

# Pay transparency in Poland - state before the reform

How often do Polish employers include salary ranges in job postings? An analysis of job postings ahead of the implementation of the EU Pay Transparency Directive.

August 2026



# Introduction

In 2025, Polish employers became subject to a new requirement: as a rule, they must disclose salary information as early as the job-posting stage. Compliance remains uneven, and this is only the beginning of a broader overhaul of pay regulations.

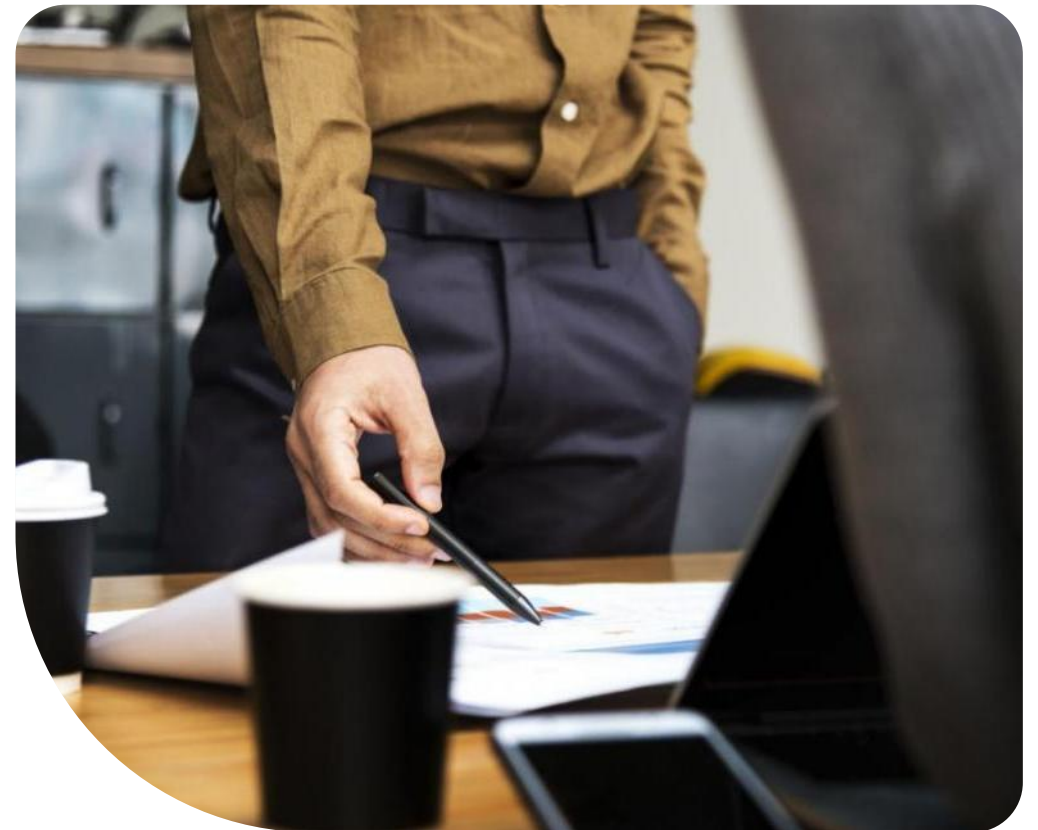
A year ago, pay transparency was a hot-button issue in Poland. Employees rarely discussed their pay, employers were reluctant to disclose salary levels, and compensation decisions on both sides of the labour market were often based on incomplete information and guesswork.

Since then, the first signs of change have emerged. Pay transparency reform is no longer just a proposal; it has become a concrete shift that employers need to put into practice. More organizations are reviewing their pay policies, standardizing their pay structures, and determining how best to communicate compensation information to candidates and employees.

The clearest and easiest-to-measure sign of these changes is the number of job postings that include salary information. Recruitment ads reveal whether pay transparency is becoming part of everyday practice or remains the exception.

How has Poland's labour market changed over the past 12 months? Are employers disclosing salaries more often? And is the pace of change sufficient to prepare the market for full implementation of the new regulations?

[Read on to learn more.](#)



# About the study

The study presented in this report examined actual job postings published on the Pracuj.pl, Praca.pl, and rocketjobs.pl recruitment platforms in Poland. We analyzed how salary ranges were presented in a random sample of 300 job postings. Data was collected from March through May 2026.

# Chapter 1

## **Study Results**



# 24%

Share of job postings in Poland that disclose a specific salary or salary range  
(March–May 2026)

Last year, the figure was 21%

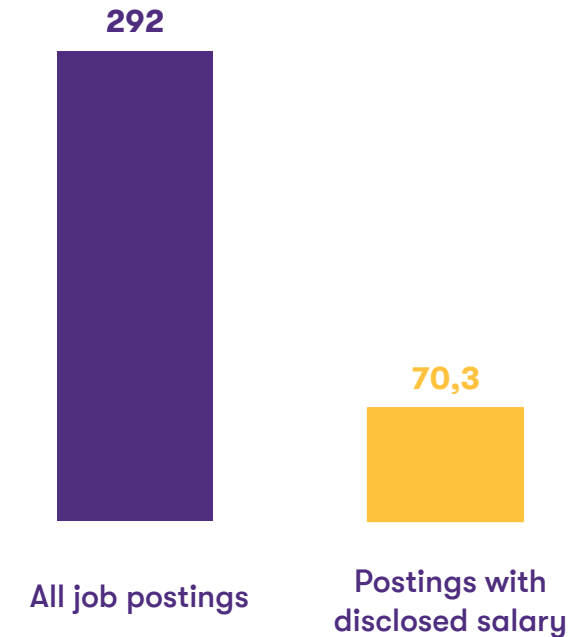
# One in four job postings includes salary information

In Poland, only about one in four job postings includes compensation information at the time of publication. Pay transparency remains the exception rather than the norm.

According to Grant Thornton's study, of the 292,054 job postings published between March and May 2026 on Pracuj.pl, Praca.pl, and RocketJobs.pl, only 70,314 included compensation information – either a specific amount or a range. This means that only **24.1%** of job postings tell candidates how much they could earn in a given role, **an increase of just 3 percentage points from the previous year.**

Over the past year, employers have gained greater clarity about their new obligations under national and EU regulations, and some organizations have begun preparing to comply. However, the study results show that change is gradual and the market is still adapting to the new rules. Although **current regulations do not require employers to publish compensation information directly in job postings**, rising candidate expectations and the direction set by pay transparency regulations suggest that the share of postings with salary information will continue to grow. In the coming years, pay transparency is likely to become an important factor in the competition for talent.

Chart 1. Job postings published on Pracuj.pl, Praca.pl, and RocketJobs.pl from March through May 2026, by whether they disclosed a specific salary or salary range (thousands).



# Salary ranges are more common than fixed amounts

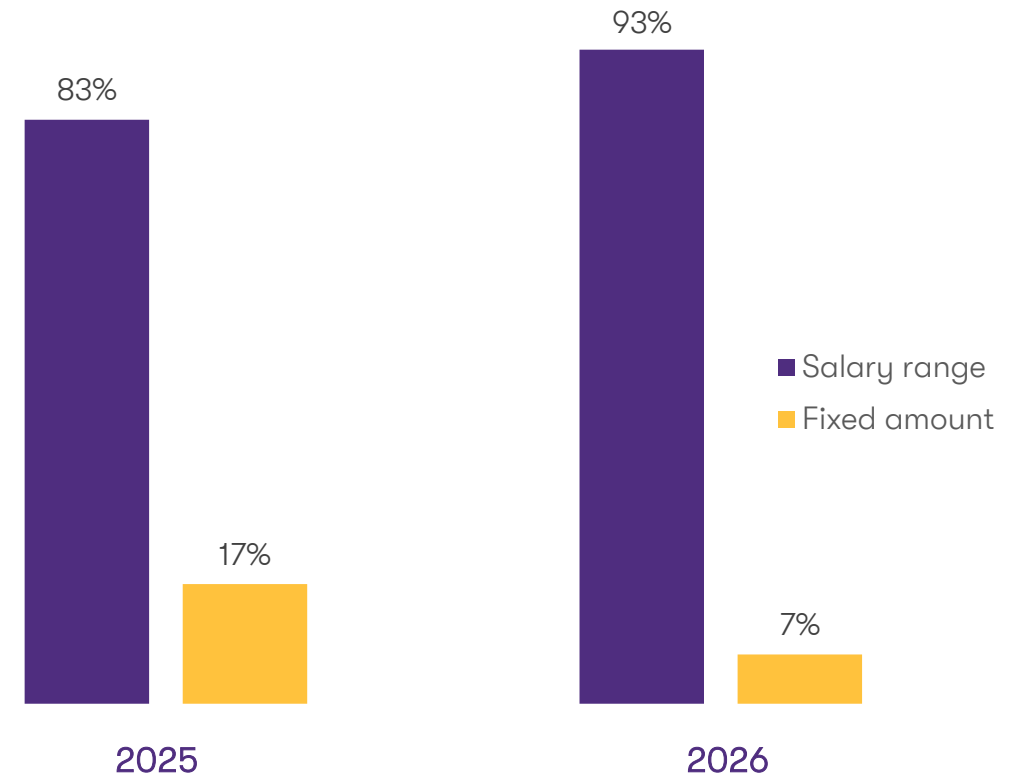
When employers disclose pay in a job posting, they typically provide a salary range rather than a fixed amount. Compared with last year's findings, this preference has become even more pronounced.

To assess how salaries are presented, we analyzed a random sample of 300 job postings that included salary information - 100 postings from each of the three months covered by the study.

The analysis found that **93% of employers presented compensation as a salary range**, while only **7%** provided a single fixed amount (most often an hourly rate). A year earlier, the corresponding figures were **83% and 17%, respectively**. These results indicate that as salary disclosure becomes more widespread, employers increasingly favor the flexibility of a range.

A salary range estimates expected pay while letting the final offer reflect experience, qualifications, and responsibilities.

Chart 2. Job postings with disclosed salary information: fixed amount vs. salary range.



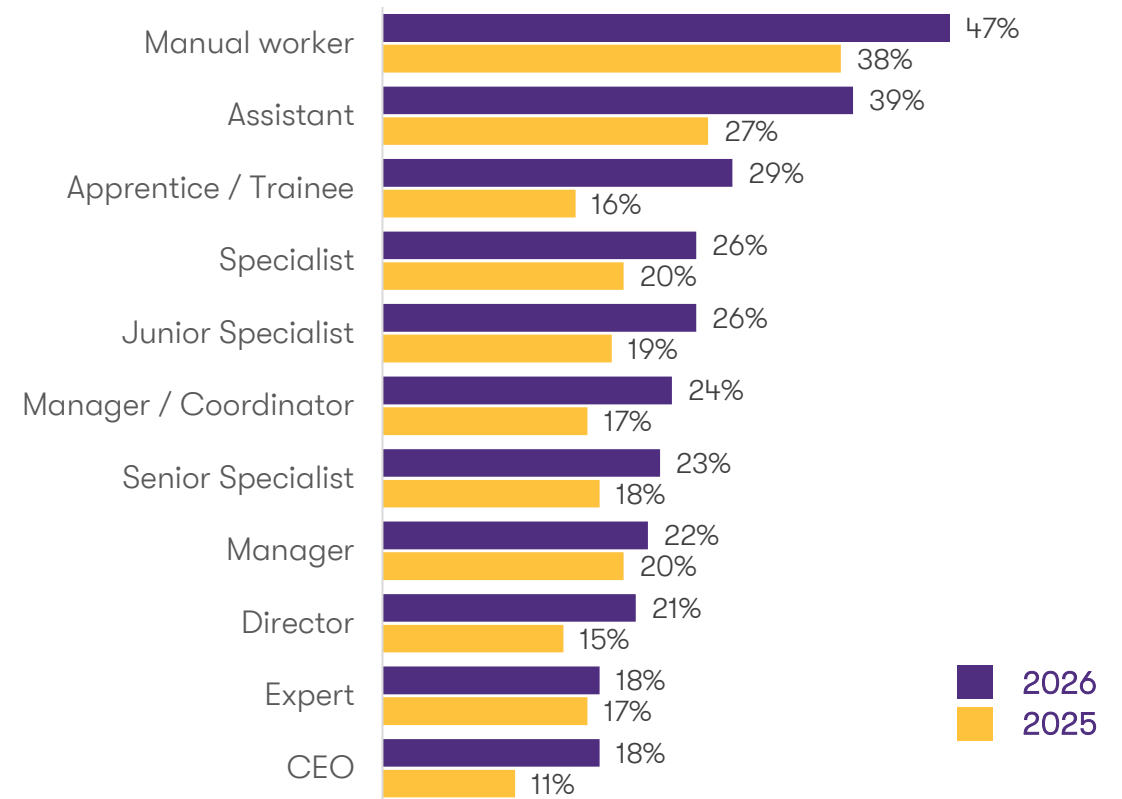
# Manual workers are most likely to see salary information

Manual workers are currently the most likely to know the salary at the job-posting stage, while candidates for managerial roles are the least likely.

Our study shows that employers' willingness to disclose salary information varies significantly by job level. Usually, the lower the level and the more repetitive the work, the more likely employers are to disclose pay. Among manual worker postings, 47% included a specific salary or range (up 9 percentage points from last year). The corresponding figures were 18% for CEOs and 21% for directors (increases of 7 and 6 percentage points, respectively).

The largest increase was recorded in internship and apprenticeship postings (up as much as 23 percentage points). Assistants, interns, and apprentices are now especially likely to see potential salary information in the job posting.

Chart 3. Percentage of job postings that disclose a specific salary or salary range, by job level. 2026 data is shown in purple; 2025 data is shown in yellow.



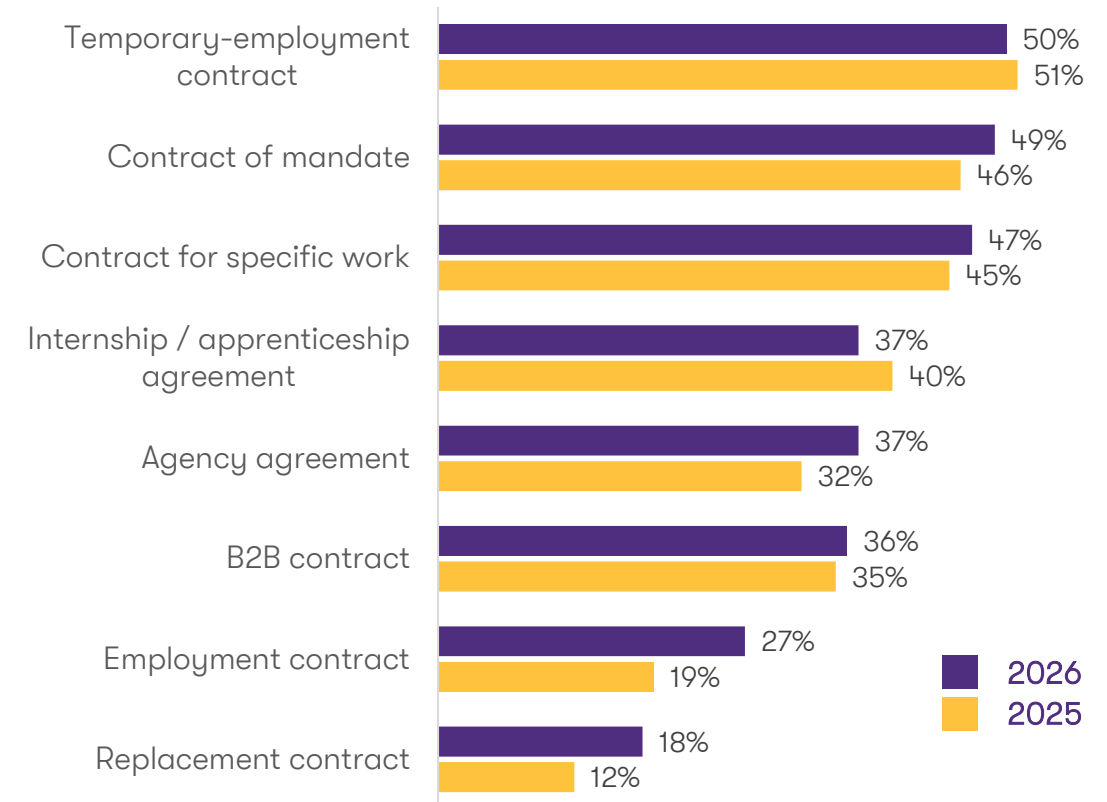
# Contract type matters

Employers' willingness to disclose salary information clearly depends on the type of contract. The more flexible the employment arrangement, the more likely employers are to disclose the offered salary.

Temporary-employment contracts had the highest share of postings with salary information, with pay disclosed in **half of all postings** (50%, down 1 percentage point year over year). Rates were disclosed slightly less often for contracts of mandate (49%) and contracts for specific work (47%). Internship and apprenticeship agreements (37%), agency agreements (37%), and B2B contracts (36%) also showed relatively high transparency. Salary information appeared much less often in employment-contract postings: despite a clear increase from last year, only 27% disclosed pay. Replacement contracts had the lowest share, at 18%.

These differences likely reflect the characteristics of each employment arrangement. Temporary-work and civil-law contract rates are more often standardized and tied to specific tasks, making them easier to publish. By contrast, employers recruiting for permanent positions remain more cautious about salary disclosure, concerned about the potential impact on internal pay policies, current employees' expectations, and market competitiveness. Over the past year, **the shift has been incremental rather than transformative.**

Chart 4. Percentage of job postings that disclose a specific salary or salary range, by contract type. 2026 data is shown in purple; 2025 data is shown in yellow.



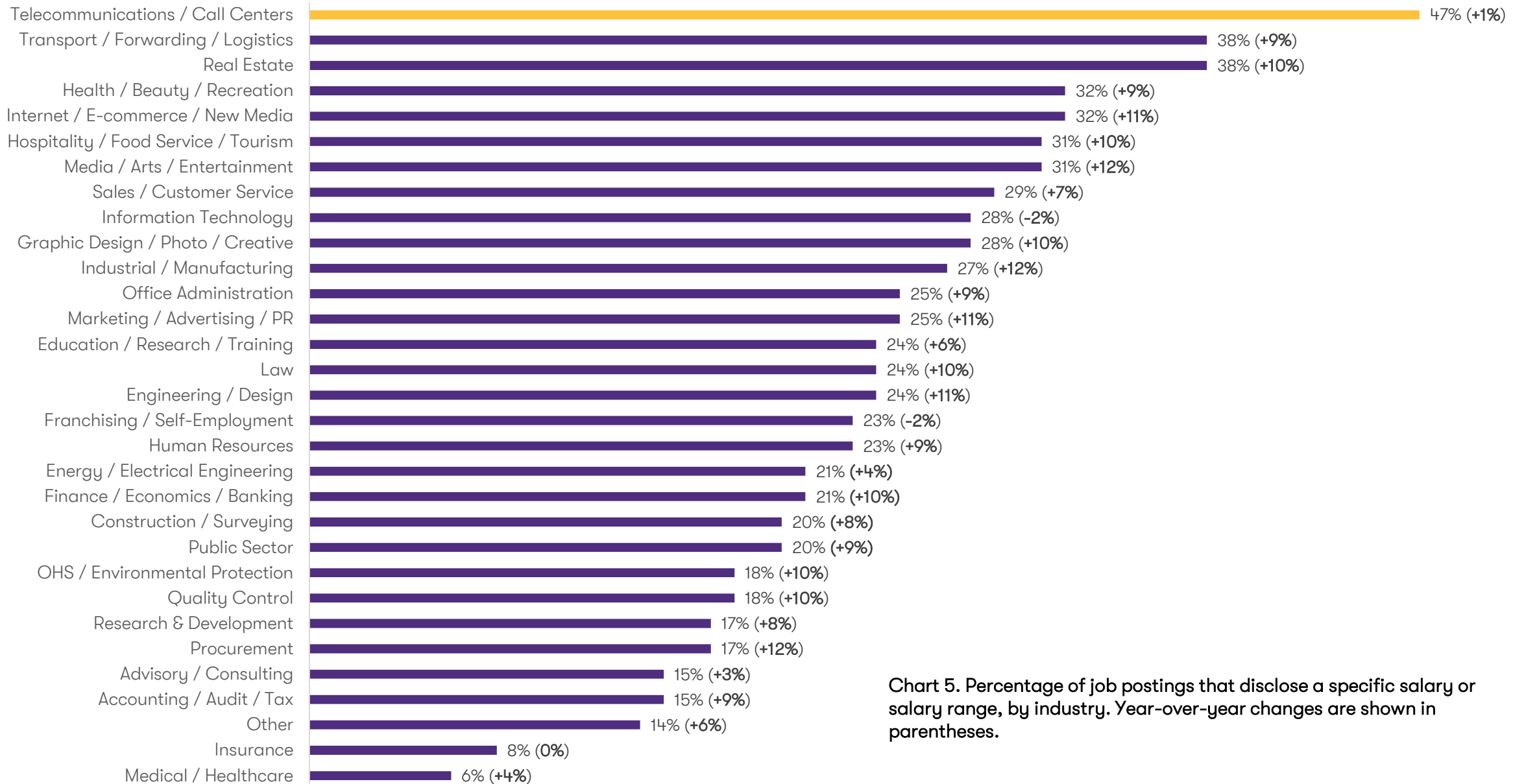


Chart 5. Percentage of job postings that disclose a specific salary or salary range, by industry. Year-over-year changes are shown in parentheses.

# Salary ranges are becoming increasingly varied

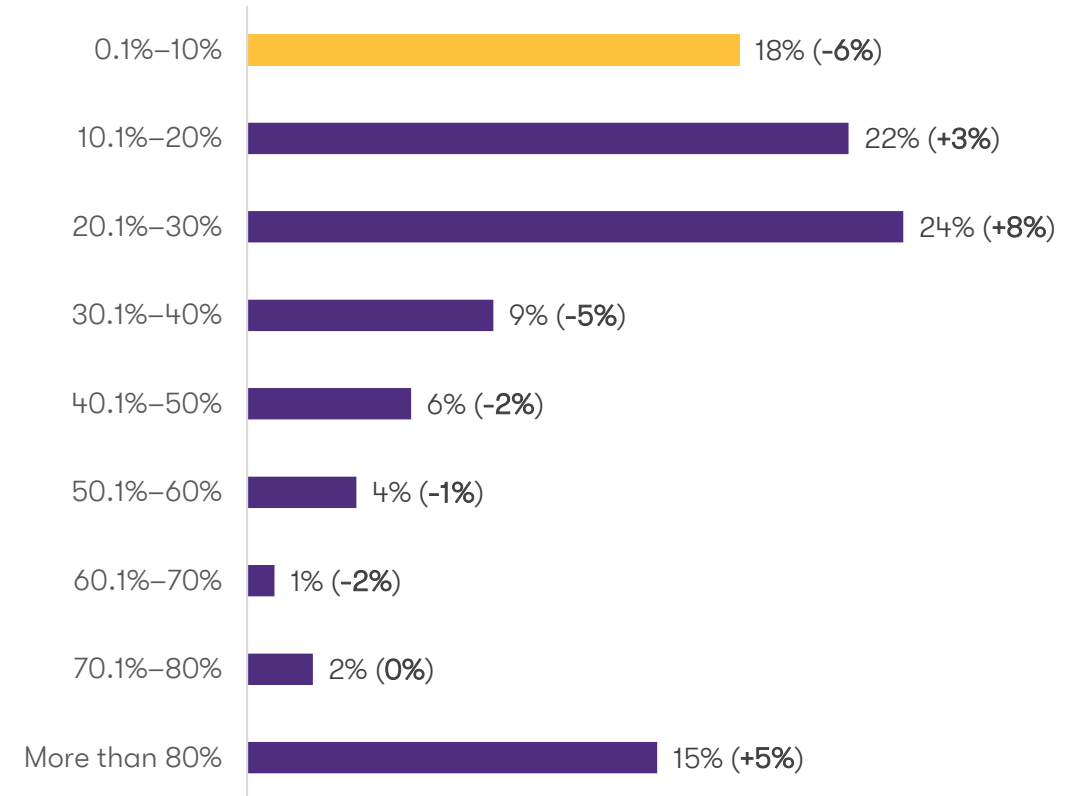
Employers take widely differing approaches to setting salary ranges, from nearly nominal gaps between the minimum and maximum, to extremely wide spreads.

The most common postings show a 20%-30% difference between the minimum and maximum salary; this range appears in 24% of postings that disclose a range. Ranges of 10%-20% are slightly less common (22%), followed by very narrow ranges of no more than 10% (18%). In nearly two-thirds of postings with disclosed pay, the salary range is therefore no wider than 30%.

At the same time, a second group of postings features very wide ranges, and this group has grown the most. As many as 15% of postings include ranges wider than 80%, while another 22% have ranges between 30% and 80%. This suggests that some employers use published salary information more as an indication of potential earnings than as a commitment to a specific rate.

Such wide ranges may reflect different compensation models. In some cases, they reflect a genuinely broad scope of responsibilities or a substantial variable-pay component, such as commissions and bonuses. In others, they may be **a way to preserve flexibility in negotiations** or to attract candidates with different levels of experience through a single posting. From a candidate's perspective, however, simply including a salary range does not always make a job posting fully transparent.

Chart 6. Difference between the minimum and maximum salaries shown in job-posting salary ranges. Year-over-year changes are shown in parentheses.



## Pay transparency requires a structured compensation system

The survey results show that regulations requiring salary information in recruitment have not yet delivered genuine pay transparency. In many organizations, compliance remains more procedural than systemic. The increase in job postings that include salary ranges is noticeable but still modest, and the way those ranges are presented often suggests that companies lack structured pay frameworks or clearly defined job levels.

Extremely wide or unusually narrow salary ranges suggest that they are not yet the product of a structured compensation system. Instead, they often serve as a tool that allows employers to retain maximum flexibility in negotiations.

This is hardly surprising. Many companies still operate under a model in which salaries have historically been determined through individual negotiations rather than a consistent job-evaluation framework.

Yet transparency is not simply about publishing a range. It requires an organization to explain why a position falls within a particular grade and which objective criteria govern progression between pay levels. The proposed regulations implementing the EU Pay Transparency Directive require objective, gender-neutral criteria for determining compensation levels and pay progression.

Current practices can therefore be expected to continue until the regulations implementing the European directive are fully in force. Those regulations will

require employers to organize their entire pay architecture, from job evaluation and the creation of job-grade categories, to rules for pay progression and pay-gap monitoring. Among other measures, the regulations provide for reporting obligations, job evaluation, and the establishment of salary ranges on that basis for employers with at least 100 employees.

The labour market is awaiting this stage of the reform because it is the part most likely to improve employees' position. True transparency begins when an organization can demonstrate that compensation is linked to the value of the work, the level of responsibility, the required competencies, and the role's position within the organizational structure. In such a model, salary ranges are the outcome of an orderly system, not merely an element of a job posting.

For companies, especially those with more than 100 employees, now is the right time to prepare for the new requirements. Organizations that begin evaluating roles, structuring pay grids, and analysing potential pay inequities today will not only reduce regulatory and reporting risks but also build greater employee trust and a stronger competitive position in the labour market. In the coming years, genuine organizational transparency will be determined by the quality and consistency of the compensation system, not simply by whether salary ranges are published.



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## Chapter 2

# **Employers: new responsibilities ahead**

# Current legal framework in Poland

## 1. Gender Pay Gap Transparency

The starting point is Directive (EU) 2023/970 of the European Parliament and of the Council of May 10, 2023, on strengthening the application of the principle of equal pay for equal work or work of equal value between women and men through pay-transparency and enforcement mechanisms. The directive requires Member States to adopt measures that increase pay transparency, give employees access to compensation information, and establish pay-gap reporting.

**The EU directive entered into force on June 6, 2023.**

The deadline for transposing the directive into Polish law has already passed; it was June 7, 2026.

Only a few EU countries (Lithuania, Malta, Slovakia, and Italy) have incorporated the directive into national law.

**Many countries, including Poland, are still working through the legislative process, and the exact effective date of the regulations remains unknown.**

## 2. Amendment to the Labor Code [Act of June 4, 2025, amending the Labor Code]

The first stage of the reform amended the Labor Code with respect to the disclosure of compensation before employment.

Effective December 24, 2025, employers must inform candidates of the compensation or salary range, provide access to compensation policies, refrain from asking about prior compensation, and ensure gender-neutral job postings and recruitment processes.

## 3. Draft Act implementing the Pay Transparency Directive [Draft dated April 29, 2026]

The next step is the draft Pay Transparency Act dated April 29, 2026, which would implement the directive's remaining requirements, including job evaluation, the creation of job-grade categories, transparent compensation structures, gender pay-gap analysis, employees' right to obtain additional compensation information, the lifting of pay-confidentiality restrictions for a defined purpose, reporting obligations, and significant penalties.

The draft law would also provide employers with tools and methodologies to support job-value assessments and the analysis of pay inequities.

## 4. Draft regulation of the Ministry of Labor and Social Policy on pay-gap indicators [Draft dated April 24, 2026, on detailed indicator reporting]

The draft Act would be accompanied by implementing provisions defining how to calculate and report the indicators included in reports on the pay gap between female and male employees, including annual and hourly pay gaps and median pay gaps, including supplemental or variable compensation components, to ensure consistent monitoring of pay inequities.

# Reform in progress

The amendment to the Labor Code requiring employers to inform candidates about salary ranges is only the first step toward full pay transparency in Poland. The real challenge for employers will come with the Act implementing the EU Pay Transparency Directive, which will require a comprehensive overhaul of compensation systems, job evaluation, and pay-gap reporting.

The EU directive, followed by the Polish draft Act, assumes that employers will be required, among other things, to:

- establish **objective, gender-neutral job-evaluation criteria** (including at least four criteria: skills, responsibility, effort, and working conditions);
- assess the **value of every role** within a single organizational structure using the same, objective and gender-neutral evaluation criteria;
- assign employees **to job grades (category of workers)** that include people performing the same work or work of equal value;
- create **transparent pay structures (salary ranges)** based on those criteria and categories; and
- define **rules for setting and increasing compensation (pay progression)** that employees can access.

The purpose of the new regulations is **to create pay systems that make it possible to verify whether people performing work of equal value are paid in accordance with the principle of equal treatment.**

The draft regulations also provide for **new employee information rights.**

Each employee will be able to **request** information from the employer about their own compensation level and **average pay levels** (broken down by gender) **for categories** of employees performing the same work or work of equal value.

Employers will therefore need to prepare not only appropriate **data and analytical procedures**, but also a communication policy and a process for handling such requests.

In practice, this means conducting a pay-gap analysis, **identifying and eliminating unjustified pay gaps**, and implementing measures that promote greater pay transparency and equity within the organization.

# Reform in progress

The new regulations would also introduce extensive reporting obligations in Poland, measures to address the pay gap, and greater involvement by trade unions or employee representatives in job evaluation, compensation structures, and monitoring compliance with the principle of equal pay for work of equal value.

Under the EU directive and the subsequent Polish draft Act, employers would be required, among other things, to:

- **Pay-gap reporting** - companies with at least 100 employees would be required to report specified data on the pay gap between women and men on a regular basis.
- If a **pay gap is identified** (exceeding 5% in any employee category), the employer would be required to conduct a **joint pay assessment** with employee representatives and **implement remedial measures**.

## Strengthening employees' legal protections

The regulations provide for a number of significant sanctions against employers that fail to implement mechanisms to eliminate pay inequities, including:

- compensation and other remedies for employees who have suffered harm; and
- a fine **of up to PLN 60,000**.

The most serious consequences for employers **would be claims of pay or gender discrimination, along with** reputational damage (including adverse media coverage).

The draft regulations would also expand **trade unions' rights**, including the right to:

- participate in determining job-evaluation criteria;
- access information necessary to monitor equal pay;
- participate in joint pay assessments;
- participate in pay-gap remediation processes; and
- represent employees in matters related to equal pay.

The Act also provides that, in organizations without trade unions, these powers in relation to joint pay assessments (including determining remedial measures to eliminate an unjustified pay gap) would be exercised by **worker's representatives** selected in accordance with procedures adopted by the employer.

# What comes next in the legislative process?

The situation now looks very different from just a few months ago. The legislative process in Poland is already well advanced. In May 2026, a revised draft law implementing the directive was published, incorporating comments submitted during the public consultation.

From today's perspective, the next steps are:

## 1. Completion of the legislative process:

- adoption of the Act by the Sejm and Senate;
- signature by the President; and
- publication in the Journal of Laws.

## 2. Six-month transition period (*vacatio legis*) - the current draft allows six months for employers to prepare for the new requirements. If the law is enacted in summer 2026, most of the new obligations would therefore take effect in early 2027.

## 3. Entry into force of the obligations arising from the directive.

Once the Act takes effect, employers would be subject, among other things, to:

- employees' right to information about their own compensation and the average compensation of women and men in categories performing the same work or work of equal value;
- the obligation to apply transparent, gender-neutral criteria for determining compensation;
- a prohibition on preventing employees from disclosing information about their own compensation; and
- obligations to analyze and report the gender pay gap (for employers that meet the directive's workforce thresholds).

## 4. Initial pay-gap reporting - the reporting obligation would be phased in according to the workforce thresholds set out in the directive:

- at least 150 employees - annual reporting, with the first report due by June 7, 2027, covering the period from the Act's effective date through the end of that calendar year;
- 100–149 employees - annual reporting, with the first report for the preceding calendar year due by June 7, 2031; and
- fewer than 100 employees - no mandatory reporting, although voluntary reporting would be possible beginning June 7, 2031.

Adapting to the new regulations will be particularly challenging for companies that lack formal HR structures, job-evaluation tools, or internal compensation policies. Compliance will require not only procedural changes but also cultural change - **promoting equality, transparency, and accountability in compensation management.**

## A step toward pay transparency and nondiscrimination

Effective December 24, 2025, Polish law generally requires employers to disclose compensation information at the job-posting stage. Employers must not only provide the compensation amount or range but also ensure gender neutrality and non-discrimination throughout the recruitment process. However, the provision allowing compensation to be disclosed “before the employment relationship is established” may, in practice, mean that an employer provides it only when the contract is signed. This is only one of the regulated stages.

The EU Pay Transparency Directive 2023/970, however, is much broader in scope and provides for extensive reporting mechanisms, job evaluation, the creation of pay structures, access to information, corrective action, elimination of the gender pay gap, and significant sanctions. The draft law implementing the directive is still under consideration by Parliament, even though the implementation deadline passed in June 2026.

However, in the debate over implementation of the directive, I believe pay transparency is primarily about providing a credible answer to whether I, as an employer, can objectively and consistently explain why employees in my organization receive different levels of compensation and whether I can engage in a meaningful dialogue with employees on this issue. Employers will need to examine their pay structures through the lens of legal risk. In my view, the market has not yet fully recognized the procedural consequences of the new regulations.

Employers should prepare carefully to defend their compensation decisions.

However, I do not view the directive solely as a source of risk. For well-prepared organizations, it can become a catalyst for organizing compensation systems, increasing employee trust, and strengthening the employer’s reputation in the labour market. We increasingly see that candidates and employees expect not only attractive compensation but also transparent rules for determining it and far more information starting at the recruitment stage.



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# The two biggest challenges under the proposed regulations

## Job evaluation and job-grade (category of workers) structure

One of the greatest challenges will be developing and implementing an objective, gender-neutral job-evaluation system. Employers will need to establish evaluation criteria and sub-criteria, assess the value of each role, and use the results to create categories of employees performing the same work or work of equal value.

In practice, every role will need to be reviewed, job descriptions updated, roles evaluated, and employees assigned to the appropriate grades. The accuracy of this process will determine whether employers can subsequently assess the pay gap and demonstrate that pay differences are based on objective criteria.

The legislature has established a minimum of **four mandatory criteria, with optional subcriteria and additional criteria, for assessing whether employees are in comparable situations** in terms of the value of their work: skills, effort, responsibility, and working conditions.

This obligation applies to **all employers, regardless of size.**

## Handling employee requests for compensation information

The second major challenge will be implementing procedures that enable employees to exercise their right to compensation information. Under the draft law, employees could request information about their own compensation and the average compensation of women and men in the category of employees performing the same work or work of equal value. Employers would be required to respond within 30 days of receiving a request.

**A particular challenge is that the draft law does not limit the number of requests an employee may submit, and the information must be calculated using data from the 12 months preceding the month in which the request is submitted.**

In practice, calculations, indicators, and job-grade data would need to be updated monthly to ensure that employee inquiries can be answered accurately and with current information.

Employers would need not only appropriate data and analytical tools but also procedures for handling requests, data-protection rules, and a communication policy.

# What should employers do now?

## A practitioner's perspective



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1

Review **the job architecture** and update job descriptions to reflect required qualifications, skills, duties, responsibilities, and working conditions.

4

Assign positions to categories of workers and assess the pay gap and other inequities, identifying areas for corrective action (remedial measures).

2

Establish objective, gender-neutral **criteria**; build **a job-evaluation model**; and assess the value of all roles to provide a basis for comparing work of equal value.

5

Define pay progression rules and criteria for salary increases, ensuring that they are transparent, objective, and accessible to employees.

3

Develop a transparent **pay structure** with defined salary ranges for individual roles or job categories, based on evaluation results and objective compensation criteria.

6

Develop a communication policy and procedures for providing information to employees, including handling compensation inquiries and comparisons within job grades.

# What should employers do now?

## A legal perspective



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1

Review current internal policies, as well as employment agreement and confidentiality agreement templates.

4

Verify that salary or salary-range information is made available to candidates during recruitment.

2

Prepare compensation policies (including compensation regulations and collective agreements) that reflect the planned requirements, job architecture, and pay structures, as well as transparency, non-discrimination, and ethics policies.

5

Prepare the documents needed to provide employees with required information and, where no trade union is present, select employee representatives with whom the employer will work.

3

Conduct a **robust discrimination-risk assessment**, considering employees' gender, qualifications, duties, responsibilities, experience, and other relevant factors.

6

Provide training on employers' new obligations and employees' rights, particularly for HR staff, managers, and management board members.

## Job categorization is the foundation for implementation

From the perspective of a manager responsible for payroll services, I have seen many companies begin preparing for the new regulations in recent months. This applies primarily to larger organizations, but it is important to note that smaller employers would also be required to meet some of the obligations under the Act.

In practice, organizations are starting by analyzing their job structures and evaluating roles, which is the right approach. Job categorization will provide the foundation for both reporting and employees' right to obtain information about compensation levels within comparable categories. In conversations with employers, I often hear that the information requirement will be easy to implement because it will be enough to provide the salary specified in the employment contract and the range for a given job category. That is an oversimplification: under the draft regulations, the information must be based on actual compensation paid, which requires careful data preparation.

From a technical perspective, many practical questions remain, including how to account for variable-compensation components and how to report employees who change job-grade categories during the year. These are only some of the issues that will need to be clarified in practice. At the same time, HR and payroll system providers are developing

solutions to support the new obligations, although the final form of those solutions will depend on the final wording of the Act.

As an outsourcing provider, we closely monitor regulatory developments and will support our clients in meeting their new obligations. However, it is essential for employers to establish the appropriate job categorization from the outset - without it, fulfilling both reporting and information obligations properly will be difficult.



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