



Global Legislative Update

Law & Policy Group

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In this document

Mercer's *Global Legislative Update* covers legal developments affecting retirement, health, executive rewards, talent, diversity and inclusion, and other HR programs that affect local and/or expatriate employees. Links to developments with upcoming effective dates covered in past updates are also included to remind employers of impending deadlines. These icons indicate whether employer action is required.



Employer action required



Potential implications for employers



Developments to monitor

Please note: Mercer is not a law firm and therefore cannot provide legal advice. Please consult legal counsel before taking any actions based on the commentary and recommendations in this report.

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Section 1

Highlights

Global	
Artificial Intelligence	Global employer resources
Minimum wage rates	Global employer resources
Remote working	Global employer resources
Reproductive rights	Global employer resources post <i>Dobbs</i> ruling
Americas	
Argentina	Minimum pension benefit published Pension moratorium to expire
Brazil	Employers must include psychosocial risks in risk-management process
Canada	Federal minimum wage to increase Minimum wage to increase in British Columbia Minimum wage to increase in New Brunswick Minimum wage to increase in Newfoundland and Labrador Public service plan opens to the private sector in Nova Scotia Ontario pay transparency duties to start in 2026
Chile	Minimum wage increased
Costa Rica	Paid bereavement leave effective
United States	Executive order on in vitro fertilization issued Equal Employment Opportunity Commission Chair to take action against anti-American national origin discrimination More leeway to transfer missing participants' benefits SECURE 2.0's auto-enrollment mandate revs up with IRS proposal National Labor Relations Board's Acting General Counsel rescinds memoranda by former General Council Executive order establishing the President's Make America Healthy Again Commission Proposed regulations confirm that SECURE 2.0 age 60-63 'super catch-ups' are optional 2025 state paid family and medical leave contributions and benefits Beyond COBRA: State laws add complexity to continuation coverage Domestic partner benefits remain popular but present challenges

Americas (continued)	
United States	Group fixed-indemnity plans pose legal and tax issues Roundup: Employer resources on DOL’s final independent contractor rule User’s guide to SECURE 2.0 Transportation plans offer valued benefits, but pose compliance issues Roundup: Employer resources on noncompete restrictions Roundup: Employer resources on the changing landscape of DEI Roundup: Employer resources on DOL’s expansion of overtime protections Some states require group health plan reporting Resources for tracking state and local retirement initiatives Roundup: Employer resources on states’ recent equal pay laws Roundup: Employer resources on states’ recreational marijuana laws Roundup: Employer resources on minimum wage increases Roundup: Employer resources on hairstyle nondiscrimination laws 2026 individual-mandate coverage dollar limits set in Massachusetts Paid sick and safe leave law changed in Michigan Paid family medical leave rates adjusted in Minnesota Network adequacy rules for fully insured plans issued in New York Cybersecurity rules to take effect in Puerto Rico Benefit and leave laws sometimes differ from others in Puerto Rico Attorney General says pharmacy benefit manager laws apply to ERISA plans in Texas Telehealth law enacted in Virgin Islands
Asia Pacific	
Australia	Superannuation portability between Australia and Cook Islands Memorandum of Understanding signed Mandatory service standards for large super funds to be introduced Securities regulator consults on further relief from breach reporting regime Regulator calls on super funds to improve anti-scam measures
Hong Kong	Minimum wage to increase
Malaysia	Internship program to boost upskilling and employment opportunities Minimum wage increased
Philippines	New rules for employment of foreign nationals issued
Singapore	Central Provident Fund contribution rates for older workers increased
EMEA	
European Union (EU)	Corporate sustainability, due diligence rules simplified Work program for 2025 includes plans to simplify sustainability reporting, other employment measures
Bosnia and Herzegovina	Minimum wage increased
Egypt	Minimum wage increased
France	Permitted meal expense deductions updated

EMEA (continued)	
Greece	Significant reduction in social security contributions planned for overtime, night shifts, and holidays Calculation method for pension contributions adjusted, scope of insurance coverage expanded
Hungary	Tax exemption scheme for working mothers announced
Ireland	Maternity leave postponement allowed for serious health conditions Use of some nondisclosure agreements restricted
Italy	Annual cap for pension contributions in 2025 updated 2025 budget includes employment and social security measures Employment measures introduced
Rwanda	Social security pension contributions increased
Saudi Arabia	Revised national hiring targets for certain sectors issued
Spain	Minimum wage increased
United Kingdom (UK)	Regulator issues approach to defined contribution Master Trust supervision Advisory fuel rates for company cars updated Employees to be allowed neonatal leave Consultation on changes to banking remuneration regime issued

Section 2

Global

Artificial Intelligence	
Status	 Ongoing initiatives
Development	<p>Career</p> <p>Roundup: Global employer resources on artificial intelligence</p> <p>Artificial Intelligence (AI) has become more of a permanent feature of the workplace for many employees and employers around the world and poses numerous challenges and considerations as it reshapes work. To help employers consider the issues associated with AI, the roundup cited below provides links to general information about ongoing legislative and governance initiatives and trends. Sources include Marsh McLennan, organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated
Minimum wage	
Status	 Ongoing initiatives
Development	<p>Career</p> <p>Roundup: Global employer resources on minimum wage increases</p> <p>To help multinational employers address the different minimum wage rates around the world, the roundup cited below provides links to resources from organizations, government websites, third-party resources, and news articles.</p>
Resources	Roundup , regularly updated
Remote working	
Status	 Ongoing initiatives
Development	<p>Career — Health — Wealth</p> <p>Roundup: Countries address remote-working issues</p> <p>Remote working has become a more of permanent feature for many employees and employers after various countries introduced COVID-19 measures. Remote working poses challenges and considerations for employers devising or adjusting policies. Issues to consider include the definition of remote work, eligibility criteria, hybrid working arrangements, employee engagement and performance, cybersecurity, health and safety, the right to disconnect, the impact of employees relocating to a different country or state, and the post-pandemic return to the workplace. Several jurisdictions have introduced remote-working legislation that clarifies post-pandemic employer and employee requirements, and others are expected to follow suit. To help employers consider the issues associated with remote working, the roundup cited below provides links to resources from Marsh McLennan, organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated

Reproductive rights

Status



Ongoing initiatives

Development

Health

Roundup: Global employer resources on reproductive rights post *Dobbs* ruling

In June 2022, the US Supreme Court's *Dobbs v. Jackson Women's Health Organization* decision overturned *Roe v. Wade*, finding no federal constitutional right to abortion and allowing states to regulate and ban abortions at all stages of pregnancy. To provide multinational employers some information on countries' positions on reproductive rights and the varying employee health benefit plan issues involved, the roundup cited below provides links to organizations, government websites, third-party analysis, news articles and viewpoints.

Resources

[Roundup](#), regularly updated

Section 3

Americas

Argentina (new)	
Status	 Currently effective
Development	<p>Wealth</p> <p>Minimum pension benefit published</p> <p>From March 2025, the mobility rate increased by 2.21%, impacting the income of retirees and pensioners under measures included in ANSES Resolution 145/2025 (ANSES is the principal administrator of social security and other social benefits in Argentina). The minimum legal benefit is fixed at AR\$279,121.71 and the maximum pension benefit is AR\$1,878,224.89. Additionally, the Universal Basic Pension (PBU) is AR\$127,685.44, and the Universal Pension for the Elderly (PUAM) is AR\$223,297.37. These values are reviewed and adjusted monthly. Pensions benefits also increased by 2.21% in March 2025.</p>
Resources	<p>maria.p.maydana@mercer.com</p> <p>Resolution 145/2025 (Spanish) (Official Bulletin, Feb. 26, 2025)</p>
Argentina (new)	
Status	 Effective March 23, 2025
Development	<p>Wealth</p> <p>Pension moratorium to expire</p> <p>On March 23, 2025, the current “pension moratorium” will end. Introduced in March 2023, the “pension moratorium” allows individuals who did not have the required 30 years of contributions to buy back years to enable their retirement. Individuals who can demonstrate economic vulnerability will be allowed to apply for the Universal Pension for the Elderly (PUAM) — this is a noncontributory pension available to individuals aged 65 and older (currently, around 200,000 people receive this pension).</p>
Resources	<p>maria.p.maydana@mercer.com</p>

Brazil (new)	
Status	 Effective May 26, 2025
Development	<p>Career — Health</p> <p>Employers must include psychosocial risks in risk-management process</p> <p>Employers in Brazil have until May 26, 2025, to ensure that their Risk Management Program (PGR) includes psychosocial risks related to the work environment under measures included in Ordinance 1,419 of Aug. 27, 2024. The PGR forms part of employers' occupational risk management process (GRO). Currently it covers several workplace safety and health risks, such as risks arising from physical, chemical, biological, accidents and ergonomic factors. Employers must develop an inventory of risks (this must be retained for 20 years) and adopt measures to eliminate or reduce occupational risks.</p> <p>The Brazilian safety and health authorities have provided a nonexhaustive list of common psychosocial risks including work content and design; workload and pace; scheduling of work; employees' control over their work; provision of equipment to perform work; organizational culture (including harassment); career development and work-life balance.</p>
Resources	Ordinance 1,419 of Aug. 27, 2024 (Portuguese) (Government, Aug. 28, 2024)
Brazil (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> Measures gradually reintroduce the payroll tax — key date: Jan. 1, 2026
Canada (new)	
Status	 Effective April 1, 2025
Development	<p>Career</p> <p>Federal minimum wage to increase</p> <p>The federal minimum wage will increase to C\$17.75/hour, up from C\$17.30, on April 1, 2025.</p>
Resources	Increasing the federal minimum wage starting April 1, 2025 (Government, Feb. 28, 2025)
Canada — British Columbia (new)	
Status	 Effective June 1, 2025
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>On June 1, the general hourly minimum wage in British Columbia will increase to C\$17.85, up from C\$17.40.</p>
Resources	2025 minimum wage increases confirmed (Government, Feb. 14, 2025)
Canada — New Brunswick (new)	
Status	 Effective April 1, 2025
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>On April 1, 2025, the minimum wage will increase to C\$15.65/hour, up from C\$15.30/hour.</p>
Resources	Minimum wage to increase to \$15.65 per hour (Government, Feb. 11, 2025)

Canada — Newfoundland and Labrador (new)

Status	 Effective April 1, 2025
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>On April 1, the minimum wage will increase to C\$16.00/hour, up from C\$15.60/hour. The minimum overtime rate will also increase to C\$24, up from C\$23.40/hour.</p>
Resources	Minister Dempster announces increase to the minimum wage (Government, Feb. 14, 2025)

Canada — Nova Scotia (new)

Status	 Currently effective
Development	<p>Wealth</p> <p>Public service plan opens to the private sector</p> <p>Effective Feb. 4, 2025, the Nova Scotia Public Service Superannuation Plan (PSSP) opened its membership to qualified private-sector employers. As a result, more private sector employers now have access to a defined benefit pension plan. The PSSP Trustee may approve a private sector employer’s request to transfer an existing pension plan into the PSSP. Supporting regulations prescribe how to request the transfer of an employer pension plan to the public plan. Sixty-five employers already participate in the PSSP.</p>
Resources	Public Service Superannuation Plan Opens to Private Sector (Government, Feb. 5, 2025)

Canada — Ontario (updated)

Status



Effective Jan. 1, 2026

Development

Career

Pay transparency duties to start in 2026

Effective Jan. 1, 2026, employers with 25 or more employees in Ontario will be subject to pay transparency duties for publicly advertised job postings. Employers will also have to disclose if artificial intelligence will be used in the hiring process for any publicly advertised role. The measures feature in the *Working for Workers Four Act, 2024* that received royal assent in 2024. The effective dates and accompanying regulations were announced on Dec. 2, 2024. Highlights of the measures:

- All publicly advertised roles must include information about the expected or range of compensation for positions paying CAD\$200,000/year or less. The compensation range for any position must not exceed CAD\$50,000. A “publicly advertised job posting” is defined as an “external job posting that an employer or person acting on behalf of an employer advertises to the general public in any manner.”
- Certain types of advertised jobs are excluded. They do not apply to general recruitment campaigns that do not involve a specific role; roles open only to applicants from among the employer’s current workforce; and job postings for work that will be performed outside of Ontario, or both inside and outside Ontario subject to the work not being a continuation of work that had been performed inside Ontario.
- “Compensation” is defined as “wages” in the Employment Standards Act 2000. “Wages” means any monetary remuneration paid by an employer to an employee under the terms of an employment contract; any payment that an employer must pay to an employee under this Act, and any allowances for room or board under an employment contract or prescribed allowances.
- Employers must specify if the role is for a current vacancy.
- Employers must disclose if artificial intelligence will be used to screen, assess or select applicants for a role.
- Employers will not be allowed to impose any Canadian work experience in publicly advertised job postings or associated application forms. The measure aims to reduce the barriers for job seekers in Ontario.
- Employers must notify interviewees for a particular post within 45 days of the interview about their hiring decision. The notification must be communicated in person, in writing, or via technology.
- Employers must retain copies of every publicly advertised job posting and associated application form for three years after removal of public access to the posting. They must also retain for three years records of the information provided to applicants who have been interviewed.

Resources

[Working for Workers Four Act, 2024](#) (Legislature) and [O. Reg. 476/24: Rules and exemptions re job postings](#) (Government, Nov. 29, 2024)

Canada (previously covered, with upcoming effective date)

Development	<p>Career</p> <ul style="list-style-type: none"> • Minimum wage to increase in Nova Scotia — key date: April 1, 2025 • Employers face required disclosures regarding pay in Ontario — key date: Jan. 1, 2026 • Rights of digital platform workers enhanced in Ontario — key date: July 1, 2025 <p>Career — Health</p> <ul style="list-style-type: none"> • New leave entitlements in Ontario — key date: unknown • ‘Right-to-disconnect’ established for employees — key date: Slated to take effect in 2025 <p>Wealth</p> <ul style="list-style-type: none"> • Pension super priority federal legislation enacted — key date: April 27, 2027
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Chile (new)

Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>The government announced on Feb. 6, 2025, that the minimum wage increased to 510,636 CLP/month (up from 500,000 CLP/month), backdated to Jan. 1, 2025. A further increase is slated to take effect in May 2025. The minimum wage paid to individuals younger than age 18, and older than 65, is 380,923 CLP/month, up from 372,989 CLP/month. From January 2025, the Consumer Price Index registered during the last six months of the previous calendar year is used to calculate changes to the minimum wage.</p>
Resources	<p>Law (Spanish) (Official Diary, Feb. 8, 2025)</p>

Colombia (previously covered, with upcoming effective date)

Development	<p>Wealth</p> <ul style="list-style-type: none"> • Pension reforms issued — key date: July 1, 2025
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Costa Rica (new)	
Status	 Currently effective
Development	<p>Career — Health</p> <p>Paid bereavement leave effective</p> <p>Employees in Costa Rica are now entitled to paid bereavement leave upon the death of certain relatives. The measures feature in Law 10589 that amends the labor code and took effect on their publication in the official journal on Dec. 3, 2024. The law does not increase the amount of paid bereavement leave already provided by employers or included in collective agreements.</p> <p>Employees can take up to three working days of paid leave on the death of first-degree relatives (spouses, parents, children, parents-in-law, sons-in-law, and daughters-in-law) on provision of proof of death. Unmarried couples who have cohabited for two or more years are also entitled to paid bereavement leave, subject to providing certain documentary evidence.</p> <p>Employees are entitled to one working day of paid leave on the death of second- or third-degree relatives. Second-degree relatives include grandparents, siblings, grandchildren and brothers/sisters-in-law. Third-degree relatives include uncles/aunts, nephews/nieces, great-grandparents and great-grandchildren.</p>
Resources	Law 10589 (Spanish) (Government, Nov. 5, 2024)
Mexico (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none"> • Employment rights of digital platform workers to be regulated — key date: June 22, 2025
Peru (previously covered, with upcoming effective date)	
Development	<p>Career — Wealth</p> <ul style="list-style-type: none"> • Pension system modernization law issued — key date: unknown
United States (US) (new)	
Status	 Currently effective
Development	<p>Career — Health</p> <p>Executive order on in vitro fertilization issued</p> <p>On Feb. 18, 2025, President Trump signed an executive order (EO) seeking to expand access to in vitro fertilization (IVF). The order is short on details. The “Purpose and Policy” section (typically the start of each EO) notes the following:</p> <ul style="list-style-type: none"> • Americans need reliable access to IVF and more affordable treatment options, as the cost per cycle can range from \$12,000 to \$25,000. • It is the Trump Administration’s policy to ensure reliable access to IVF treatment, including by easing unnecessary statutory or regulatory burdens to make IVF treatment drastically more affordable. • Policy recommendations on “protecting IVF access and aggressively reducing out-of-pocket and health plan costs for IVF treatment” is due to the president within 90 days (May 19). This EO doesn’t require any immediate changes for employer health programs.
Resources	Expanding access to in vitro fertilization (The White House, Feb. 18, 2025)

US (new)

Status



Currently effective

Development

Career

Equal Employment Opportunity Commission Chair to act against anti-American national origin discrimination

The Equal Employment Opportunity Commission (EEOC) Acting Chair announced that it was “putting employers and other covered entities on notice” that it “is here to protect all workers from unlawful national origin discrimination, including American workers.”

The EEOC will help deter illegal migration and reduce the abuse of legal immigration programs by increasing enforcement of employment antidiscrimination laws against employers that illegally prefer non-American workers, as well as against staffing agencies and other agents that unlawfully comply with client companies’ illegal preferences against American workers.

When appointed in January, the Acting Chair listed her priorities, consistent with the President’s Executive orders as: rooting out unlawful DEI-motivated race and sex discrimination; protecting American workers from anti-American national origin discrimination; defending the biological and binary reality of sex and related rights, including women’s rights to single-sex spaces at work; protecting workers from religious bias and harassment, including antisemitism; and remedying other areas of recent under-enforcement.

Resources

[EEOC Acting Chair vows to protect American workers from anti-American bias](#) (EEOC, Feb. 19, 2025) and [President appoints Andrea R. Lucas EEOC Acting Chair](#) (EEOC, Jan. 21, 2025)

US (new)

Status



Currently effective

Development

Wealth

More leeway to transfer missing participants’ benefits

A new temporary enforcement policy lets fiduciaries of ongoing retirement plans transfer small benefits owed to missing participants to a state unclaimed property fund without fear of Department of Labor (DOL) enforcement action. Field Assistance Bulletin (FAB) 2025-01 explains that this policy only applies to benefits — including uncashed checks — with a present value of \$1,000 or less. The FAB requires fiduciaries to meet a series of other conditions to qualify for this relief. While prior DOL guidance has allowed fiduciaries of terminating plans to transfer missing participants’ benefits to state unclaimed property funds in some instances, this is the first piece of agency guidance specifically addressing transfers from ongoing retirement plans

Resources

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[GRIST](#), Feb. 18, 2025

US (new)

Status  **Comments can be submitted until March 17, 2025.**

Development **Wealth**
SECURE 2.0’s auto-enrollment mandate revs up with IRS proposal
 IRS proposed regulations provide comprehensive guidance on mandatory automatic enrollment for new 401(k) and 403(b) plans. Starting with 2025 plan years, the SECURE 2.0 Act of 2022 (Div. T of Pub. L. No. 117-328) requires 401(k) and 403(b) plans established on or after Dec. 29, 2022, to include an eligible automatic contribution arrangement (EACA) that meets certain minimum contribution and investment requirements, unless an exemption applies. The proposal addresses those exemptions, incorporating and expanding interim guidance released last year. IRS also proposes to clarify the administration of key EACA features for nonexempt plans. The proposal would take effect for plan years beginning more than six months after the publication of final regulations. Until then, sponsors can rely on a reasonable good-faith interpretation of SECURE 2.0’s statutory auto-enrollment provision. Comments are due March 17.

Resources matthew.calloway@mercer.com, brian.kearney@mercer.com and margaret.berger@mercer.com
[GRIST](#), Feb. 11, 2025

US (new)

Status  **Currently effective**

Development **Career — Health**
National Labor Relations Board’s Acting General Counsel rescinds memoranda by former General Council
 On Feb. 14, 2025, the Acting National Labor Relations Board General Counsel (GC) [issued](#) GC 25-05, which rescinded numerous policy memos issued by the prior GC. Among the rescinded memos are:

- GC 21-06 and GC 21-07 addressing remedies to be sought
- GC 22-04 on mandatory work meetings to discuss labor issues
- GC 23-02 on electronic monitoring
- GC 23-05 on severance agreements and
- GC 23-08 and GC 25-01 on noncompete agreements.

Resources [GC 25-05 Rescission of certain general Counsel Memoranda](#) (NLRB, Feb. 14, 2025)
[Roundup: US employer resources on recent noncompete restrictions](#), regularly updated

US (new)

Status



Initiative

Development

Health

Executive order establishing the president’s *Make America Healthy Again* Commission

The White House recently issued an executive order redirecting national attention toward understanding and reducing chronic disease rates, with a specific focus on ending childhood chronic diseases. According to the order, this initiative will require innovative approaches to nutrition, physical activity, healthy lifestyles, the over-reliance on medication and treatments, the impact of new technological habits, environmental impacts, and the quality and safety of food and drugs. The order provides direction to health-related agencies, establishes a new commission, and outlines its mission. The order directs agencies involved in health or healthcare to:

- Focus on reversing chronic disease by, for example:
 - Avoiding or eliminating conflicts of interest
 - Prioritizing “gold-standard” research on the root causes of illness among Americans
 - Ensuring access to healthy, abundant, and affordable food.
- Ensure the availability of expanded treatment options and the flexibility for health insurance coverage to support beneficial lifestyle changes and disease prevention.

The order also establishes the president’s *Make America Healthy Again Commission*, chaired by the Secretary of Health and Human Services, with the Assistant to the President for Domestic Policy serving as executive director. The Commission’s initial mission will be to advise and assist the President in addressing the childhood chronic disease crisis. Within 100 days of the order, the Commission will submit the *Make Our Children Healthy Again* assessment to the president. Within 180 days of the order, the Commission will provide a *Make Our Children Healthy Again* Strategy, based on findings of the Assessment. There may be additional reports and, eventually, an updated mission.

Resources

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[Establishing the President’s *Make America Healthy Again* Commission](#) (The White House, Feb. 13, 2025)

US

Status



Comments can be submitted until March 14, 2025.

Development

Wealth

Proposed regulations confirm that SECURE 2.0 age 60-63 ‘super catch-ups’ are optional

Just-proposed IRS regulations provide urgently needed guidance on the increased catch-up contribution limit under the SECURE 2.0 Act of 2022 (Div. T of Pub. L. No. 117-328) for defined contribution plan participants ages 60–63. Many employers offering catch-up contributions will be relieved to know they are not required to offer the higher “super catch-up” limit but can continue to offer the regular limit to all catch-up eligible participants.

The catch-up contribution rules allow participants ages 50 and older to make contributions above the applicable annual dollar limit on elective deferrals. Without reflecting the SECURE 2.0 changes, the catch-up contribution limit for 2025 is \$7,500 for participants in 401(k), 403(b) and governmental 457(b) plans. Starting this year, SECURE 2.0 increases the catch-up limit for participants ages 60–63 to \$11,250 (both limits are indexed for inflation). The law makes a similar change to the catch-up contribution limits under savings incentive match plans for employees (SIMPLE plans).

Since the law’s enactment, many employers and administrators have been unsure about the impact of a separate nondiscrimination rule in the Internal Revenue Code and regulations — known as the “universal availability requirement” — on the higher catch-up limit. This rule generally says that a plan that offers catch-up contributions will not satisfy the nondiscrimination requirements unless all catch-up eligible participants are provided with an effective opportunity to make the same dollar amount of catch-up contributions. The proposed regulations provide the following clarifications on how the universal availability requirement applies to the higher catch-up limit:

- Plans that offer catch-up contributions do not have to offer the higher catch-up limit. Plans can limit catch-up contributions for participants ages 60–63 to the same limit that applies to all other catch-up eligible participants.
- Plans that offer the higher catch-up limit to participants ages 60–63 will not violate the universal availability requirement, even though all other catch-up eligible participants are unable to make catch-up contributions in the same dollar amount.

While the regulations are proposed to be effective for tax years beginning six months after publication of a final rule, sponsors can rely on the proposal for 2025 and future tax years. IRS is accepting comments on the proposed regulations until March 14.

Resources

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GRIST, Jan. 10, 2025

US

Status	 Effective dates vary.
Development	<p>Career — Health</p> <p>2025 state paid family and medical leave contributions and benefits</p> <p>Mandates requiring paid leave for an employee’s own health condition exist in many states — California, Colorado, Connecticut, Hawaii, Massachusetts, New Jersey, New York, Oregon, Rhode Island and Washington — along with Puerto Rico and Washington, DC. Delaware, Maine, Maryland and Minnesota will start similar programs in the next few years. Except for Hawaii and Puerto Rico, these jurisdictions also require paid family leave. Voluntary group family leave insurance is now available in Alabama, Arkansas, Florida, Kentucky, Michigan, South Carolina, Tennessee, Texas and Virginia. Private employers may opt-in to the state program for governmental employees in New Hampshire and Vermont.</p>
Resources	<p>rich.glass@mercer.com and katharine.marshall@mercer.com</p> <p>GRIST, updated Jan. 29, 2025 and Paid family and medical leave: Snapshots across the US (Mercer, January 2025)</p>

US

Status	 Currently effective
Development	<p>Health</p> <p>Beyond COBRA: State laws add complexity to continuation coverage</p> <p>Though COBRA has endured for decades, state continuation laws are its less familiar sidekick. These laws (often referred to as “mini-COBRA” laws), fill in COBRA’s gaps, particularly for small employers offering fully insured group health plans as well as fully insured large-employer group health plans (often referred to as “post-COBRA” laws), where coverage is required beyond COBRA’s normal time frames. The GRIST cited below summarizes the major aspects of state continuation requirements.</p>
Resources	<p>rich.glass@mercer.com</p> <p>GRIST, Nov. 12, 2024</p>

US

Status	 Currently effective
Development	<p>Career — Health</p> <p>Domestic partner benefits remain popular but present challenges</p> <p>Domestic partner benefits continue to be common among many employers. However, compliance complexities present challenges for employers. The GRIST cited below (with minor updates and clarifications) reviews the major issues, particularly related to taxation and documentation, and provides useful tools, including a tax dependent flow chart, an employer domestic partner checklist and two tables summarizing applicable state laws.</p>
Resources	<p>rich.glass@mercer.com and patty.cartwright@mercer.com</p> <p>GRIST, regularly updated</p>

US

Status  **Currently effective**

Development **Health**
Group fixed-indemnity plans pose legal, tax issues
 Concerns that fixed-indemnity plans may too easily be mistaken for comprehensive medical coverage or may improperly treat some benefit payments as tax free has led to a final rule from the departments of Labor, Treasury, and Health and Human Services. The rule requires fixed-indemnity plans to supply a new consumer notice beginning in 2025 but omits more sweeping proposals that would have required many employers to redesign their fixed-indemnity coverage. Treasury proposals to clarify the tax treatment of employer-provided accident and health plans — particularly the tax treatment of fixed-indemnity plans — also were left out of the final rule. The GRIST cited below provides background information about group fixed-indemnity plans, details about the new consumer notice, an overview of proposals left out of the final rule, and a summary of IRS guidance identifying a variety of fixed-indemnity designs (often paired with a wellness program) as improper “double dipping” schemes. This article also summarizes provisions in the rule addressing individual fixed-indemnity plans and short-term limited duration insurance.

Resources jennifer.wiseman@mercer.com and cheryl.hughes@mercer.com
[GRIST](#), Aug. 27, 2024

US

Status  **Currently effective**

Development **Career — Health**
Roundup: Employer resources on DOL’s final independent contractor rule
 On Jan. 9, 2024, the DOL announced a final rule that revises how to determine if an individual is an independent contractor or an employee entitled to minimum wage, overtime and other protections under the federal Fair Labor Standards Act. The controversial rule took effect on March 11, 2024.
 To provide employers with some information about the rule and the varying aspects and issues to consider, this roundup provides links to government information, third-party analyses, news articles and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer’s or the authors’ point of view on the subject.

Resources [Roundup: Employer resources on DOL’s final independent contractor rule](#) (Mercer, regularly updated)

US	
Status	 Effective dates vary.
Development	<p>Wealth</p> <p>User’s guide to SECURE 2.0</p> <p>A dizzying array of legislation affecting defined contribution (DC) and defined benefit (DB) plans became law on Dec. 29, 2022, as part of a fiscal 2023 government spending package. Capping several years of congressional efforts, the SECURE 2.0 Act of 2022 (Div. T of Pub. L. No. 117-328) is intended to build on changes made by the Setting Every Community Up for Retirement Enhancement (SECURE) Act of 2019 (Div. O of Pub. L. No. 116-94). Navigating SECURE 2.0 is a formidable challenge. The statute consists of 120 pages of text and 90 individual sections — with no table of contents. To help employers and plan sponsors understand the legislation’s implications, this guide provides a high-level summary of SECURE 2.0 provisions grouped topically, including separate treatment of provisions specific to DC and DB plans.</p> <p>The six tables in this guide describe statutory changes and their effective dates, identify whether the changes are mandatory or optional for employers, and provide initial observations, including implementation challenges for which agency guidance would be helpful. The act also includes several apparent errors for which Congress intends to introduce technical corrections legislation. Those errors are noted in the relevant sections of the guide.</p> <p>This guide doesn’t address SECURE 2.0’s employee stock ownership plan (ESOP) provisions and a handful of other nonbenefit-related provisions. When referring to the original SECURE Act, this guide uses the term “SECURE 1.0” to avoid any confusion between the laws.</p> <p>This guide will be updated periodically to reflect additional information and guidance.</p>
Resources	margaret.berger@mercer.com , matthew.calloway@mercer.com and brian.kearney@mercer.com User’s guide to SECURE 2.0 , periodically updated
US	
Status	 Effective dates vary.
Development	<p>Career — Health</p> <p>Transportation plans offer valued benefits, but pose compliance issues</p> <p>Since 1998, employees have been able to pay for qualified transportation fringe benefits through pretax salary reductions under Internal Revenue Code (IRC) § 132(f), and these benefits have become quite popular. (Employers could provide this benefit on a tax-advantaged basis as early as 1992.) The tax exemption extends to commuting expenses for transit passes, qualified parking, van pools, and in certain years, bicycles.</p> <p>While these benefits are not subject to cafeteria plan or ERISA rules, compliance difficulties exist, and a 2018 tax law that will expire at the end of 2025 added complexities. The federal monthly limits are adjusted every year, most recently for 2024. Some state and local jurisdictions have imposed employer mandates — including one that applies to Chicago-area employers starting in 2024 — leveraging the tax advantage of commuter benefits; other jurisdictions provide tax-related incentives.</p>
Resources	rich.glass@mercer.com and cheryl.hughes@mercer.com GRIST , regularly updated

US

Status  **Effective dates vary.**

Development **Career**
Roundup: Employer resources on noncompete restrictions
 Noncompete agreements prevent former employees from working for a competing employer or starting a competing business for a certain time after their employment ends. At the federal level, former President Biden, the Federal Trade Commission (FTC), the National Labor Relations Board (NLRB) and Congress have attempted to ban or limit the use of noncompete agreements. The FTC’s final rule banning noncompetes was scheduled to be effective Sept. 4, 2024, but on Aug. 20, 2024, a federal judge in Texas blocked the rule from taking effect nationwide. While the FTC has appealed the ruling, the rule will remain on hold until a future judicial decision either permanently blocks it or upholds it as lawful. The rule has been challenged in other lawsuits, with conflicting results. These divergent rulings and the impact of the recent Supreme Court Loper decision that overturned the “Chevron doctrine” of deference to federal agencies have led to employer uncertainty as to how to proceed. The Trump administration may also affect the fate of noncompetition provisions.
 At the state level, several states have generally banned noncompete agreements. Numerous other states have enacted restrictions, such as only allowing noncompete agreements for employees above a certain salary threshold. This roundup focuses on recent federal and state actions to restrict noncompete provisions and provides links to federal and state resources from organizations, government websites, third-party resources and news articles.

Resources [Roundup](#), regularly updated

US

Status  **Currently effective**

Development **Career**
Roundup: Employer resources on the changing landscape of DEI
 The US Supreme Court, in *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College* (June 29, 2023), ruled colleges' use of race as a factor in student admissions is unconstitutional under the Fourteenth Amendment’s Equal Protection Clause.
 Since the decision, there have been various viewpoints on the effect of this ruling on companies’ diversity, equity and inclusion (DEI) programs. While the prior Biden administration actively supported affirmative action and various DEI initiatives, President Trump’s administration has adopted a firm stance against DEI programs in both the federal government and private sectors, issuing several executive orders (EOs) designed to limit these efforts. For example, one EO directs all federal agencies to “combat illegal private-sector DEI preferences, mandates, policies, programs, and activities.” Additionally, the EO directs the Office of Federal Contract Compliance Programs to immediately cease (i) promoting “diversity;” (ii) holding federal contractors and subcontractors responsible for taking “affirmative action;” and (iii) allowing or encouraging federal contractors and subcontractors to engage in workforce balancing based on race, color, sex, sexual preference, religion, or national origin. On Feb. 21, 2025, a federal judge in Maryland preliminarily blocked the Trump administration from enforcing key provisions of the recent EOs to eliminate “illegal” DEI programs and initiatives from the federal government and federal contractors, finding that the provisions are unconstitutionally vague and infringe upon free speech.
 To provide employers with some information about the varying aspects and issues to consider with respect to employers’ DEI programs, this roundup provides links to government information, third-party analyses, news articles and viewpoints.

Resources [Roundup](#), regularly updated

US	
Status	 Currently effective
Development	<p>Career</p> <p>Roundup: Employer resources on DOL’s expansion of overtime protections</p> <p>This roundup provides some information on the US Department of Labor’s (DOL) final rule that would have significantly expanded overtime protections. This rule has been challenged in multiple lawsuits, and on Nov. 15, 2024, a Texas federal district court judge vacated and set aside the final rule on a nationwide basis — holding that it exceeded the DOL’s statutory authority under the Fair Labor Standards Act (FLSA). As a result, the 2025 increases will not go into effect, and the July 2024 increases were revoked. The DOL appealed this decision, but the incoming Trump administration will likely forgo pursuing the appeal and let the decision stand. This roundup provides links to government information, third-party analyses, news articles and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer’s or the authors’ point of view on the subject.</p>
Resources	Roundup , regularly updated
US — States	
Status	 Compliance dates vary.
Development	<p>Health</p> <p>Some states require group health plan sponsor reporting</p> <p>Several states and localities have group health plan reporting requirements. This GRIST summarizes key reporting mandates in three categories: individual health coverage mandates, health plan assessments and surcharges and other types of reporting. This year, a new table was added to describe individual tax liability for failure to maintain minimum essential coverage (MEC) in the five states (plus Washington, DC) that impose MEC mandates.</p>
Resources	rich.glass@mercer.com and dorian.smith@mercer.com GRIST , regularly updated
US — States	
Status	 Effective dates vary.
Development	<p>Wealth</p> <p>Resources for tracking state and local retirement initiatives</p> <p>This article summarizes state and local retirement initiatives for private-sector workers and rounds up relevant Mercer and third-party resources. This listing is updated periodically and may not always reflect the latest development in every locality.</p>
Resources	margaret.berger@mercer.com and brian.kearney@mercer.com GRIST , regularly updated

US — States

Status  **Effective dates vary.**

Development **Career**
Roundup: Employer resources on states’ recent equal pay laws
 The federal Equal Pay Act of 1963 requires that men and women in the same workplace receive equal pay for equal work. In recent years, many states have taken further efforts to address equal pay, such as enacting laws that prohibit employers from asking job applicants about salary history, requiring disclosure of salary ranges and pay data, protecting employees who disclose their pay, expanding equal pay protections for characteristics other than sex, and broadening comparisons of work and pay. In 2023, New Jersey and Illinois expanded equal pay protections to temporary workers. Stronger federal legislation — the Paycheck Fairness Act — was first introduced in 1997 but has not passed after numerous attempts — most recently in June 2021.
 This roundup primarily focuses on recent state legislative initiatives pertaining to salary history bans and salary range disclosure requirements that affect private sector employers, and provides links to state resources from organizations, government websites, third-party resources and news articles. Certain cities have also acted, but they are generally beyond the scope of this roundup.

Resources [Roundup](#), regularly updated

US — States

Status  **Effective dates vary.**

Development **Career**
Roundup: Employer resources on states’ recreational marijuana laws
 Twenty-four states, plus Guam and Washington, DC, have legalized the possession and personal use of marijuana for recreational purposes. To provide employers with some information on states’ actions and the varying employment considerations involved, this roundup provides links to organizations, government websites, third-party analysis, news articles and viewpoints on marijuana usage for recreational purposes. Thirty-eight states, plus Guam, Puerto Rico, the US Virgin Islands and Washington, DC, have legalized marijuana use for medical purposes, but this roundup focuses on legal recreational marijuana use and its implications for employers. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. It also does not necessarily reflect Mercer’s or the authors’ point of view on the subject.

Resources [Roundup](#), regularly updated

US — States

Status	 Effective dates vary.
Development	<p>Career</p> <p>Roundup: Employer resources on minimum wage increases</p> <p>On Jan. 1, 2024, the minimum wage rate for federal contracts increased to \$17.20/hour — up from \$16.20/hour in 2023. This minimum wage rate applies to nontipped and tipped employees alike, as this executive order eliminated the lower cash wage that contractors may pay tipped employees. Several states have also acted to gradually increase the minimum wage to at least \$15/hour for most employees. To help employers prepare and address related issues, this roundup provides links to federal and state resources from organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated

US — States

Status	 Effective dates vary.
Development	<p>Career</p> <p>Roundup: Employer resources on hairstyle nondiscrimination laws</p> <p>The Creating a Respectful and Open World for Natural Hair (CROWN) Act movement in the United States aims to prohibit discrimination based on natural hair texture or hairstyles normally associated with race, such as braids, locks, twists, curls, cornrows, Afros, head wraps or bantu knots. The official campaign of the CROWN Act is led by the CROWN Coalition. Federal legislation, supported by the Biden administration, passed the House during the last session of Congress — but was not enacted. Many states have already passed CROWN Acts, and many others are considering legislation. To help employers ensure their employee handbooks and appearance policies are nondiscriminatory and comply with federal, state, and local laws, the roundup cited below provides links to federal and state resources from organizations, government websites, third-party analysis, news articles and viewpoints.</p>
Resources	Roundup , regularly updated

US — Massachusetts (new)

Status



Effective Jan. 1, 2026

Development

Health

2026 individual-mandate coverage dollar limits set

The Massachusetts Health Connector announced the 2026 dollar limits on deductibles and other cost sharing for minimum creditable coverage (MCC) requirements. Here are the 2026 rates:

Deductibles:

- Individual tier: \$3,200 (2026), \$2,950 (2025)
- Individual tier separate prescription: \$400 (2026), \$360 (2025)
- Family tier: \$6,400 (2026), \$5,900 (2025)
- Family tier separate prescription: \$800 (2026), \$720 (2025)

Out-of-pocket maximums:

- Individual tier: \$10,150 (2026), \$9,200 (2025)
- Family tier: \$20,300 (2026), \$18,400 (2025)

In addition, the Department of Revenue recently announced the 2025 monthly penalties for uninsured Massachusetts residents (based on individual income as a percentage of the federal poverty level (FPL)):

- 150.1%-200% FPL: \$25
- 200.1%-250% FPL: \$49
- 250.1%-300% FPL: \$73
- 300.1%-400% FPL: \$113
- 400.1%-500% FPL: \$132
- Above 500% FPL: \$187

The state's individual mandate requires state residents to maintain MCC or face a potential state tax penalty. Plan sponsors (or their vendors) must determine whether coverage meets MCC standards.

Resources

[Administrative Information Bulletin 01-25 \(Massachusetts Health Connector, Feb. 24, 2025\)](#); [TIR 25-1: Individual mandate penalties for tax year 2025 \(Government, Feb. 3, 2025\)](#) and [HHS poverty guidelines for 2025 \(ASPE\)](#)

US — Michigan (new)

Status



Generally effective, but small businesses have until Oct. 1, 2025, to comply.

Development

Career — Health

Paid sick and safe leave law changed

As a result of last year's state supreme court decision, Michigan's paid sick and safe leave (PSSL) law was due to change on Feb. 21, 2025. However, Governor Gretchen Whitmer signed 2025 Pub. Act 2 (HB 4002), which further amends the Earned Sick Time Act (ESTA). Highlights include:

- Front-loading and carryover. Front-loading is specifically allowed. Employers may cap carryover to 72 hours (40 hours for small businesses employing 10 or fewer employees). Carryover is optional if an employer front-loads 72 hours of sick time (40 hours for small businesses).
- Annual usage cap. Under the version of the law validated by the state supreme court, there was none. Now, employers can cap usage at 72 hours.
- Waiting period. The state supreme court version of the law allowed a 90-day waiting period. Now, they can be up to 120 days from the hire date for employees hired on Feb. 22, 2025, or later.
- Covered employees. The only employees exempt from the law are federal government employees, unpaid interns and trainees, and employees who schedule their own work hours and are not subject to any minimum hours requirement.
- Paid time off (PTO) policies. If an employer's PTO policy provides at least 72 hours of time off (40 hours for small businesses) or accrues PTO at the same or better ESTA rate (one hour per 30 work hours), it complies with the requirements.
- Notice and documentation. An employer's notice must include a procedure for how employees notify the employer of the need to sick time. The notice is due at hire or by March 23, whichever is later. After three consecutive days of absence, an employer can require any documentation days within 15 days after the employee's request.
- Rehires. Rehire within two months (six months under the state supreme court's version of the law) of termination entitles an employee to reinstatement of the unused balance.
- Enforcement. Employees no longer have the right to sue for violations. Instead, this right belongs to the Department Labor and Economic Opportunity. The new law establishes a penalty scheme, including a civil fine of eight times the employee's hourly wage for failing to provide sick leave.

Small businesses have until Oct. 1, 2025, to comply with HB 4002. Otherwise, the law took effect on Feb. 1, 2025.

Resources

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[HB 4002](#) (Legislature, Feb. 21, 2025); [Paid Medical Leave Act](#) (Legislature) and [Decision](#) (Supreme Court, July 31, 2024)

US — Minnesota (new)**Status****Starting on Jan. 1, 2026****Development****Career — Health****Paid family medical leave rates adjusted**

Minnesota's Department of Employment and Economic Development (MN DEED) changed the overall contribution rate for paid family and medical leave (PFML) to 0.88%, starting on Jan. 1, 2026.

The original rate, set by statute, was 0.7% but allowed MN DEED to adjust the rate before 2026, up to a maximum of 1.2%, subject to a cap equal to the Social Security maximum wage base. Employers may require employees to pay for up to half of the contribution rate (i.e., 0.44%).

Minnesota splits the contribution rate into two buckets: medical leave and family leave. The new contribution rates are 0.61% for the employee's medical care (up from 0.3%), and 0.27% (down from 0.4%) to care for family members. A small employer contribution rate is available for employers with fewer than 30 Minnesota employees, if the average employee wage is less than 150% of the statewide average weekly wage. This rate is now 0.22%. The employee contribution rate is unaffected by whether an employer qualifies for the small employer contribution rate.

PFML contributions and benefits start on Jan. 1, 2026.

Resources

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[Premium rate and contributions](#) (Government, Feb. 25, 2025) and [GRIST](#), regularly updated

US — New York (new)**Status****Effective July 1, 2025****Development****Health****Network adequacy rules for fully insured plans issued**

New York's Department of Financial Services (DFS) adopted final network adequacy and access standards for mental health and substance use disorder treatment services. The DFS regulations apply to fully insured plans delivered or issued for delivery in New York. Highlights include:

Network adequacy. A plan must ensure that its network is adequate to meet participants' behavioral health needs and to provide an appropriate choice of providers. An adequate network includes residential facilities providing sub-acute care, assertive community treatment providers, critical-time intervention services providers, and mobile crisis intervention services providers.

Wait-time standards. A plan must generally be able to treat behavioral health conditions within 10 business days (or seven calendar days after a hospital discharge or emergency room visit). Plans can use telehealth to meet this requirement.

Complaint process. If a plan cannot locate an in-network provider within three business days of an access complaint, it must notify the participant and approve an out-of-network provider that is within a reasonable distance of the participant and does not charge excessive or unreasonable rates.

Directory, notices and certification. The rules also establish standards for network directories and require webpage posting of relevant information. Starting on Dec. 31, 2026, and annually thereafter, plans must certify compliance with these rules.

The rules will take effect on July 1, 2025. The rules do not apply to self-funded ERISA plans.

Resources

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[Regulations](#) (DFS, February 2025)

US — Puerto Rico (previously covered, now effective)

Status	 Effective March 10, 2025
Development	<p>Health</p> <p>Cybersecurity insurance rules adopted</p> <p>The Oficina del Comisionado de Seguros (OCS) issued Rule 108 that establishes cybersecurity standards in the insurance industry and standards for the investigation and notification to OCS for incident reporting. The rule applies the general framework of the National Institute of Standards and Technology (NIST). HIPAA security standards are also based on NIST. Specifically, the rule requires licensed insurers to:</p> <ul style="list-style-type: none"> • Develop, implement, and maintain a specified cybersecurity program • Investigate cybersecurity events • Notify OCS of cybersecurity events <p>OCS is permitted to issue penalties of up to \$10,000 per violation. The rule takes effect on March 10, 2025</p>
Resources	Rule 108 (Spanish) (Government)

US — Puerto Rico

Status	 Currently effective
Development	<p>Career — Health</p> <p>Benefit and leave laws vary</p> <p>Puerto Rico is an unincorporated territory within the US with a separate tax code and constitution and its own tax, benefit and insurance laws. Nonetheless, many (but not all) US laws apply to this territory of a little more than three million residents. The GRIST cited below summarizes major requirements and special issues, including an overview of complicated tax-related health and fringe benefit rules, leave laws, the ACA and more.</p>
Resources	<p>rich.glass@mercer.com</p> <p>GRIST, Aug. 12, 2024</p>

US — Texas (new)

Status



Currently effective

Development

Health

Attorney General says pharmacy benefit manager laws apply to ERISA plans

Texas Attorney General Ken Paxton issued Opinion KP-0480, confirming his office’s view that two 2021 laws apply to pharmacy benefit managers (PBMs) acting on behalf of ERISA plans, including fully insured plans issued in another state. Here are the two major conclusions of the opinion:

- A court applying whether the laws had a “reference to” an ERISA plan (one of the prongs in *Rutledge v. PCMA*), would likely conclude that ERISA does not preempt the two laws.
- A court would likely conclude that the two laws are enforceable against PBMs and issuers regardless of where the plan’s state of issuance.

Both laws have been in effect for several years.

Under 2021 Ch. 142 (HB 1763), PBMs cannot reduce pharmacy payments after adjudication, except as part of an audit. They also cannot pay an affiliated pharmacy or pharmacist more than what the PBM pays a nonaffiliated pharmacy. Finally, PBMs cannot require pharmacy accreditation standards that are more stringent than federal or state requirements.

Under 2021 Ch. 1012 (HB 1919), PBMs cannot require use of affiliated pharmacies to receive the maximum benefit or offer reduced cost sharing for use of affiliated pharmacies. The law also bans solicitations by and mandated prescription transfers to affiliated pharmacies.

Charles Schwertner, the state Senate’s president pro tempore, sought the opinion in May 2024, based on testimony at hearings during the 2023 legislative session. A Texas AG opinion is a written interpretation of existing law. These opinions cannot create new provisions in the law or correct unintended, undesirable effects of the law. A Texas AG opinion does not in any way rule on what the law should say or resolve factual disputes. Still, the opinion may hold some sway as the state legislature considers several PBM and prescription drug bills this year.

Resources

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[Opinion KP-0480](#) (Attorney General’s office, Feb. 5, 2025)

US — Virgin Islands (new)

Status



Currently effective

Development

Health

Telehealth law enacted

As a result of 2024 Act 8958 (B 35-0254), the US Virgin Islands recently joined an audiology and speech-language pathology compact, joining a majority of states that have taken similar action. The intent of the law is “to facilitate interstate practice of audiology and speech language pathology with the goal of improving public access,” including via telehealth.

Resources

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[2024 Act 8958](#) (B 35-0254) (Legislature) and [Compact map](#) (ASLP-IC)

US (previously covered, with upcoming effective dates)

Development

Career

- [Salary disclosures, wage data reporting to be required in Massachusetts](#) — key date: July 31, 2025
- [Salary disclosures to be required in job advertisements in Vermont](#) — key date: July 31, 2025
- [Hourly minimum wage to increase to \\$18 in Hawaii](#) — key date: Jan. 1, 2026
- [Artificial Intelligence law focused on employment laws enacted in Illinois](#) — key date: Jan. 1, 2026
- [Artificial intelligence law enacted; will significantly affect employers in Colorado](#) — key date: Feb. 1, 2026

Career — Health

- [Paid sick and safe leave initiative approved in Missouri](#) — key date: May 1, 2025
- [Law will require promotion opportunity disclosures, pay transparency in job postings in New Jersey](#) — June 2025
- [Paid family medical leave effective dates delayed in Maryland](#) — key date: July 1, 2025
- [Pharmacy benefit manager regulations finalized in New York](#) — key date: July 1, 2025
- [Paid sick leave initiative approved in Nebraska](#) — key date: Oct. 1, 2025
- [Paid family and medical leave mandated in Minnesota](#) — key date: Jan. 1, 2026

Development

Health

- [Pharmacy benefit manager \(PBM\), prescription law enacted in Massachusetts](#) — key date: April 2025
- [Paid sick and safe leave initiative approved in Missouri](#) — key date: May 1, 2025
- [Doula coverage mandated in Delaware](#) — key date: plan years beginning in 2026
- [Insulin cost-sharing law enacted in Illinois](#) — key date: July 1, 2025
- [Data protection law enacted in Tennessee](#) — key date: July 1, 2025
- [Dependent coverage law enacted in Illinois](#) — key date: Plan years starting in 2026
- [Multiemployer welfare arrangements laws enacted in California](#) — June 1, 2025

US (previously covered, with upcoming effective dates) (continued)

Development

Health (continued)

- [Prescription drug law enacted in Virginia — key date: July 1, 2025](#)
- [Law applies balance billing restrictions to ground ambulance providers in Texas — key date: expires Sept. 1, 2025](#)
- [Telehealth law to expire in Hawaii — key date: Dec. 31, 2025](#)
- [Mental health parity changes — key date: Jan. 1, 2026](#)
- [Telehealth law enacted in Colorado — key date: Jan. 1, 2026](#)
- [New law focuses on prior authorization practices for fully insured plans in Colorado — key date: Jan. 1, 2026](#)
- [Abortion coverage required in Delaware — key date: Plan years starting on or after Jan. 1, 2026](#)
- [Colonoscopy coverage mandate enacted in Illinois — key date: Plan years starting in 2026](#)
- [Fertility-related insurance laws enacted in Illinois — key date: Plan years starting in 2026](#)
- [Pregnancy-related services coverage mandate enacted in Illinois — key date: Jan. 1, 2026](#)
- [Paid family and medical leave law enacted in Minnesota — key date: Jan. 1, 2026](#)
- [Pharmacy benefit manager law enacted in Pennsylvania — key date: Jan. 1, 2026](#)
- [Telehealth laws enacted in Washington — key date: Jan. 1, 2026](#)
- [Pharmacy benefit manager law enacted in Washington — key date: Jan. 1, 2026](#)
- [Telehealth parity extended in New Jersey — key date: July 1, 2026](#)
- [Prior authorization insurance law enacted in Wyoming — key date: July 1, 2026](#)
- [State-based exchange delivery to change in Oregon — key date: Nov. 1, 2026](#)

Wealth

- [PBGC premium acceleration set to take effect for 2025 — key date: Sept. 15, 2025](#)
- [Effective date for portion of upcoming required minimum distribution regulations delayed — key date: Jan. 1, 2026](#)
- [Tax withholding rule for pension payments outside of the US finalized — key date: Jan. 1, 2026](#)
- [IRS delays SECURE 2.0's Roth catch-up mandate — key date: 2026](#)

Section 4

Asia Pacific

Australia (new)	
Status	 Memorandum of understanding
Development	<p>Wealth</p> <p>Superannuation portability between Australia and Cook Islands Memorandum of Understanding signed</p> <p>The Governments of Australia and the Cook Islands have signed a Memorandum of Understanding, signaling their intention to allow the transfer of individuals' retirement saving between any complying Australian superannuation fund and the Cook Islands National Superannuation Fund (CINSF). The portability scheme will start after legislative changes are enacted and formal agreement between countries is reached. Portability arrangements are already in place between Australia and New Zealand, and New Zealand and the Cook Islands.</p>
Resources	<p>paul.shallue@mercer.com</p> <p>Memorandum of Understanding (MoU) on superannuation portability between the Australian and Cook Islands governments (The Treasury, Feb. 20, 2025)</p>
Australia (new)	
Status	 Planned standards
Development	<p>Wealth</p> <p>Mandatory service standards for large super funds to be introduced</p> <p>The Australian government announced on Jan. 28, 2025, that it will introduce mandatory and enforceable service standards for all large superannuation funds regulated by the Australian Prudential and Regulation Authority (APRA). The most urgent areas to address are:</p> <ul style="list-style-type: none"> • The timely and compassionate handling of death benefits. • Fair and efficient processing of insurance claims. • Clear, respectful and accessible communications with members. <p>The Treasury will release draft standards for public consultation, and confirmed its intention to work closely with consumer advocates, regulators and industry stakeholders. No timeline was published, but the minister said, "[w]e want to ensure that 22 percent of Australians who are in retirement by this time next year have the service and expectations, that we set superannuation up for in the first place."</p>
Resources	<p>paul.shallue@mercer.com</p> <p>Mandatory service standards for the superannuation industry (Treasury, Jan. 28, 2025)</p>

Australia (new)**Status****Proposal****Development****Wealth****Securities regulator consults on further relief from breach reporting regime**

Proposals that would provide additional relief to reduce the reporting burden associated with the reportable situations (breach reporting) regime are included in a consultation issued by the Australian Securities and Investments Commission (ASIC). Comments were invited through March 11, 2025.

The proposals would give relief from reporting certain breaches of the misleading and deceptive conduct provisions and certain contraventions of civil penalties, where the following conditions are met:

- The breach has been rectified within 30 days from when it first occurred (including paying any necessary remediation)
- The number of impacted consumers does not exceed five
- The total financial loss or damage to all impacted consumers from the breach is not more than AU\$500 (including where the loss has been remediated)
- The breach is not a contravention of the client money reporting rules or clearing and settlement rules.

The proposed additional relief aims to strike a balance between managing the reporting burden on financial services licensees while still ensuring that ASIC receives reports of high regulatory and intelligence value.

The Financial Services Council (FSC) criticized ASIC's proposals saying their scope is too limited and repeated its call for ASIC to improve the usability and efficiency of its portal to ease the reporting of breaches. The FSC also called on Parliament to adopt a deregulation agenda to boost productivity in the financial services sector.

Resources

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[ASIC proposes further relief for licensees under the reportable situations regime](#) (ASIC, Feb. 18, 2025)

Australia (new)**Status****Currently effective****Development****Wealth****Regulator calls on super funds to improve anti-scam measures**

The Australia Securities and Investments Commission (ASIC) called on superannuation fund trustees to take stronger action to detect, prevent and respond to scam and fraud against their members. ASIC identified several weaknesses in trustees' practices that require improvement after their review of 15 superannuation trustees that found none had an organization-wide scams strategy. ASIC's recommendations include:

- Conduct a preliminary assessment of anti-scam and anti-fraud measures to identify areas for improvement.
- Address the anti-scam practices highlighted in REP 761 and REP 790, including the establishment of a 'scams strategy,' introduction of dedicated reporting for scam, and conducting a review of their scam prevention, detection and response capability.
- Consider if the scam management key function should be assigned to an accountable person as funds prepare for the incoming Financial Accountability Regime.
- Leverage industry bodies and bilateral relationships to share information and promote improvement industry-wide.

The Association of Superannuation Funds Australia (ASFA) released a response criticizing the letter and ASIC's media statement, pointing out that fewer than 20 superannuation-related scams complaints were reported in 2024, and outlined several consumer protection actions taken in the superannuation sector.

Resources

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[ASIC calls out superannuation trustees for weak scam and fraud practices](#) (ASIC, Jan. 30, 2025)

Australia (previously covered, with upcoming effective dates)**Development****Career — Health — Wealth**

- [Superannuation contributions on paid parental leave legislation enacted](#) — key date: July 1, 2025

Wealth

- [Changes to Operational Risk Financial Requirement finalized](#) — key date: July 1, 2025
- [Updated guidance on strategic planning and member outcomes issued](#) — key date: July 1, 2025
- [New operational risk management standard to apply](#) — key date: July 1, 2025
- [Operational resilience guidance finalized](#) — key date: July 1, 2025
- [APRA Super Data Transformation, Phase 2 enhancements finalized](#) — key date: December 2025
- [Extension of superannuation disclosure relief confirmed](#) — key date: Jan. 1, 2026
- [Anti-money laundering, counter-terrorism legislation effective](#) — key date: March 31, 2026

China (previously covered, with upcoming effective date)**Development****Career**

- [Preferential taxation policy for expatriates expanded](#) — key date: Dec. 31, 2027
- [Preferential taxation policy for annual one-time bonus extended](#) — key date: Dec. 31, 2027

Hong Kong (new)	
Status	 Effective May 1, 2025
Development	<p>Career</p> <p>Minimum wage to increase</p> <p>The minimum wage will increase to HK\$42.1/hour, up from HK\$40, effective May 1, 2025, subject to approval of the LegCo. In April 2024, the Chief Executive in Council agreed to the Minimum Wage Committee's recommendation to review the minimum wage annually.</p>
Resources	Min wage recommendation adopted (Government, Feb. 18, 2025)
Hong Kong (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Corporate governance code and listing rules revised, diversity enhanced — key date: July 1, 2025 • Statutory minimum wage to be reviewed annually — key date: January 2025 • Number of statutory holidays increased — key date: 2026 <p>Wealth</p> <ul style="list-style-type: none"> • Mandatory pension fund offsetting to end — key date: May 2025
India (previously covered, with upcoming effective date)	
Development	<p>Career — Health — Wealth</p> <ul style="list-style-type: none"> • Labor and employment laws reformed — key date: effective date delayed
Indonesia (new)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>On Dec. 4, 2024, the Minister of Manpower issued Regulation No. 16 of 2024 on Determination of 2025 Minimum Wages (“UMP”). The Regulation introduces a new formula for calculating the 2025 minimum wages that will be determined by the governor of each province. For 2025, the minimum wage increased by 6.5%, effective Jan. 1, 2025.</p>
Resources	Regulation No. 16 of 2024 (Indonesian) (Government, Dec. 4, 2024)
Indonesia (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Details of public housing savings program, contributions and registration issued — key date: May 20, 2027
Japan (previously covered with upcoming effective dates)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Employers will have to offer flexible working arrangements — key date: April 2025

Malaysia (new)**Status****Currently effective****Development****Career****Internship program to boost upskilling and employment opportunities**

Malaysia launched a pilot program — The Progressive Policy on Expatriate Contribution to Local Talent Development — that aims to upskill and boost the employment rate among eligible Malaysian nationals by requiring employers that are granted approval for expatriate employment passes (EPs) to offer internships. The program launched on Feb. 15, 2025, and will be fully rolled out from Jan. 1, 2026. It will be overseen by TalentCorp and aims to create 250,000 to 280,000 student internships per year. Highlights include:

- For every EP approved, companies must offer three internship or work-based learning placements for local talent (1:3 ratio). Adjustments to the ratio may be made based on company and workforce size.
- The internship placements are open to local students from public and private higher education institutions as well as technical and vocational education and training (TVET) institutes.
- The program will only focus on MYXpats registered companies in Tier 1 and Tier 2 categories (EPI and EPII) — these mainly concern multinational companies, government-related companies and conglomerates.
- Certain companies are exempt, such as new companies operating in Malaysia for fewer than two years, companies with representative or regional offices (RERO) in Malaysia and companies in receipt of government tax exemptions (especially in key sectors like digital and energy).
- The internships must offer a minimum of 10 weeks of structured, high-quality and paid roles that are endorsed by the responsible authority. The pay must not be at least 500 MYR or 600 MYR/month, depending on the individuals' study level.
- Companies with approved EPs will be notified about the program, and they must advertise the required number of internship placements to which students can apply.
- A double tax deduction incentive on expenses incurred on interns will be available to participating employers.
- No specific penalties will apply for noncompliance as the program aims to encourage active industry participation in national talent development.

Resources

[The progressive policy on expatriate contribution to local talent development](#) (Ministry of Human Resources)

Malaysia (new)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>The national minimum wage increased to 1,700 RM/month on Feb. 1, 2025, up from 1,500 RM/month, for employers with five or more employees. From Aug. 1, 2025, the minimum monthly wage will apply to all employers, regardless of their workforce size. The government reviews the minimum wage at least once every two years.</p> <p>In 2023, Malaysia's cabinet approved the progressive wage policy (PWP) that aims to complement the minimum wage policy and reduce the economic gap between certain states. According to the 2025 budget speech, the pilot phase for the PWP began in June 2024 and will be fully enforced in 2025. PWP guidelines will outline the annual progressive salaries for every sector, occupation and level.</p>
Resources	Minimum wages order 2024 (Government, Dec. 4, 2024) and Budget Speech 2025 (Government, Oct. 18, 2024)
Malaysia (previously covered with upcoming effective dates)	
Development	<p>Career</p> <ul style="list-style-type: none"> Progressive wage policy to be implemented — key date: expected in 2025
Philippines (new)	
Status	 Currently effective
Development	<p>Career</p> <p>New rules for employment of foreign nationals issued</p> <p>Employers that apply for Alien Employment Permit (AEP) applications to employ foreign national in the Philippines will face more expansive rules. The measures are included in Department Order 248 issued on Jan. 21, 2025, that will take effect 15 days after their publication in the official journal. Highlights include:</p> <ul style="list-style-type: none"> Employers will have to advertise job postings in PHiJobNet — the government's job matching portal, the Public Employment Service Office or Job Placement Office of the local government that has jurisdiction over the workplace where the foreign worker will be employed. Employers that apply for work permits for foreign nationals could face longer processing times, stricter evaluations and additional documentation requirements. Certain employers will have to develop a Skills Training Program and an Understudy Training Program to enable skills and knowledge transfer from foreign workers to Filipino counterparts.
Resources	Department Order 248 (Government, Jan. 21, 2025)

Singapore (new)**Status****Beginning in 2026****Development****Wealth****Central Provident Fund contribution rates for older workers to increase**

From 2026, the Central Provident Fund (CPF) contribution rates will increase by 1.5% (inclusive of employer and employee contributions) for individuals aged 55 to 65 under initiatives announced in the government's budget speech on Feb. 18, 2025. Highlights of the CPF changes include:

- The CPF employer and employee contribution rates will increase in 2026. For individuals aged 55 to 60, employers' contributions will increase to 16% (up from 15.5%) and employee contributions will increase to 18% (up from 17%). For individuals aged 60 to 65, employers' contributions will increase to 12.5% (up from 12%), and employee contributions will increase to 12.5% (up from 11.5%).
- The government will continue to pay the CPF Transition Offset (offset) to employers through 2026 to cover half the increase in employer contributions. The offset was introduced to help employers hiring Singaporean workers to adjust to the higher Retirement Age and Re-employment Age.
- The Senior Employment Credit (SEC) will be extended by one year to Dec. 31, 2026. The SEC provides wage offsets to employers who hire Singaporean workers aged 60 and older who earn up to S\$4,000 per month. The upper age to qualify for the highest SEC wage support tier will be increased to 69 years old, up from 68.
- The government will convene during 2025 a Tripartite Workgroup on Senior Employment to undertake a holistic and longer-term review of senior employment policies, to improve the employability of seniors and increase the availability of jobs that better suit their needs.

Resources[Budget highlights 2025](#) (CPF Board, Feb. 18, 2025)**Singapore (previously covered with upcoming effective dates)****Development****Career**[First workplace fairness bill passes parliament](#) — key date: 2026 or 2027**Career — Health**[Shared parental leave entitlement, mandatory paternity leave introduced](#) — key date: April 1, 2025**Career — Wealth**[Retirement and reemployment ages to increase](#) — key date: July 1, 2026

South Korea (previously covered, with upcoming effective date)

Development

Career

- [Sanctions against employers habitually in wage arrears introduced](#) — key date: Oct. 23, 2025

Taiwan (previously covered, with upcoming effective date)

Development

Career — Wealth

- [Employees and employers can negotiate post-retirement age employment](#) — key date: unknown

Vietnam (previously covered, with upcoming effective date)

Development

Career — Wealth

- [Social insurance law revised](#) — key date: Effective July 1, 2025

Section 5

Europe, Middle East and Africa (EMEA)

European Union (EU) (new)	
Status	 Proposal
Development	<p>Career</p> <p>Corporate sustainability, due diligence rules simplified</p> <p>On Feb. 26, 2025, the European Commission (commission) issued proposals to amend the Corporate Sustainability Reporting Directive (CSRD) and the Corporate Sustainability Due Diligence Directive (CSDDD), aimed at reducing the costs and complexity of complying with the sustainability reporting and due diligence requirements.</p> <p>Highlights include:</p> <p>CSRD</p> <ul style="list-style-type: none"> • Two-year postponement of the reporting date for companies that have not started implementing the CSRD. • Reduction in scope of companies that must report under the CSRD. The commission claims this would reduce by 80% the number of companies in scope of the CSRD. • Introduction of a voluntary reporting standard for companies that are in the value chains of larger organizations subject to the CSRD. • Reduction and clarification of certain data points included in the European Sustainability Reporting Standards • Removal of the commission’s power to issue sector-specific standards. <p>CSDDD</p> <ul style="list-style-type: none"> • One-year postponement of the directive to July 26, 2027 for the largest companies. The commission would issue guidance by July 2026 to help companies prepare. • Limit the requirement for in-depth assessments of adverse impacts for organizations in the value chain. • Extend the interval between periodic assessments and updates to five years. • The obligation to engage with stakeholders would be streamlined, and termination of business relationships would be required only as a last resort. • Restrict the additional information that large companies can request from smaller companies. • No harmonized EU civil liability regime would be imposed. • Deletion of the review clause that could expand the requirements for financial service organizations in scope of the CSDDD.
Resources	Questions and answers on simplification omnibus I and II (European Commission, Feb. 25, 2025)

EU (new)**Status****Planned initiatives****Development****Career****Work program for 2025 includes plans to simplify sustainability reporting, other employment measures**

On Feb. 12, 2025, the European Commission issued its work program for 2025, which includes a legislative initiative — the “First Omnibus Package on Sustainability” — aimed at reducing the burdens on business by simplifying the reporting requirements required by the corporate sustainability reporting and due diligence directives.

No new legislative proposals impacting employment matters are included in the work program. However, several non-legislative initiatives are listed:

- A new action plan to implement the European Pillar of Social Rights (Q4 2025)
- Quality jobs roadmap (Q4 2025)
- Competitiveness union of skills (Q1 2025)
- Roadmap for women’s rights (Q1 2025)
- New equality strategies for LGBTIQ (Q4 2025)
- Anti-racism (Q4 2025)

Resources

[Commission work programme 2025](#) (European Commission, Feb. 11, 2025)

EU (previously covered, with upcoming effective dates)**Development****Career**

- [Pay transparency law must be transposed into national law](#) — key date: June 7, 2026
- [Law approved to improve gender balance on company boards](#) — key date: June 30, 2026
- [Corporate sustainability, human rights due diligence directive finalized](#) — key date: July 26, 2026
- [Ban on forced or child labor finalized](#) — key date: Dec. 14, 2027

Career — Health

- [Platform Worker’s Directive moves forward](#) — key date: Dec. 2, 2026

Belgium (previously covered, with upcoming effective date)**Development****Wealth**

- [Blue- and white-collar pension harmonization postponed](#) — key date: Jan. 1, 2027
- [Federal government agrees on pension reforms](#) — key date: Jan. 1, 2028

Bosnia and Herzegovina (new)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>Republika Srpska: The minimum net monthly minimum wage is 900 BAM. For jobs requiring three years of secondary education, the minimum gross monthly wage is 1,426.23 BAM, and for jobs requiring four years or more of secondary education, the gross minimum monthly wage is 1,508.20 BAM.</p> <p>Federation of Bosnia and Herzegovina: Effective Jan. 1, 2025, the monthly net minimum wage is 1,000 BAM, up from 610 BAM.</p>
Resources	Law (Bosnian) (Government, Jan. 28, 2025) and Announcement (Bosnian) (Government, Dec. 30, 2024)
Channel Islands — Jersey (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> Minimum wage to increase — April 1, 2025
Egypt (new)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>The minimum wage increased to 7,000 EGP, up from 6,000 EGP, effective March 1, 2025. The National Wages Council introduced a minimum 250 EGP periodic bonus (or 3% of the insurance subscription wage) and set the first-ever minimum hourly wage for part-time workers at 28 EGP net. A monthly minimum wage for Egypt's private-sector employees took effect for the first time in 2021.</p>
Resources	Egypt raises minimum wage for private sector (Government, Feb. 10, 2025)
France (new)	
Status	 Currently effective
Development	<p>Health</p> <p>Permitted meal expense deductions updated</p> <p>The French government updated the permitted business meal expense deduction thresholds and limits for 2025. Highlights include:</p> <ul style="list-style-type: none"> Flat-rate assessment amount of €5.45 for meals taken at home The exemption threshold of €21.10 for meal expenses incurred on business trips.
Resources	Announcement (French) (Official Bulletin, Feb. 19, 2025)
France (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> New gender quotas imposed for senior execs/management teams — key date: March 1, 2026

Germany (previously covered, with upcoming effective date)

Development **Career**

- [Minimum wage increase for cleaners](#) — key date: 2026

Greece (new)

Status  **Effective date unknown**

Development **Career — Health — Wealth**

Significant reduction in social security contributions planned for overtime, night shifts, and holidays

On Feb. 20, 2025, the Ministry of Labor and Social Security announced measures to significantly reduce social security contributions for overtime, night work, and work on holidays or Sundays for full-time employees. Calculations will be based on the hourly wage that corresponds to an eight-hour workday and will not include any additional pay. The measures were submitted to parliament for approval on Feb. 26, 2025.

Additional pay for employees who perform overtime, night work and who work on holidays and Sundays is unchanged and will continue to be paid. The change means that employees will receive increased net pay due to the reduction in their additional contributions, and employers will pay reduced employer contributions.

Resources maria.markopoulou@marsh.com
[Announcement](#) (Greek) (Ministry of Labor, Feb. 20, 2025)

Greece (new)

Status  **Currently effective**

Development **Health — Wealth**

Calculation method for pension contributions adjusted, scope of insurance coverage expanded

Employees’ spouses and their children are now included in permitted exemptions from income tax for contributions paid to a social security fund for optional insurance by the employee or the employer on behalf of the employee for medical and hospital coverage, as well as for life or disability coverage. The same change applies to premiums paid to an insurance policy by the employee or the employer on behalf of the employee for medical and hospital coverage of the employee, their spouse, and children, or for life or disability coverage up to €1,500 annually, per employee.

Resources maria.markopoulou@marsh.com
[Law](#) (Greek) (Official Gazette, Feb. 14, 2025)

Hungary (new)**Status**  **Starting in October 2025.****Development****Career****Tax-exemption scheme for working mothers announced**

The prime minister announced in his annual review the phased introduction of a tax-exemption scheme for women who have children, starting in October 2025. The proposed scheme would grant certain working mothers a lifetime exemption from the personal taxation of salaries. The scheme would be phased-in from October 2025 for women who have three children. It would be expanded from January 2026 to include mothers younger than age 40 who have two children; from January 2027 to mothers aged 40 to 50; from January 2028 to mothers aged 50 to 60; and January 2029 to mothers older than 60. Parliament must approve the legislation.

Resources [Announcement](#) (Hungarian) (Government, Feb. 24, 2025)**Ireland (previously covered, now effective)****Status**  **Currently effective****Development****Career — Health****Maternity leave postponement allowed for serious health conditions**

Employees in Ireland are allowed to postpone their maternity leave if they suffer a serious health condition under measures included in the Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024 (“Act”) that passed parliament on Oct. 24, 2024. Highlights include:

- A “relevant employee” is an individual who is pregnant or on maternity leave and has a “serious health condition” — defined as a serious risk to the employee’s life or health (including the mental health) that requires medical intervention for a period of time.
- Employees can notify their employer of their intention to postpone the start of all, or part of, their maternity leave for up to 52 weeks.
- The employee must notify their employer of postponement of leave at least two weeks before the leave is due to commence. The notification must specify the date when the postponement will start and end, and include a medical certificate with the dates.
- Employees can take their maternity leave (or maternity leave that is untaken) in one continuous period on the day immediately after the end of the postponement period. They must notify their employer of their intention to start their maternity leave as soon as reasonably practicable, but no later than the day on which the leave begins. Employees can postpone their leave one further time.

Resources [Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024](#) (Irish Statute Book, Oct. 28, 2024)

Ireland (previously covered, now effective)	
Status	 Currently effective
Development	<p>Career</p> <p>Use of some nondisclosure agreements restricted</p> <p>Employers in Ireland are not allowed to enter into nondisclosure agreements (NDAs) concerning allegations of discrimination or harassment in relation to their employment, or potential employment, under measures included in the Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024. Highlights of the NDA provisions include:</p> <ul style="list-style-type: none"> • NDAs are agreements or provisions that are in writing, or not, between an employer and employee that aims to prevent a “relevant disclosure” by either the employer or the employee, or both parties. • NDAs that prevent a “relevant disclosure” will be null and void. A “relevant disclosure” is information concerning an allegation by the employee that he or she was discriminated against, or experienced victimization, harassment or sexual harassment in relation to employment, or potential employment, by the employer, and/or any actions taken by the employer or employee in response to making such an allegation. • “Excepted nondisclosure” agreements are permitted if the employee has requested it and certain criteria are fulfilled. The employee must receive independent legal advice prior to signing such agreements, paid for by the employer.
Resources	Maternity Protection, Employment Equality and Preservation of Certain Records Act 2024 (Irish Statute Book, Oct. 28, 2024)
Ireland (previously covered, with upcoming effective date)	
Development	<p>Career — Health — Wealth</p> <ul style="list-style-type: none"> • Wage threshold for PRSI contributions to increase — key date: Oct. 1, 2025 <p>Wealth</p> <ul style="list-style-type: none"> • Pension-related issues included in Finance Bill — key date: Jan. 1, 2026 • More details on Auto Enrolment scheme published — key date: Sept. 20, 2025
Italy (new)	
Status	 Currently effective
Development	<p>Wealth</p> <p>Annual cap for pension contributions in 2025 updated</p> <p>An annual ceiling on the contribution and pensionable earnings base applies to workers without prior social security contributions and who enrolled from Jan. 1, 1996, in compulsory pension schemes. The ceiling impacts workers’ contribution periods and pension portions from the start of their employment. Effective Jan. 1, 2025, the maximum contribution amount for calculating pension amounts for state pension benefits is €120,607 gross income, including bonus payments. The measure is included in Law 225/1995.</p>
Resources	massimo.magni@mercero.com Circular No. 26 (Italian) (Government, Jan. 30, 2025)

Italy (new)**Status****Currently effective****Development****Career — Health — Wealth****2025 budget includes employment, social security measures**

Employment-related measures were featured in the budget. Highlights include:

- Parents are now entitled to parental leave allowance of 80% of pay for the first three months of parental leave (up from 60% for the second month and 30% for the third month in 2024). Leave can be taken until child's sixth birthday.
- Small- and medium-sized employers that hire workers on open-ended contracts in the South of Italy will benefit from discounted social security contributions.
- Reduced substitute tax rate to 5% (down from 10%) applicable to productivity bonuses paid in 2025, 2026 and 2027.
- Reduced employer social security contributions for employers that hire working mothers with two or more children aged younger than 10 years, and whose taxable earnings do not exceed €40,000. From 2027, the reduction will be expanded to include women with three or more children who are younger than 18 years.
- Reduced employer social security contributions for lower paid employees (6% discount for employees earning up to €2,692 calculated over 13 months, and 7% for employees earning up to €1,923 calculated over 13 months).
- The maximum tax-exempt fringe benefit payable to help employees with their water, electricity and gas bills, house rent, mortgages and other welfare services is €1,000 per year and €2,000 per year for workers that have dependent children. This regime will continue through 2027.
- Revised taxation of mixed-use company cars and other vehicles that can also be used privately by employees. For contracts signed on or after Jan. 1, 2025, a single percentage of 50% is taxable (this corresponds to 15,000 km mileage, calculated on the per kilometer running costs), but this is reduced to 20% for plug-in hybrid electric vehicles and 10% for battery-operated electric vehicles.
- A tax-exempt rental allowance of up to €5,000 per year can be paid for two years to employees who are newly hired on open-ended contracts, and who move over 100 kilometers for their new job. Eligible employees must have earned less than €35,000 in the year prior to their hire.
- Newly enrolled employees in the mandatory general social security insurance (AGO) have the option to increase their contribution amount by up to two percentage points — up to half the increase is tax deductible. This measure is addressed in a separate decree.
- Workers who meet, by Dec. 31, 2025, the eligibility requirements for the so-called “Quota 103” or early retirement pension (42 years and 10 months for men, and 41 years and 10 months for women) can choose to remain employed and ask their employer to pay them a sum equal to the employer's social security contribution that previously would have been paid to the social security institution. This sum does not count as income for tax purposes.
- Women with at least four children can take early retirement 16 months (up from 12) before their pensionable age.
- Other early retirement options are still allowed, for example the so-called “women's option” for women aged 61 with 35 or more years of social security contributions.

Resources

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[Budget](#) (Italian) (Official Gazette, Dec. 30, 2024)

Italy (new)	
Status	 Effective dates vary.
Development	<p>Career — Health</p> <p>Employment measures introduced</p> <p>The Labor Bill (Collegato Lavoro), Law No. 203 of Dec. 13, 2024 and Decree Law No. 202 of Dec. 27, 2024 (Decree Law Milleproroghe 2025) address redundancy pay, staff leasing, probationary periods for fixed-term workers and smart working arrangements. The laws took effect in January and February 2025. Highlights of the measures include:</p> <ul style="list-style-type: none"> • The redundancy pay for workers who are laid-off but who work either as employees or in a self-employed capacity will be suspended for the days worked. • From July 2025, employers will no longer be allowed to use the same leased workers for periods exceeding 24 months where the worker had been hired indefinitely by the staff leasing company. • The general rule that restricts the number of temporary agency workers and fixed-term workers to no more than 30% of an employer's permanent workforce is suspended in the case of workers aged 50 or older; workers who are hired for new business start-ups and certain other types of employment; and workers hired by the staff leasing agency on indefinite contracts. • The probationary period for workers hired on fixed-term contracts must not exceed one day of actual work for every 15 calendar days from the start of their employment. However, collective bargaining agreements can include more favorable provisions. • Employers must provide a minimum of five-days' notice to workers about the commencement of, or changes to, "smart working" arrangements. "Smart working" is a form of working to achieve defined objectives and includes flexible working arrangements that allow workers to work remotely and to set their own working hours and work locations.
Resources	<p>massimo.magni@mercer.com</p> <p>Law (Italian) (Official Gazette, Dec. 13, 2025)</p>
Oman (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none"> • Social protection for foreign employees expanded — key date: July 2025
Qatar (previously covered, with upcoming effective date)	
Development	<p>Career</p> <p>Nationalization program launched to boost employment rate — key date: unknown</p>

Rwanda (new)**Status**  **Currently effective****Development****Wealth****Social security pension contributions increased**

Effective January 2025, Rwanda's social security pension contributions increased to 12% — up from 6%. The reform aims to reflect increased life expectancy (currently, 70 years). This is the first increase since 1962. The pension provides support on retirement, disability and death. Highlights of the changes include:

- The 12% contribution is divided equally between employers and employees.
- Starting in 2027, pension contributions will increase 2% each year until they reach 20% by 2030.
- Pension contributions are aligned with the Rwanda Revenue Authority's taxable base and are calculated on total gross salary, which includes transport allowances.
- Pension benefits will increase to provide most support to the lowest earners.

Resources

[FAQs Pension reforms](#) (Rwanda Social Security Board)

Saudi Arabia (new)**Status**  **Effective dates vary.****Development****Career****Revised national hiring targets for certain sectors issued**

The Ministry of Human Resources and Social Development recently issued four Ministerial Resolutions that introduce a phased increase to the number of Saudi nationals that entities must hire under the “Nitaqat” program. The resolutions concern four professional categories that were already subject to partial national hiring rules. Certain wage thresholds also apply to the roles for them to count towards an entity's Nitaqat compliance. The previous Nitaqat system was issued in December 2021 and applied from 2022 through 2024. Highlights of the new resolutions include:

- **Accounting and finance.** Entities that employ five or more finance and accounting professions must ensure that by Oct. 27, 2025, a minimum 40% of such roles are filled by Saudi nationals (the current requirement is 30% of roles). The percentage will then increase to 50% by Oct. 27, 2026; 60% by Oct. 27, 2027; and 70% by Oct. 27, 2028. From Oct. 27, 2029, entities that employ three or four accounting and finance professions must ensure that a minimum of 30% positions are filled by Saudi nationals.
- **Technical engineering.** Several technical engineering professions are covered. The Ministerial Resolution retains the same employee-threshold but increases the nationalization requirement to 30%, effective July 27, 2025 (up from 20%).
- **Dentistry.** The Ministerial Resolution retains the current employee threshold (three or more dentistry-related professions) and will require entities to increase their hiring of Saudi nationals to 45%, effective July 27, 2025, and then to 55% by Jan. 27, 2026.
- **Pharmaceutical.** Pharmaceutical professions include certain roles but exclude medical advertising representatives and pharmaceutical representatives. The Ministerial Resolution retains the current employee-threshold and the Nitaqat targets will increase to 35%, 65% and 55% respectively, effective July 27, 2025.

Resources

[Human Resources Ministry issues major localization decisions for 269 professions](#) (Saudi Press Agency, Jan. 26, 2025) and [Executive Regulations](#) (Arabic) (Ministry of Human Resources and Social Development, Feb. 19, 2025)

Spain (new)	
Status	 Currently effective
Development	<p>Career</p> <p>Minimum wage increased</p> <p>The minimum wage rate for 2025 is €39.47/day, €1,184/month (14 payments); €1,381.33/month (12 payments); or €16,576/year. The 2025 rates are included in Royal Decree-Law No. 87/2025 of Feb. 11, 2025, and the amounts are backdated to Jan. 1, 2025. The 2025 minimum wage rate increase is 4.41% compared with 2024.</p>
Resources	Decree-Law No. 87/2025 (Spanish) (Official Bulletin, Feb. 11, 2025)
South Africa (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Expanded remuneration and pay gap disclosures required — key date: Upon proclamation
Spain (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none"> • New paid family leave entitlement — key date: unknown
Sweden (previously covered, with upcoming effective date)	
Development	<p>Wealth</p> <ul style="list-style-type: none"> • Flexibility of receiving occupational pension benefit payments increased — key date: Oct. 1, 2025
Switzerland (previously covered, with upcoming effective date)	
Development	<p>Career — Health</p> <ul style="list-style-type: none"> • Paid parental leave introduced in Geneva — key date: unknown
United Arab Emirates (previously covered, with upcoming effective date)	
Development	<p>Career</p> <ul style="list-style-type: none"> • Revised employment terms to apply in Abu Dhabi Global Market — key date: April 1, 2025 • Flexibility of receiving occupational pension benefit payments increased — key date: Oct. 1, 2025

United Kingdom (UK) (new)

Status  **Announcement of upcoming changes**

Development **Wealth**
Regulator issues approach to defined contribution Master Trust supervision
 Following a 12-month review of master trusts, the United Kingdom’s Pensions Regulator (TPR) announced that it will evolve its approach to the supervision and regulation of the defined contribution (DC) market to make master trusts the gold standard of pension provision. DC and master trusts will be supervised differently to identify market and saver risks sooner and enhance the pensions system.
 TPR aims to ensure that all savers receive value for money, with clear priorities around investments, data quality and innovation at retirement.
 This approach demonstrates TPR’s shift to a more prudential style of regulation that places greater emphasis on the management of regulatory risks, the anticipation of potential threats to savers, and that addresses risks to the UK economy.

Resources [Oversight of largest DC schemes evolves with a sharper focus on member outcomes](#) (TPR, Feb. 20, 2025)

UK (new)

Status  **Currently effective**

Development **Career**
Advisory fuel rates for company cars updated
 The United Kingdom’s tax authority — HM Revenue and Customs — issued updated guidance on advisory fuel rates (AFRs) for employer-provided company cars, effective March 1, 2025 (however, employees are allowed to use the old rates until April 1, 2025).
 AFRs are provided for fully electric cars, petrol, diesel, and liquefied petroleum gas. AFRs are reviewed quarterly, and can only be used to reimburse employees for business travel in their company cars, and for employees to repay the cost of fuel used for private travel.

Resources [Advisory fuel rates](#) (Government, Feb. 24, 2025)

UK (updated)**Status****Effective April 6, 2025****Development****Career — Health****Employees to be allowed neonatal leave**

Employed parents with babies up to age 28 days who are admitted to a hospital for seven days or more will have the right to neonatal leave of up to 12 weeks under measures included in the Neonatal Care (Leave and Pay) Act, which received Royal Assent on May 24, 2023. The measures will take effect on April 6, 2025, and will apply to children born on or after that date. Draft regulations were presented to parliament on Jan. 20, 2025. Further guidance will be published by the government and the Advisory, Conciliation and Arbitration Service (ACAS). Highlights include:

- Employees will be entitled to neonatal leave from the first day of employment. Employees with 26 weeks of service and earning more than the lower earnings limit will be entitled to statutory neonatal pay.
- Neonatal leave is capped at 12 weeks, including for multiple births, and will be added at the end of other leave entitlements (such as maternity, paternity and statutory parental leaves), provided it is taken within 68 weeks of birth.
- Neonatal care is defined as medical care in a hospital, or in another place to which the child is moved after leaving the hospital, subject to a consultant directing the child's medical care; it also includes ongoing monitoring by, and visits from, healthcare professionals arranged by that hospital and palliative or end-of-life care.
- Two different types of neonatal leave are allowed. "Tier one" leave can be taken when the child is in neonatal care, or up to seven days after the end of such care, in nonconsecutive blocks of a minimum of one week. "Tier two" leave must be taken in one continuous block.
- Employees must notify their employer that they will take leave and provide certain information. Different notice periods apply to "tier one" and "tier two" leave, although the employer and employee can agree to waive the notice requirements.
- Employees who take neonatal care leave are entitled to the same protections that apply to other periods of family-related leave.

Resources

[The neonatal care leave and miscellaneous amendments regulations 2025](#) (Government, Jan. 20, 2025); [Neonatal Care \(Leave and Pay\) Act 2023](#) (Legislature) and [Workers' rights wins for parents and careers](#) (Government, May 25, 2023)

UK

Status  Consultation open through March 13, 2025.

Development**Career****Consultation on changes to banking remuneration regime issued**

Proposals that aim to make the UK's banking remuneration regime more “effective, simple and proportionate,” and which could result in significant changes to remuneration regulations, were published for consultation by the Financial Conduct Authority (FCA) and the Prudential Regulation Authority (PRA) on Nov. 26, 2024; comments are invited through March 13, 2025. The policy proposals have been developed by the regulators collaboratively but agreed to by each regulator independently. They intend to publish a final policy statement during the second half of 2025 that would take effect the day after its publication and apply to employers' performance years starting after that date. The proposed measures are applicable to banks, building societies and PRA-designated investment firms (but not credit unions and insurers), and aim to “complement previous remuneration regime changes enhancing proportionality for small firms, and removing the bonus cap.” In October 2023, the UK removed the “bonus cap” to permit employers to set their own ratio of variable to fixed remuneration. In November 2024, the Chancellor of the Exchequer called for consideration to be given to the UK's regulations in the context of improving competitiveness.

The proposals aim to improve the link between remuneration and individual accountability and include a simplified procedure for identifying “material risk takers” (MRTs); the reduction of the deferral and retention periods; increased accountability for senior managers; and consolidation of the rules that are currently duplicated in the FCA Handbook and the PRA Rulebook. Highlights of the consultation proposals include:

- Reduction in the number of MRTs subject to the remuneration rules. A single quantitative threshold would be introduced, allowing for the 0.3% of individuals who are the highest earners to be identified as MRTs.
- Increased governance expectations for employers when they identify MRTs. However, they would no longer need regulatory approval to exclude individuals who would otherwise qualify as MRTs due to their remuneration.
- Increased proportionality threshold at which certain remuneration rules can be disapplied for MRTs for individuals whose total annual pay does not exceed £660,000 (up from £500,000), and whose variable pay is no more than 33% of total pay.
- Revised rules and expectations on deferral of variable remuneration. For example, vesting periods would start immediately (currently they start three years from when the award is made), and the holding periods for financial instruments would be removed, allowing for faster payment of bonuses and noncash elements.
- Clarification of the role of remuneration committees in setting remuneration.
- Improved links between remuneration and individual accountability in the event of risk management failures. Employers would have to use malus or clawback to adjust MRTs' variable pay where their seniority and role could make them responsible for risk events that involve one or more members of their team.
- Requirement for employers to consider senior managers' performance against PRA supervisory priorities when determining accountability for adverse risk events.

Resources

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[CP16/24 — Remuneration reform](#) (Bank of England, Nov. 26, 2024)

UK (previously covered, with upcoming effective date)

Development

Career — Health

- [Paternity leave to be expanded to bereaved partners](#) — key date: unknown
- [Employees to be allowed neonatal care leave](#) — key date: expected April 2025
- [Benefits-in-kind digitization reporting confirmed](#) — key date: April 2026

Career — Health — Wealth

- [Autumn Budget increases National Insurance, National Minimum Wage Rates and includes pension changes](#) — key date: April 6, 2025

Wealth

- [Pension auto enrollment to expand, reducing eligible age and abolishing earnings threshold](#) — key date: unknown
- [Guidance sets staging date for schemes to connect to Pensions Dashboard](#) — key date: April 30, 2025



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