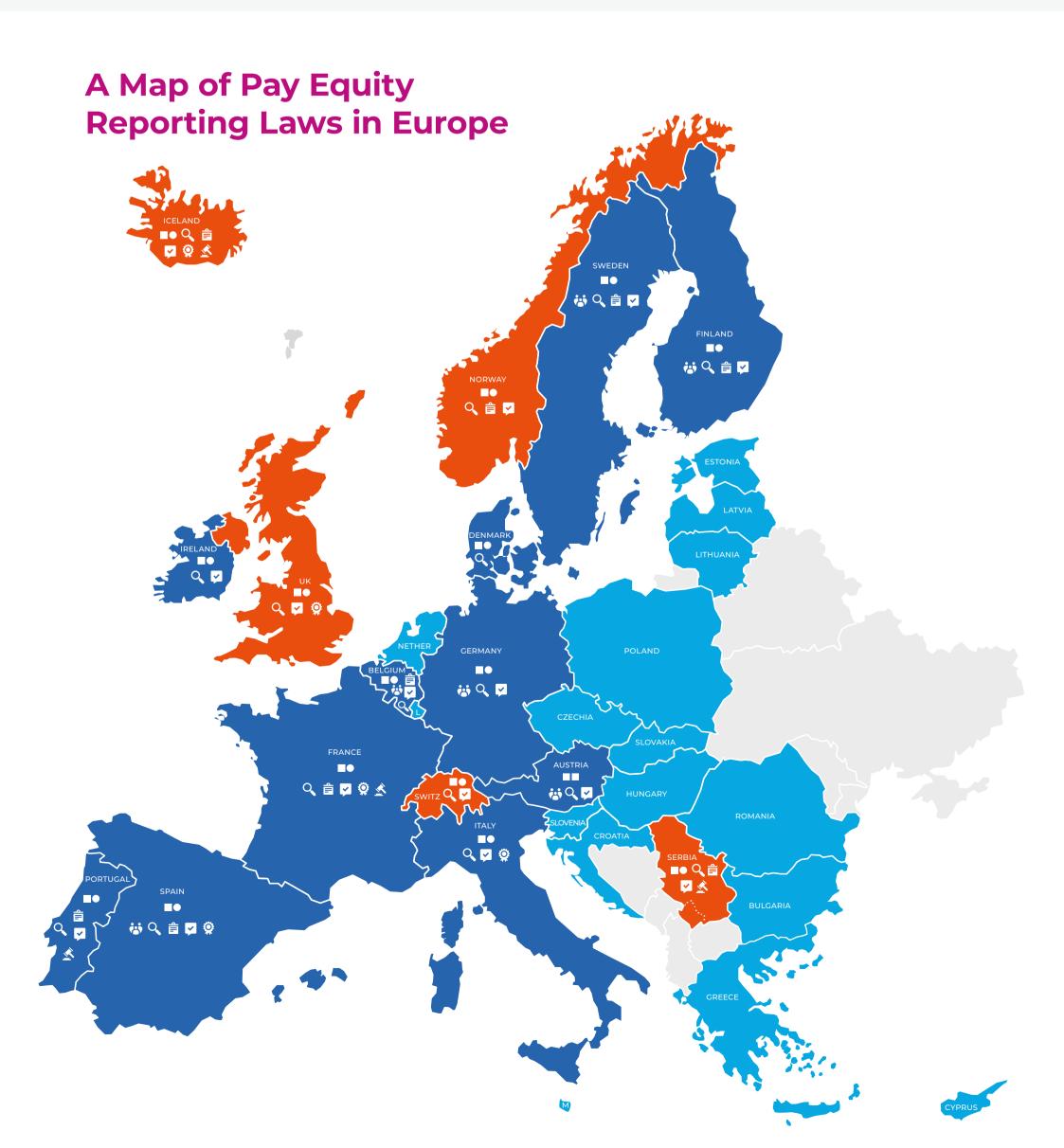
Countries with pay equity reporting requirements covering gender



EU countries with pay equity reporting requirements covering gender



EU countries that will implement pay equity reporting requirements covering gender by June 2026 (as per the EU Pay Transparency Directive)





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### Legend

### **Equity Types**



Equal pay for equal work



Equal pay for comparable work (Intermediate)



Equal pay for work of equal value (Advanced)

### **Key Points**



**Employee representation** required



Reporting required



**Analysis** required



Certification



Pay equity plan required



Specific penalties

# **European Pay Equity Reporting in Depth**

### **EU Nations**

### All European Union Countries



- As per the Pay Transparency Directive, all EU countries not listed below must implement gender-focused pay equity reporting requirements by June 2026.
- Basic threshold: All employers
- Extra requirements at: 100 employees
- Reporting: Yes—internal and with appropriate regulatory agency
- Requires input from employee representatives

### **Austria**



- **Equal Treatment Act**
- Basic threshold: All employers
- Extra requirements at: 150 employees
- Reporting: Yes, to a works council
- Requires input from employee representatives

# Belgium





Extra requirements at: 50

- employees Reporting: Yes—to a works
- representatives

Requires input from employee

# Denmark



- Equal Pay Act
- Basic threshold: All employers
- Extra requirements at: 35 employees
- Reporting: No

# **Finland**



- The Equality Act and Non-Discrimination Act
- Basic threshold: All employers Extra requirements at: 30
- employees
- Reporting: Yes—internal Requires input from employee
- representatives

# France











- Decree 2019-15
- Basic threshold: 50 employees Extra requirements at: 250
- employees
- · Reporting: Yes—internal, to employers website, and to social and economic council

### Germany









- Basic threshold: 200 employees
- Extra requirements at: 500 employees
- Reporting: Yes—internal
- Requires input from employee representatives

### Ireland



- The Gender Pay Gap Information Act
- Extra requirements at: 50 employees
- Reporting: Yes—to employers website or to a government portal

# Italy









- Basic threshold: All employers
- Extra requirements at: 50 employees
- Reporting: Yes—to union and labor ministry

# Portugal





- Law 60/2018
- Basic threshold: All employers
- Extra requirements at: 50 employees
- Reporting: Yes—to employees and labor ministry

# Spain





- Decree 901 and Decree 902
- Basic threshold: 50 employees Reporting: Yes—to employees
- and public registry Requires input from employee

# Sweden

representatives









- (amended in 2017) Basic threshold: All employers
- Extra requirements at: 10 and 25 employees
- Reporting: Yes, to a works council, to equality ombudsman
- representatives

Requires input from employee

### Iceland









**Non-EU Nations** 

- Basic threshold: All employers
- Extra requirements at: 25 employees

Reporting: Yes—to employees,

and Directorate of Equality Requires independent audit in compliance with IST 85

# Norway

standard









- Equality and Anti-**Discrimination Act**
- Basic threshold: All employers Extra requirements at: 50
- Reporting: Yes—to ombudsman

employees

# Serbia







- Law on Gender Equality Basic threshold: All employers
- Extra requirements at: 50 employees
- Reporting: Yes—to labor ministry

# Switzerland







- Basic threshold: All employers
- Extra requirements at: 100 workers, with exception for prior verifications
- Reporting: Yes—internal, and external for public sector employers and publicly traded companies
- Requires independent audit of analysis results
- Alternatively, requires input from employee representatives

# United Kingdom







Equality Act 2010 Basic threshold: All employers

employees

- Extra requirements at: 250
- Reporting: Yes—to employer's website and to a government website



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# Legend

### **Equity Types**



Equal pay for equal work



Equal pay for comparable work (Intermediate)



Equal pay for work of equal value (Advanced)

### **Key Points**



**Employee representation** required

Reporting required



**Analysis** required



Pay equity plan required



Certification



Specific penalties

# Focus of Pay Equity Reporting Requirements



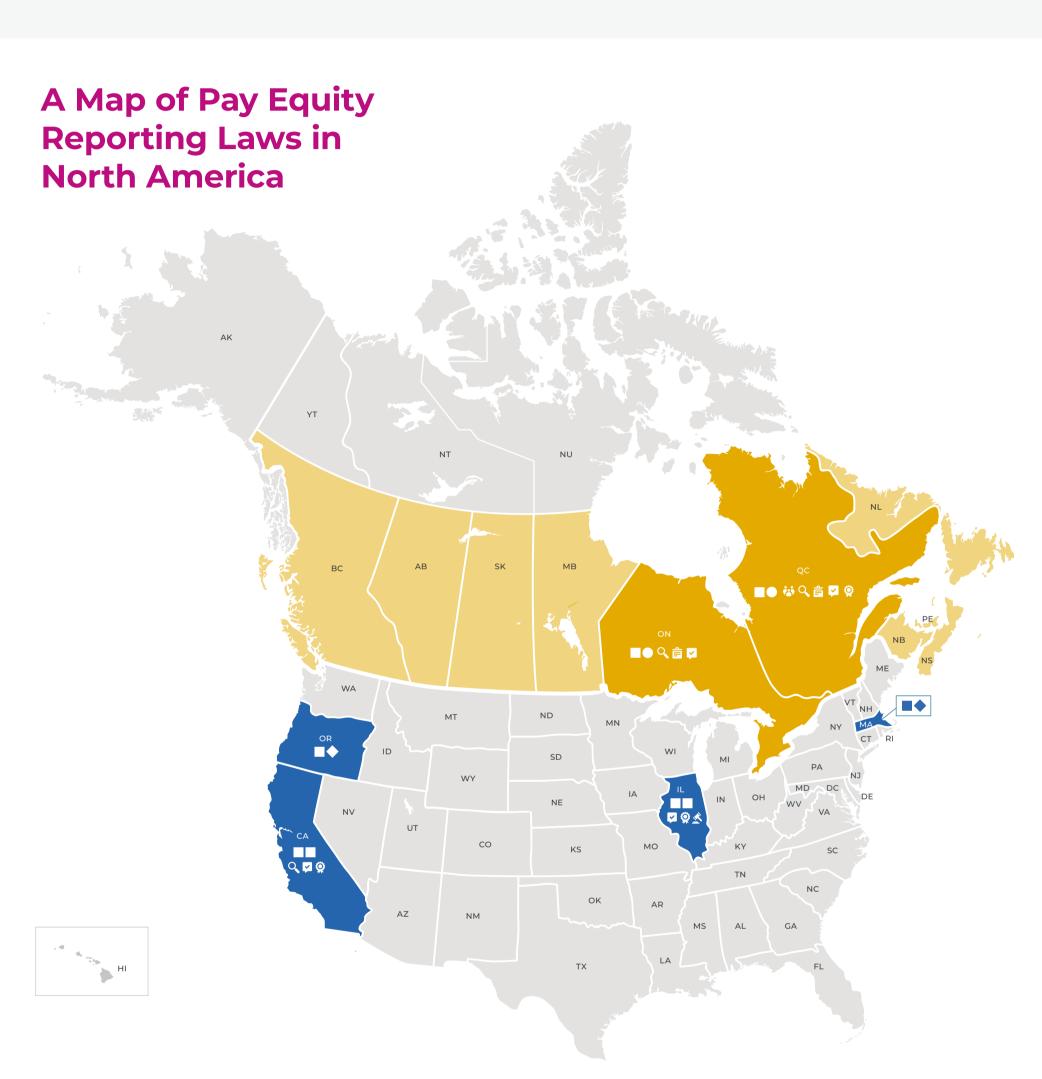
Canadian provinces with pay equity reporting requirements covering gender



Canada-wide pay equity reporting requirements covering gender



US states with pay equity reporting requirements covering gender and race.



# North American Pay Equity Reporting in Depth

# Canada

# **All Canadian Provinces**





with 10 or more employees

Basic threshold: Federally regulated employers

- Extra requirements at: 100 employees
- Reporting: Yes—to employees and to pay equity commissioner
- Requires input from employee representatives
- Indigenous governing bodies are exempt from the act

# Ontario











- Basic threshold: 10 employees
- Reporting: Yes—to employees

# Quebec





Pay Equity Act





- Basic threshold: 10 employees
- Extra requirements at: 50 employees
- Reporting: Yes—to employees
- Requires input from employee representatives

# **United States of America**

# California





- SB-973 Basic threshold: 100 employees
- Reporting: Yes—to the Department of Fair **Employment and Housing**

# Illinois







- Equal Pay Act of 2003 Amended
- Basic threshold: 100 employees
- Reporting: Yes—to the Illinois Department of Labor

# Massachusetts



- Frances Perkins Workplace Equity Act (WEA)
- Basic threshold: 100 employees
- Reporting: No—but there are strong safe harbor provisions for organizations that complete selfevaluations in good faith and can demonstrate that reasonable progress has been made.

# Oregon



- Oregon Equal Pay Act
- Basic threshold: All employers
- Reporting: No

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# Legend

### **Equity Types**



Equal pay for equal work



Equal pay for comparable work (Intermediate)



Equal pay for work of equal value (Advanced)

# **Key Points**



**Employee representation** required

Reporting required



Analysis required



Certification



Pay equity plan required



Specific penalties

# Focus of Pay Equity Reporting Requirements

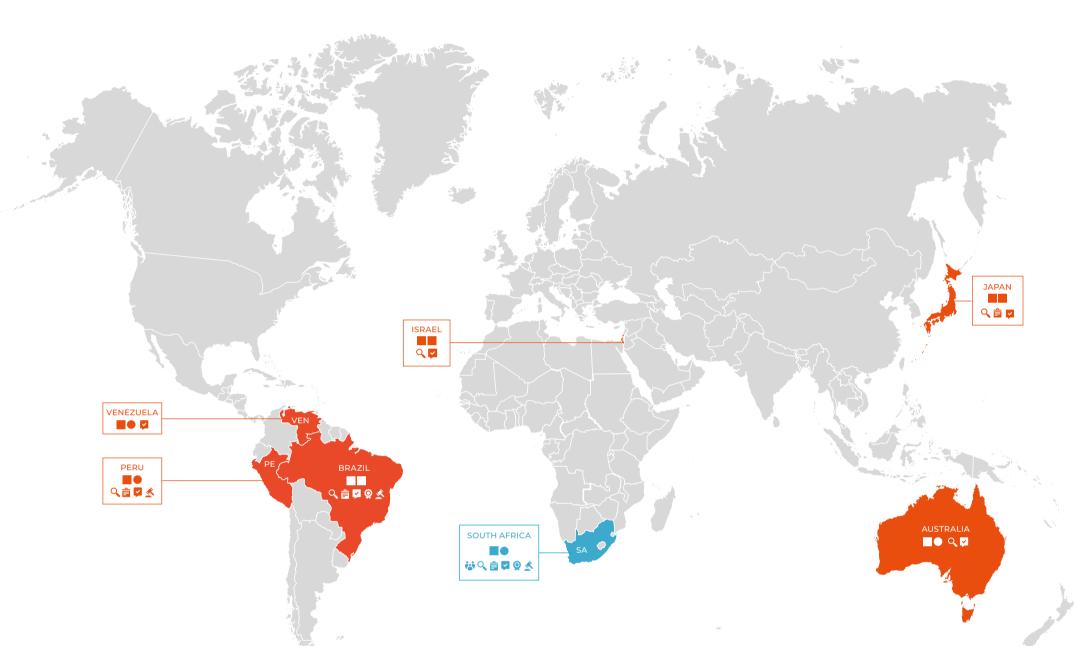


Countries with pay equity reporting requirements covering gender.



Countries with pay equity reporting requirements covering gender and race.

# Rest of world (ROW) (Asia, Africa, the Middle East, and South America) Pay Equity in Depth



# Rest of World Pay Equity Reporting in Depth

# **South America**

# Brazil







- Basic threshold: All employers
- Extra requirements at: 100 employees
- Reporting: Yes—to employee representatives, and to the Ministry of Labor and Employment

# Peru







- Basic threshold: All employers
- Reporting: Yes—to employees and to Ministry of Labor upon request
- Input from employee representatives encouraged

# Venezuela

- Organic Law of Labor and **Workers**
- Basic threshold: All employers
- Reporting: Yes—to labor ministry

# **APAC**

# Australia



- Workplace Gender Equality Act 2012
- Basic threshold: 100 employees
- Reporting: Yes—to public and to Workplace Gender Equality Agency

# Japan





- Basic threshold: 100 employees
- Extra requirements at: 300 employees
- Reporting: Yes—to public, and to prefectural labor bureaus

### Africa and the Middle East

# Israel





- Equal Pay for Male and Female Employees Law, 1996
- Basic threshold: All employers
- Extra requirements at: 518 employees
- Reporting: Yes—to employees and to public on website

# South Africa





- Basic threshold: 50 Employees, or
- when meeting turnover threshold Reporting: Yes—to Department of
- Requires input from employee representatives

**Employment and Labour** 

Watch for updates to this graphic at affirmity.com/resources/visual-guide-pay-equity-around-the-world

Need help preparing your organization for global pay equity reporting requirements?

Contact us today at affirmity.com/contact-us.