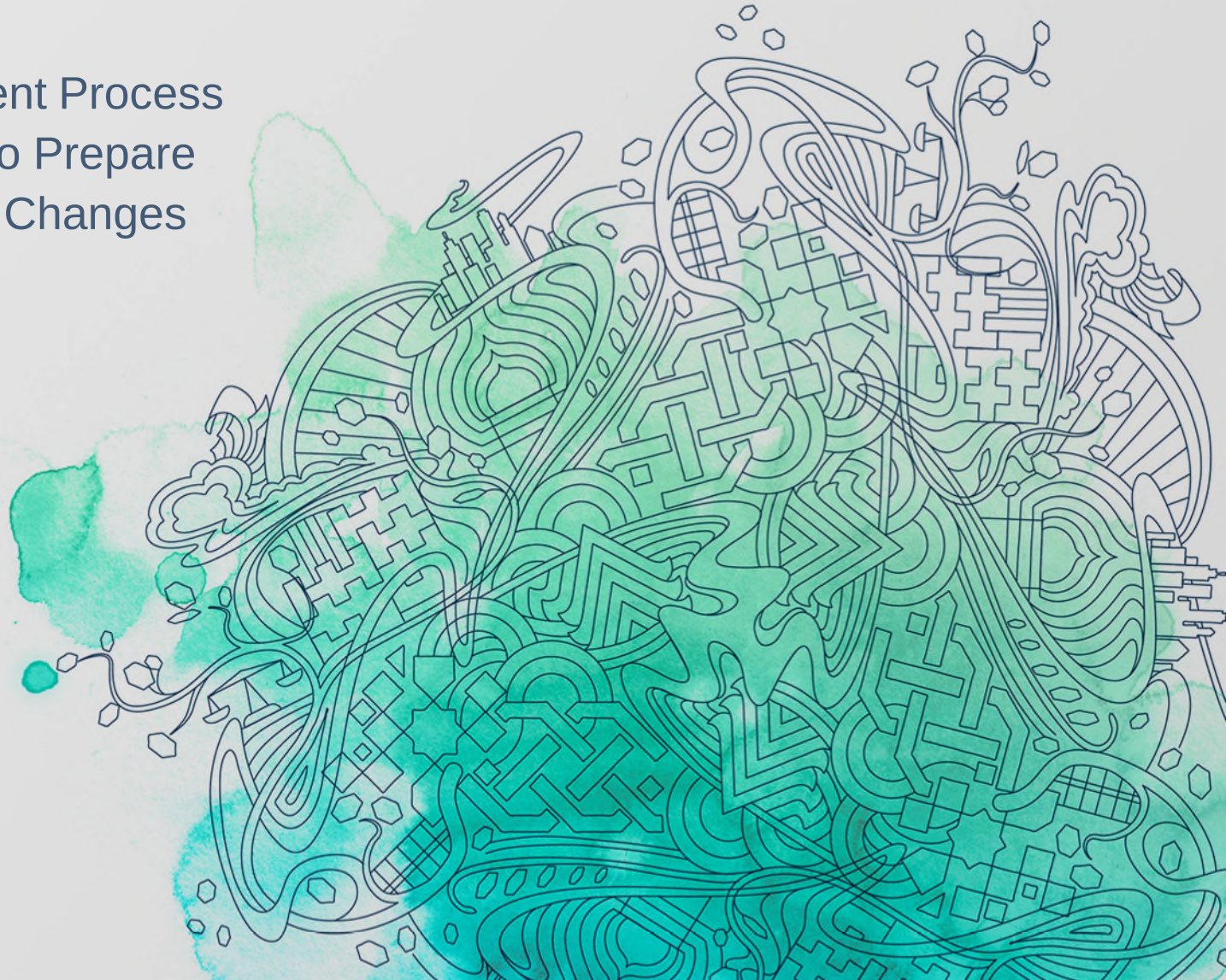


HR IN THE KNOW 6/2025

Pay Transparency: Recruitment Process
Under New Rules – 5 Steps to Prepare
Your Company for Upcoming Changes

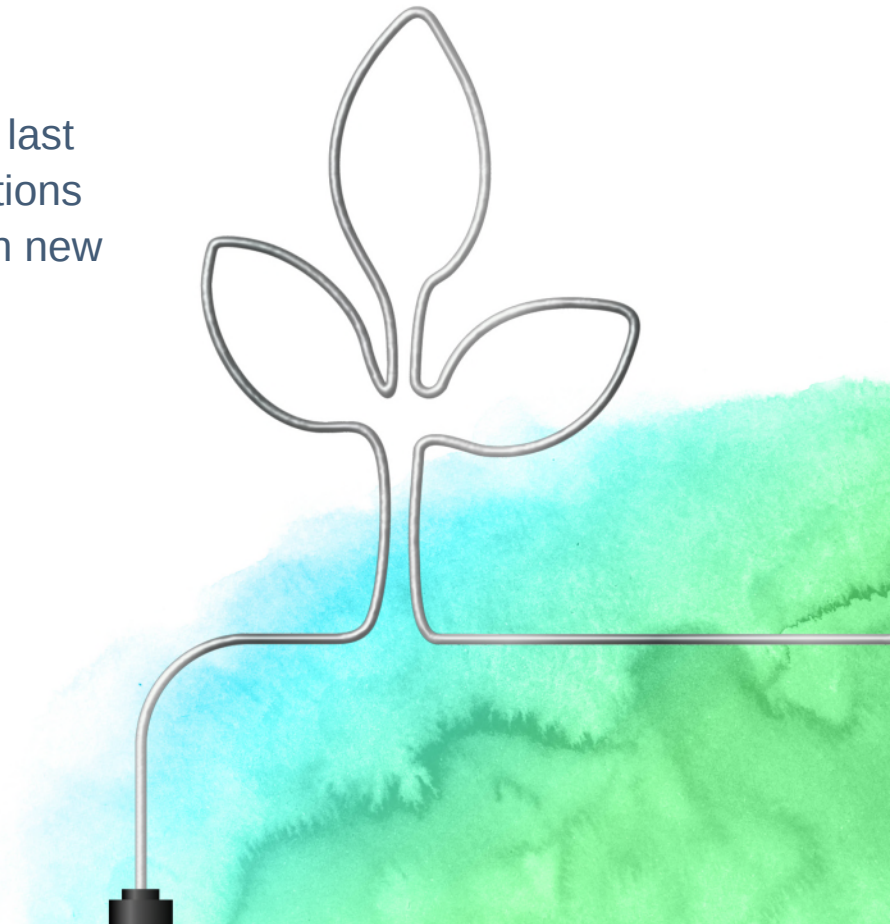
NOVEMBER 2025



FINAL COUNTDOWN BEFORE NEW RECRUITMENT RULES COME INTO FORCE

On 24 December this year, an amendment to the Labour Code will come into force, imposing new recruitment obligations on employers. Importantly, they also apply to ongoing recruitment processes as of the date the amendment takes effect, as well as to all forms of recruitment processes, including internal recruitment and when the process is conducted by an external headhunter or recruitment agency.

There is little time left – realistically about a month – so this is the last moment to prepare for them. The checklist includes a range of actions that are universally applicable to every organisation to comply with new obligations.



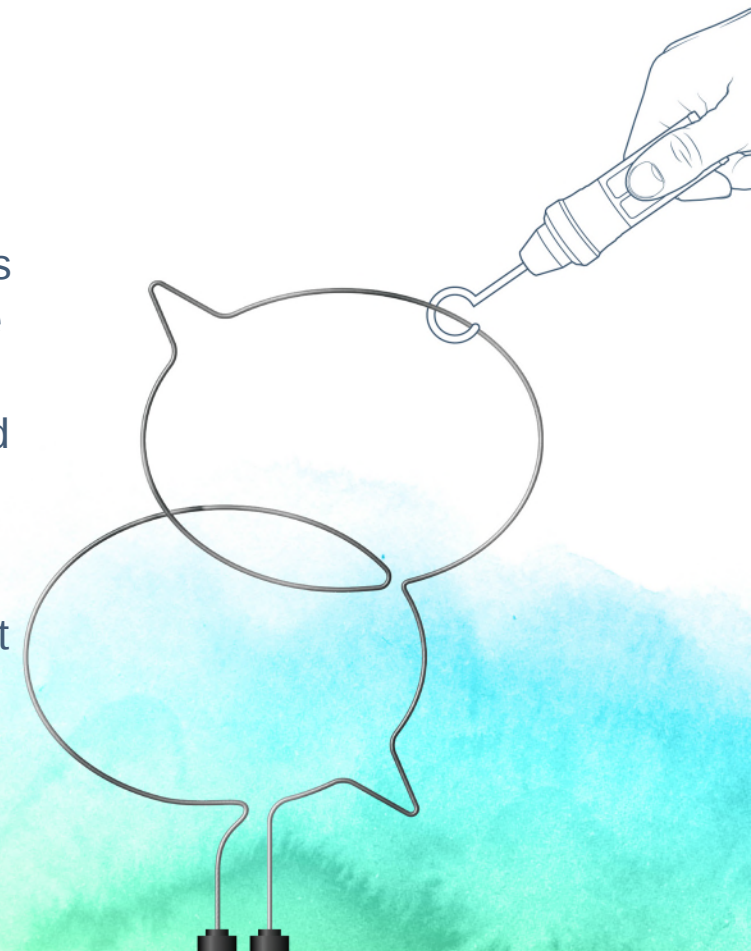
STEP 1: REMUNERATION MAPPING (PAY AND NON-PAY COMPONENTS) FOR JOB POSITIONS

Why?: To prepare information for candidates about the initial pay or its range.

From 24 December, every candidate must receive from the employer (in paper or electronic form such as by e-mail) information about the pay for the job position – either the initial amount or its range, determined on objective, neutral criteria, particularly regarding gender, as well as relevant provisions of collective agreements or remuneration regulations.

This means the information should specify: (i) the total reward at the job position (not just base salary), (ii) additional pay components and benefits – if entitlement does not arise directly from law (granted voluntarily by the employer) or these components are awarded in an amount other than statutory – determined on objective and non-discriminatory criteria, based on actual and current remuneration for employees in the position.

Without a remuneration map, especially for jobpositions subject to current or imminent recruitment, it may be difficult to fulfil these obligations.

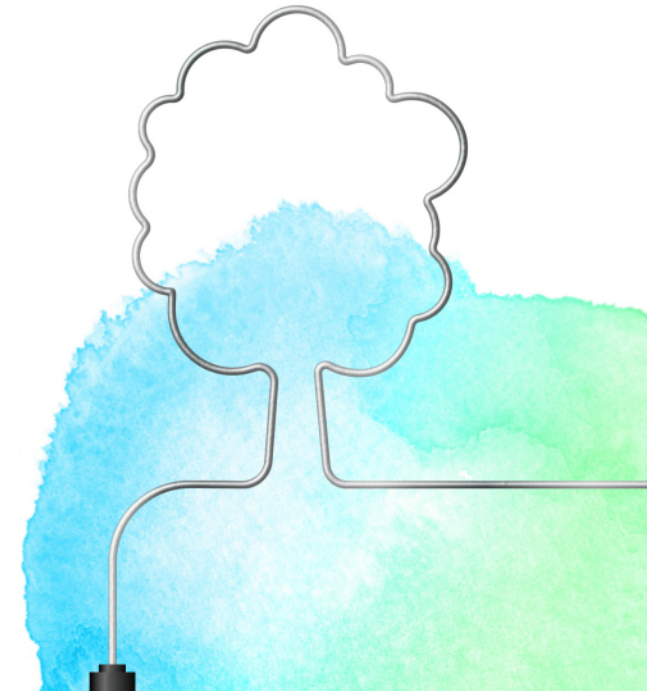


STEP 2: DECIDING WHEN AND HOW TO FULFIL NEW RECRUITMENT OBLIGATIONS

Why?: To determine to whom and to what extent to disclose information about pay policies and amounts.

In addition to initial pay information, the candidate should receive relevant provisions of the collective labour agreement or remuneration regulations applicable to the job position. This does not have to be the full regulation; a tailored extract suffices, though its preparation may be time-consuming and with risk of mistakes. Alternatively, it is possible to provide the full text of pay policies in a way that mitigates the risk of disclosure (e.g. via a link or QR code without download/print options). These details may be given at the final recruitment stage to the selected candidates only.

The amendment does not prohibit providing information on initial pay and pay policy extracts only to candidates at the last stage of recruitment or supplementing them at subsequent stages. Full information should be provided no later than before employment is established, with sufficient time for the candidate to be able to conduct informed and transparent pre-employment pay negotiations.



STEP 3: ANALYSING THE RECRUITMENT PROCESS AND RECRUITMENT DOCUMENTATION FOR EQUAL TREATMENT (NON-DISCRIMINATION)

Why?: To ensure gender neutrality of job titles and job advertisements.

The new rules require that job titles and the content of job advertisements be gender-neutral. The amendment does not prescribe how to ensure neutrality – compliance can be achieved, for example, by using both feminine and masculine forms, gender-neutral terms (“we will hire a person for position X”), placeholders, or other forms indicating that candidates of any gender may apply. The requirement applies also to the job advertisement itself, which must not directly or indirectly suggest employer preference regarding candidate gender.

STEP 4: NEW TEMPLATES OF JOB ADVERTISEMENT AND INITIAL PAY INFORMATION

Why?: To meet the requirements set out in Steps 1–3.



STEP 5: VERIFICATION OF RECRUITMENT POLICIES AND PRACTICES

Why?: To ensure the recruitment process is non-discriminatory and to eliminate questions about salary.

The amendment clearly states that recruitment at every stage must be conducted in a non-discriminatory manner, especially regarding gender. There is no statutory list of actions or guidelines. The basic principle is to assess all candidates and make recruitment decisions based on the same objective, gender-neutral criteria (requirements) and to avoid questions that may indicate gender bias (e.g. regarding marital status or caregiving responsibilities).

Further, employers will no longer be able to ask about a candidate's current salary or pay history. In light of this prohibition, particular caution is needed when discussing a candidate's financial expectations, especially regarding the basis for those expectations.

It is advisable to create a new recruitment policy or verify the existing one to address all the above requirements and to familiarise and train all participants in the recruitment process (not just HR, but also managers) on the new requirements.

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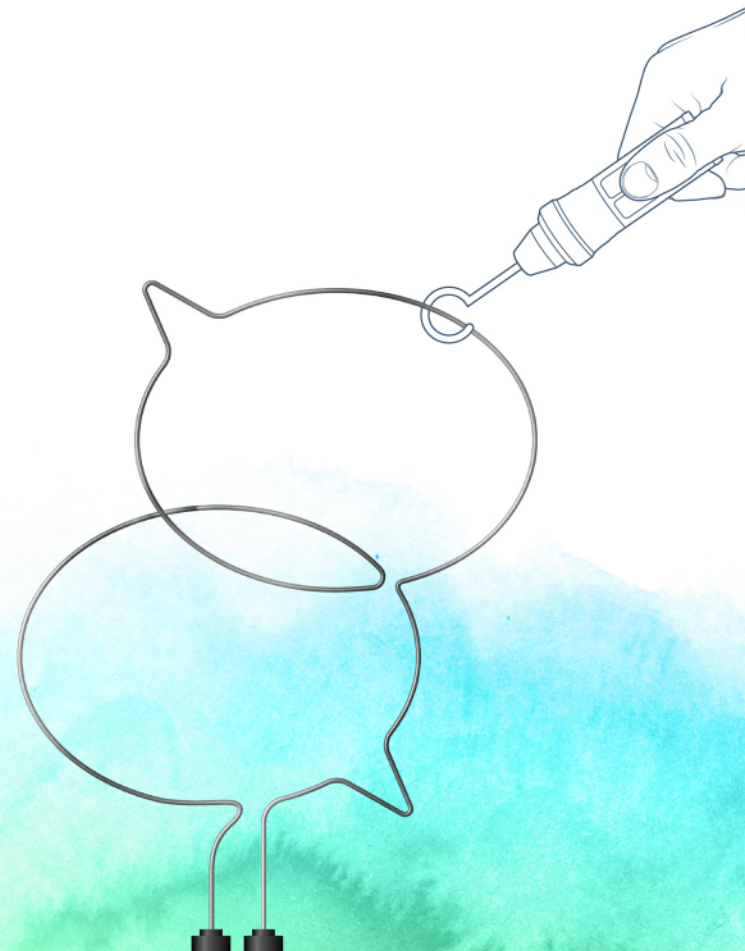
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