

EU DIRECTIVE 2023/970

Equal Pay, Equal Work

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EU Pay Transparency Directive

What is new for the business in Bulgaria — and how to prepare in view of **07.06.2026** as upcoming deadline for transposition?

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*This material is shared with the members of the
Hellenic Business Council in Bulgaria as a
dedicated briefing — a practical orientation on
the obligations Bulgarian employers will need to
meet under the published draft transposition
law.*

————— KOMAREVSKI DIMITROV & PARTNERS —————

01

HIRING & RECRUITMENT

Transparency and non-discrimination at hiring

Both the Directive and the Bulgarian draft law extend the principle of transparency and non-discrimination to **job applicants**. This requires a review of the recruitment process across three workstreams.

**WHAT
CHANGES**

- Salary information should be disclosed upfront
- Questions about past salary are not allowed.

01 Job ads**Gender-neutral job titles**

Job ads must include a gender-neutral designation of the position.

02 Interviews**No questions about prior pay**

HR / recruitment teams should be instructed regarding the new rules for conducting the job interviews, namely: the candidates must not be asked on prior pay.

03 Pay disclosure**Disclose the salary or its range**

The information may be provided either with the job ads or later in the process — e.g. by sending an offer to the approved candidate.

02

CURRENT EMPLOYEES

Transparency in pay-setting and periodic raises

Employers must build a pay-setting system based on **objective, gender-neutral criteria**. The Bulgarian draft law sets out the following indicative criteria:

01
Complexity

of the duties performed

02
Difficulty

effort required by the role

03
Responsibility

attached to the position

04
Working conditions

in which the duties are performed

**PRACTICAL
NOTE**

Most companies — particularly those that are part of international groups — already have internal compensation and bonus policies. However, it is recommended to **review and align** them with the criteria herein.

Access to average pay levels and end of pay secrecy

Significant new provisions, which have drawn **conflicting reactions**, include the following:

Access to average pay information upon request

Employees would have the right to receive a breakdown on the company's **average pay levels by gender and similarity of the job positions.**

End of pay secrecy

Employees must **not be restricted** — through employment contracts or internal rules — from sharing information about their individual remuneration.

04

NATIONAL MONITORING

Annual reporting on the gender pay gap

Employers will report annually to the **Commission for Protection against Discrimination (CPD)** on the pay differences between men and women.

250 +

Employees — the threshold for the first wave of reporting obligations.

07.06. 2027

First reports due — submitted to the CPD as the supervisory authority.

SMALLER COMPANIES

Under ~100 employees: no reporting — yet

Smaller companies are **not exempt** from the pay-transparency requirements themselves; for now, however, no reporting obligation has been set for them.

ABOUT US



Komarevski Dimitrov and Partners is an independent full-service Bulgarian law firm, delivering premium legal services and recognized by both local peers and international legal ranking directories.

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