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INTERNAL GUIDE | RECRUITMENT TEAM

EU Pay Transparency: What you need to do differently

A practical guide for recruiters placing
candidates into European roles

| Updated June 2026

| Applies to all EU hiring

Why this matters to you

The EU Pay Transparency Directive came into force across member states on 7 June 2026. It does not apply to UK roles, and it does not apply to you personally as a UK-based recruiter. But the moment you are working on a role based in an EU country, or sourcing candidates who will be employed in an EU country, the rules apply to that hiring process.

The changes are not huge in terms of day-to-day workflow, but they are non-negotiable. Two things in particular will catch people out: disclosing salary before interview, and not asking candidates about what they currently earn. Both are now legal requirements across the EU, not just best practice.

This guide covers what you need to change in how you write job ads, how you handle salary conversations, and what to brief your clients on.



The two rules that affect you most

Rule 1: Salary must be disclosed before the first interview

For any EU-based role, the salary or salary range must be shared with a candidate before they sit their first interview. That means it either appears in the job ad, or you share it with them when you invite them to interview. You cannot wait until offer stage. You cannot keep it vague.

Several countries go further and require the salary range to appear in the job ad itself (see the country table below). Even where it is not strictly required in the ad, including it is the simpler approach and reduces back-and-forth later in the process.

Rule 2: You cannot ask candidates what they currently earn

The ban on salary history questions applies from the very first conversation with a candidate through to the point of offer. This covers phone calls, emails, intake calls, and any other point of contact. You can ask what their salary expectations are. You cannot ask what they are currently being paid, what they earned in a previous role, or anything that ties an offer to their history rather than the value of the role.

HARD STOP

Asking a candidate "what are you on at the moment?" is now prohibited for EU roles. It is not just poor practice; it is a breach of the directive. Remove this question from your intake process for any European role and do not let it creep back in under different phrasing.

- ✔ What salary are you looking for?
- ✔ What range works for you?
- ✔ Is £X–£Y within your expectations?
- ✔ What would you need to make a move?

- ✘ What are you currently earning?
- ✘ What's your current package?
- ✘ What were you on in your last role?
- ✘ Can you share your last payslip?

Writing job ads for EU roles

The safest approach for any EU role is to include a salary range in the job ad. In some countries it is a legal requirement. In all countries it satisfies the directive's disclosure rule automatically, without you needing to manage a separate pre-interview disclosure step.

The range needs to be genuine. Posting an extremely wide range (£40k–£120k) to technically comply while giving candidates no useful information is unlikely to hold up to scrutiny and undermines trust. Work with your client to get a real range before the role goes live.

WHAT TO INCLUDE IN THE COMPENSATION SECTION OF AN EU JOB AD

Salary: €58,000 – €72,000 per year, depending on experience

That is it. It does not need to be complicated. A clear range tied to the role, stated in the currency of the country the role is based in. If the client also offers a bonus or other benefits, those can follow separately but the base range must be present.

What to do if your client will not give you a range

This is the most common friction point. Push back on clients who say "competitive" or "DOE" for EU roles. Explain that this is no longer legally acceptable for roles in EU markets. If they genuinely have not decided on a range, work with them to define one before the role goes live rather than advertising without it. A role that launches without a salary range in a country that requires one is non-compliant from day one.

BRIEF YOUR CLIENTS

Many UK-based hiring managers will not know this has changed. Part of your job on EU roles is to explain to clients that "we'll discuss salary later" is no longer an option, and that "competitive salary" in a job ad does not meet the directive's requirements. Frame it as protecting them from legal exposure, not as an inconvenience.



What each market requires

The EU directive sets the minimum standard, but individual countries can and do go further. Here is where the main markets UK recruiters work with currently stand.

Country	What is required	In the job ad?
Ireland	Salary range must appear in the job ad itself	Yes, mandatory in ad
Italy	Pay information required in the job posting, not just pre-interview	Yes, mandatory in ad
Netherlands	Disclosure before first interview; new national law expected January 2027	Recommended, not yet required in ad
Germany	National legislation still pending despite directive being in force	Recommended; enforce baseline rule
France	National law adoption delayed; directive baseline applies	Recommended; enforce baseline rule
Poland	Flexible; disclosure in ad, pre-interview, or pre-contract, but must be shared by offer stage	Optional but encouraged

The practical takeaway: include the salary range in the job ad for all EU roles as a default. It satisfies the requirements of the strictest markets and removes the risk of missing the pre-interview disclosure step in the others.

Your process for EU roles, step by step

1

Take the brief from the client

As part of the role briefing, get a confirmed salary range from the client. This is not optional for EU roles. If they cannot give you one, the role is not ready to advertise.

2

Write the job ad with the range included

Include the salary range in the compensation section of the ad. State it clearly in the local currency. Do not use "competitive", "DOE", or a range so wide it is meaningless.

3

First contact with candidates

When you speak to a candidate about the role, you can ask about their salary expectations. Do not ask what they currently earn or what they earned previously. Ask what range they are looking for and whether the advertised range works for them.

4

Confirm the range before interview

If for any reason the salary range was not in the job ad, it must be confirmed with the candidate before their first interview begins. Do not wait until after the interview. Send it in writing so there is a record.

5

Manage the offer within the stated range

Offers should sit within the range that was advertised or disclosed. If a client wants to offer outside that range, they need to understand that creates a compliance issue. The range needs to have been accurate, not a placeholder.

Handling salary conversations with candidates

The ban on salary history questions will feel like a habit to break for many recruiters. The instinct to anchor a candidate's expectations to their current salary is deeply ingrained in how many recruitment conversations work. That approach now needs to change for EU roles.

The good news is that the conversation becomes simpler, not harder. You have a range. You ask the candidate whether that range works for them. If it does, you move forward. If it does not, you know early rather than three interviews in.

When a candidate volunteers their current salary

If a candidate tells you what they currently earn without being asked, you can note it but you should not use it to anchor the offer. The offer should be based on where the candidate sits within the role's range, not on what they happened to say. Passing that figure to a client and suggesting they use it as leverage would breach the spirit of the directive even if the candidate disclosed it freely.

When a candidate asks why you will not ask about their salary

Be straightforward. Explain that for roles in EU countries, you are no longer permitted to base offers on someone's salary history. The offer will be based on the role and where they sit within the range. Most candidates will find this refreshing rather than confusing.

Checklist for every EU role

Checklist for every EU role

Confirmed salary range obtained from client before the role is advertised

Salary range included in the job ad in local currency

Job ad does not use "competitive salary", "DOE", or equivalent vague language

Job description uses gender-neutral language throughout

No questions about current or previous salary at any stage of the process

Candidate confirmed salary range expectations before first interview is scheduled

If range was not in the ad, it was confirmed in writing before interview

Final offer sits within the range that was disclosed to the candidate

Client briefed on their obligations if this is a direct hire

THE UPSIDE

Being transparent about salary from the start reduces time wasted on candidates who were never going to accept the range, cuts late-stage drop-off, and makes conversations with candidates more straightforward. The recruiters who adapt fastest will actually run cleaner, more efficient EU processes as a result.

Questions to expect from candidates and clients

"Why do you need to advertise the salary range?"

For EU-based roles, it is now a legal requirement under the EU Pay Transparency Directive. In some countries (Ireland, Italy) it must be in the ad itself. In all EU countries, it must be shared before a first interview. Including it in the ad is the simplest way to comply and it also tends to generate better-matched applicants.

"Can we just say 'up to £X' rather than giving a range?"

Technically a single upper figure is better than nothing, but a range is what the directive intends. Work with the client to establish a genuine minimum and maximum. Giving candidates only an upper bound with no floor is not in the spirit of the legislation and may not satisfy national implementations in stricter markets.

"We don't want competitors to see our salary levels"

This is a common concern. The reality is that salary data is increasingly available through benchmarking tools, Glassdoor, and LinkedIn anyway. Withholding it in job ads for EU roles is not a viable option; it just means the role is non-compliant. Help clients frame transparent pay as a competitive advantage in attracting candidates rather than a risk to be managed.

"What if the candidate asks for more than the range?"

That is a conversation between the client and the candidate. As the recruiter, your job is to have set expectations clearly from the start so this is less likely to happen. If a client genuinely wants flexibility above the stated range, they should have built that into the range they advertised.

This guide reflects the EU Pay Transparency Directive (2023/970) as in force from June 2026. Country-level national legislation is still developing in some markets; requirements may change. For legal advice specific to a particular jurisdiction, consult qualified employment counsel. Last updated June 2026.



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