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New draft law on Pay Transparency

Under the provisions of the new draft law introduced by the Ministry of Labor and Social Security, Greece aims to transpose Directive (EU) 2023/970 on strengthening the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and related enforcement mechanisms.

The main provisions of the draft law are summarized as follows:

Pay structures

- Employers are required to maintain and implement pay structures that ensure the principle of equal pay, i.e. comprehensive pay policy frameworks (rules, classifications, criteria, and procedures) capable of enabling objective and transparent evaluation of job positions and preventing gender-based discrimination.

Pre-employment Pay Transparency

- All forms of discrimination based on gender or family status in the terms of access to employment are prohibited.
- Gender neutrality is required in job vacancy announcements and job titles.
- Candidates have the right to receive information on the initial pay or its range before the interview or conclusion of the employment contract.
- Questions to candidates regarding pay in recent or previous positions are prohibited.

Information right for employees

- Employees have the right to receive information on their individual pay level and on the average pay levels by gender and employee category.
- Employers are required to provide a substantiated response within two (2) months of a request being submitted.
- Employers must inform employees annually of their right to information.

Obligation to report gender pay gap data

- Contractual clauses that prevent the disclosure of pay information are prohibited where such disclosure is aimed at safeguarding the principle of equal pay.
- Employers with at least 100 employees are required to provide detailed gender pay gap data (overall, median, by category, etc.).
- **Employers with ≥ 250 employees:** first report due by June 7, 2027, thereafter annually.
- **Employers with 150–249 employees:** first report due by June 7, 2027, thereafter every three years.
- **Employers with 100–149 employees:** first report due by June 7, 2031, thereafter every three years.
- **Employers with fewer than 100 employees** may provide data on a voluntary basis.
- Data must be submitted to the Greek Ombudsman.
- Information may be incorporated into the sustainability report (ESRS).
- Administrative sanctions are imposed in the event of non-reporting.

Data Protection

- The processing of pay data is permitted exclusively for the purpose of applying the principle of equal pay, in accordance with the GDPR and Law 4624/2019.

Joint Pay Assessment

- A joint pay assessment is mandatory when, cumulatively: (a) the pay gap exceeds 5% within a category of employees, (b) the gap cannot be justified by objective criteria, and (c) it has not been remedied within 6 months.
- The assessment is carried out in cooperation with employee representatives and includes an analysis of the gender ratio, justification of differences, and remedial measures.
- Corrective measures must be implemented within one year from notification of the assessment.

Means of legal protection and sanctions

- If unjustified pay discrimination is proven, the employee may receive full compensation.
- The burden of proof is reversed in cases where the employer fails to comply with pay transparency obligations.
- The Ombudsman, trade unions, and associations of persons may bring appeals or legal actions on behalf of affected employees.
- The Labor Inspectorate may issue orders for corrective measures (cessation of the infringement, awareness-raising, review of pay mechanisms, action plan).
- Fines are imposed for each quarter of non-compliance with corrective measures.
- A special labor dispute procedure applies to cases of alleged direct or indirect gender-based pay discrimination.

Let's talk

For a more in-depth discussion on the above you may contact:



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