welcome to brighter

Global Legislative Update

Law & Policy Group

By Stephanie Rosseau and Fiona Webster

November 2025

A business of Marsh McLennan

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.

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 *Dobbs* ruling
Right to disconnect	Global employer resources
Americas	
Barbados	Minimum wage increased
Brazil	Maternity leave for extended hospitalization related to childbirth expanded
Colombia	New regulation on provision of breastfeeding spaces issued
El Salvador	Minimum wage increased
United States (US)	Most retirement plan sponsors have few 2025 year-end amendments Mercer projects 2026 retirement plan limits Top 10 health, fringe and leave benefit compliance and policy issues in 2026 Roundup: Employer resources on H-1B reforms Roundup: Employer resources on tax deduction for overtime pay Roundup: State accrued paid leave mandates 2025 state paid family and medical leave contributions and benefits roundup Domestic partner benefits remain popular, but present challenges Beyond COBRA: State laws add complexity to continuation coverage Group fixed-indemnity plans pose legal and tax issues 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

Americas (continued)	
US	Roundup: Employer resources on minimum wage increases Roundup: Employer resources on hairstyle nondiscrimination laws Benefit and leave laws vary in Puerto Rico Pharmacy benefit manager law enacted in California Paid family medical leave law enacted in California Paid sick and safe leave and unpaid leave laws amended for additional permitted uses in California Insulin mandate enacted in California California adds three covered services added to benchmark plans New tax law affects qualified small employer health reimbursement arrangements in California California publishes state disability and paid family leave rates Prior authorization report law enacted in California Colorado sets upper prescription drug limit Colorado amends paid family and medical leave rules Connecticut issues 2026 paid family medical leave rates Delaware to require salary and benefit disclosures in job postings Hawaii issues prepaid Health Care Act Form HC-5 for 2026 Iowa clarifies pharmacy benefit manager law Maryland issues proposed Paid Family and Medical Leave guidance issued Massachusetts requires salary disclosures, wage data reporting New York announces maximum weekly paid family leave benefit New York City adds permitted uses to Earned Sick and Safe Time Act New Mexico enacts immunization law Enhanced premium tax credit law enacted in New Mexico Oklahoma enacts law that impose limits on administration of prescription drug benefits Benefit and leave laws vary in Puerto Rico Washington announces paid family and medical leave contributions
Asia Pacific	
Australia	Next phase of ASIC oversight initiatives published APRA issues revised governance proposals following industry consultation Treasury consults on merger notification and control Tax changes on earnings of super ‘large balances’ proposed Payday superannuation legislation introduced

Asia Pacific (continued)	
China	Private pension withdrawal options expanded Beijing's social insurance contribution thresholds updated Family care leave introduced in Shanghai Shanghai provides employer social insurance subsidy for maternity and childbirth leave
India	Employers must disclose more on workplace sexual harassment incidents Electronic system for filing provident fund returns, payments launched Employers can voluntarily enroll eligible employees in Employees' Provident Fund
Malaysia	Employment protections for gig workers finalized
Myanmar	Minimum wage increased for private sector
Singapore	Wage increases for in-house security officers announced The Workplace Fairness (Dispute Resolution) Bill passed
South Korea	Implementation plans, effective date for labor relations law announced
Taiwan	Increased minimum wage proposed
EMEA	
European Union (EU)	Ruling expands nondiscrimination rights for employees who have children with disabilities Revised European Works Council Directive approved
Albania	Increased minimum wage announced
Bahrain	Upgraded Wage Protection System introduced
Belgium	'Unemployment with company allowance' early retirement scheme for new entrants ends
Croatia	Increased minimum wage announced
Czech Republic	Increased minimum wage announced
Denmark	Bereavement leave for spouses, cohabiting partners expanded
Greece	Payment of annual housing contribution by employers Interpretative guidance issued on Digital Work Card, recording of parental leave Labor law changes introduced
Hungary	Personal tax exemption scheme for certain mothers expanded
Ireland	Budget for 2026 includes benefit and employment measures Minimum wage to increase
Isle of Man	Shared parental leave, parental bereavement leave introduced Minimum wage to increase
Lithuania	Minimum wage to increase

EMEA (continued)	
Nigeria	Guidelines on foreign currency pension contributions issued
Norway	Company-specific age limits to be abolished
Poland	Method for determining length of service to expand
Qatar	New fee structure for work permits introduced
Romania	Medical leave and pay reduced Public health insurance contribution requirements expanded
Saudi Arabia	Health insurance disclosure form for smaller employers to be introduced
Slovakia	Minimum wage to increase
Tanzania	Minimum wage for private sector to increase on Jan. 1, 2026
United Kingdom (UK)	Bonus rules for senior bankers eased Immigration changes introduced Four consultations on measures in Employment Rights Bill issued Pension Regulator launches enforcement strategy consultation Government responds to consultation on unconnected multiemployer CDC schemes UK consults on retirement collective defined contribution schemes

Section 2

Global

Artificial Intelligence	
Status	⚠ **Ongoing initiatives**
Development	**Career** **Roundup: Global employer resources on artificial intelligence** 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.
Resources	Roundup, regularly updated

Minimum wage	
Status	⚠ **Ongoing initiatives**
Development	**Career** **Roundup: Global employer resources on minimum wage increases** 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.
Resources	Roundup, regularly updated

Remote working	
Status	⚠ **Ongoing initiatives**
Development	**Career — Health — Wealth** **Roundup: Countries address remote-working issues** Remote working has become more of a 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.
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

Right to disconnect	
Status	⚠ **Ongoing initiatives**
Development	**Career** **Roundup: Right to disconnect around the world** In recent years, several countries have enacted legislation requiring employers to allow employees the "right to disconnect" — or to "switch off" from work-related electronic communications (such as emails) outside of their normal working hours. To help employers consider the issues associated with the right to disconnect, this roundup provides links to general information about countries' legislative/regulatory governance initiatives and trends. Sources include organizations, government websites, third-party resources and news articles.
Resources	Roundup, regularly updated

Section 3

Americas

Barbados (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On June 1, 2025, the government increased the national minimum wage to BB$420 for a 40-hour working week for employees who are paid weekly, up from BB$340. The daily minimum wage rate increased to BB$84, up from BB$68, for an eight-hour workday for employees not employed on a weekly basis. The hourly rate increased to BB$10.50, up from BB$8.50, for employees not employed on a weekly or daily basis. The sectoral wage for security guards was BB$9.25 and is now BB$11.43/hour for employees paid on an hourly basis.
Resources	National minimum wage (Government)

Brazil — (new)	
Status	**Currently effective**
Development	**Career — Health** **Brazil expands maternity leave for extended hospitalization related to childbirth** Effective Sept. 29, 2025, new measures were introduced to extend maternity leave for mothers and/or babies who require hospitalization exceeding two weeks due to childbirth-related complications. These changes feature in Law No. 15.222/2025 that modified the labor code, and include the following key provisions: • Maternity leave and maternity allowance now begin on the date of hospital discharge, rather than the child's birth date. • Maternity leave is extended by an additional 120 days, doubling the standard leave period from 120 days to 240 days in cases of prolonged hospitalization. Any leave granted before the birth is deducted. • The payment period for the maternity allowance, which is reimbursed by the National Institute of Social Security, is also lengthened accordingly.
Resources	Law No. 15.222/2025 (Portuguese) (Official Journal, Sept. 29, 2025)

Brazil (previously covered, with an upcoming effective date)	
Development	**Career** • Measures gradually reintroduce the payroll tax — key date: Jan. 1, 2026 **Career — Health** • Inclusion of psychosocial risks in risk management process postponed — key date: May 26, 2026
Colombia (new)	
Status	⚠ **Effective July 2, 2026**
Development	**Career — Health** **New regulation on provision of breastfeeding spaces issued** From July 2, 2026, employers will have to provide a designated space in their workplace to enable women to breastfeed. The measures are included in Executive Decree No. 44943-MTSS-S that repeals the previous decree. The designated space must be a room, booth or other area that meets minimum hygiene, safety, privacy and accessibility requirements — including refrigeration, wash facilities, seating, ventilation and lighting, etc. Restrooms, bathrooms, storage rooms or similar areas are not acceptable spaces. Employers will be fined for noncompliance (eight to 23 times base salaries) and will have to implement other corrective measures imposed by the Ministry of Health.
Resources	Executive Decree No. 44943-MTSS-S (Spanish) (Government)
Canada (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Career** **Employment insurance contribution rates adjusted for 2026** In 2026, the Employment Insurance (EI) contribution rates will decrease, while the maximum insurable earnings will increase. Highlights of the changes include: • For employees outside Québec, the contribution rate will be 1.63%, down from 1.64%, and the employer rate will decrease to 2.28%, down from 2.3%. • In Québec, the employee contribution rate will reduce to 1.3% (down from 1.31%), and the employer contribution rate will be 1.82%, down from 1.83%. • The maximum insurable earnings will increase to C$68,900, up from C$65,700. Additionally, the one-week waiting period before a worker can start receiving EI benefits will be waived for an additional six months until April 11, 2026. During this time, termination pay (including vacation pay, severance pay and pay in lieu of notice) will not be deducted from EI benefits.
Resources	Summary of the 2026 Actuarial Report on the Employment Insurance Premium Rate (Government, Sept. 22, 2025)

Canada — Québec	
Status	⚠ **Plans must be amended to comply with the regulation by Nov. 21, 2025.**
Development	**Wealth** **Changes to flexible pension plan rules for members** The Québec regulation, revised in November 2024, impacts Québec plan members with Flexible Pension Plan (FPP) accounts, irrespective of the plan's registration jurisdiction. An FPP provision that is offered under a defined benefit pension plan allows plan members to make optional ancillary contributions to acquire or improve ancillary benefits under the plan, up to the limits imposed by the Income Tax Act and/or the plan provisions, without impacting the calculation of the Pension Adjustment. The amended regulation requires a plan with an FPP feature to allow members a refund of their optional ancillary contributions upon termination of active membership, including any "excess" amount that previously would have been forfeited to the plan and reimbursed outside the plan by the plan sponsor. Retraite Québec confirmed that this change was drafted after consulting with the Canada Revenue Agency on how to ensure compliance with Newsletter 96-3R1. The amended regulation introduces other changes regarding the administration of FPP accounts for Québec members including the possibility for a plan to permit members to make their FPP elections after the payment of their pension has begun and to use a 24-month average interest rate to value optional ancillary benefits. Two action items arise from the application of the regulation, and include pension plans with Québec members not registered in Québec: • Plan sponsors have until Nov. 21, 2025, to amend their plans to comply with the Québec Regulation with respect to FPP accounts of Québec members. • Administration procedures for FPP accounts of Québec members should be discussed with, and confirmed by, plan sponsors and then reviewed with the plan administrators and third-party service providers.
Resources	Amendment to flexible pension plan rules for Quebec members (Mercer, Sept. 12, 2025)

Canada (previously covered, with an upcoming effective date)	
Development	**Career** • Pay transparency duties to start in Ontario — key date: Jan. 1, 2026 **Career — Health** • Sick note requirement for short-term health leave eased in British Colombia — key date: Fall 2025 • 'Right-to-disconnect' established for employees — key date: Slated to take effect in 2025 • Revision of workplace laws finalized in Saskatchewan —key date: Jan. 1, 2026 **Wealth** • Basic rate for pension plans set — key date: April 1, 2026 • Pension super priority federal legislation enacted — key date: April 27, 2027

Chile (previously covered, with an upcoming effective date)	
Development	**Career** • Female board representation boosted — key date: Jan. 1, 2026

Colombia (previously covered, with an upcoming effective date)	
Development	**Career — Wealth** • Labor laws revised, worker protections expanded — key date: July 1, 2026 **Wealth** • Pension reforms issued — key date: Postponed from July 1, 2025, pending judicial decision

El Salvador (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On June 1, 2025, the minimum wage increased to $408.80/month for workers in the commerce, services, industrial and sugar mill sectors. The minimum wage also increased to $402.25/month for workers in the textile and apparel industry, and to $272.67/month for workers in the agricultural sector (including coffee workers).
Resources	Announcement (Spanish) (Official Journal, May 23, 2025)

Panama (previously covered, with an upcoming effective date)	
Development	**Wealth** • Employer social security contributions increased — key date: March 1, 2027

Peru (new)	
Status	⚠ **Effective dates vary, starting in June 2027.**
Development	**Wealth** **Regulations to support pension system reform issued** On Sept. 5, 2025, Supreme Decree No. 189-2025-EF, approving the regulations for the Law on the Modernization of the Peruvian Pension System, was published in the Official Journal,. This law introduces the New Integrated Pension System (NSIP) which provides for mandatory, voluntary and optional pension savings for individuals aged 18 and older. Key points of the regulations include: • Starting in June 2027, all Peruvians turning 18 will have 12 months to choose between contributing to the public pension system (SNP) or the private pension system (SPP). Individuals will also be allowed to switch between these two systems. • From 2028, individuals who are not employed may choose which pension system to contribute to, provided their income at registration is at least equal to the minimum wage. • Foreign workers must enroll in the pension system within 10 days of starting work in Peru and notify their employer. Exemptions apply to foreigners covered by international social security treaties. • Additional voluntary pension contributions can be made by employees, employers, third parties or the state. • Starting in 2028, independent contractors are required to contribute to the pension system, with contribution amounts calculated on their income.
Resources	Supreme Decree No 189-2025-EF (Spanish) (Government, Sept. 5, 2025)

Peru (previously covered, with an upcoming effective date)	
Development	**Career — Wealth** • Pension system modernization law issued — key dates: 2027 and 2028

US (new)	
Status	⚠ **Amendments must be made by Dec. 31, 2025.**
Development	**Wealth** **Most retirement plan sponsors have few 2025 year-end amendments** Retirement plan sponsors have few (if any) plan amendments to adopt before the end of 2025. For most plans, no required changes under law or guidance need amendments by Dec. 31, 2025. However, sponsors of calendar-year plans may need to update their plan documents before the end of the year to reflect discretionary changes that took effect earlier in 2025. Looking ahead, most sponsors have until the end of 2026 to amend their plans for several significant law changes enacted in recent years. However, tax-exempt sponsors of 457(b) plans must amend their plans by Dec. 31, 2025, for certain provisions of the Setting Every Community Up for Retirement Enhancement Act of 2019 (Div. O of Pub. L. No. 116-94) (SECURE 1.0) and the SECURE 2.0 Act of 2022 (Div. T of Pub. L. No. 117-328).
Resources	brian.kearney@mercer.com, margaret.berger@mercer.com GRIST, Oct. 3, 2025

US (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Wealth** **Mercer projects 2026 retirement plan limits** Every key Internal Revenue Code limit for qualified retirement plans will increase from 2025 to 2026, Mercer projects. The 2026 limits will reflect increases in the Consumer Price Index for All Urban Consumers (CPI-U) from the third quarter of 2024 to the third quarter of 2025. This update article reflects the final CPI-U value for September.
Resources	margaret.berger@mercer.com Mercer projects 2026 retirement plan limits (Mercer, Oct. 24, 2025)

US (new)	
Status	⚠ **Ongoing developments**
Development	**Career — Health** **Top 10 health, fringe and leave benefit compliance and policy issues in 2026** This comprehensive report provides a Congressional outlook describing the fate of the looming expiration of Affordable Care Act (ACA) subsidies as well as potential year-end legislation that might include pharmacy benefit manager manager (PBM) reforms, healthcare pricing transparency, restraints on drug price increases, new provider billing rules and health savings account (HSA) enhancements. Additionally, the report details the 10 top year-end 2025 and 2026 compliance and policy developments expected to affect health and fringe benefit plans and leave programs.
Resources	rich.glass@mercer.com; cheryl.hughes@mercer.com; geoff.manville@mercer.com and katharine.marshall@mercer.com Top 10 health, fringe and leave benefit compliance and policy issues in 2026 (Mercer, Oct. 30, 2025)

US	
Status	⚠ **Ongoing developments**
Development	**Career** **Roundup: Employer resources on H-1B reforms** On Sept. 19th, 2025, President Trump signed a proclamation to restrict the entry into the US of H-1B alien workers in specialty occupations, requiring a $100,000 payment to accompany or supplement H-1B visa petitions for new applications. Other planned H1-B changes were also included in the proclamation. Guidance in response to the proclamation was issued by US Citizenship and Immigration Services, US Customs and Border Protection, the Department of State, and the Department of Homeland Security. However, implementation of the proclamation has caused confusion among employers and H-1B holders. On Sept. 20, 2025, the Chamber of Commerce released the following statement: “We’re concerned about the impact on employees, their families, and American employers. We’re working with the Administration and our members to understand the full implications and the best path forward.” To provide employers with some information about the new H-1B visa requirements and the varying aspects and issues to consider, this roundup provides links to government information, third-party analyses, news articles and viewpoints.
Resources	Roundup: Employer resources on H-1B reforms, regularly updated

US (continued)	
Status	**Currently effective**
Development	**Career** **Roundup: Employer resources on tax deduction for overtime pay** On July 4, 2025, President Trump signed the "One Big Beautiful Bill," which includes a federal income tax deduction on nonexempt workers' overtime pay covered by the Fair Labor Standards Act. The overtime tax deduction is currently scheduled to expire after 2028. To provide employers with some information about the deduction and the varying aspects and issues to consider, this roundup provides links to government information, third-party analyses, news articles and viewpoints.
Resources	Roundup: Employer resources on tax deduction for overtime (Mercer, regularly updated)

US	
Status	**Effective dates vary.**
Development	**Career — Health** **Roundup: State accrued paid leave mandates** More than one-third of all states have some form of accrued paid leave requirement. All these laws have certain common features, including the following: • Which employers must comply, and which employees can accrue and take paid leave • How much paid leave employees may accumulate, use and carry over from one year to the next • Whether a new hire waiting period is permissible before using accrued paid leave, and whether leave may be accrued and/or taken in increments other than one hour • Whether employers may front-load or credit total annual paid leave at the start of each year and avoid the need to track hourly accruals or provide year-end carryovers • What reasons — in addition to an employee's own illness — justify the use of accrued paid leave • What notice or documentation employers may require employees to provide, and what information about the paid leave entitlement employers must provide to employees • What protections — in addition to job protections — apply to employees who exercise rights to accrued paid leave • Whether employers must pay out unused accrued leave when employees separate from service, and what rules apply when an individual is rehired The accrued paid leave laws summarized in the Section 2 tables in the GRIST cited below generally have common features — not featured in the tables — including the following: • Paid leave requirements are based on the employee's work location and accruals start on the date of hire. • Employers whose existing paid leave programs meet or exceed the maximum accrual and allow the same leave uses without more restrictions or limitations don't have to provide additional paid leave. • The term "health" includes mental health, preventive care and chronic conditions in addition to physical illness. • Employees exempt from federal minimum wage and overtime standards are considered to work 40 hours per week. • Properly classified independent contractors are not eligible for accrued paid leave. • Employers may require reasonable notice if the leave is foreseeable. • If leave is unforeseeable, employees should provide notice as soon as practicable. • Worker protections and antiretaliation provisions apply. • Leave mandates don't apply to federal government employers but often apply to state and/or local government employers. • Workers covered under the federal Railroad Unemployment Insurance Act are excluded because of preemption • Requirements typically don't apply to employees covered by a collective bargaining agreement (CBA) in effect at the time of a law's passage. CBAs negotiated after a law's enactment typically would not be subject to these laws if the CBA expressly waives the law's requirements and provides for equivalent or more generous paid sick leave.
Resources	rich.glass@mercer.com and katharine.marshall@mercer.com Roundup: State accrued paid leave mandates (Mercer, regularly updated)

US	
Status	**Effective dates vary.**
Development	**Career — Health** **2025 state paid family and medical leave contributions and benefits** Mandates requiring paid leave for an employee's own health condition exist in 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.
Resources	rich.glass@mercer.com and katharine.marshall@mercer.com GRIST, updated Jan. 29, 2025 and Paid family and medical leave: Snapshots across the US (Mercer, Sept. 23, 2025)

US	
Status	**Currently effective**
Development	**Career — Health** **Domestic partner benefits remain popular, but present challenges** 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.
Resources	rich.glass@mercer.com and patty.cartwright@mercer.com GRIST, regularly updated

US	
Status	**Currently effective**
Development	**Health** **Beyond COBRA: State laws add complexity to continuation coverage** 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.
Resources	rich.glass@mercer.com GRIST, Nov. 12, 2024

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	**Effective dates vary.**
Development	**Wealth** **User's Guide to SECURE 2.0** 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. 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 drafting errors for which Congress intends to introduce technical corrections legislation. Those errors are noted in the relevant sections of the guide. This guide doesn't address SECURE 2.0's employee stock ownership plan (ESOP) provisions and a handful of other no benefit-related provisions. When referring to the original SECURE Act, this guide uses the term "SECURE 1.0" to avoid any confusion between the laws. This guide is updated periodically to reflect additional information and guidance.
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	**Career — Health** **Transportation plans offer valued benefits, but pose compliance issues** 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. 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 adds 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.
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 on 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** In June 2023, the US Supreme Court in *Students for Fair Admissions, Inc. v. President and Fellows of Harvard College* ruled colleges' use of race as a factor in student admissions is unconstitutional under the 14th Amendment's equal protection clause. Since the decision, various viewpoints have emerged on the ruling's effect on companies' diversity, equity and inclusion (DEI) programs. While the 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) to limit these efforts. This roundup provides links to government information, third-party analyses, news articles and viewpoints about the varying aspects and issues to consider regarding employers' DEI programs.
Resources	Roundup, regularly updated

US	
Status	**Currently effective**
Development	**Career** **Roundup: Employer resources on DOL's expansion of overtime protections** 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 did not go into effect, and the July 2024 increases were revoked. On Feb. 28, 2025, the DOL appealed a December 2024 Texas federal court's decision that also blocked the rule. Both cases were appealed to the Fifth Circuit Court of Appeals. 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, regularly updated

US — States	
Status	**Compliance dates vary.**
Development	**Health** **Some states require group health plan sponsor reporting** Several states and localities have group health plan reporting requirements. The GRIST cited below 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.
Resources	rich.glass@mercer.com and dorian.smith@mercer.com GRIST, regularly updated

US — States	
Status	**Effective dates vary.**
Development	**Wealth** **Resources for tracking state and local retirement initiatives** 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.
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	**Career** **Roundup: Employer resources on minimum wage increases** On March 14, 2025, President Trump rescinded former President Biden's April 2021 executive order requiring federal contractors to pay a $15 hourly minimum wage to workers for new federal contract solicitations starting Jan. 30, 2022, and increasing to $17.75/hour in 2025. Federal appeals courts have different positions on the legality of the 2021 order, and the Department of Labor rules implementing the order remain in place. Executive Order 13658 — which was implemented by the Obama administration and currently requires federal contractors to pay $13.30/hour — also remains. Numerous states have taken action 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 resources and news articles.
Resources	Roundup, regularly updated

US — States	
Status	**Effective dates vary.**
Development	**Career** **Roundup: Employer resources on hairstyle nondiscrimination laws** 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.
Resources	Roundup, regularly updated

US — California (new)	
Status	⚠ **Generally effective for plan years starting in 2026.**
Development	**Health** **Pharmacy benefit manager law enacted** The governor signed 2025 Ch. 605 (SB 41), a comprehensive pharmacy benefit manager (PBM) bill that imposes several restrictions on PBMs, but the scope is primarily limited to fully insured plans and healthcare service plans (including HMOs) subject to state law. It fully applied to self-funded ERISA plans before it was amended in the last days of the legislative session. As it stands, the only applicable provision for self-funded plans is a PBM fiduciary duty to “be fair and truthful toward the client, to act in the client’s best interests, to avoid conflicts of interest, and to perform its duties with care, skill, prudence, and diligence.” Here is a summary of other provisions: • Ban on spread pricing • 100% rebate pass-through to the payer (i.e., plan sponsor) or program • Prohibition on calculating a participant’s cost sharing at a greater amount than the actual rate paid by the plan or insurer for a prescription drug • Prohibition against a PBM requiring use of only an affiliated pharmacy and imposing requirements, conditions or exclusions that discriminate against a nonaffiliated pharmacy • Mandated PBM compensation de-linking, where PBM income must come solely from a management fee through a pass-through pricing model. • Quarterly PBM reporting to fully insured plan sponsors. The law will generally take effect for plan years starting in 2026. With a few exceptions (like domestic partner coverage), California generally does not apply its insurance laws on an extraterritorial basis to fully insured plans issued in another state, as long as both an employer’s principal place of business and a majority of employees are located outside of California.
Resources	rich.glass@mercer.com 2025 Ch. 605 (SB 41) (Legislature, Oct. 11, 2025)

US — California (new)	
Status	⚠ **Effective July 1, 2028**
Development	**Career — Health** **Paid family medical leave law enacted** A new law (2025 Ch. 772, SB 590) adds designated persons to the family member list for purposes of family care leave. A designated person is a “care recipient related by blood or whose association with the individual is the equivalent of a family relationship.” Employees must identify the designated person and attest that the individual qualifies as a designated person.
Resources	rich.glass@mercer.com 2025 Ch. 772, SB 590 (Legislature, Oct. 13, 2025)

US — California (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career — Health** **Paid sick and safe leave and unpaid leave laws amended for additional permitted uses** Under a new law (2025 Ch. 148, AB 406), the paid sick and safe leave (PSSL) and unpaid leave laws were amended for additional permitted uses. Employees may use PSSL or unpaid leave if they or a family member are a victim of specified crimes and are attending any judicial proceeding related to that crime. The key definition is “victim,” a person against whom a violent felony, serious felony or felony theft or embezzlement is committed. Victims also include those who suffer direct or threatened harm because of a lengthy list of crimes or delinquent acts. These provisions will take effect on Jan. 1, 2026. Also, effective Oct. 1, two additional PSSL reasons already covered under the unpaid leave law apply: appearing in court as a witness to comply with a subpoena or other court order and serving on an inquest jury or trial jury. These provisions expire on Jan. 1, 2035.
Resources	rich.glass@mercer.com 2025 Ch. 148, AB 407 (Legislature, Oct. 1, 2025)

US — California (new)	
Status	**Effective for 2026 plan year**
Development	**Health** **Insulin mandate enacted** Fully insured plans and healthcare service plans (including HMOs) in the large group market cannot impose cost sharing on insulin exceeding $35 for a 30-day supply, effective for 2026 plan years. The same requirement will apply to small group plans, starting in 2027. An exception exists for HSA-qualifying high-deductible health plans. Step therapy is permissible if a plan covers at least one insulin in each drug type without step therapy. With a few exceptions (like domestic partner coverage), California generally does not apply its insurance laws on an extraterritorial basis to fully insured plans issued in another state, as long as both an employer’s principal place of business and a majority of employees are located outside of California. The law does not affect self-funded ERISA plans.
Resources	rich.glass@mercer.com 2025 Ch. 737, SB 40 (Legislature, Oct. 13, 2025)

US — California (new)	
Status	**If approved by federal Department of Health and Human Services, inclusion will start in 2027.**
Development	**Health** **Three covered services added to state’s benchmark plans** AB 224 (fully insured plans) and SB 62 (healthcare service plans) add three covered services to the state’s benchmark plan for essential health benefits under the Affordable Care Act. These services are fertility coverage, durable medical equipment, and annual hearing exams and hearing aids. If approved by the federal Department of Health and Human Services, inclusion of these services in the benchmark plan will start in 2027. The law does not affect self-funded ERISA plans, unless they use California as a benchmark state. The addition of fertility coverage is consistent with the state’s insurance law mandate enacted last year and delayed until Jan. 1, 2026.
Resources	rich.glass@mercer.com 2025 Chs. 680/739, AB 224/SB 62 (Legislature, Oct. 13, 2025)

US — California (new)	
Status	⚠ **Currently effective**
Development	**Health** **New tax law affects qualified small employer health reimbursement arrangements** A new law — 2025 Ch. 231 (SB 711) — changed to California's Revenue and Taxation Code to conform with years of changes made to the federal Internal Revenue Code (IRC) that was in effect on Jan. 1, 2025. California doesn't automatically conform to changes in the federal tax code and instead must enact legislation. The last major update was in 2015. Not all federal changes were adopted, however. Only select changes made by the 2017 Tax Cuts and Jobs Act were adopted and this summer's "One Big Beautiful Bill Act" (Pub. L No. 119-21) was not addressed. California continues to treat HSAs and Qualified Small Employer Health Reimbursement Arrangements (QSEHRAs) differently. HSA contributions and earnings continue to be taxable under state law. Similarly, payments or reimbursements from a QSEHRA are taxable under state law. As a reminder, QSEHRAs are available only to small employers not subject to the ACA's employer shared responsibility provisions (i.e., fewer than 50 full-time employees, including full-time equivalents, in the prior year). QSEHRAs can be used to pay for individual health insurance premiums and qualified medical expenses.
Resources	rich.glass@mercer.com 2025 Ch. 231 (SB 711) (Legislature, Oct. 1, 2025)

US — California (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Career — Health** **State disability and paid family leave rates published** The Employment Development Department published its State Disability Insurance (SDI) and Paid Family Leave (PFL) rates for 2026. The employee contribution rate, which includes both SDI and PFL, will increase from 1.2% (2025) to 1.3% (2026). Employer SDI/PFL contributions are not required. For voluntary plans, the employer voluntary plan assessment rate (equal to 14% of the employee contribution rate) will increase from 0.168% (2025) to 0.182% (2026).
Resources	rich.glass@mercer.com Contribution rates (Employment Development Department) and Unemployment insurance code (Government)

US — California (new)	
Status	⚠ **Reports must be provided by July 1, 2026.**
Development	**Health** **Prior authorization report law enacted** A new law sets up a process to establish a prior authorization "gold carding" program for fully insured plans. Under 2025 Ch. 408 (SB 306), health insurers and healthcare service plans (including HMOs) must provide detailed prior authorization reports to the Department of Managed Health Care and Department of Insurance, respectively, by July 1, 2026. These departments will identify services approved at least 90% of the time and publish a list by July 1, 2027. No later Jan. 1, 2028, applicable plans will be prohibited from using prior authorization for those services, absent a determination of fraud or clinically inappropriate care. Unless extended, the law expires on Jan. 1, 2034. With a few exceptions (like domestic partner coverage), California generally does not apply its insurance laws on an extraterritorial basis to fully insured plans issued in another state, as long as both an employer's principal place of business and a majority of employees are located outside of California. The law does not affect self-funded ERISA plans.
Resources	rich.glass@mercer.com 2025 Ch. 408 (SB 306) (Legislature, Oct. 6, 2025)

US — Colorado (new)	
Status	⚠ **Effective date unknown**
Development	**Health** **Upper prescription drug limit set** Colorado's prescription drug affordability review board set the upper payment limit (UPL) on its first drug, Enbrel, used to treat inflammatory conditions, including arthritis. The board's announcement will apparently make Colorado the first state to place a price limit on a prescription drug. The effective date of the UPL is not clear. Nor is the impact on employer-sponsored health coverage in the state. The Board's statutory authority extends to fully insured plans issued in the state, as well as self-funded ERISA plans that elect to be optional participating plans, as defined by law.
Resources	rich.glass@mercer.com Colorado Prescription Drug Affordability Review Board & Advisory Council (Legislature)

US — Colorado (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career — Health** **Paid family and medical leave rules amended** The Family and Medical Leave Insurance (FAMLI) Division amended several sets of regulations, primarily to implement SB 25-144, which added neonatal intensive care as a permitted use. Highlights include: • "Neonatal intensive care unit" (NICU) excludes well-baby nurseries, pediatric intensive care units and units not classified by the treating facility as NICU. The rules clarify the parameters for this leave, including documentation. For benefits starting in 2026, the FAMLI Division will withhold and remit federal income taxes from benefits for leave to care for a covered individual's own serious health condition. Care for a family member encompasses assistance with basic medical, hygienic, nutritional, safety, transportation needs, physical care or psychological comfort. • An employer may require exhaustion of FAMLI leave as a condition to short-term disability or long-term disability or other separate bank of leave benefits. However, an employer cannot require an employee to exhaust available FAMLI leave or begin FAMLI leave as a condition to access leave that it is otherwise required to provide, like the Federal Medical Leave Act or state paid sick leave. Employees are not required to exhaust employer-provided benefits to access FAMLI benefits. Actions by employers suggesting otherwise may constitute unlawful interference. • Annual attestation is no longer required. Private plan benefits are not subject to Colorado income tax.
Resources	rich.glass@mercer.com Rules and Guidance (Department of Labor and Employment) and SB 25-144 (Legislature)

US — Connecticut (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career — Health** **2026 paid family medical leave rates issued** Connecticut announced its paid family and medical leave (PFML) contribution rates and benefit maximums for 2026. The employee PFML contribution rate will remain at 0.5% of wages (up to the Social Security maximum wage base, not yet announced for 2026), per a recent CT Paid Leave Authority announcement. The program does not require employer contributions. The maximum weekly benefit equals 60 times the state minimum wage, which will increase from $16.35 to $16.94 per hour in 2026. As a result, the maximum weekly benefit will increase from $981 to $1,016.40.
Resources	rich.glass@mercer.com Information on Connecticut Paid Leave (Government)

US — Delaware (new)	
Status	⚠ **Effective Sept. 26, 2027.**
Development	**Career — Health** **Salary and benefit disclosures in job postings to be required** On Sept. 26, 2025, Delaware's governor signed legislation (HB 105) that will require private and public employers with 25 or more employees to include salary or wage information and a general description of benefits in all postings for job opportunities. The law takes effect two years after its enactment on Sept. 26, 2027. The state's Department of Labor will enforce the requirements and promulgate administrative regulations.
Resources	tauseef.rahman@mercer.com GRIST, Oct. 20, 2025

US — Hawaii (new)	
Status	⚠ **Effective Jan. 1, 2026.**
Development	**Health** **Prepaid Health Care Act Form HC-5 for 2026 issued** Hawaii's Prepaid Health Care Act (PHCA) requires employers to offer health coverage to all eligible employees in the state. An employee may waive coverage under the employer's health plan if certain conditions apply, such as having other health coverage. To claim an exemption, the employee must complete and provide Form HC-5 (Employee Notification to Employer) to the employer. This notice is binding for only one year, so exempt employees must annually complete a new form by Dec. 31, using the current calendar year's form. The employer must keep this form on file.
Resources	rich.glass@mercer.com Form HC-5 employee notification to employer for calendar year 2026 (Department of Labor and Industrial Relations, October 2025) and Prepaid Health Care links (Disability Compensation Division)

US — Iowa (new)	
Status	⚠ **Currently effective**
Development	**Health** **Pharmacy benefit manager law clarified** The Department of Insurance and Financial Services has issued Bulletin 25-6, which provides its interpretation of the scope of SF 383 — enacted in June 2025 — and a July preliminary injunction that stopped several provisions from taking effect. The bulletin clarifies that the preliminary injunction applies only to the named plaintiffs in the lawsuit — which includes members of the Iowa Association of Business and Industry — plus their pharmacy benefit managers (PBMs), contractors and agents only "when acting on behalf of those plaintiffs." Otherwise, the bulletin states: "For those employer groups who are plaintiffs in that lawsuit, and the contractors and agents those plaintiffs use for plan administration, some sections of SF 383 remain enforceable. PBMs, contractors and agents are expected to implement SF 383 for all of their third-party payor clients who are not subject to the court's order."
Resources	rich.glass@mercer.com Bulletin 25-06 (Department of Insurance and Financial Services, Sept. 24, 2025) and SF 383 (Legislature, Nov. 6, 2025)

US — Maryland (new)	
Status	**Consultation open until Nov. 17, 2025.**
Development	**Career — Health** **Proposed paid family and medical leave guidance issued** The Maryland Department of Labor has proposed regulations and issued comprehensive FAQs on its paid family and medical leave (PFML) law that takes full effect in 2028. Comments are invited through Nov. 17, 2025. Highlights of the FAQ on the Family and Medical Leave Insurance (FAMLI) program include: • Employers with fewer than 15 employees do not have to contribute. The FAQ confirms that this number is based on national headcount. Employers must collect and make contributions for all Maryland-based employees, even if employees do not meet the 680-hour eligibility requirement. • If employees lack sufficient pay to cover contributions, employers have up to six pay periods to collect the money. • Employers may run employer-provided leave (e.g., parental leave) concurrently with PFML if the leave is specifically designed to cover a FAMLI qualifying event. Short-term disability benefits do not reduce or offset FAMLI benefits, but the STD plan can take into account FAMLI benefits, including the ability to top off the benefit up to 100% of wages. Employees may use regularly accrued paid leave to top of the FAMLI benefit; an employer cannot require it. • Employers must notify employees at these times: one pay period before payroll deductions start in 2027, by July 2027, upon hire and annually thereafter. • Kinship care. This is a permitted use under the law. The FAQ defines the term, which includes care on a formal and informal basis. • Private plans are subject to department approval. The process will start in fall 2026. Employers with fewer than 50 employees desiring to self-insure must have that plan in place by July 31, 2026. • Q/A-16 provides a seven-point employer checklist.
Resources	rich.glass@mercer.com Proposed regulations (Department of Labor, Oct. 17, 2025) and FAQs (Department of Labor, October 2025)

US — Massachusetts (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Career** **Salary disclosures, wage data reporting required** On July 31, 2024, Massachusetts' governor signed An Act Relative to Salary Range Transparency (H 4890), which requires public and private employers with 25 or more employees to disclose pay ranges in job postings, provide the pay range of a position to an employee who is offered a promotion or transfer and, upon request, provide the pay range to employees who already hold that position or are applying for it. The salary disclosure requirements took effect on Oct. 29, 2025. The legislation also requires public and private employers with 100 or more employees to submit wage data reports to the state. The Attorney General's Office conducted a public awareness campaign on the new rules in the spring of 2025, and guidance was also issued.
Resources	tauseef.rahman@mercer.com GRIST (updated Oct. 13, 2025)

US — New York (new)	
Status	⚠ **Effective Jan. 1, 2026.**
Development	**Career — Health** **New York announces maximum weekly paid family leave benefit** The Department of Financial Services (DFS) announced the maximum weekly paid family leave benefit for 2026. It will be $1,228.53, up from $1,177.32 in 2025.
Resources	rich.glass@mercer.com New York paid family leave updates for 2026 (New York State)

US — New York City (new)	
Status	⚠ **Effective on or about Feb. 22, 2026.**
Development	**Career — Health** **Amended Earned Sick and Safe Time Act adds permitted uses** New York City's amended the Earned Sick and Safe Time Act has added these permitted uses: • Providing care for a child or care recipient • Attending a legal proceeding for subsistence benefits or housing • Responding to a public disaster or to respond to workplace violence. The law also provides an additional 32 hours of unpaid safe/sick time, available upon hire and on the first day of each calendar year. This will replace the two days that were provided by the Temporary Schedule Change Act. Employees will still be able to request temporary changes to their work schedule subject to employer approval.
Resources	rich.glass@mercer.com Law 2025/145 (Legislature, Oct. 25, 2025); Paid safe and sick leave law (New York City); and Temporary Schedule Change Law (New York City)

US — New Mexico (new)	
Status	**Generally effective; insurance provisions will take effect on July 1, 2026.**
Development	**Health** **Immunization law enacted** A new law, 2025 Ch. 5 (SB 3, Spec. Sess. 1), sets immunization guidelines for children and requires vaccines acquired through the Statewide Vaccine Purchasing Program to be recommended by the Department of Health. Fully insured plans cannot impose cost sharing for immunizations recommended by the Department of Health. The law generally took effect on Oct. 2. The insurance provisions will take effect on July 1, 2026. New Mexico generally does not apply its insurance laws on an extraterritorial basis to fully insured plans issued in another state. Other than access, the law does not directly affect self-funded ERISA plans.
Resources	rich.glass@mercer.com 2025 Ch. 5 (SB 3, Spec. Sess. 1) (Legislature, Oct. 8, 2025)

US — New Mexico (new)	
Status	**Currently effective**
Development	**Health** **Enhanced premium tax credit law enacted** A new law (2025 Ch.1 (HB 2, Spec. Sess. 1) creates a healthcare affordability fund to help state residents with healthcare costs, targeting reductions in premiums in the Health Insurance Marketplace and support for uninsured residents. Specifically, if the ACA is repealed in full or in part, invalidated by the US Supreme Court or administered by HHS in a way that alters eligibility criteria for the advanced premium tax credit, causing significant coverage loss, the state's healthcare authority has the power to minimize loss of coverage by expanding eligibility, subject to available funds. The law took effect on Oct. 3, 2025.
Resources	rich.glass@mercer.com 2025 Ch. 1 (HB 2, Spec. Sess. 1) (Legislature, Oct. 3, 2025)

US — Oklahoma (previously covered, now effective)	
Status	**Currently effective**
Development	**Health** **Laws enacted that impose limits on administration of prescription drug (Rx) benefits** • **HB 1808**. The Ensuring Transparency in Prescription Drugs Prior Authorization Act imposes disclosure and review requirements on fully insured plans and pharmacy benefit managers (PBMs) performing Rx prior authorization. Specifically, utilization review entities must post their requirements, including clinical criteria, as well as drug formularies on an accessible website. Only a plan's physician, pharmacist or licensed mental health professional may make adverse benefit determinations. The law shortens prior authorization time frames. State actuaries estimated the law's cost to be $3 million alone for the state governmental plan in FY2026. A penalty of up to $5,000 applies. The law's scope appears to be limited to fully insured plans. • **HB 789**. The law bans effective rate contracting, where PBM reimbursement is based on the effective rate of payment rather than a predetermined fixed price or fixed discount percentage. Earlier versions required PBM reimbursement of at least 106% of the National Average Drug Acquisition Cost (known as NADAC), plus a $15 professional fee per Rx fill. PBMs that lease, rent or otherwise make provider networks available to another PBM cannot combine any ERISA or government plans with any non-ERISA or nongovernment plans. The law's scope appears to include self-funded ERISA plans. Oklahoma generally applies its insurance laws on an extraterritorial basis to state residents covered by fully insured plans issued in another state. The laws took effect on Nov. 1, 2025
Resources	rich.glass@mercer.com HB 1808 (Legislature, May 29, 2025) and HB 789 (Legislature, May 28, 2025)

US — Puerto Rico	
Status	**Currently effective**
Development	**Career — Health** **Benefit and leave laws vary** Puerto Rico is an unincorporated territory within the US with a separate tax code, constitution, and benefit and insurance laws. Nonetheless, many (but not all) US laws apply to this territory of approximately 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.
Resources	rich.glass@mercer.com GRIST, Aug. 12, 2024

US — Washington (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Career — Health** **Paid family and medical leave contributions announced** The Employee Security Department (ESD) announced that paid family and medical leave (PFML) contributions will increase to 1.13% of wages, up from 0.92%, starting in 2026. The employer portion of that rate is 28.57% (0.32284%); the employee portion is 71.43% (0.80716%). Employers with fewer than 50 Washington employees are not required to contribute, but they must still collect and remit employee contributions or pay their portion on their behalf. The maximum wage base for contributions equals the Social Security maximum taxable wage base ($184,500 in 2026).
Resources	Paid family and medical leave premium rate (Employment Security Department, Oct. 29, 2025) and Social Security contribution and benefit base (Government)

US (previously covered, with upcoming effective dates)	
Development	**Health** • Mental health parity changes — key date: Jan. 1, 2026 • 2026 HSA, HDHP and excepted-benefit HRA figures set — key date: Jan. 1, 2026 • Update on CMS audits and penalties for noncompliant section 111 reporting for group health plans — key date: Jan. 1, 2026 • Prescription law enacted in Arizona — key date: Jan. 1, 2026 • Breastfeeding consultation services coverage required in Arkansas — key date: Plan years starting in 2026 • Portable benefit plan for independent contractors created in Alabama — key date: Jan. 1, 2026 • Health Care Expenditure rates hiked in San Francisco, California — key date: Jan. 1, 2026 • Contractor-lessee health plan, pay rates updated in San Francisco, California — 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 • Law eliminates the exception for individual and small-group market-plans regarding abortion coverage mandate in Colorado — key date: Jan. 1, 2026 • Doula coverage mandated in Delaware — key date: Plan years beginning in 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 • Pharmacy benefit manager law enacted in Illinois — key date: Jan. 1, 2026 • Pharmacy benefit manager laws enacted in Indiana — key date: Jan. 1, 2026 • Dependent coverage law enacted in Illinois — key date: Plan years starting in 2026

US (previously covered, with upcoming effective dates)

Development

Health

- Pharmacy benefit manager licensure law to take effect in Massachusetts — key date: Jan. 1, 2026
- 2026 individual-mandate coverage dollar limits set in Massachusetts — key date: Jan. 1, 2026
- Pharmacy benefit manager law to change in Nebraska — key date: Jan. 1, 2026
- Fertility mandate enacted in Nevada — key date: Jan. 1, 2026
- Ground ambulance surprise billing banned in New Hampshire — key date: Jan. 1, 2026
- Network adequacy standards increased in Oregon — key date: Jan. 1, 2026
- Telehealth law enacted in Oregon — 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
- Hotel medical rates released for 2026 in Seattle, 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
- Insurance law mandates gender detransition coverage in Montana — key date: Oct. 1, 2026
- State-based exchange delivery to change in Oregon — key date: Nov. 1, 2026
- Pharmacy benefit manager law enacted in Colorado — key date: Jan. 1, 2027
- Obesity and pre-diabetes treatment coverage mandated in Colorado — key date: Jan. 1, 2027
- Ground ambulance law passed in Illinois — key date: Jan. 1, 2027
- Telehealth reimbursement parity extended in Hawaii — key date: Dec. 31, 2027

Wealth

- Rules finalized on Roth catch-up mandate for high earners — key date: Most plans will need to comply starting in 2026
- 2026 mortality tables for defined benefit plans released — key date: Jan. 1, 2026
- 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
- Employer contributions to Trump accounts can begin — key date: July 2026
- Rules finalized for SECURE 2.0 'super catch-up' contributions — key date: 2027 plan year

Section 4

Asia Pacific

Australia (new)	
Status	**Report**
Development	**Wealth** **Next phase of ASIC oversight initiatives published** Following the introduction of the retirement income covenant on July 1, 2022, the Australian Securities and Investments Commission (ASIC) has released a report detailing the next phase of its oversight of Australia's retirement system and regulated superannuation entities. ASIC is now expected to focus on assessing these issues at the individual entity level. The report reviews retirement communications practices across 12 large superannuation funds, which together represent 45% of APRA-regulated funds by member assets. Key findings in the report include: • Some trustees use a "one-size-fits-all" approach to retirement communications, failing to tailor messages and delivery methods to the diverse needs and preferences of their members. • There is a general lack of urgency among funds to improve retirement communications. • Trustees' communications often do not adequately address the needs of First Nations peoples, vulnerable groups and culturally and linguistically diverse members. • Funds with strong governance, robust research capabilities and effective benchmarking tend to provide better retirement communications.
Resources	tasnima.bhuiyan@mercer.com Report 818 (From superficial to super engaged: Better practices for retirement trustee communications) (ASIC, Oct. 14, 2025)

Australia (new)	
Status	**Updated standards and guidance to be issued first half of 2026.**
Development	**Wealth** **APRA issues revised governance proposals following industry consultation** The Australian Prudential Regulation Authority (APRA) has announced revisions to three of its original governance proposals to avoid placing excessive regulatory burdens on boards. This decision follows a consultation earlier in 2025 aimed at modernizing the prudential governance framework for banks, insurers and superannuation trustees. In March 2025, APRA had put forward eight measures to update its cross-industry prudential standards and governance guidance. The key modifications proposed by APRA include: • Introducing a hard tenure limit of 12 years for nonexecutive directors, with short extensions allowed only in limited circumstances. This replaces the previous proposal of a 10-year limit with a possible two-year extension. • Withdrawing the proposal that banks and insurers must have at least two independent directors (including the chair) who do not serve on other group boards. • Cancelling the requirement for significant financial institutions to engage early with APRA regarding "responsible person" appointments and succession planning. Additionally, APRA would clarify or adjust proposals related to individual director skills, perceived conflicts of interest, and the publication of registers detailing relevant interests and duties.
Resources	tasnima.bhuiyan@mercer.com Announcement (APRA, Oct. 24, 2025)

Australia (new)	
Status	**Consultation closed on Nov. 3, 2025.**
Development	**Wealth** **Treasury consults on merger notification and control** Starting Jan. 1, 2026, a new mandatory merger regime will require businesses planning certain types of acquisitions to obtain approval before proceeding, subject to specific thresholds. The Treasury recently released a consultation on the exposure draft titled Competition and Consumer (Notification of Acquisitions) Amendment (2025 Measures No. 1 Determination 2025), which closed on Nov. 3, 2025. Currently, businesses are not required to notify the Australian Competition and Consumer Commission of acquisitions. The Government intends to refine the initial notification requirements to ensure the merger reforms are targeted and risk-based, through amendments to subordinate legislation. Key proposed changes include: • Clarification and expansion of existing exemptions related to financial market activities. • A simplified approach to monetary thresholds for asset acquisitions. • Exemptions for leases and other acquisitions of interests in land conducted in the ordinary course of business, except where targeted notification requirements apply. • Streamlined notification obligations for serial acquisitions.
Resources	Announcement (Government, Oct. 15, 2025)

Australia (new)	
Status	**Proposal**
Development	**Wealth** **Tax changes on earnings of super 'large balances' proposed** The Treasurer announced significant changes to the previously proposed new tax on earnings of super "large balances" that exceed AU$3m — it was slated to start on July 1, 2025, but there has been no legislation. The proposed changes appear to take account of the difficulties identified with legislating for the previous measures. The government would introduce legislation to implement these changes as soon as possible in 2026, and further consultation is expected. Highlights of the proposed changes: • A new start date of July 1, 2026, for the modified high balances earnings tax • Two indexed thresholds would apply for the additional earnings tax — 30% on balances of AU$3m to AU$10m, and 40% on balances that exceed AU$10m. • Tax would apply only to income earnings and realized gains. The Treasurer also announced changes to the current low-income superannuation tax offset (LISTO), applicable from July 1, 2027. LISTO would increase from AU$310 to AU$810, and the higher eligibility threshold would increase to AU$45,000, up from AU$37,000. Additionally, the Treasurer flagged protective measures for federal court judges that would align their super treatment for the new tax with State Supreme Court judges.
Resources	anthony.nemec@mercer.com Reforms to support low-income workers and build a stronger super system (Treasury, Oct. 13, 2025)

<table>
<tr><th colspan="2">Australia (new)</th></tr>
<tr><td>Status</td><td>Proposal</td></tr>
<tr><td>Development</td><td>Wealth
Payday super legislation introduced
The government has introduced the Treasury Laws Amendment (Payday Superannuation) Bill 2025 and the Superannuation Guarantee Charge Amendment Bill 2025 that follow industry consultation and government announcements. The Australian Taxation Office (ATO) also released a draft practical compliance guideline (PCG) 2025/D5 Payday Super — first year ATO compliance approach, in relation to the 2026–27 year. Highlights of the proposals include:
Employers would have to pay their employees’ super contributions at the same time as their salary and wages.
A superannuation guarantee charge (SGC) would be applied if contributions are not received by their employees’ superannuation fund within seven business days after an employer makes a qualifying earnings (QE) payment to an employee — a longer timeframe to pay contributions would be allowed in certain circumstances. The QE is a new concept that covers ordinary time earnings, salary sacrifice superannuation contributions and other amounts currently included in an employee's salary or wages for SG.
The SGC would be updated and include unpaid contributions. Additional interest charges and penalties would apply if the SGC liability is not paid in full.
The SGC would be tax-deductible, ensuring that the income tax consequences for paying employees’ superannuation are consistent. The late payment offset would not apply to amounts contributed after July 1, 2026.
The Small Business Superannuation Clearing House would be retired from July 1, 2026, and closed to new users from Oct. 1, 2025. The ATO would engage with small businesses to help their transition.
The deadline for superannuation funds to allocate or return contributions that cannot be allocated would be reduced to three business days, down from 20.
Employers would be required to report in Single Touch Payroll both the QE and the superannuation liability for an employee.</td></tr>
<tr><td>Resources</td><td>anthony.nemec@mercer.com
Treasury Laws Amendment (Payday Superannuation) Bill 2025 (Legislature); Superannuation Guarantee Charge Amendment Bill 2025 (Legislature) and Draft compliance guideline (ATO)</td></tr>
<tr><th colspan="2">Australia (previously covered)</th></tr>
<tr><td>Development</td><td>Wealth
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
Superannuation, Medicare implications of 2025/26 federal budget highlights — key date: July 1, 2026
Superannuation service standards for claims handling released — key date: July 1, 2026</td></tr>
</table>

China (new)	
Status	**Currently effective**
Development	**Wealth** **Private pension withdrawal options expanded** Effective Sept. 1, 2025, China has broadened the eligibility criteria for withdrawing funds from private pension accounts. The new withdrawal conditions added are: • Out-of-pocket medical expenses incurred in the previous year by the individual, their spouse, or minor children that exceed the per capita disposable income of their provincial-level region for that year. • Receipt of unemployment insurance benefits for a total of 12 months within the past two years. • If the individual is currently receiving minimum living allowances for urban or rural residents. The original withdrawal conditions remain unchanged and include retirement, total disability, permanent emigration and death.
Resources	Announcement (Chinese) (Ministry of Human Resources and Social Security, July 13, 2025)

China — Beijing (new)	
Status	**Currently effective**
Development	**Health** **Social insurance contribution thresholds updated** Starting from July 1, 2025, Beijing increased the thresholds for calculating social insurance contributions. The maximum contribution base is now 35,811 CNY, and the minimum contribution base is 7,162 CNY.
Resources	Announcement (Chinese) (Beijing Municipal Bureau of Human Resources and Social Security, Sept. 18, 2025)

China — Shanghai (new)	
Status	**Currently effective**
Development	**Career — Health** **Family care leave to be introduced** A family care leave system was introduced on Nov. 1, 2025, under a recently issued government Decision on Amending the Shanghai Elderly Rights Protection Regulations. Under this new policy, employees are entitled to five working days of fully paid family care leave per year to take care of elderly parents who are hospitalized. Employees who are only children (born under the one-child policy) are granted seven working days per year. Further details will be provided in implementing regulations. Since 2021, other locations in China (such as Beijing, Tianjin, Zhejiang Province and Guangdong Province) have introduced similar leave provisions for employees to care for their parents aged 60 or older. However, the terms and conditions of elder care leave vary by location.
Resources	Decision on amending the Shanghai elderly rights protection regulations (Chinese) (Government, Sept. 26, 2025)

China — Shanghai (new)	
Status	**Currently effective**
Development	**Health** **Employer social insurance subsidy for maternity and childbirth introduced** Starting Jan. 1, 2025, Shanghai introduced an employer social insurance subsidy for eligible female employees during their maternity and childbirth leave. Highlights of the subsidy scheme include: • To qualify for the employer subsidy, the employee must give birth while employed by the company; be entitled to statutory maternity and childbirth leave; and be lawfully enrolled in the social insurance system. • The subsidy covers 50% of the employer's contributions to the following social insurance schemes during the maternity and childbirth leave period (for six months beginning the month of the employee's childbirth), basic pension insurance, basic medical insurance (including maternity insurance), unemployment insurance, and work-related injury insurance.
Resources	Announcement (Chinese) (Shanghai Municipal Human Resources and Social Security Bureau, Aug. 8, 2025)

China (previously covered, with upcoming effective date)	
Development	**Career** • Unemployment insurance contribution refund policy extended — key date: Dec. 31, 2025 • 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 **Health** • Commercial insurance catalog for innovative medicines developed — key date: Effective date is unknown

Hong Kong (previously covered, with upcoming effective date)	
Development	**Career** • Working time threshold for 'continuous contracts' reduced — key date: Jan. 18, 2026 **Health** • Revised fee schedule for public healthcare services gazetted — key date: Jan. 1, 2026

India (new)	
Status	**Currently effective**
Development	**Career** **Employers must disclose more on workplace sexual harassment incidents** Effective July 14, 2025, companies must provide detailed disclosures in their board report regarding compliance with the Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (POSH Act) as mandated by the Companies (Accounts) Second Amendment Rules 2014. The recent changes aim to strengthen corporate accountability in the prevention and redressal of workplace sexual harassment. The POSH Act took effect in 2013, but many companies have historically failed to submit the required annual reports. Companies must submit a Board Report under Section 134 of the Companies Act, 2013 that includes the: • Total number of sexual harassment complaints received during the relevant financial year • Number of complaints resolved • Number of cases that remained unresolved for over 90 days • Gender composition of employees employed by the company at the financial year-end.
Resources	Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 and Companies (Accounts) Second Amendment Rules 2014 (English and Hindi)

India (new)	
Status	**Currently effective**
Development	**Wealth** **Electronic system for filing provident fund returns, payments launched** The Employees Provident Fund Organisation (EPFO) has launched a new Electronic Challan-cum-Return (ECR) system for filing provident fund returns and making payments, effective from the wage month of September 2025. This update is designed to simplify and improve the monthly return filing and contribution process for employers and payroll managers. Previously, the ECR system combined return filing and payment into a single step, with limited validation checks and few options to correct errors after submission. Employers are encouraged to write to their local Provident Fund offices, and copy the central office, if they encounter difficulties with the new EPFO portal. Key features of the new system include: • Employers are now required to file their returns first; payments can only be made after the return has been approved. • The system validates the data before submission, identifying errors such as ineligible pension contributions. • Damages and interest under Section 14B and 7Q of the EPF Act will be automatically calculated and paid through the ECR platform.
Resources	jyotsna.tiwari@mercer.com Circular No. Compliance/ECR Revamp/2025/12997 (EPFO, Sept. 26, 2025)

India (new)	
Status	**Currently effective**
Development	**Career — Wealth** **Employers can voluntarily enroll eligible employees in Employees' Provident Fund** The Ministry of Labour and Employment launched the Employees' Enrolment Scheme, 2025 (EES 2025) on Nov. 1, 2025. This scheme allows employers to voluntarily declare and enroll eligible employees who had started employment with the employer between July 1, 2017, and Oct. 31, 2025, and who should be enrolled in the Employees' Provident Fund (EPF) scheme. The EES 2025 will close on April 30, 2026. The government expects that EES 2025 will increase EPF enrollment and help employers regularize their past employee enrolment records. Highlights of the scheme include: • The employee's share of the provident fund contribution for this period is waived, provided it was not deducted from their wages. • Employers are required to pay only their own share of the contribution for the specified period, along with a nominal lump sum penalty of 100 INR. • Employers are not required to pay EPF contributions for employees who have already left their employment as of the date of declaration. • Enrolment must be completed through the Employees' Provident Fund Organisation's (EPFO) online portal.
Resources	jyotsna.tiwari@mercer.com Announcement (Ministry of Labour and Employment, Nov. 1, 2025)

India (previously covered, with upcoming effective date)	
Development	**Career — Health — Wealth** • Labor and employment laws reformed — key date: effective date delayed

Indonesia (previously covered, with upcoming effective date)	
Development	**Career** • Details of public housing savings program, contributions and registration issued — key date: May 20, 2027 **Health** • New insurance regulation for health insurance products issued — key date: Delayed from Jan. 1, 2026

Malaysia (new)	
Status	**No effective date specified.**
Development	**Career — Health** **Employment protections for gig workers finalized** The Gig Workers Bill 2025 will provide mandatory protections for approximately 1.2 million gig workers in Malaysia. This Bill clearly defines the responsibilities of contracting entities, regulates the terms of service agreements and establishes new mechanisms for resolving disputes. The Bill, which passed Parliament on Sept. 9, 2025, currently awaits Royal Assent and will be officially gazetted. Key highlights of the Bill include: • Gig workers are individuals who perform services under service agreements and receive payment, often through digital platforms. The types of work covered are specified. • Gig workers must be provided with mandatory written service agreements outlining the terms of service and payment details. These agreements will specify the worker's pay, the nature of the services to be provided, insurance coverage and termination procedures. • Platforms are prohibited from arbitrarily changing payment rates or deactivating workers without due process. Workers who are wrongly suspended must be compensated. • A Gig Workers Tribunal and registered gig worker associations will be established to manage disputes and collective bargaining. The Tribunal will have the authority to issue legally binding decisions, including compensation or recovery of earnings. Noncompliance with these rulings may result in fines up to 50,000 MYR and criminal penalties. • Platform providers must register gig workers under the Self-Employment Social Security Scheme. They are required to make mandatory deductions and contributions from gig workers' earnings to the Social Security Organization. Contributions to the Employees Provident Fund (EPF) may be considered in the future. • A tripartite Consultation Council will advise on issues such as minimum earnings rates, calculation methods, sector- and region-specific standards and other regulatory matters affecting gig workers.
Resources	Gig Workers Bill, 2025 (Parliament)

Myanmar (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased for private sector** Myanmar's National Committee for Setting the Minimum Wage has introduced an additional 1,000 MMK daily allowance for private-sector workers. The combined minimum daily wage is now 7,800 MMK (the 4,800 MMK base wage plus a 3,000 MMK allowance), retroactively applied to Oct. 1, 2025. Overtime pay is calculated on 4,800 MMK/day.

New Zealand (previously covered, with upcoming effective date)	
Development	**Career** • KiwiSaver scheme and contribution amounts adjusted — key date: Jan. 1, 2026

Singapore (new)	
Status	**Effective Jan. 1, 2026, with further increases in 2027 and 2028.**
Development	**Career** **Wage increases for in-house security officers announced** Starting from Jan. 1, 2026, Singapore's 7,000 full-time and part-time in-house security officers will receive scheduled wage increases over a three-year period, lasting until Dec. 31, 2028. This follows the government's acceptance of the Security Tripartite Cluster's recommendations regarding the Security Progressive Wage Model (PWM). From Jan. 1, 2026, the wages of 1,500 full-time in-house security officers will increase to at least the new entry-level PWM wage of SG$2,475. Over the course of 2026 to 2028, the baseline monthly gross wage will further increase to SG$2,795, up from SG$2,475. Since Jan. 1, 2024, the Security PWM has included a separate wage model specifically for in-house security officers.
Resources	Announcement (Government, Oct. 30, 2025)

Singapore (new)	
Status	**Effective by the end of 2027.**
Development	**Career** **The Workplace Fairness (Dispute Resolution) Bill passed** On Nov. 4, 2025, Singapore's Parliament passed the second part of the Workplace Fairness Act called The Workplace Fairness (Dispute Resolution) Bill. This second Bill completes the law, which is expected to take effect by the end of 2027. The first part of the law, passed earlier in January 2025, makes it illegal for employers to discriminate against workers based on grounds of age, nationality, gender, marital or pregnancy status, caregiving duties, race, religion, language, disability or mental health. The second Bill creates a clear process for handling workplace disputes and discrimination complaints. Highlights of the second Bill include: • Employers must have a system for employees to raise complaints internally first. • If the complaint is not resolved internally, both sides must try mediation before going to court. Mediation claims must be made within certain time limits. • If mediation fails, disputes involving claims up to SG$250,000 can be taken to the ECT. Bigger claims go to the High Court. • Unions can help their members during mediation and at the ECT, but usually, lawyers are not allowed. • Complaints that are clearly without merit can be dismissed, and the person making the claim might have to pay legal costs. • Employers face sanctions of between SG$5,000 and SG$250,000 for breaching the Act.
Resources	Press release (Ministry of Manpower, Nov. 4, 2025)

Singapore (previously covered, with upcoming effective date)	
Development	**Career** • First workplace fairness bill passes parliament — key date: End of 2027 **Career — Wealth** • Retirement and reemployment ages to increase — key date: July 1, 2026 **Wealth** • Central Provident Fund contribution rates for older workers to increase — key date: Beginning in 2026

South Korea (previously covered, soon to be effective)	
Status	**Effective March 10, 2026.**
Development	**Career** **Implementation plans, effective date for labor relations law announced** The government has announced that the "Yellow Envelope Act" will take effect on March 10, 2026. To support its implementation, the government has established a task force to develop detailed guidelines covering key issues such as the definition of "employer," bargaining procedures and the scope of labour disputes. The Ministry of Employment and Labour is expected to release these guidelines by the end of 2025. Passed by parliament in August 2025, the Act amends important provisions of the Trade Unions and Labour Relations Adjustment Act. It aims to strengthen the rights of organised labour and will affect employers across all industry sectors. Highlights of the Act include: • The definition of "employer" will be expanded to include those who can substantially and specifically control workers' conditions, even if they are not directly party to the employment contract. As a result, companies that use subcontractors could now qualify as employers of a subcontractor's workforce and could be required to engage in collective bargaining with subcontractors' unions. • Broader eligibility for union membership, including permission for former employees to join labor unions. • Employer claims for damages against unions and individual workers will be limited and immunity for union actions will be expanded. • Unions will have broader grounds to initiate disputes, including management decisions impacting working conditions, collective bargaining agreements and worker status.
Resources	miyoung.kim@mercer.com Legislation (Korean) (Government, Sept. 9, 2025) and Task force (Korean) (Government)

South Korea (previously covered, with upcoming effective date)	
Development	**Wealth** • Plans to increase pension premiums, expand coverage — key date: Jan. 1, 2026

Taiwan (new)	
Status	**Proposal**
Development	**Career** **Minimum wage increase proposed** Effective Jan. 1, 2026, the Ministry of Labor has proposed increasing the minimum wage to NT$29,500/month (up from NT$28,590) and to NT$196/hour (up from NT$190), subject to parliamentary approval.
Resources	Announcement (Chinese) (Ministry of Labor, Sept. 26, 2025)

Taiwan (previously covered, with upcoming effective date)	
Development	**Career — Health** • Parental leave flexibility to increase — key date: Jan. 1, 2026 **Career — Wealth** • Employees and employers can negotiate post-retirement age employment — key date: unknown

Thailand (previously covered, with upcoming effective date)	
Development	**Career** • Minimum wage to increase — key date: Effective 90 days after publication in the Royal Gazette **Health** • Start date of Employee Welfare Fund postponed — key date: Oct. 1, 2026

Vietnam (previously covered, with upcoming effective date)	
Development	**Career** • Unemployment insurance participation expanded — key date: Jan. 1, 2026 **Health** • Start date of Employee Welfare Fund postponed — key date: Oct. 1, 2026

Section 5

Europe, Middle East and Africa (EMEA)

European Union (EU) (new)	
Status	**Currently effective**
Development	**Career** **Ruling expands nondiscrimination rights for employees who have children with disabilities** On Sept. 11, 2025, the Court of Justice of the European Union (CJEU) ruled that employees that have children with disabilities have the right to request reasonable adjustments to their employment and working conditions to enable them to care for their child. The court emphasized that employers must provide “reasonable accommodation that is appropriate” to support employees in fulfilling their caregiving responsibilities, provided that such accommodations do not impose a disproportionate burden on the employer — a determination that must be made by national courts. The CJEU’s ruling is a significant change in EU equality law and member states’ laws will have to ensure that employees who are primary carers of children with a disability have a right to reasonable accommodation. The ruling affirmed that the EU’s general principle of nondiscrimination extends to indirect discrimination “by association” on the grounds of disability. Consequently, parents of children with disabilities are entitled to equal treatment in employment and occupation under the EU’s directive on equal treatment in employment and occupation. This judgment arose from the case of an employee in Italy who requested a position with fixed working hours to care for her son, who has significant needs due to his disability. While the employer initially granted temporary arrangements, they declined to make these adjustments permanent. The case now returns to the Italian Supreme Court to make a final decision on the specific facts, applying the clarifications provided by the CJEU.
Resources	Information on the judgment (CJEU, Sept. 9, 2025)

European Union (new)	
Status	⚠ **Member states must transpose by late 2027, full application by late 2028**
Development	**Career** **Revised European Works Council Directive approved** On Oct. 27, 2025, the Council of the European Union gave its final approval to the revised European Works Council (EWC) Directive. EU member states will have two years — until late 2027 — to transpose the directive into national law, with the new measures applicable by late 2028. This revision follows the previous update made in 2009, which itself amended the original directive adopted in 1994. Key highlights of the revised directive include: • Updated definitions of key terms.: The directive introduces new or clarified definitions for important concepts, including dominant influence (this determines which entity holds organizational responsibility for establishing an EWC); consultation (employee representatives are entitled to provide opinions that company management must formally respond to); transnational (this defines the scope of business issues subject to EWC scrutiny); financial and other resources (specifies provisions for funding the EWC, including coverage of legal costs and involvement of external experts in an advisory capacity); confidentiality (management must justify any withholding of information from the EWC on confidentiality grounds); sanctions (strengthened penalties for noncompliance, mandating that member states impose “dissuasive financial penalties” that take account of the company’s annual turnover for breaches of information and consultation obligations). • Revised subsidiary requirements for default EWCs. These requirements apply when no agreement is reached and have historically influenced EWC negotiations. The revisions include an expanded list of topics for information and consultation and a requirement to hold two EWC meetings annually (up from one), with procedures to address issues arising between meetings • Renegotiation of “Article 13 agreements.” Companies with existing “Article 13 agreements” on transnational information and consultation arrangements, concluded under the 1994 directive, must renegotiate these agreements if requested by at least 100 employees or their representatives from two or more member states. The renegotiation period is limited to two years. This change is significant and is expected to affect approximately 30% of current transnational information and consultation agreements. • Renegotiation of existing EWC agreements. Companies with agreements previously negotiated under the EWC directive must also renegotiate these arrangements upon request by employee representatives.
Resources	Press release (Council of the European Union, Oct. 27, 2025)

EU (previously covered, with upcoming effective dates)	
Development	**Career** • 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 **Career — Health — Wealth** • Agreement on postponement of corporate sustainability, due diligence reporting rules — key date: Dec. 31, 2025 • Pay transparency law must be transposed into national law — key date: June 7, 2026
Albania (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career Increased minimum wage announced** On Jan. 1, 2026, the monthly minimum wage will increase to 50,000 ALL.
Resources	Announcement (Albanian) (Government, Sept. 30, 2025)
Austria (previously covered, with upcoming effective date)	
Development	**Wealth** • Eligibility criteria for early retirement adjusted — key date: Jan. 1, 2026
Bahrain (new)	
Status	**Currently effective**
Development	**Career** **Upgraded Wage Protection System introduced** On Oct. 22, 2025, Bahrain's Labour Market Regulatory Authority introduced an enhanced Wage Protection System (WPS) for the private sector. This upgraded system aims to strengthen worker protection and reduce wage-related disputes. Under the WPS, employers are required to pay employees' wages through licensed banks and financial institutions approved by the Central Bank of Bahrain. The system promotes transparency, accountability and ensures timely payment of wages.
Resources	Announcement (Bahrain News Agency, Oct. 21, 2025) and Wage Protection System (Labour Market Regulatory Authority)

Belgium (new)	
Status	**Currently effective**
Development	**Wealth** **'Unemployment with company allowance' early retirement scheme for new entrants ends** From June 30, 2025, Belgium closed its early retirement scheme (also known as the "unemployment with company allowance" or "bridge pension") to new entrants. The scheme enabled employees to stop working before they reached statutory retirement age and be paid state unemployment benefits and an employer-paid allowance. Employees currently receiving this allowance will continue to do so. Employees whose contracts had already been terminated before June 30 with a view to accessing the allowance are eligible for transition measures. In addition, the medical early retirement scheme will remain open until Dec. 31, 2025, for employees who fulfill the eligibility criteria — with a possible extension until June 30, 2029.
Resources	Royal Decree (French and Dutch) (Government, Sept. 24, 2025)

Belgium (previously covered, with upcoming effective date)	
Development	**Career — Health** • Summer deal includes employment measures — key date: Implementing legislation must be agreed to, and clarification is still required for some measures **Health** • Mobility Budget to be required — key date: Jan. 1, 206 • Maximum value of meal vouchers to increase in 2026 —key date: Jan. 1, 2026 **Wealth** • Blue- and white-collar pension harmonization postponed — key date: Jan. 1, 2027 • Federal government agrees on pension reforms — key date: Jan. 1, 2028

Croatia (new)	
Status	⚠ **Effective Jan. 1, 2026.**
Development	**Career** **Increased minimum wage announced** On Jan. 1, 2026, the gross monthly minimum wage will increase to €1,050, up from €970/month. The government has also announced that the minimum wage will increase to €1,250 gross by 2028.
Resources	Announcement (Croatian) (Government, Oct. 24, 2025) and Announcement (Croatian) (Government, Sept. 24, 2025)
Croatia (previously covered, with upcoming effective date)	
Development	**Wealth** • Pension Act revised — key date: Jan. 1, 2026
Czech Republic (new)	
Status	⚠ **Effective Jan. 1, 2026.**
	Career **Minimum wage increase announced** On Jan. 1, 2026, the minimum wage will increase to 22,400 CZK/month. A new methodology for calculating the minimum wage indexation was introduced in 2025, and the indexation amount is now announced annually, by the end of September.
Resources	Announcement (Czech Trade, Aug. 31, 2025)
Czech Republic (previously covered, with upcoming effective date)	
Development	**Career** • Simplified employee reporting to be introduced — key date: Jan. 1, 2026 **Wealth** • Pension contribution rules changed for employees in arduous job roles — key date: Jan. 1, 2026
Denmark (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Career — Health** **Denmark to expand bereavement leave for spouses, cohabiting partners** Starting in 2026, Denmark will grant families the right to 12 weeks of paid bereavement leave when an individual loses their spouse or cohabiting partner, provided they have minor children together. This leave will be compensated at the same rate as maternity benefits paid in cases where the other parent passes away. These provisions are part of the 2026 Finance Act.
Resources	Announcement (Danish) (Government, Oct. 24, 2025)

Denmark (previously covered, with upcoming effective date)	
Development	**Career — Health** • Leave for parents of hospitalized newborn or adopted child and bereavement leave benefits expanded — key date: Jan. 1, 2026

France (previously covered, with upcoming effective date)	
Development	**Career** • 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 **Wealth** • Corporate tax reductions that will impact company pension schemes introduced — key date: Jan. 1, 2028

Greece (new)	
Status	**Contribution required by Sept. 30, 2025.**
Development	**Health** **Payment of annual housing contribution by employers** The National Social Security Fund (e-EFKA) in Greece issued a circular stating that employers must pay an annual contribution of €20 per employee to the Workers Housing Organization insurance (‘OEE’). This contribution, along with social security payments, was due by Sept. 30, 2025, for the August 2025 payroll period. The OEE is managed by the Ministry of Labor and a board of directors and funds initiatives that support lower paid and vulnerable social groups.
Resources	Circular (Greek), (National Social Security Fund, Aug. 29, 2025)

Greece (new)	
Status	**Currently effective**
Development	**Career — Health** **Interpretative guidance issued on Digital Work Card, recording of parental leave** The Ministry of Labor and Social Security has issued an interpretative circular to clarify specific aspects of the Digital Work Card (‘ERGANI II’) for enterprises operating in certain industry sectors. These sectors include financial and insurance activities; electricity, gas, steam, and air conditioning supply; wholesale and retail trade; repair of motor vehicles and motorcycles; and administrative and support activities. Additionally, a second circular provides guidance on how to declare parental leave within the ERGANI II system. Key points covered in the circulars include: • Assumptions regarding the use of the Digital Work Card • Permitted exemptions from the Digital Work Card system • Procedures for recording changes to working hours, work time organisation and overtime • Handling of missing digital work card markings or late submission of digital work card data by employers • Information that is not required to be reported, along with requirements for recording details about seconded employees and contractors • Guidance for employers on declaring parental leave in ERGANI, including the submission process, mandatory fields, and conditions necessary for correctly registering parental leave.
Resources	Circular (Greek) (Government, Oct. 13, 2025) and Circular on parental leave (Greek) (Government, Sept. 1, 2025)

Greece (new)	
Status	**Effective dates vary.**
Development	**Career — Health** **Labor law changes introduced** Greece has recently introduced new labor Law 5239/2025, which makes significant changes to workforce organization and management. The measures include the option for a permanent four-day workweek, extended overtime allowances and modernization of the digital ERGANI platform to simplify administrative procedures and enhance functionality. Highlights of the law include: Employers are no longer required to upload scanned copies of employment contracts (including part-time contracts) to the ERGANI system. They also do not need to keep manual records such as working time schedules, annual leave books, employment contracts, or payslips. Changes to contracts can be uploaded directly. • Employers can issue fixed-term contracts for urgent business needs through a special application on the ERGANI platform. • Employees and employers can mutually agree to a four-day workweek, where employees work 10 hours per day without any pay reduction. • Up to four hours of overtime per day are allowed. The annual and weekly maximum overtime limits remain at 150 hours and 48 hours respectively. • Employees may split their annual leave into more than two periods per year, subject to employer approval. • Maternity leave (nine weeks after childbirth) now also applies to foster mothers and women who adopt children up to age eight (up from age six). Maternity benefits are now based on the individual’s total insurance period, even if an employee changes employers or insurance funds. • Formalization of the Digital Work Card system to allow flexible work attendance agreements of up to 120 minutes and preparation time of 10 or 30 minutes depending on the industry. • Integration of a digital health and safety IT system with ERGANI and other national databases. • Premiums for overtime, night work, Sunday and holiday pay (whether statutory, agreed in collective labour agreements, or voluntarily paid by employers) are exempt from social security contributions.
Resources	Government (Greek) (Official Journal, Oct. 17, 2025)

Hungary (previously covered, now effective)	
Status	Currently effective
Development	**Career** **Personal tax exemption scheme for certain mothers expanded** The scheme allowing lifetime exemption from personal income tax for mothers in Hungary with four or more children expanded on Oct. 1, 2025, to mothers that have three children. The tax exemption applies to income derived from work (such as salaries, fees for services or withdrawals from sole proprietorship). • The exemption will be further expanded to mothers with two children beginning in 2026, based on age (mothers aged younger than 40 in 2026; mothers aged 40 to 49 in 2027; mothers aged 50 to 59 in 2028; mothers older than 60 in 2029). • Single mothers younger than age 30 have been eligible for partial personal tax exemption since 2023 and they will benefit from full exemption by 2026. • The tax benefit can be claimed during the year through a tax advance declaration via the employer, or a refund can be requested in the annual tax return after the end of the tax year.
Resources	Announcement (Hungarian) (Government, Sept. 16, 2025)

Ireland (new)	
Status	Effective dates vary.
Development	**Career — Health — Wealth** **Budget for 2026 includes benefit and employment measures** The government presented its Budget for 2026 on Oct. 7, 2025. Key employment-related measures include: • The national minimum wage will increase by 65 cents to €14.15/hour. • The Universal Social Charge will increase by €1,318 (or 2%), bringing the new limit to €28,700/year. • The benefits-in-kind (BIK) regime for company cars will change. The temporary universal relief on the original market value of vehicles, introduced in 2023, will be gradually reduced. It will remain at €10,000 in 2026 and then it will reduce to €5,000 in 2027 and €2,500 in 2028 and will be abolished from 2029 onwards. Additionally, a new vehicle category will be introduced for zero-emission cars, applying the lowest BIK rates. • The core State Pension (contributory and noncontributory) rates will increase by €10/week, effective January 2026. This follows three consecutive increases of €12/week and signals a moderation of welfare growth as inflation returns to more typical levels. The increase will affect all “integrated” pension schemes that calculate benefits and/or contributions based on the State Pension.
Resources	lorna.white@mercer.com Budget 2026 (Government, Oct. 7, 2025) and Announcement (Government, Oct. 16, 2025))

Ireland (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career** **Minimum wage to increase** In 2026, the minimum wage will be €14.15/hour. Currently, the minimum wage is €13.50/hour. Lower statutory rates apply to employees younger than 20. The government announced earlier in 2025 the postponement of the National Living Wage to 2029 — it had been due to take effect in 2026.
Resources	Minimum wage set to increase to €14.15 an hour in 2026 (Government, Oct. 7, 2025)

Ireland (previously covered, with upcoming effective date)	
Development	**Wealth** • Small delay for start of 'My Future Fund' for pension autoenrollment — Jan. 1, 2026 • Pension-related issues included in Finance Bill — key date: Jan. 1, 2026

Isle of Man (previously covered, currently effective)	
Status	**Currently effective**
Development	**Career — Health** **Shared parental leave, parental bereavement leave introduced** Shared parental leave and parental bereavement leave became effective on Nov. 1, 2025, under measures included in the Employment (Amendment) Act 2024. Highlights of the measures include: • Parents — including adoptive parents — can take up to 50 weeks of shared parental leave to care for a new baby during the first 12 months following the birth, or adoption. Both maternity and paternity leave are still available for new parents. Eligible employees are paid a shared parental allowance. • Parents can take an additional two weeks of leave following the death of a child younger than age of 18, including for stillbirths. Expectant parents who suffer a miscarriage are entitled to one week of leave. • The leave can be taken as a single two-week block or two separate one-week blocks during the first year after the child's death. • Employees are paid a parental bereavement allowance for up to two weeks following the death of a child or stillbirth after 24 weeks of pregnancy, or one week following a miscarriage before 24 weeks of pregnancy. Eligibility criteria apply. The government also announced that new rights for neonatal care leave and carer's leave secondary legislation for rest breaks will be published in the coming months.
Resources	New employment rights for shared parental leave and parental bereavement leave (Government, Oct. 22, 2025)

Isle of Man (new)	
Status	⚠ **Effective April 1, 2026**
Development	**Career** **Minimum wage to increase** On April 1, 2026, the minimum wage will increase to £13.46/hour, up from £12.25/hour. The youth hourly minimum wage (paid to individuals who have left school but who are not yet age 18) will increase to £10.76/hour, up from £9.55/hour. In July 2025, the parliament adopted a new approach that sets the minimum wage rates at 66% of median earnings.
Resources	Announcement (Government, Oct. 24, 2025)

Italy (previously covered, with upcoming effective date)	
Development	**Career — Health** • Leave for employees with disabling or chronic oncological diseases expanded — key date: Jan. 1, 2026

Lithuania (new)	
Status	⚠ **Effective Jan. 1, 2026**
Development	**Career** **Minimum wage to increase** On Jan. 1, 2026, the monthly minimum wage will increase to €1,153, up from €1,038. The minimum gross hourly wage will increase to €7.05, up from €6.35.
Resources	Law (Lithuanian) (Official Journal, Oct. 16, 2025)

Lithuania (previously covered, with upcoming effective date)	
Development	**Health** • Changes to taxation of benefits — key date: Jan. 1, 2026

Netherlands (previously covered, with upcoming effective date)	
Development	**Health** • Employer disability and sickness benefit premiums increased — key date: Jan. 1, 2026 **Wealth** • Significant reforms to the occupational pension system — key date: Unknown • Lump-sum Revision Act start date postponed again — key date: Postponed until July 1, 2026

Nigeria (new)	
Status	**Currently effective**
Development	**Wealth** **Guidelines on foreign currency pension contributions issued** In September 2025, Nigeria's National Pension Commission (PenCom) introduced new Guidelines on Foreign Currency Pension Contributions. These Guidelines allow both employers and employees to make pension contributions in U.S. dollars under the Contributory Pension Scheme (CPS). Highlights of the Guidelines include: • Pension deductions in foreign currency can now be made directly into employees' Retirement Savings Accounts. This applies to Nigerians living overseas, as well as resident Nigerians and foreign workers in Nigeria who receive part or all of their salary in foreign currency. Previously, the CPS only permitted contributions in Naira, which excluded individuals earning income abroad or locally in foreign currency. • The eligibility criteria, required documentation, "Know Your Customer" procedures, investment principles, allowable investment instruments, safeguards, tax rules for early withdrawals and anti-money laundering measures. • Foreign currency pension contributions are held in a dedicated Foreign Currency Dollar Fund. • Individuals may access up to 60% of their funds before retirement, provided there is a six-month holding period, and that 40% of the funds remain preserved for pension income.
Resources	ebun.jackson-adekola@marsh.com Guidelines on foreign currency pension contributions (National Pension Commission, September 2025)

Norway (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career — Health** **Company-specific age limits abolished** Starting Jan. 1, 2026, it will be illegal for employers in Norway to enforce company-specific age limits that require employees to retire before the age of 72 under measures included in the amended Working Environment Act. The only exception applies to professions with specific health and safety regulations that mandate earlier retirement. Norway's general retirement age increased to age 72, up from 70, in 2015. For companies with existing collective agreements that set a lower retirement age, a transition period is allowed. These agreements can remain in effect until they expire, but no later than Jan. 1, 2029.
Resources	Amended Working Environment Act (Norwegian) (Government, May 27, 2025)

Oman (previously covered, with upcoming effective date)	
Development	**Career** • Annual salary increment scheme revised — Key date: Jan. 1, 2026 • Social protection for foreign employees expanded — key date: July 2026 **Health — Wealth** • Three workforce insurance schemes postponed — key date: July 19, 2026

Poland (new)	
Status	Jan. 1, 2026
Development	**Career — Health** **Method for determining length of service expanded** Starting Jan. 1, 2026, Poland will broaden the way an employee's length of service is calculated. The new method will include work performed for the same employer outside of traditional employment contracts, such as self-employment, service contracts or work under "mandate contracts." This change, introduced through amendments to the labor code, aims to include individuals who have years of professional experience but are currently excluded from benefits linked to length of service. The measure will affect employee entitlements linked to length of service, including additional holiday leave, long service awards and eligibility for roles requiring documented work history. However, these entitlements will only apply if the individual is actively employed when claiming them, and if social security contributions were paid during those periods. The Social Insurance Institution (ZUS) will issue certificates confirming these periods of service. If ZUS cannot provide a certificate, employees may submit their own documentation to verify their length of service.
Resources	Announcement (Polish) (Government, Oct. 16, 2025)

Qatar (new)	
Status	Currently effective
Development	**Career** **New fee structure for work permits introduced** The Ministry of Labor has introduced a new fee structure for work permits and labor services under Ministerial Decision No. 32/2025. Private sector employees must now pay an annual fee of 100 QAR for work permits, covering new, renewal and replacement applications. Recruitment agencies must pay 2,000 QAR for new or renewed licences and 1,000 QAR for replacements. Document attestation services, such as verifying contracts and certificates, are charged at 20 QAR. Exemptions apply to Qatari nationals, children of Qatari women and citizens of Gulf Cooperation Council states.
Resources	Ministerial Decision No. 32/2025 (Arabic) (Government, Sept. 26, 2025)

Romania (new)		
Status		**Currently effective**
Development	**Career — Health** **Medical leave and pay reduced** Effective Aug. 1, 2025, the medical leave payment for employees has been reduced under budgetary reform measures that aim to address the increased number of medical leave requests. The first five days of medical leave are paid for by the employer. Highlights of the changes include: • The payment is now based on the length of the leave — previously it was a uniform 75% rate of the calculation base. • The monthly gross medical allowance for temporary incapacity to work due to common illnesses or nonoccupational accidents is calculated individually based on the total duration of each medical episode by applying different percentage rates: 55% for medical leave certified for a period of up to seven calendar days; 65% for leave ranging from eight to 14 calendar days; 75% for medical leave exceeding 15 calendar days. • The 75% allowance is unchanged for cardiovascular patients, regardless of the length of their medical leave, and individuals diagnosed with serious medical conditions such as AIDS, tuberculosis and cancer continue to receive a 100% allowance.	
Resources	alina.popescu@mercermarshbenefits.com Law No. 522 (Romanian) (Official Journal, Aug. 1, 2025)	

Romania (new)		
Status		**Currently effective**
Development	**Health** **Public health insurance contribution requirements expanded** Law 141/2025 published on July 25, 2025, introduced important changes to the public health insurance scheme (CASS). Highlights of the changes include: • From Sept. 1, 2025, individuals who were previously exempt from paying CASS contributions must now pay — they include spouses and parents without their own income who are supported by an insured person; individuals receiving unemployment benefits or other unemployment insurance support; individuals on maternity leave; and beneficiaries of other social assistance programmes. A new procedure also allows a third party to pay contributions on their behalf. • From Aug. 1, 2025, until Dec. 31, 2027, pensions exceeding 3,000 RON are also subject to CASS contributions, including pensions received from abroad.	
Resources	alina.popescu@mercermarshbenefits.com Law 141/2025 (Romanian) (Official Journal, July 25, 2025)	

Saudi Arabia (new)	
Status	**Effective Jan. 1, 2026**
Development	**Health** **Health insurance disclosure form for smaller employers to be introduced** Starting Jan. 1, 2026, health insurance providers in Saudi Arabia have the right to request employers (policyholders) with fewer than 100 employees to complete a medical disclosure form for newly issued policies. This requirement is outlined in a circular issued on Oct. 19, 2025. While the policyholder may submit the medical disclosure forms to the insurance providers, it is mandatory that the individual beneficiaries complete these forms themselves. Health insurance companies retain the right to request additional information if necessary and may also waive the requirement to provide some or all the disclosed data. For employers with more than 100 employees, health insurance providers may only request medical disclosure under specific circumstances: if the individual beneficiary is over 65 years of age, or if an individual is added to the policy after it has already taken effect (this includes new employees and/or spouses on a dependent visa, within 30 days of the start of employment or their marriage).
Resources	zaid.ahmed@marsharabia.sa Circular (English and Arabic) (Insurance Authority, Oct. 19, 2025)

Slovakia (new)	
Status	**Effective Jan. 1, 2026**
Development	**Career** **Minimum wage to increase** On Jan. 1, 2026, the minimum wage rate will increase to €915/month and to €5.259/hour. The current rates are €816/month and €4.69/hour. Different rates apply to employees depending on their job grades.
Resources	Announcement (Slovak) (Government, Oct. 8. 2025)

Slovakia (new)	
Status	**Generally effective from 2026.**
Development	**Career — Health — Wealth** **Public holidays, sick leave payments and health insurance contributions adjusted** Changes to Slovakia's public holidays, employers' requirement to pay sick leave and health contribution rates are included in a 'comprehensive law' that aim to consolidate public finances. The measures will start in 2026 except for the permanent cancellation of the Nov. 17 public holiday which will be effective this year. Highlights of the changes include: • Changes to public holidays. Starting in 2025, Nov. 17 is no longer a public holiday — this is a permanent change. In 2026, May 8 and Sept. 15 will temporarily lose their status as public holidays. • On Jan. 1, 2026, employers will have to pay the wages of employees who are on sick leave for 14 calendar days, up from 10. Social insurance will only be paid from the 15th day of incapacity. • On Jan. 1,2026, social insurance must be paid if an employee receives any taxable income, for example while on sick leave or during leave to care for a family member. • Effective Jan. 1, 2026, employees' health insurance contribution will increase to 5%, up from 4%; for individuals with disability, the contribution rate will increase to 2.5%, up from 2%. On Jan. 1, 2028, the contribution rate for employers will reduce to 10%, down from 11%. • The amount of the 13th old-age pension, early retirement pension and disability pension (upon reaching retirement age) will be fixed at €667.30 from 2026 to 2028.
Resources	petr.boldis@mercer.com Announcement (Slovak) (Government, Sept. 25, 2025)

Slovenia (previously covered, with upcoming effective date)	
Development	**Career — Wealth** • Phased retirement introduced, hiring of older employees boosted — key date: Upon proclamation

South Africa (previously covered, with upcoming effective date)	
Development	**Career** • Expanded remuneration and pay gap disclosures required — key date: Upon proclamation

Spain (previously covered, with upcoming effective date)	
Development	**Career — Health** • Birth and child care leave expanded — Jan. 1, 2026

Sweden (previously covered, with upcoming effective date)	
Development	**Wealth** • Flexibility of receiving occupational pension benefit payments increased — key dates: Jan. 1, 2026

Tanzania (new)	
Status	Effective Jan. 1, 2026.
Development	**Career** **Minimum wage for private sector to increase** On Jan. 1, 2026, the minimum wage for private sector employees will increase to 358,322 TZS, up from 275,060 TZS.
Resources	Announcement (Swahili) (Government, Oct. 17, 2025)

UK (new)	
Status	Currently effective
Development	**Career** **Bonus rules for senior bankers eased** Remuneration rules for senior bankers in the UK, introduced after the 2008 financial crisis, have been relaxed following measures announced by the Prudential Regulation Authority (PRA) and the Financial Conduct Authority (FCA). These changes follow the removal of the bonus cap in 2023 and a November 2024 consultation. The final measures, some of which go beyond the regulators' initial proposals, are designed to enhance the competitiveness and growth of the UK's financial sector. They came into effect on Oct. 16, 2025, in time for the 2025 pay awards and any other awards that have been granted but not yet fully paid. Highlights of the measures include: • Stronger alignment is created between the regulators and unnecessary duplication is eliminated. The FCA's Remuneration Handbook rules will be reduced by over 70%, as firms will primarily follow the PRA's remuneration rules going forward. • The bonus deferral period for senior bankers has been shortened to four years, down from eight. • Partial bonus payments are now allowed for the most senior bankers starting from the first year, instead of beginning in the third year. • The portion of bonuses that must be deferred has been reduced —only 60% of the amount exceeding the £660,000 threshold needs to be deferred. Previously, 60% of the entire bonus amount above that threshold had to be deferred. • Companies now have greater flexibility to pay a higher cash portion of bonuses immediately. Previously, both the immediate and deferred parts of bonuses were required to be split evenly, with 50% in cash and 50% in instruments. • Enhanced alignment with the Senior Managers Regime, ensuring that firms take into account performance related to PRA supervisory priorities when determining bonus payments for the responsible senior managers. The regulators believe that the updated bonus deferral periods will still allow sufficient time for firms to detect any issues (for example related to potential malus and/or clawback) and adjust individuals' bonus payments accordingly.
Resources	PRA and FCA announce changes to banker bonuses for 2025 (Bank of England, Oct. 15, 2025)

UK (new)	
Status	⚠ **Effective dates vary.**
Development	**Career** **Immigration changes introduced** The UK government has announced significant increases to the Immigration Skills Charge that will come into effect in December 2025. Other changes include expanded English language requirements and measures affecting employment in the UK for foreign graduates. Highlights of these changes include: • From Dec. 16, 2025, the Immigration Skills Charge will increase to £1,320/year for large sponsors, up from £1,000/year. Small or charitable sponsors will see an increase to £480 per year, up from £364. A Statutory Instrument confirming the revised charges will be issued shortly. • On Nov. 4, 2025, the list of eligible universities for recruitment under the High Potential Individual route doubled, allowing more recent foreign graduates to qualify for this route, which grants the right to work in the UK for up to two years. The number of applications under this route is now capped at 8,000/year. • Effective Jan. 8, 2026, main applicants who apply under the Skilled Worker, Scale-Up and High Potential Individual routes will have to demonstrate English language proficiency at Level B2 of the Common European Framework of Reference for Languages (CEFR), an increase from the current Level B1. This requirement will only apply to first-time applicants. • Also from January 2026, the period during which foreign non-PhD graduates who have recently graduated from UK universities can work in the UK without sponsorship will be reduced to 18 months, down from two years. The length of permission for PhD graduates to be employed in the UK remains unchanged at three years.
Resources	Statement of changes to the Immigration Rules: HC 1333 (Government, Oct. 14, 2025)

UK (new)	
Status	**Consultations close on Dec. 18, 2025, and Jan. 15, 2026**
Development	**Career — Health** **Four consultations on measures in Employment Rights Bill issued** On Oct. 23, 2025, the government published four consultation papers detailing measures included in the Employment Rights Bill (the Bill), which is expected to receive Royal Assent in the coming weeks. Additionally, on July 1, 2025, the government released a roadmap outlining the anticipated implementation dates for the Bill. Several measures in the Bill require further consultation and subsequent regulations. These consultations focus on additional details to be included in regulations concerning bereavement leave; enhanced dismissal protections for pregnant women and new mothers; the duty to inform workers of their right to join a trade union; and the rights of trade unions to access workplaces. Highlights of the four consultations include: • The Bill would require employers to provide workers with a written statement informing them of their right to join a trade union at the start of their employment and at other specified times. The consultation seeks feedback on the content of this statement and the timing of when it should be reissued and consultation closes on Dec. 18, 2025. • The Bill would establish a statutory right for trade unions to physically access workplaces and communicate with workers both in person and digitally, to support union recruitment and collective bargaining. The consultation covers how unions should request access, how employers should respond (proposing a five-working-day response period followed by a 15-working-day negotiation period) and the factors the Central Arbitration Committee would consider when deciding if and on what terms access should be granted. This consultation closes on Dec. 18, 2025. • The Bill would introduce a new, additional day-one right to unpaid bereavement leave for employees who experience the loss of a loved one, including pregnancy loss. It includes minimum statutory requirements, a minimum leave period of one week and a 56-day window for the leave to be taken. The consultation seeks views on eligibility criteria, total duration of leave, the timeframe for taking the leave and the types of pregnancy loss covered. This consultation closes on Jan. 15, 2026. • The Bill would prohibit the unlawful dismissal of pregnant women, women on maternity leave and mothers who have returned to work for at least six months after their return, except in specific circumstances. The consultation requests input on when this protected period should begin, if it should be a day-one right, the circumstances that would justify fair dismissal and if other parents should receive enhanced dismissal protection. This consultation closes on Jan. 15, 2026.
Resources	Employment Rights Bill (Parliament) and Duty to inform workers; Trade union right of access; Leave for bereavement; Enhanced dismissal protections (Government, Oct. 23, 2025)

UK	
Status	**Consultation closed on Nov. 11, 2025.**
Development	**Wealth** **Pension Regulator launches enforcement strategy consultation** The Pension Regulator (TPR) launched a consultation on a new enforcement strategy, accompanied by a blog describing the proposed approach. The strategy details how TPR will operate, including when and how it will intervene. TPR plans to continue to take a pragmatic, strategic, evidence-based approach, prioritizing cooperation and prevention — but it will take stronger action where needed. The consultation closed on Nov. 11, 2025, and TPR plans to publish the final strategy in early 2026.
Resources	richard.wyatt@mercer.com Enforcement strategy consultation (TPR, Sept. 16, 2025)

UK (new)	
Status	**Legislation is provisionally effective July 31, 2026.**
Development	**Wealth** **Government responds to consultation on unconnected multiemployer CDC schemes** The government has published its response to the October 2024 consultation concerning draft regulations aimed at extending collective defined contribution (CDC) provisions to unconnected multiemployer (UME) schemes. The consultation proposed amendments to the existing legislative framework to enable CDC schemes to be accessible to a broader range of employers through UME schemes. The Government plans to enact the legislation and update the Pensions Regulator's (TPR) code of practice by July 31, 2026. This would allow unconnected multiemployer CDC schemes to apply for authorisation from TPR. CDC schemes represent an innovative pension model that blends features of both defined contribution and defined benefit schemes. They aim to provide members with a target pension income while collectively sharing investment and longevity risks across the membership.
Resources	richard.wyatt@mercer.com Consultation response (Government, Oct. 23, 2025)

UK (new)	
Status	**Consultation closes on Dec. 4, 2025.**
Development	**Wealth** **UK consults on retirement collective defined contribution schemes** The UK's Department for Work and Pensions (DWP) is consulting on a new type of collective defined contribution (CDC) pension scheme, called a retirement CDC scheme. The consultation period will close on Dec. 4, 2025. The government plans for the legislation enabling retirement CDC schemes to come into effect in 2028, supported by a detailed roadmap for CDC schemes. Retirement CDC schemes would allow individuals with defined contribution pension funds to transfer their pension pots at retirement into a collective fund. This fund, managed by trustees, would provide members with a lifelong income that is adjusted annually based on investment performance and the scheme's financial sustainability. These schemes are designed exclusively for pensioner members who would not accumulate any further benefits after joining. Retirement CDC schemes would operate as unconnected multiemployer (UME) schemes. Such schemes would be established under trust within an occupational pension scheme, either as a section of a master trust or as a standalone unconnected multi-employer CDC scheme. They would be authorized and regulated by The Pensions Regulator which would oversee ongoing compliance, including requirements to notify the Regulator of certain significant events.
Resources	richard.wyatt@mercer.com Consultation (Government, Oct. 23, 2025)

UK (previously covered, with upcoming effective date)	
Development	**Career — Health** • Paternity leave to be expanded to bereaved partners — key date: provisionally 2026 • Benefits-in-kind digitization reporting confirmed — key date: April 2026 **Wealth** • Pension auto enrollment to expand, reducing eligible age and abolishing earnings threshold — key date: unknown • Policy paper on inheritance tax and pensions death benefits — key date: April 6, 2027

Mercer LLC
1166 Avenue of the Americas
New York, NY 10036
www.mercer.com

A business of Marsh McLennan