MARSH

Marsh People and Investments

Global Legislative Update

September 2026

Law & Policy Group
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In this document

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

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Section 1
Highlights

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Americas	
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Canada	Input on expansion of pay equity legislation in New Brunswick requested Minimum wage to increase in Manitoba Minimum wage increased in Northwest Territories Minimum wage increased in Nunavut Minimum wage to increase in Ontario Minimum wage to increase in Prince Edward Island Minimum wage to increase in Saskatchewan
United States	Final rule implements executive order to 'end illegal discrimination' in federal contracts Key deadlines set for preapproved defined contribution plans Regulatory agendas confirm agencies' retirement plan priorities Proposed rule would ease electronic delivery by group health plans Equal Employment Opportunity Commission proposes ending annual workforce data reporting $103,625 H1-B fee cap proposed 2027 affordability percentage for employer health coverage increases Retirement plan amendments for recent laws due by December 31, 2026 Changes to recoupment rules for trusteed defined benefit plans proposed Roundup: Employer resources on employee voting rights/trends Roundup: Employer resources on tax deduction for overtime pay Roundup: Employer resources on H-1B reforms

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Asia Pacific	
Australia	Superannuation advertising ban regulations issued Independent review of enhanced regulatory sandbox issued New investor directed portfolio services instrument issued Minimum wage increased Government-funded parental leave increased New external financial reporting agency introduced Family law superannuation splitting amendments updated Superannuation for young workers proposed

Asia Pacific (continued)	
China	Transfer of enterprise annuity personal accounts to ease
Indonesia	Health insurance reforms introduced
Japan	Out-of-pocket medical expenses ceiling increased
Macao	Annual leave to increase Statutory maternity leave increased
Malaysia	Expanded social security coverage (LINDUNG 24/7 Scheme) introduced
New Zealand	Changes to accrual of annual and sick leave enacted
Singapore	Annual leave of certain outsourced workers increased Use of digital medical certificate expanded
South Korea	Minimum wage to increase National Pension Contribution base thresholds adjusted for 2026-2027 Paternity and child care leave expanded
Vietnam	New public health measures for business travelers introduced New paid public holiday on November 24 announced
Europe, Middle East and Africa (EMEA)	
European Union	Enforcement date for certain for certain high-risk artificial intelligence systems extended Roundup: Employer resources on EU's pay transparency directive
Belgium	Flexi-job scheme expanded Termination notice periods reduced during first six months of service Minimum wage increased
Cyprus	Employers face new obligations for accommodating breastfeeding
France	Physicians must specify employees' sick leave duration
Greece	Special maternity leave and benefits expanded
Netherlands	Minimum wage increased
Poland	Employers must proactively prevent 'workplace mobbing'
Saudi Arabia	Medical insurance policies required to waive prior approval limits
Serbia	Minimum wage to increase
South Africa	Expanded remuneration and pay gap disclosures required
Spain	Flexible retirement options improve
United Arab Emirates	Employers responsible for entire pension contributions for low-earning employees
United Kingdom	Expanded rights for carers and parents of seriously ill children proposed Regulator to apply new rules and guidance on nonfinancial misconduct Trade union access draft code and regulations published in Great Britain Equality Action Plan requirement introduced for gender pay gap and menopause issues in Great Britain

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, 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, news articles, and viewpoints.
Resources	Roundup, regularly updated

Remote working	
Status	⚠ **Ongoing initiatives**
Development	**Career — Health** **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 provides links to government information, third-party analyses, 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 — Health** **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 analysis news articles, and viewpoints.
Resources	Roundup, regularly updated

Section 3

Americas

Argentina (new)	
Status	⚠ **Effective November 1, 2026**
Development	**Career — Wealth** **Severance liability fund to be established** From November 1, 2026, Argentina's Labor Assistance Fund (FAL) will take effect, with the aim of making severance liabilities and other labour obligations more predictable for private-sector employers. Under Decree No. 408/2026, published on June 1, 2026, employers must make monthly contributions of 1% for large companies and 2.5% for small and medium-sized enterprises (SMEs). Highlights include: • The FAL will be funded through mandatory monthly contributions calculated on the remuneration used for employers' contributions to the Argentine Integrated Pension System (SIPA). • Each employer must open an individual account with an entity authorized by the National Securities Commission (CNV). Contributions will be paid through the Federal Tax and Customs Authority (ARCA) for all registered employees. • Employer contributions to the FAL are deductible for income tax purposes. Private-sector employers should prepare now to comply with the FAL regime, including the selection of a CNV-authorized entity, opening of the individual employer account, and adaptation of payroll systems to incorporate the new monthly contribution.
Resources	adriana.vera@mercer.com Decree No. 408/2026 (Spanish) (Official Bulletin, June 1, 2026) and Argentina to establish severance liability fund (Marsh, August 2026)
Brazil (previously covered, with an upcoming effective date)	
Development	**Career — Health** • Paid paternity leave expanded — key date: January 1, 2027 **Career** • Payroll tax to increase — key date: January 1, 2027

Canada — New Brunswick	
Status	**Consultation is open until October 30, 2026.**
Development	**Career** **Input on expansion of pay equity legislation requested** New Brunswick is asking for input in an open consultation on the province's pay equity legislation. The review intends to address wage disparities and ensure that pay equity principles are applied across all sectors of employment, with an expanded scope that includes the private and care sectors. The province's current Pay Equity Act only applies to public sector organizations.
Resources	Review of the Pay Equity Act, 2009, in New Brunswick (Government, July 2, 2026)
Canada — Manitoba (new)	
Status	**Effective October 1, 2026**
Development	**Career** **Minimum wage to increase** On October 1, 2026, the minimum wage will increase to C$16.40/hour, up from C$16/hour. The hourly minimum wage for construction workers increased on May 1, 2026, and it will increase again in 2027.
Resources	Provincial minimum wage to increase to $16.40 on October 1 (Government, April 1, 2026)
Canada — Northwest Territories (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On September 1, 2026, the minimum wage increased to C$17.20/hour, up from C$16.95/hour.
Resources	NWT minimum wage set to increase September 1, 2026 (Government, July 31, 2026)
Canada — Nunavut (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On September 1, 2026, the minimum wage increased to C$20.17/hour, up from C$19.75/hour.
Resources	Nunavut's minimum wage increases September 1 to $20.17 per hour (Government, June 30, 2026)

Canada — Ontario (new)	
Status	**Effective October 1, 2026**
Development	**Career** **Minimum wage to increase** On October 1, 2026, the minimum wage will increase to C$17.95, up from C$17.60/hour.
Resources	Ontario raising minimum wage to protect workers and support a competitive economy (Government, April 1, 2026)
Canada — Prince Edward Island (new)	
Status	**Effective October 1, 2026**
Development	**Career** **Minimum wage to increase** On October 1, 2026, the rate will increase to C$17.30/hour, up from C$17/hour, and it will increase to C$17.60/hour on April 1, 2027.
Resources	Minimum wage order (board and lodging) (Government, April 2, 2026)
Canada — Saskatchewan (new)	
Status	**Effective October 1, 2026**
Development	**Career** **Minimum wage to increase** On October 1, 2026, the minimum wage in Saskatchewan will increase to $15.70/hour, up from C$15.35/hour.
Resources	Protecting jobs and increasing workers' wages (Government, June 29, 2026)
Canada (previously covered, with an upcoming effective date)	
Development	**Career — Health** • 'Right-to-disconnect' established for employees — key date: Expected to take effect later in 2026 • Sick leave note requirements to change in Manitoba — key date: October 1, 2026 **Career** • Equal pay regulations for federally regulated employers published — key date: October 26, 2026 **Health** • Significant public and private healthcare reforms introduced in Alberta — key date: To be implemented in stages throughout 2026 and 2027 **Wealth** • Base Canada Pension Plan contribution rate to decrease — key date: January 1, 2027 • Pension super priority federal legislation enacted — key date: April 27, 2027

Colombia (previously covered, with an upcoming effective date)	
Development	**Wealth** • Pension reforms issued — key date: Postponed from July 1, 2025, pending judicial decision
El Salvador (previously covered, with an upcoming effective date)	
Development	**Career** • Annual bonus payments mandated — key date: January 1, 2027
Honduras (previously covered, with an upcoming effective date)	
Development	**Career** • Minimum wage increased — key date: January 1, 2027
Mexico (previously covered, with an upcoming effective date)	
Development	**Career** • Maximum working week to be gradually reduced — key date: Beginning in 2027
Panama (previously covered, with an upcoming effective date)	
Development	**Wealth** • Employer social security contributions increased — key date: March 1, 2027
Peru (previously covered, with an upcoming effective date)	
Development	**Career — Wealth** • Pension system modernization law issued — key dates: 2027 and 2028 • Regulations to support pension system reform issued — key date: starting in June 2027
United States (US) (new)	
Status	⚠ **Effective October 26, 2026**
Development	**Career — Health** **Final rule implements Executive Order to 'end illegal discrimination in federal contracts** On August 21, 2026, the Department of Labor (DOL), through the Office of Federal Contract Compliance Programs (OFCCP) published a final rule implementing President Trump's 2025 Executive Order 14173, Ending Illegal Discrimination and Restoring Merit-Based Opportunity, which revoked Executive Order 11246. The final rule becomes effective on October 26, 2026 and, together with Executive Order 14173, unwinds OFCCP's race-and sex-based affirmative action regulations for federal contractors and subcontractors first implemented in 1965.
Resources	Rescission of Executive Order 11246 implementing regulations (Federal Register, August 21, 2026)

US (new)	
Status	**Dates vary**
Development	**Wealth** **Key deadlines set for preapproved defined contribution plans** IRS Announcement 2026-15 gives employers using preapproved defined contribution (DC) plans until September 30, 2028, to adopt a newly approved document for the fourth remedial amendment cycle. The announcement doesn't affect preapproved defined benefit or 403(b) plans, which have their own remedial amendment cycles. On August 31 or shortly thereafter, IRS expects to issue opinion letters to plan providers that timely submitted documents for the fourth remedial amendment cycle reflect changes on the 2023 Cumulative List. IRS will then post a list of available preapproved plans on its website. An employer that timely adopts a newly approved document can rely on the provider's opinion letter during the fourth cycle as if the letter were the employer's own. Employers modifying a preapproved document lose reliance on the opinion letter (unless they make only certain approved modifications) but may be eligible to apply for a determination letter. Determination letter applications for modified fourth-cycle documents can be submitted from October 1, 2026, through September 30, 2028. • Employers making nonextensive changes to a nonstandardized plan (i.e., a plan in which not all provisions are safe harbor) may apply for a determination letter using Form 5307, Application for Determination for Adopters of Modified Volume Submitter Plans. Employers of any preapproved plan document (standardized or nonstandardized) may also use Form 5307 if the only modification is the addition of language to satisfy Internal Revenue Code Sections 415 and 416 due to the required aggregation of plans. IRS will review applications filed on a Form 5307 against the 2023 Cumulative List. • Employers making extensive changes to a nonstandardized document or any changes to a standardized document are treated as having adopted an individually designed plan. These employers may be able to apply for a determination letter using Form 5300, Application for Determination for Employee Benefit Plan, if eligible under the determination letter rules for individually designed plans. IRS will review nonstandardized plans against the 2023 Cumulative List and standardized plans against the Required Amendments List issued two calendar years before the application's submission date.
Resources	margaret.berger@mercer.com and brian.kearney@mercer.com GRIST, August 11, 2026

US (new)	
Status	**Regulatory agendas**
Development	**Wealth** **Regulatory agendas confirm agencies' retirement plan priorities** Recently updated regulatory agendas for IRS, the Department of Labor (DOL), and the Pension Benefit Guaranty Corp. (PBGC) prioritize guidance on Trump accounts, the rollback of Biden-era ERISA regulations, and ongoing implementation of the SECURE 2.0 Act of 2022 (Div. T. of Pub. L. No. 117-328). Unlike previous years, when two regulatory agendas were published — for the spring and fall — the updated agenda appears to cover all of 2026. The article below highlights selected items of interest but omits routine projects and several others for which the only update was an extension of the anticipated completion date — as is the case for most of the ongoing items. The agendas' anticipated completion dates are generally aspirational and routinely change as agency priorities shift.
Resources	margaret.berger@mercer.com and matthew.calloway@mercer.com GRIST, July 31, 2026

US (new)	
Status	**Comments are due September 21, 2026.**
Development	**Health** **Proposed rule would ease electronic delivery by group health plans** The Department of Labor (DOL) announced a proposed rule that would make it easier for ERISA-covered group health plans to deliver required notices and documents electronically. The proposal creates an optional "notice and access" safe harbor for electronic delivery, similar to a safe harbor available for retirement plans since 2020. Individuals who want to receive paper copies can opt out of electronic delivery entirely. If finalized as proposed, the new safe harbor would be available starting the first day of the plan year after the final rule is published. Note that plan sponsors would not be forced to switch to the new method. Under the proposal, the new safe harbor would apply only to ERISA-covered group health plans. It would apply to "covered individuals," meaning participants, beneficiaries or other people entitled to covered documents who provide an electronic address. Acceptable electronic addresses include, but appear not to be limited to, personal and work email addresses and smartphone numbers. The new safe harbor would cover a broad range of "covered documents," meaning ERISA Title I group health plan disclosures. This includes documents that must be furnished automatically as well as those provided only on request. For each covered document, each covered individual must be provided with a Notice of Internet Availability (NOIA) identifying the document and supplying an internet address or hyperlink to the document for ready access. The NOIA generally must be delivered when a covered document is made available on a website. The NOIA is required for items furnished only upon request after the request is made and the document is made available on the website. The proposal also permits certain annual combined NOIAs. A combined notice could cover SPDs, annual disclosures, documents that must be included with annual enrollment materials or materials describing plan benefits, and other covered documents if approved by the Secretary of Labor or Treasury. A combined NOIA can be furnished each plan year, not more than 14 months after the prior year's notice. The plan administrator must maintain a compliant website for covered individuals to access documents. Finally, the proposal requires reasonable procedures for paper copies and opt-outs. Before relying on the new safe harbor, a plan administrator must send each individual an initial paper notice explaining the new electronic delivery approach. The proposed rule allows participants already receiving electronic disclosures under the 2002 safe harbor to receive the initial notice electronically.
Resources	jennifer.wiseman@mercer.com DOL proposes rule to modernize electronic delivery for group health plans, lowering costs (DOL, July 22, 2026)

US (new)	
Status	**Proposal**
Development	**Career** **Equal Employment Opportunity Commission proposes ending annual workforce data reporting** On July 21, 2026, the U.S. Equal Employment Opportunity Commission (EEOC) voted to issue a proposed rule to rescind and remove the requirements for the filing of the EEO-1, EEO-2, EEO-3, EEO-4, EEO-5, and EEO-6 reports, and the recordkeeping and record preservation requirements related to these reports. The EEOC's regulations currently require all organizations covered by Title VII of the Civil Rights Act to file these annual reports. The EEOC has determined that the reports are "inconsistent with equal employment opportunity law, may raise constitutional concerns, and collect data that is not narrowly tailored or necessary to enforce anti-discrimination statutes." Also, "any limited value of the reports is outweighed by the significant burdens they impose on employers and on the Commission." The comment period ended on July 24, 2026.
Resources	Removal of reporting requirements (Federal Register, July 23, 2026)

US (new)	
Status	**Comments on the proposed rule can be submitted until September 24, 2026.**
Development	**Career** **$103,625 H1-B fee cap proposed** On August 25, 2026, the Department of Homeland Security (DHS) issued a proposed rule that would impose a $103,265 fee for all H-1B cap-subject petitions, including those eligible for the advanced degree exemption. The proposed fee would be paid at the time of filing and would be imposed in addition to all other applicable fees or payments. Under the proposed rule, the additional fee would not apply to H-1B petitions that are not subject to the cap, such as petitions filed by certain nonprofit research organizations, governmental research organizations, and institutions of higher education. This proposed fee follows a prior $100,000 fee introduced in September 2025 that was blocked by a federal judge in June 2026, ruling it an unlawful "tax" requiring congressional approval. The Trump administration has appealed the ruling.
Resources	Fee for certain H-1B petitions (Federal Register, August 25, 2026)

US (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Health** **2027 affordability percentage for employer health coverage increases** The Affordable Care Act (ACA) benchmark for determining the affordability of employer-sponsored health coverage will increase for the 2027 plan year according to IRS Rev. Proc. 2026-26 — to 10.22% of an employee's household income up from the 2026 plan-year level of 9.96%. This affordability percentage can affect individuals' eligibility for federally subsidized coverage from a public exchange, as well as employers' potential liability for shared-responsibility (or "play or pay") assessments.
Resources	dorian.smith@mercer.com and cheryl.hughes@mercer.com GRIST, July 22, 2026

US (new)	
Status	⚠ **Due December 31, 2026**
Development	**Wealth** **Retirement plan amendments for recent laws due by December 31, 2026** Sponsors of tax-favored retirement plans have until December 31, 2026, to adopt required and discretionary amendments related to several recent major laws. These amendments may be extensive for some sponsors, depending on the degree to which their plans are affected. The December 31 deadline also applies to any other discretionary amendments implemented during 2026 by sponsors with calendar-year plans. All amendment deadlines discussed in the below GRIST article apply to both individually designed and preapproved plans. Some sponsors may have only a few required amendments due by the end of this year. However, for sponsors that have adopted any of the laws' optional changes, the list of amendments due by year-end could be lengthy. Sponsors that haven't already done so may want to consult with legal counsel to get started on the amendment process soon to allow adequate time for the necessary amendments to be identified, drafted, and reviewed. Sponsors using preapproved plan documents may want to reach out to their document providers to confirm they are drafting interim amendments to comply with the law changes.
Resources	brian.kearney@mercer.com and margaret.berger@mercer.com GRIST, July 21, 2026

US	
Status	**Proposal**
Development	**Wealth** **Changes to recoupment rules for trusteed defined benefit plans proposed** The Pension Benefit Guaranty Corporation (PBGC) proposes to simplify its rules for recouping benefit overpayments from participants and beneficiaries of terminated single-employer defined benefit (DB) plans administered by the agency. The proposal wouldn't affect recoupment of overpayments involving ongoing single-employer plans or any multiemployer plans. PBGC is requesting comments on how the agency should approach certain situations involving overpayments that arose before plan termination.
Resources	margaret.berger@mercer.com and matthew.calloway@mercer.com GRIST, July 21, 2026

US	
Status	**Currently effective**
Development	**Career** **Roundup: Employer resources on employee voting rights/trends** Federal law does not require private-sector employers to give employees time off to vote, but many state laws do. In 2021, President Biden signed an executive order allowing federal employees up to four hours of administrative leave to vote in federal, state, local, tribal, and territorial elections. Federal employees also may now use up to four hours of administrative leave per year to serve as nonpartisan poll workers or observers. However, in 2025, President Trump rescinded that order, directing agencies to provide only a "limited amount" of leave — generally up to three hours — if and only if employees have no reasonable opportunity to vote outside of work. The Office of Personnel Management's current guidance gives discretion to agencies. Introduced in July 2025, the Time Off to Vote Act would require employers — upon the request of the employee — to provide at least two consecutive hours of paid leave to vote in federal elections. More than half of the states require employers to grant employees time off to vote. To help employers address the related issues, this roundup provides links to some general information about voting rights and trends from organizations, government websites, third-party resources, and news articles.
Resources	Roundup: US employer resources on employee voting rights/trends (Marsh, regularly updated)

US	
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, regularly updated

US	
Status	⚠ **Ongoing developments**
Development	**Career** **Roundup: Employer resources on H-1B reforms** On September 19, 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. Since then, implementation of the proclamation has caused confusion among employers and H-1B holders, and states have challenged the restrictions. To provide employers with some information about state-of-play of the H-1B visa requirements and the issues to consider, this roundup provides links to government information, third-party analyses, news articles, and viewpoints. The aggregated content in each section is organized in reverse chronological order and is by no means comprehensive. The content also does not necessarily reflect Mercer's or the authors' point of view on the subject.
Resources	Roundup: Employer resources on H-1B reforms, 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 February 6, 2026, and Paid family and medical leave: Snapshots across the US (Mercer, February 6, 2026)

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. 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	⚠ **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. 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 — 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 • Requirements typically don't apply to employees covered by a collective bargaining agreement (CBA) in effect at the time of a law's passage.
Resources	rich.glass@mercer.com and katharine.marshall@mercer.com Roundup: State accrued paid leave mandates (Mercer, 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, November 12, 2024

US	
Status	⚠ **Currently effective**
Development	**Health** **Group fixed-indemnity plans pose legal and 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 GRIST 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, August 27, 2024

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 expired at the end of 2025 added complexities. The federal monthly limits are adjusted every year. Some state and local jurisdictions have imposed employer mandates, such as leveraging the tax advantage of commuter benefits and providing tax-related incentives.
Resources	rich.glass@mercer.com and cheryl.hughes@mercer.com GRIST, regularly updated

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 December 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 nonbenefit-related provisions. When referring to the original SECURE Act, this guide uses the term "SECURE 1.0" to avoid any confusion between the laws. 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	**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 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	**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 period after their employment ends. At the federal level, the Federal Trade Commission (FTC), under the Biden administration, finalized a rule banning noncompetes. In August 2024, a federal judge in Texas blocked the rule from taking effect nationwide. While the FTC appealed the decision, the current FTC, under the Trump administration, will not defend this rule. At the moment, it is unclear as to what position the FTC will take on noncompete agreements. On September 4, 2025, the FTC launched a public inquiry to better understand the scope, prevalence and effects of employer noncompete actions, as well as to gather information to inform possible enforcement actions. 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 analyses, news articles, and viewpoints.
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 GRIST 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 government information, third-party analyses, news articles, and viewpoints. 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 government information, third-party analyses, 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 January 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 government information, third-party analyses, news articles, and viewpoints.
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 is meant 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, this roundup provides links to government information, third-party analyses, news articles, and viewpoints.
Resources	Roundup, regularly updated

US — Alaska (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Health** **Telehealth parity law enacted** An Alaska law requires fully insured plans to reimburse telehealth healthcare providers at the same rate as in-person healthcare providers. An exception to the rule allows plans to use a geographic pay differential to reimburse out-of-state healthcare providers. This portion of the law (2026 Ch. 57, HB 14) will take effect January 1, 2027. Alaska generally applies its insurance laws on an extraterritorial basis to state residents covered by fully insured plans issued in another state.
Resources	rich.glass@mercer.com 2026 Ch. 57, HB 14 (Legislature, July 16, 2026)

US — California — San Francisco (new)	
Status	⚠ **Effective for employers with 100 or more employees on January 1, 2027 and on January 1, 2028 for employers with 20-99 employees.**
Development	**Career — Health** **Paid parental leave eligibility requirements reduced** The Paid Parental Leave Ordinance (PPLO) requires employers with at least 20 employees worldwide to provide eligible employees with up to eight weeks of leave to bond with a new child. Leave is paid at 100% of wages, subject to a weekly cap ($2,522 in 2026). Because California's Paid Family Leave benefits generally also apply, the PPLO payment is typically provided as a "top-off." To be eligible, employees must meet all of the PPLO requirements: • Be eligible for state PFL benefits for new child bonding • Work for the current employer at least 180 days • Work at least eight hours per week in San Francisco • Work at least 40% of total hours in San Francisco. A recent PPLO amendment reduces the first eligibility requirement to 90 days.
Resources	rich.glass@mercer.com Ordinance No. 162-26 (Government, July 16, 2026) and Paid Family Leave (EDD)

US — California — San Francisco (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Health** **2027 healthcare expenditure rates published** San Francisco has published its 2027 healthcare expenditure (HCE) rates — up more than 9% from 2026 — under the city's Health Care Security Ordinance (HCSO). The revised HCE rates are: • 100 or more employees: $4.49/hour (2027), $4.11/hour (2026) • 20-99 employees (50-99, nonprofits): $2.99/hour, $2.74/hour (2026) • Under 20 employees (under 50, nonprofits): No requirement. The exemption threshold for managerial, supervisory, and confidential employees will increase from $128,861 to $131,763/year. The HCSO applies to all employers required to have a San Francisco business registration certificate and with at least 20 employees in any location, as long as at least one works in San Francisco.
Resources	rich.glass@mercer.com Health Care Security Ordinance (Government)
US — Delaware (new)	
Status	⚠ **Currently effective**
Development	**Health** **Vaccine coverage law enacted** Under 2026 Ch. 419 (HB 338), fully insured health plans must cover, at no cost to members, vaccines supported by national clinical guidelines or standards of care in effect on January 1, 2025, in addition to vaccines recommended by the federal Advisory Committee on Immunization Practices. Also, fully insured plans must cover preventive services for women, infants, children, and adolescents based on guidelines from the federal Health Resources and Services Administration that were in effect on January 1, 2025. The law took effect on August 3, 2026. It is unclear whether Delaware applies its insurance laws on an extraterritorial basis to fully insured plans issued in another state. The law does not affect self-funded ERISA plans.
Resources	rich.glass@mercer.com 2026 Ch. 419 (HB 338) (Legislature, August 3, 2026) and Preventive guidelines and screenings for women, children, and youth (HRSA)

US — Delaware (new)	
Status	⚠ **Effective dates vary.**
Development	**Health** **Medicare reference-based pricing for fully insured plans required** A new Delaware law requires fully insured health plans to adopt Medicare reference-based pricing (RFP) for certain services provided at hospitals, in addition to covering a value-based care program. The law (SS 2 for SB 1) amends multiple statutes, including Title 18 (the Insurance Code). In particular, starting with insurers' 2028 rate filings, the allowed costs for inpatient hospital, outpatient, and emergency department services at hospitals cannot exceed a Medicare RFP target, expressed as a percentage of the full Medicare rate issued by the federal Centers for Medicare and Medicaid Services. The applicable percentage is as follows: • Filings in 2028/2029 (for the 2029 and 2030 plan years): 275% of Medicare (outpatient), 310% of Medicare (inpatient, emergency) • Filings in 2030/2031 (for the 2031 and 2032 plan years): 250% of Medicare (outpatient), 275% of Medicare (inpatient, emergency) • Filings in 2032 and beyond (for the 2033 and later plan years): 250% of Medicare (outpatient, inpatient, emergency) Different Medicare pricing targets apply to the state's free-standing children's hospital, and the state governmental health plan. Exceptions also apply for certain services provided by Medicare-dependent rural hospitals and urban Medicaid hospitals. This law has undergone several revisions due to hospital opposition. However, a recent report cited a RAND study indicating that Delaware has among the highest hospital prices in the country. Last year, Vermont became the first state to enact an RFP mandate for the commercial market. Once the Department of Insurance (DOI) issues regulations, fully insured plans must offer a value-based care program that complies with DOI standards. Existing law requires that plans spend at least 11.5% of total medical care costs on primary care through the 2026 plan year, and the new law extends it. It is unclear whether Delaware applies its insurance laws on an extraterritorial basis to fully insured plans issued in another state. The law does not apply to self-funded ERISA plans.
Resources	rich.glass@mercer.com SS 2 for SB 1 (Legislature, July 20, 2026)

US — Illinois (new)	
Status	⚠ **Effective dates vary.**
Development	**Career — Health** **Perimenopause coverage mandate enacted, bias against menopause-related conditions banned** Illinois has enacted the Menopause Equity and Care Act, making it the latest state to require health plan to full cover for perimenopause conditions. Under 2026 Pub. Act 104-0793 (HB 5284), individual and group fully insured health plans must cover treatments related to perimenopause for plan years beginning in 2028. Required benefits must include medications for menopause-related osteoporosis and nonhormonal therapies for vasomotor symptoms. For plans covering more than 25 employees, the law also requires coverage of an annual menopause or perimenopause health visits for individuals 45 years and older. This requirement is retroactive to plan years starting in 2026, but it is subject to an exception for HSA-qualifying high-deductible health plans. (Illinois insurance law already mandates menopause coverage.) In addition, Illinois amended its Human Rights Act to prohibit discrimination and harassment based on menopause-related conditions, effective January 1, 2027. Illinois generally does not apply its insurance laws on an extraterritorial basis to fully insured plans issued in another state. The law does not affect self-funded ERISA plans.
Resources	rich.glass@mercer.com 2026 Pub. Act 104-0793 (HB 5284) (Legislature)
US — Michigan (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Tax credit to employers offering paid organ donation leave provided** Under Public Act 39 (SB 301), employers can claim a 100% corporate income tax credit for providing employes with up to 12 weeks of organ donation leave, starting with the 2026 tax year. Michigan already offers a similar employer tax credit (also capped at 12 weeks) for paid adoption leave.
Resources	rich.glass@mercer.com 2026 Public Act 39 (SB 301) (Legislature, July 29, 2026)

US — New Jersey (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career — Health** **Some 2027 paid family medical leave rates announced** In New Jersey, paid family and medical leave (PFML) comprises temporary disability insurance (TDI) and family leave insurance (FLI). For 2027, employers will have to withhold and remit contributions on wages up to the taxable wage base of $177,100, a 3.5% increase from $171,100 in 2026. The maximum TDI/FLI weekly benefit rate will be $1,158 in 2027, also a 3.5% increase from $1,119 in 2026. Employee contribution rates for 2027 have not been announced. The 2026 employee rates are 0.19% for TDI and 0.23% for FLI. Employer FLI contributions are not required.
Resources	rich.glass@mercer.com Rate information, contributions, and due dates (Department of Labor & Workforce Development)
US — Pennsylvania (new)	
Status	⚠ **Currently effective**
Development	**Health** **Telehealth law enacted** Pennsylvania enacted a law that enables the state to join a professional counseling compact. Under 2026 Act 23 (SB 604), the state will join the professional counseling compact once the 10th state starts issuing privileges. Interstate compacts have the effect of broadening access to telehealth services across state lines.
Resources	rich.glass@mercer.com 2026 Act 23 (SB 604) (Legislature, July 12, 2026)
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, August 12, 2024

US — Washington — Seattle (new)	
Status	⚠ **January 1, 2027**
Development	**Health** **2027 hotel medical rates announced** Seattle published its 2027 health expenditure rates for hotel employees, an increase of more than 14%. The city announced the 2027 monthly rates that covered hotel industry employers must make to, or on behalf of, each covered employee for medical care. Rates will increase based on family status: • Employee only (no children, spouse/domestic partner) — $702 (2027), $612 (2026) • Employee + dependent(s) — $1,195 ($1,043) • Employee + spouse/domestic partner — $1,404 ($1,225) • Employee + spouse/domestic partner + dependent(s) — $2,106 ($1,837) The ordinance applies to most businesses that own, control, or operate a Seattle hotel or motel with 100 or more guest rooms and to "ancillary hotel businesses" with 50 or more employees worldwide.
Resources	rich.glass@mercer.com Improving access to medical care for hotel employees ordinance (Office of Labor Standards)
US (previously covered, with upcoming effective dates)	
Development	**Career** • Safeguards for immigrants that will require employer action enacted in Washington — key date: October 1, 2026 • Trapped at Work Act amended in New York — key date: December 19, 2026 • Large private employers required to report pay data by race and gender in New York City — key date: Multiyear beginning in 2027 • Most noncompete agreements banned in Washington — key date: June 30, 2027 **Career — Health** • Broad workforce law that includes expanded wage transparency requirements enacted in Connecticut — key date: October 1, 2026 • Paid family medical leave contribution rate confirmed in Maryland— key date: January 1, 2027 • Paid family medical leave law delayed in Maryland — key date: January 1, 2027 • Emergency rule mandating gender-affirming care coverage finalized in New Mexico — key date: January 1, 2027 • Effective date of paid family medical leave law's application to construction workers clarified in New York — key date: January 1, 2027 • Paid family leave law for unionized construction employees expanded in New York — key date: January 1, 2027 • Workplace protections for menstruation and menopause enacted in Philadelphia, Pennsylvania — key date: January 1, 2027

US (previously covered, with upcoming effective dates) (continued)	
Development	**Career — Health (continued)** • Paid sick leave law enacted in Virginia — Key date: January 1, 2027 • Salary and benefit disclosures in job postings to be required in Delaware — key date: September 26, 2027 • Contribution rates of paid family and medical leave program changed in Washington — key date: January 1, 2028 • Paid family medical leave law enacted in Virginia — key date: April 1, 2028 • Paid family medical leave law enacted in California — key date: July 1, 2028 **Career — Health — Wealth** • Independent contractor/employee classification rules adopted in New Jersey — Key date: October 1, 2026 **Health** • Upper prescription drug limit set in Colorado — key date: January 1, 2027 • Law addressing artificial intelligence in insurance coverage enacted in Alabama — key date: October 1, 2026 • Ground ambulance balanced billing law enacted in Alabama — key date: October 1, 2026 • Telehealth law enacted in Maryland — key date: October 1, 2026 • Association Self-Funded Health Benefit Plan Coverage Act enacted in Mississippi — key date: October 1, 2026 • Insurance law mandates gender detransition coverage in Montana — key date: October 1, 2026 • State-based exchange delivery to change in Oregon — key date: November 1, 2026 • Mercer projects 2027 transportation and health flexible spending arrangement limits — key date: January 1, 2027 • Three covered services added to California's benchmark plans — key date: If approved by federal Department of Health and Human Services, inclusion will start in 2027 • Menopausal coverage law required in California — key date: January 1, 2027 • Health Care Accountability Ordinance standards updated for 2027 in San Francisco, California — key date: January 1, 2027 • Prescription utilization review for fully insured plans restricted in Colorado — key date: January 1, 2027 • Pharmacy benefit manager law enacted in Connecticut — key date: January 1, 2027 • Obesity and pre-diabetes treatment coverage mandated in Colorado — key date: January 1, 2027 • AI insurance law enacted in Georgia — key date: January 1, 2027 • Ground ambulance law passed in Illinois — key date: January 1, 2027 • Prior authorization law enacted in Kentucky — key date: January 1, 2027 • Prior authorization law enacted in Louisiana — key date: January 1, 2027

US (previously covered, with upcoming effective dates) (continued)	
Development	**Health (continued)** • Law addresses pharmacy benefit manager's manufacturer rebates, fees, standard of care and transparency in Louisiana — key date: January 1, 2027 • Paid family medical leave contribution rate confirmed in Maryland — key date: January 1, 2027 • 2027 individual-mandate coverage dollar limits set in Massachusetts — key date: January 1, 2027 • Pharmacy benefit manager law enacted in New Mexico — key date: January 1, 2027 • Health Savings Account compatibility law enacted in New York — key date: Plan years starting January 1, 2027 • Vaccine law enacted in Rhode Island — key date: January 1, 2027 • Pharmacy benefit manager law enacted in Tennessee — key date: Plan years starting in 2027 • Insulin mandate law enacted in Virginia — key date: Plan years starting in 2027 • Perimenopause and menopause coverage required in Virginia — key date: Plan years starting in 2027 • Washington Partnership Access Line rates announced — key date: January 1, 2027 • Ground ambulance balance billing law enacted in West Virginia — key date: Plan years starting in 2027 • Pharmacy benefit manager law enacted in Virginia — key date: July 1, 2027 • Telehealth reimbursement parity extended in Hawaii — key date: December 31, 2027 • Telehealth parity extended in New Jersey — key date: December 31, 2027 • Insured plans must apply third-party financial assistance to cost sharing for prescription drugs in Colorado — key date: January 1, 2028 • Prescription drug cost sharing capped in the individual and small group markets in Virginia — key date: Plan years starting in 2028 **Wealth** • Rules finalized for SECURE 2.0 'super catch-up' contributions — key date: 2027 plan year • Applicability date for final required minimum distribution regulations delayed again — key date: 2027 at the earliest • Individual Retirement Arrangements' amendment deadline for SECURE acts and more extended — key date: December 31, 2027

Section 4

Asia Pacific

Australia (new)	
Status	⚠ **Currently effective**
Development	**Wealth** **Superannuation advertising ban regulations issued** The Australian government has registered the Treasury Laws Amendment (Payday Super) Regulations 2026, which support the reforms in the Treasury Laws Amendment (Supporting Choice in Superannuation and Other Measures) Act 2026 (Act). The Act commenced on July 1, 2026, and bans the advertising of certain products to new employees during the onboarding process. This measure is intended to reduce the risk of employees being induced or influenced to select a product that is inappropriate to their needs or to open multiple accounts. However, some MySuper products are exempt from the advertising ban, provided certain conditions are met, including employer default funds and an employee's stapled fund. Before commencement, the Australian Securities and Investments Commission outlined a 12-month transitional approach prior to the enforcement of the ban Enforcement activity is expected to focus initially on misconduct that is serious or reckless in nature.
Resources	anthony.nemec@mercer.com Treasury Laws Amendment (Supporting Choice in Superannuation and Other Measures) Act 2026 (Federal Register of Legislation, March 26, 2026) and ASIC confirms approach to ban on advertising super funds during employee onboarding (ASIC, June 9, 2026)

Australia (new)	
Status	**Currently effective**
Development	**Wealth** **Independent review of enhanced regulatory sandbox issued** On July 1, 2026, the Australian government released the final report of the independent review of the Enhanced Regulatory Sandbox (ERS). The review assessed how regulatory sandboxes enable eligible businesses to test certain financial products and services without first obtaining a full license from the Australian Securities and Investments Commission (ASIC). The government announced that it "will consider the recommendations and provide a response later this year." The report's findings address the role of sandboxes in encouraging innovation, and define six recommendations for the future of ERS: • Develop a national financial innovation strategy to coordinate efforts across industry, regulators, and government. • The financial sector should play a leading role in improving market-wide understanding of regulatory requirements. • Continue operating ASIC's general regulatory sandbox but broaden the ERS to increase flexibility and include clearly defined objectives. • Review participant outcomes after one year, and better integrate the ERS with ASICs broader functions, particularly licensing and supervision. • ASIC should consider using thematic sandboxes to target specific sectors, emerging themes and technologies. • The Treasury should convene a public-private committee to prioritize specific thematic ERSs.
Resources	anthony.williams@mercer.com Independent review of the enhanced regulatory sandbox — final report (Treasury, July 1, 2026)

Australia (new)	
Status	**Currently effective**
Development	**Wealth** **New investor directed portfolio services instrument issued** The Australian Securities and Investments Commission (ASIC) has registered Legislative Instrument 2026/395, which grants relief from certain requirements of the Corporations Act 2021, for operators and promoters of investor directed portfolio services ('IDPS'). The relief is largely unchanged from earlier legislation and ASIC guidance issued in 2023; the new instrument mainly simplifies that previous guidance and will operate for five years unless amended by ASIC or parliament. The instrument applies to platform operators that run IDPSs, as well as responsible entities of IDPS-like schemes. It also extends to other parties such as product issuers and providers of financial product advice delivered through platforms. An IDPS is a kind of unregistered managed investment scheme that holds and deals in one or more investments chosen by investors. An IDPS-like scheme is a registered scheme that operates in a similar way, where investment decisions are generally carried out in accordance with specific member instructions.
Resources	anthony.williams@mercer.com ASIC corporations (platforms — IDPSs and IDPS-like schemes) instrument 2026/395 (Federal Register of Legislation, July 6, 2026)

Australia (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On July 1, 2026, the National Minimum Wage increased to AU$1004.90/week or AU$26.44/hour. In addition, Modern Award Minimum Wage Rates increased by 4.75% where the lowest rate in any Modern Award was at least AU$1004.90/week or AU$26.44/hour.
Resources	Annual wage review 2026 (Fair Work Commission)

Australia (new)	
Status	**Currently effective**
Development	**Career — Health** **Government-funded parental leave increased** Australia's Government-funded Paid Parental Leave increased to 130 days (26 weeks), up from 120 days (24 weeks), for children born or adopted on or after July 1, 2026. Parental Leave Pay is a flexible entitlement that can be shared between parents, provided each person meets the eligibility requirements (including the income test, work test and residency rules). Payments are made at the national minimum wage. From July 2026, an additional 12% superannuation contribution is paid by the Australian Taxation Office (ATO) directly into the employee's superannuation fund.
Resources	Parental leave pay (Government, July 1, 2026)

Australia (new)	
Status	**Currently effective**
Development	**Wealth** **New external financial reporting agency introduced** The Treasury Laws Amendment (Financial Reporting System Reform) Act 2026 (the Act) received Royal Assent on July 6, 2026. It reforms Australia's financial reporting framework by consolidating the institutions responsible for setting and overseeing key reporting and assurance standards into a single agency — the External Reporting Agency (ERA). The Act is intended to enhance the financial reporting system across accounting, audit/assurance, and related external reporting requirements. This is particularly relevant to superannuation funds and trustees because external reporting now includes climate and sustainability-related disclosures. A ministerially-appointed Governing Council will provide oversight and support the establishment of specialist standard-setting boards. Trustees should expect greater emphasis on consistency, comparability, and governance around how climate and sustainability risks are defined, measured, and reported.
Resources	tasnima.bhuiyan@mercer.com Treasury Laws Amendment (Financial Reporting System Reform) Bill 2026 (Legislature, July 6, 2026)

Australia (new)	
Status	**Currently effective**
Development	**Wealth** **Family law superannuation splitting amendments updated** Measures in the Family Law (Superannuation) Amendment (2026 Measures No. 1) Regulations 2026 provide updated methods for valuing superannuation interests, clarify ministerial powers and streamline the regulatory framework for trustees. These changes — effective on July 22, 2026 — are to ensure the accurate valuation and administration of superannuation interests in family law proceedings. The new regulations prescribe circumstances where the Minister may issue a direction to a trustee of a superannuation plan if there is an approved methodology for valuing a superannuation interest in that plan. The direction may require trustees to arrange for a superannuation actuary to conduct a review of the target method or factor and provide recommendations in relation to the target superannuation interest, along with reasons for those recommendations. Trustees may also be required to provide the following: • A statement that a superannuation actuary has completed the review, and the date on which the review was completed; • The name, address and contact details of the superannuation actuary who conducted the review.
Resources	tasnima.bhuiyan@mercer.com Family Law (Superannuation) Amendment (2026 Measures No. 1) Regulations 2026 (Federal Register of Legislation, July 22, 2026)

Australia (new)	
Status	**Proposal**
Development	**Wealth** **Superannuation for young workers proposed** The Superannuation Legislation Amendment (Fair Super for Young Workers) Bill 2026 would change Australia's superannuation guarantee rules so that employers must pay compulsory super contributions for all employees under 18. Currently, workers under 18 only receive super if they work more than 30 hours per week. The bill would remove this exemption, meaning eligible young workers would receive super from the first dollar earned, consistent with other employees. The bill — which was introduced into parliament on August 12, 2026 — would also amend the Superannuation Guarantee (Administration) Act 1992 and the Superannuation Guarantee (Administration) Regulations 2018 to prevent regulations from reinstating the under-18 exclusion in future. If passed, the changes would comment the day after Royal Assent.
Resources	carolyne.susanto@mercer.com Superannuation Legislation Amendment (Fair Super for Young Workers) Bill 2026 (Legislature)

Australia (previously covered, with upcoming effective date)	
Development	**Wealth** • Capital gains tax and negative gearing changes enacted — key date: July 1, 2027
China (new)	
Status	⚠ **From January 1, 2027**
Development	**Wealth** **Transfer of enterprise annuity personal accounts to ease** From January 1, 2027, China will roll out a standard national process for transferring and consolidating enterprise annuity (EA) individual accounts. This is intended to support employees who change jobs or hold multiple EA accounts. Employees will be able to initiate transfers digitally via a unified online gateway, accessible through the national social insurance public service platform (si.12333.gov.cn), the 12333 app, and e-social security cards. Users will also be able to track transfer progress in real time.
Resources	angela.li@mercer.com Announcement (Chinese) (Ministry of Human Resources and Social Security, July 13, 2026)
China (previously covered, with upcoming effective date)	
Development	**Career** • Preferential taxation policy for expatriates expanded — key date: December 31, 2027 • Preferential taxation policy for annual one-time bonus extended — key date: December 31, 2027 **Health** • Long-term care insurance scheme introduced — key date: Targeted by 2028
Hong Kong (previously covered, with upcoming effective date)	
Development	**Career — Health** • General holidays for 2027 published — key date: January 1, 2027

Indonesia (updated)	
Status	**Currently effective**
Development	**Health** **Health insurance reforms introduced** Changes to Indonesia's regulatory framework for private health insurance products took effect on March 22, 2026. The measures are included in OJK Regulation (POJK) No. 36/2025 (Indonesian) and include a one-year transition period for insurers to update products and operating procedures. Insurers are currently consulting with the Financial Services Authority (OJK) to clarify the new requirements. A previous regulation (SEOJK 7/2025) (Indonesian) addressing private health insurance produces was due to take effect on January 1, 2026, but was postponed in 2025. POJK No. 36/2025 differs from SEOJK 7/2025 in several areas. Highlights include: • Insurers may offer products with copayment features, but they must also offer comparable products without copayments (separate limits apply to products with copayments). If copayments apply, the policyholder pays 5% per claim (it was 10% under SEOJK 7/2025), capped at 300,000 IDR for outpatient claims and 3,000,000 IDR for inpatient claims. • When selling or renewing policies, insurers must provide a premium comparison between versions with and without copayments. • The waiting period for critical/chronic or specified illness benefits is reduced to six months (it was one year under SEOJK 7/2025). • Insurers must prioritize coordination of benefit ('COB') implementation to enable sharing of benefit liabilities with other insurers and benefit administrators. All product features must support COB. • Insurers must obtain a claim performance report from policyholders when issuing a policy. Claim performance may be used for repricing only once per year. • Insurers must meet new operational standards, including establishing an in-house or external medical advisory function, and delivering public awareness and health programs for policyholders. • Companies may also apply an annual deductible, if it is agreed between the company and the policyholder, and it is clearly stated in the insurance policy.
Resources	astrid.suryapranata@MercerMarshBenefits.com OJK Regulation (POJK) No. 36/2025 (Indonesian) (Government)
Indonesia (previously covered, with upcoming effective date)	
Development	**Career** • Details of public housing savings program, contributions and registration issued — key date: May 20, 2027

Japan (new)	
Status	⚠ **Currently effective**
Development	**Health** **Out-of-pocket medical expenses ceiling increased** From August 1, 2026, the annual ceiling on out-of-pocket medical expenses increased under measures introduced by the 2026 Health Insurance Amendment Act. The increased ceiling — calculated on the patient's annual income — is one of the measures aimed at curbing national medical costs. Highlights include: • An increased annual cap applies to total out-of-pocket expenses incurred during the cap year (August to July). • A new cap extends long-term care protection to low-income earners who do not meet the frequent-user criteria. Existing payment caps continue for individuals who require long-term medical care and meet the frequent-user criteria. • The cost threshold is reduced for individuals with annual income below ¥2 million. • An annual outpatient cap is introduced for low earners who do not pay local resident tax, to ensure their current out-of-pocket expenses do not increase.
Resources	yukiko.sanjo@mercer.com Information on the increased ceiling (Japanese) (Government)
Macao (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career — Health** **Annual leave to increase** On January 1, 2027, Macao's annual leave entitlement will increase with seniority. Workers will be initially entitled to six days of annual leave, which will then increase by one working day for every two full years of seniority; when a worker's seniority exceeds 12 years, the number of annual leave days remains at 12. The measures were announced by the Labor Affairs Bureau and are included in Law No. 9/2026.
Resources	Law 9/2026 (Portuguese) (Labor Affairs Bureau, July 28, 2026)

Macao (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Statutory maternity leave increased** On July 28, 2026, Macau's statutory maternity leave increased to 90 days, up from 70. Sixty days are mandatory and must be taken immediately following the birth, and the remaining 30 days are flexible and can be taken, whole or in part, before or after the birth. Law No. 9/2026 also extends leave in cases of involuntary abortion and improves provisions for absences after the death of a baby. The government will subsidize small and medium-sized enterprises for maternity leave payments that have already been paid.
Resources	Law 9/2026 (Portuguese) (Labor Affairs Bureau, July 28, 2026)
Malaysia (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Health — Wealth** **Expanded social security coverage (LINDUNG 24/7 Scheme) introduced** Significant amendments to the Employees' Social Security Act 1969 introduced the LINDUNG 24/7 Scheme, a landmark reform providing comprehensive social security coverage for workers. Implementation began in June 2026. LINDUNG 24/7 extends protection beyond traditional work hours and locations, covering accidents and incidents occurring outside the workplace, including during commutes, personal activities, and flexible or gig economy work arrangements. The scheme offers benefits such as medical treatment, temporary and permanent disablement allowances, dependent benefits, constant attendance allowance, funeral benefits, rehabilitation, and education assistance. The Ministry of Human Resources is coordinating with existing programs to ensure seamless implementation.
Resources	News release (Malay) (Government, January 27, 2026)

New Zealand (new)	
Status	**Effective August 6, 2028**
Development	**Career — Health** **Changes to accrual of annual and sick leave enacted** From August 6, 2028, employees in New Zealand will accrue annual and sick leave in hours (not days or weeks) under the Employment Leave Act 2026. The Act received Royal Assent on August 6, 2026, and will replace the Holidays Act 2003. The new rules will apply from the first pay period that starts on or after August 6, 2028, and employers will then have one year to update their employment contracts. Highlights include: • Accrual of annual and sick leave will be calculated on "standard hours" worked by the employee under their employment contract, including paid breaks and paid leave but not additional or casual hours. • Annual leave will accrue in hours from day one at a minimum rate of 0.0769 per standard hour of work (this will be the equivalent of four weeks of leave for employees whose standard hours do not change during a year). Employees will be able to use annual leave to take any part of a day off work. • Sick leave will accrue in hours from day one at a minimum rate of 0.0385 per standard hour of work and during the same unworked periods as annual leave. Sick leave will be capped at 160 hours, unless otherwise agreed. • Annual leave will accrue for paid or unpaid leave under any legislation (including parental, volunteers and jury leave) but not for any other unpaid leave or when receiving accident compensation. • Bereavement and family violence leave do not accrue but will be available from the first day of employment (currently, such leave requires six months of continuous service with an employer). • After a year of employment, employees will be entitled to exchange for payment up to 25% of annual leave accrued over a 12-month period. • Leave will be paid at an hourly rate based on an employee's lowest hourly rate payable for the shift leave is taken, with an hourly average of piece rates, and will include "fixed" allowances paid during leave. Payment of annual leave taken after parental and volunteer leave is unchanged. "Leave compensation payment" (12.5% of an employee's hourly rate) will be paid for additional and casual hours. • Payment for public holidays will depend on if it is an "otherwise working day" for the employee, as included in their contract or their working pattern.
Resources	Employment Leave Act 2026 (Government, August 7, 2026)

Singapore (new)	
Status	⚠ **Beginning in 2029**
Development	**Career — Wealth** **Annual leave of certain outsourced workers increased** Beginning in 2029, the minimum annual leave entitlement for certain outsourced workers covered by the Progressive Wage Model (PWM) to 10 days (up from seven), the government announced on July 19, 2026. The PWM applies to Singapore citizens and permanent residents in the covered sectors. Highlights include: • The affected industry sectors are cleaning, security, landscaping, elevator and escalator maintenance, and waste management. • "Outsourced workers" are employed by a service provider and deployed to work at a client's premises under an outsourcing contract. • Workers who already receive leave benefits above the new minimum should continue to receive them, in accordance with their employment terms and the Employment Act. • The tripartite committee for each industry sector will set the exact effective dates for implementing the increased leave. Currently, outsourced workers can lose accumulated leave when a new service provider takes over a contract and rehires the existing workforce as leave entitlements may reset under the Employment Act. The Ministry of Manpower estimates that 60% of outsourced full-time resident employees age 25 to 64 will benefit from the increase.
Resources	Government to raise leave entitlement for outsourced progressive wage model workers from 7 days to 10 days (Ministry of Manpower, July 19, 2026)

Singapore (new)	
Status	**Currently effective**
Development	**Health** **Use of digital medical certificates expanded** From June 11, 2026, Singapore expanded the use of DigiMC (Digital Medical Certificates), a government-backed platform designed to reduce fraud by enabling employers to receive and electronically verify tamper-proof medical certificates issued by physicians in both the public and private sectors. Employers should accept valid DigiMC certificates as legitimate sick-leave documentation and take the following actions: • Update attendance and leave procedures to support digital submissions (rather than requiring hard copies) • Train HR, payroll and managers on the verification process • Ensure HRIS/workflow systems can store digital leave documentation. DigiMC is currently used across more than 600 GP clinics and 21 public healthcare institutions.
Resources	kavitha.hariharan@mercer.com A digital MC benefits everyone (Government)

Singapore (previously covered, with upcoming effective date)	
Development	**Career** • Minimum salary requirements for foreign work passes to increase — key date: January 1, 2027 • The Workplace Fairness (Dispute Resolution) Bill passed — key date: End of 2027

South Korea (new)	
Status	**Effective January 1, 2027**
Development	**Career** **Minimum wage to increase** On January 1, 2027, the hourly minimum wage will increase to 10,700 KRW, up from 10,320 KRW.
Resources	miyoung.kim@mercer.com Information on minimum wage (Korean) (Ministry of Labor, July 16, 2026)

South Korea (new)	
Status	**Currently effective**
Development	**Wealth** **National Pension Contribution base thresholds adjusted for 2026-2027** The Ministry of Health and Welfare announced the annual adjustment to the standard monthly income thresholds for the National Pension Service (NPS), effective from July 1, 2026, to June 30, 2027. These adjustments are based on the average income fluctuations of all NPS subscribers over the past three years. Employers should have adjusted their payroll systems to reflect these new thresholds. The upper income threshold increased to 6,590,000 KRW/month, up from 6,370,000 KRW/month. The lower threshold will increase to 410,000 KRW/month, up from 400,000 KRW/month. For employees earning more than the new upper limit of 6,590,000 KRW, their monthly contributions are calculated on this cap. Consequently, the maximum monthly premium (employee and employer combined) is 626,050 KRW (9.5% of 6,590,000 KRW). For employees earning less than the new lower limit of 410,000 KRW, their contributions is calculated using this floor amount, resulting in a minimum monthly premium of 38,950 KRW. Employers and employees share these premiums equally (50% each). There is no change to the premium rates for employees whose income falls between the previous upper threshold of 6,370,000 KRW and the new lower threshold of 410,000 KRW.
Resources	miyoung.kim@mercer.com Announcement (Korean) (Government, February 2, 2026)

South Korea (previously covered, mostly effective)	
Status	⚠ **Effective dates vary.**
Development	**Career — Health** **Paternity and child care leave expanded** South Korea significantly expanded paternity and child care leave to encourage greater participation by male employees in child care under measures that take effect on different dates, beginning on August 20, 2026. Highlights include: • Effective August 20, 2026, working parents can take parental leave more flexibly in blocks of one to two weeks, once per year, for eligible children. Previously, parental leave benefits are only available where leave is taken for at least 30 days. Employees can request this flexible child care leave for reasons prescribed by the Ministry of Employment and Labor, including closures of child care or school facilities, child's vacation or illness (where the child is aged eight years or younger, or in the second grade of elementary school or below. Short-term leave must be taken within the existing statutory child care leave entitlement (that is one year in principle, or up to one year and six months in certain cases). Employers may adjust the timing of leave in consultation with the employee where the requested timing would cause significant disruption to business operations. • Effective September 18, 2026, a new "spousal miscarriage/stillbirth leave" will allow spouses to take up to five days of leave after a miscarriage or stillbirth. The first three days will be paid. • Effective September 18, 2026, paternity leave will be renamed "Spousal Prenatal and Postnatal Leave," Spouses will be allowed to take leave from up to 50 days before the expected delivery date where care for the spouse or fetus is necessary. Currently, the leave must be used within 120 days following the baby's birth. • Effective November 27, 2026, the government will increase the paid portion of the six days of infertility treatment leave to four days, up from two. The maximum benefit amount will be increased to 336,840 KRW, up from 168,420 KRW.
Resources	miyoung.kim@mercer.com Information on the measures (Korean) (Government, June 30, 2026)

South Korea (previously covered, with upcoming effective date)	
Development	**Career — Health** • Paid leave for infertility treatment increased — key date: November 27, 2026 • Annual leave usage, statutory rest break changed — key date: December 10, 2026 • Employers prohibited from providing temporary housing structures for foreign workers — key date: June 2027

Taiwan (previously covered, with upcoming effective date)	
Development	**Career — Wealth** • Employees and employers can negotiate post-retirement age employment — key date: unknown

Thailand (previously covered, with upcoming effective date)	
Development	**Wealth** • Start date of Employee Welfare Fund postponed — key date: October 1, 2026
Vietnam (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **New public health measures for business travelers introduced** Effective July 1, 2026, all travelers (such as globally mobile employees and business travelers) are subject to new public health requirements when entering, transiting through, or leaving Vietnam. The measures are listed in Decree No. 165/2026/NĐ-CP. Highlights include: • Travelers must complete a health declaration (online or paper) within seven days before entering, transiting through, or exiting Vietnam. • Travelers may be asked to provide proof of vaccination or evidence of other preventive measures. • Travelers may be subject to direct or indirect health screening, such as temperature checks, and quarantine officers may interview travelers and, if necessary, collect epidemiological information. • Travelers may be subject to medical quarantine at border checkpoints, depending on circumstances and public health risk.
Resources	Decree No. 165/2026/NĐ-CP (Vietnamese) (Government, May 15, 2026)
Vietnam (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **New paid public holiday on November 24 announced** Vietnam's government announced that November 24 is now Vietnam Culture Day. Employees will be entitled to a paid day off work.
Resources	Resolution 1111/QĐ-TTg (Vietnamese) (Government) and Resolution 80-NQ/TW (Vietnamese) (Government)

Section 5

Europe, Middle East and Africa (EMEA)

European Union (EU) (new)	
Status	⚠ **Enforcement deadline is extended to December 2, 2027**
Development	**Career** **Enforcement date for certain high-risk artificial intelligence systems extended** An extended enforcement deadline of December 2, 2027, instead of August 2, 2026, now applies to standalone high-risk artificial intelligence (AI) systems under the European Union's (EU) AI Act to allow organizations more time to understand the Act's obligations. The new deadline is included in the Digital Omnibus on AI (Regulation (EU) 2026/1744), published in the EU's official journal on July 24, 2026. Standalone AI systems are those used for high-risk purposes, as described in Annex III of the AI Act, and include employment and HR systems, employment evaluation or recruitment systems, biometric identification systems, educational and vocational training or evaluation systems, etc. On May 19, 2026, the European Commission published draft guidelines with additional detail to help businesses understand how EU workplace AI tools will be treated under the AI Act.
Resources	Regulation (EU) 2026/1744 (Eur-Lex, July 8, 2026) and (Regulation EU 2024/1689 (Office Journal of the European Union, June 13, 2024)

EU	
Status	**Currently effective**
Development	**Career** **Roundup: Employer resources on EU's pay transparency directive** European Union (EU) Directive 2023/970 hopes to improve pay transparency, encourage organizations to review their pay structures, and enable individuals to enforce their equal pay rights. Under the directive, employers with 100 or more employees must publish an annual gender pay gap report. Employers are also banned from requesting applicants' salary history before hiring — to strengthen pay transparency and enforcement of equal pay for equal work. For reference purposes, in 2024, the EU's unadjusted gender pay gap averaged 11.1%. "Pay" covers — but is not limited to — salary and all related remuneration, including variable pay and benefits (cash or in-kind), bonuses, overtime, travel, housing and food allowances, training compensation, severance, statutory sick pay, and occupational pensions. The directive's implementation date was June 7, 2026; however, most Member States are at the draft legislation stage or have announced delayed timetables. To provide employers with information on the EU directive and Member States' implementation, 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.
Resources	Roundup: Employer resources on EU's pay transparency directive (Mercer, regularly updated)
EU (previously covered, with upcoming effective dates)	
Development	**Career** • Gender pay gap reporting to be phased in — key date: June 7, 2027 • Ban on forced or child labor finalized — key date: December 14, 2027 • Revised European Works Council Directive approved — key date: National transposition by January 1, 2028; new rules applicable starting on January 2, 2029. **Career — Health** • Platform Worker's Directive moves forward — key date: December 2, 2026 **Career — Health — Wealth** • Sustainability reporting and due diligence simplification measures agreed upon — key date: 12 months from the date of entry into force of the CSRD and until July 26, 2028, to transpose the CSDDD. **Health — Wealth** • Social security coordination rules revised — key date: Effective date unknown

Belgium (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Flexi-job scheme expanded** Belgium expanded the flexi-job scheme from July 1, 2026, allowing flexi-jobs in almost all industry sectors to increase labor-market flexibility. Previously, these jobs were only allowed in specifically designated sectors. Flexi-jobs enable individuals to take on additional paid work alongside retirement or a main job under a favorable social security and tax regime. Highlights include: • Sectors may choose to opt out of the scheme in full or in part. • Flexi-job workers are active employees who worked at least 80% of full-time hours with one or more employers during the third quarter preceding the quarter in which the flexi-job is performed. • Pensioners can generally start a flexi-job immediately upon retirement, unless the flexi-job is with their previous employer. • Individuals generally cannot perform a flexi-job for an organization affiliated with their main employer, subject to limited exceptions (for example where the individual works full-time for the company as an employee or temporary worker). • Flexi-wages are capped at 150% of the applicable minimum basic wage for a comparable standard employee. Certain supplements are excluded from that cap calculation. Where applicable, employers must still provide statutory allowances, bonuses and benefits (such as meal vouchers, shift allowances). Employers pay reduced social contributions on flexi-wages. • Employers must meet specific administrative requirements, including concluding a framework contract with the flexi-worker and electronically recording their attendance.
Resources	kristel.bogaerts@mercer.com Law (French) (Government, June 28, 2026)

Belgium (new)	
Status	⚠ **Currently effective**
Development	**Career** **Termination notice periods reduced during first six months of service** From August 1, 2026, Belgium shortened the termination notice period to one week for employment under six months for contracts starting on or after that date. This shortened period is automatic and applies to both employees and employers. These changes are outlined in the Act of 3 June 2026, published in the Official Journal on June 15, 2026.
Resources	Act of 3 June 2026 (French) (Government)

Belgium (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On August 21, 2026, the monthly minimum wage rate increased (Dutch) retroactively to July 1, 2026 to €2,233.61, up from €2,189.81 for workers aged 18 and older. Sectoral committees can also decide on minimum wage levels applicable to industry sectors.
Resources	Announcement (Dutch) (Government, August 21, 2026)

Belgium (previously covered, with upcoming effective date)	
Development	**Career — Health** • Transportation benefits increased — key date: October 1, 2026 • Mobility Budget required for certain employers starting in 2027 — key date: January 1, 2027 • Temporary wage indexation introduced in two phases — key date: January 1, 2028 **Wealth** • Blue- and white-collar pension harmonization postponed — key date: January 1, 2027 • Federal government agrees on pension reforms — key date: January 1, 2028

Cyprus (new)	
Status	**Currently effective**
Development	**Career — Health** **Employers face new obligations for accommodating breastfeeding** On June 25, 2026, new employer requirements to provide breastfeeding accommodations took effect in Cyprus under measures outlined in Law 103(I)/2025. Highlights include: • Employers with premises exceeding 50 square meters square either provide a dedicated room for breastfeeding, milk expression, and safe breast-milk storage, or offer a temporary space that meets all statutory standards. • Businesses operating in the same building or complex may provide a shared breastfeeding area, provided it meets the legal requirements. • Employers must inform employees about the availability and location of the facilities during their onboarding and when a woman returns from maternity leave. New employees must be able to access the facilities whenever needed. • The existing entitlement to one hour less working time per day for mothers to breastfeed or support child care remains unchanged for up to 12 months after childbirth. • The same facilities must be provided in certain public premises.
Resources	Law 103(I)/2025 (Greek) (Government, June 25, 2025)

France (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Physicians must specify employees' sick leave duration** Effective September 1, 2026, physicians must state the duration of an employee's sick leave period — or its extension — on the medical certificate. A decree published on June 13, 2026, sets the maximum duration at 31 days for an initial prescription and 62 days for an extension. These measures are included in the Social Security Financing Act (LFSS) for 2026. Exceptionally, a healthcare professional may prescribe a longer period of leave if justified by the patient's condition and aligned with recommendations from the French National Authority for Health (HAS).
Resources	amandine.marsella@mercer.com Decree No. 2026-498 (French) (Government, June 13, 2026)

France (previously covered, with upcoming effective date)	
Development	**Career** • Gender quotas for senior executives, management teams imposed — key date: March 1, 2029 **Career — Health — Wealth** • Social security contributions to be payable on long service awards — key date: January 1, 2027 **Health** • Copayment exemption for long-term illness to end — key date: October 1, 2026 • Health insurance system investment and changes to 'key letter AMI' — key date: November 2026

Greece (new)	
Status	**Currently effective**
Development	**Wealth** **Special maternity leave and benefits expanded** On August 14, 2026, Greece expanded eligibility for its special maternity leave and maternity protection benefit. Working mothers are entitled to apply to the Public Employment Service for special maternity leave of up to six months. Highlights include: • For part-time employees, any additional employment is also taken into account when assessing entitlement to the full subsidy. • Foster-to-adopt mothers who complete the adoption are now eligible for the special benefits. • The benefit remains payable even if the employer continues to pay full wages during maternity and childbirth leave. • The benefit is extended to concurrent employment situations, subject to certain conditions. • Seasonal employees are now eligible, provided their employment relationship remains active. • Salaried mothers who already received maternity and childbirth benefits as self-employed insured persons (for example freelancers) are also eligible for maternity benefits.
Resources	maria.arkopoulou@marsh.com Law (Greek) (Government, August 14, 2026)
Germany (previously covered, with upcoming effective date)	
Development	**Wealth** • Pension reform recommendations published — key date: Unknown • Corporate tax reductions that will impact company pension schemes introduced — key date: January 1, 2028
Gibraltar (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On August 1, 2026, the hourly minimum wage increased to GI£10, up from GI£9.50. The weekly minimum wage is GI£390, up from GI£370.50, and the monthly minimum wage is GI£1690, up from GI£ £1605.50.
Resources	Conditions of Employment (standard minimum wage) (amendment) order 2026 (Gazette, July 20, 2026)

Netherlands (new)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On July 1, 2026, the gross hourly minimum wage for employees 21 and older increased to €14.99, up from €14.71. The minimum wage increases every six months on January 1 and July 1.
Resources	Information on minimum wage (Dutch) (Government)
Netherlands (previously covered, with upcoming effective date)	
Development	**Wealth** • Significant reforms to the occupational pension system — key date: Unknown • Deadline extended for transition to new pension system — key date: Deadline extended to January 1, 2028 • Senate approves pension lump sum legislation — key date: January 1, 2029
Poland (new)	
Status	**Effective three months after promulgation**
Development	**Career — Health** **Employers must proactively prevent 'workplace mobbing'** Employers in Poland will need to improve how they prevent, detect and respond to workplace mobbing (workplace bullying) under amendments to the Labor Code. The president signed the law on July 30, 2026, and it is expected to take effect the beginning of 2027, and employers will then have six months to implement the required measures. Highlights include: • A simplified definition of mobbing, plus an indicative list of behaviors that can constitute mobbing and who may be considered a perpetrator. • Employers with more than 10 employees must adopt (or update) written anti-mobbing and anti-discrimination policies, procedures and measures. These must be incorporated into internal regulations (such as a collective agreement, workplace regulations or notices) and consulted on with trade unions or, where applicable, employee representatives. Employers with fewer than 10 employees are only required to inform employees of the applicable rules on preventing mobbing and discrimination. • Increased minimum compensation for breaches of the law.
Resources	Announcement (Polish) (Government, July 30, 2026)

Romania (previously covered, with upcoming effective date)	
Development	**Wealth** • Private pension framework from 2027 revised — key date: January 5, 2027
Saudi Arabia (new)	
Status	**Effective November 1, 2026**
Development	**Health** **Insurance Authority requires medical insurance policies to waive prior approval limits** Insurance companies in Saudi Arabia must offer medical insurance coverage policies without medical prior approval limits, effective from November 1, 2026 for all new and renewed insurance policies under a Circular issued by the Insurance Authority.
Resources	Council of Ministries Resolution (Insurance Authority, August 20, 2026) ashley.yau@mercer.com
Serbia (new)	
Status	**Effective January 1, 2027**
Development	**Career** **Minimum wage to increase** On August 2018, 2026, the Official Gazette published (Serbian) Decision No. 120-8350/2026, which will increase the minimum wage to 405 RSD/hour, up from 371 RSD/hour, effective January 1, 2027.
Resources	Decision No. 120-8350/2026 (Serbian) (Official Gazette)
Slovenia (previously covered, with upcoming effective date)	
Development	**Career — Wealth** • Pension reforms will increase retirement age — key date: Beginning in 2028

South Africa (previously covered, now effective)	
Status	**Currently effective**
Development	**Career** **Expanded remuneration and pay gap disclosures required** Companies that fulfill certain criteria are now subject to new remuneration disclosures and must prepare and update a remuneration policy and disclose the pay gap between their highest and lowest earners under Act No. 16 of 2024 (Companies Amendment, 2024), signed by the president on July 26, 2024. The measures increase pay transparency across organizations and intend to address "public concerns regarding high levels of inequalities in society by introducing better disclosure of senior executive remuneration and the reasonableness of the remuneration." The measures took effect on May 22, 2026, when the president issued Proclamation notice 314 of 2026. Highlights include: • Public and private companies (as defined in section 30A of the Act) must prepare a remuneration policy for approval by ordinary resolution at their annual general meeting, and thereafter every three years or sooner if there is a material change. Policies must be approved before changes can be implemented. • Public and state-owned companies have to prepare a remuneration report that comprises a background statement, the remuneration policy and an implementation report that details the remuneration and benefits paid to each director and officer; the total remuneration (including salary and benefits, employer contributions to benefit funds, and short-term or long-term incentives) of the highest paid employee and of the lowest paid employee; the average and median remuneration of all employees; and the remuneration gap between 5% highest paid and 5% lowest paid employees. • Remuneration reports must be approved by the company's board and voted on by ordinary resolution at the annual general meeting. The remuneration committee will have to explain how shareholder concerns are addressed if the report is not approved. New rules will apply to nonexecutive directors who are members of remuneration committees if a remuneration report is not approved. • Other measures include revised governance arrangements for the Social and Ethics Committee, and changes to takeover regulations and directors' liability.
Resources	Proclamation Notice 313 of 2026 (Government, May 22, 2026) President assents to laws advancing ease of doing business and corporate transparency (The Presidency, July 26, 2024) and Act No. 16 of 2024 (Companies Amendment, 2024) (Legislature, July 30, 2024)

Spain (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Career — Wealth** **Flexible retirement options improve** On August 28, 2026, Royal Decree 416/2026 of May 27, 2026, took effect, amending the deferred retirement regime and regulating the new flexible retirement regime and other aspects of combining the public retirement pension with employment. It generally applies to all social security schemes. Highlights include: • Flexible retirement is available to pensioners who are self-employed provided they have not been registered under RETA at any time in the three years preceding retirement. • Pensioners who combine retirement with part-time work are allowed to work between 33% to 80% of full-time hours (currently, 25% to 75%). The Decree clarifies that when a retirement pension is combined with part-time employment, the pension amount is reduced in inverse proportion to the reduction in the pensioner's working hours compared with a comparable full-time worker. • Pensioners receive an additional percentage of their pension if they begin flexible retirement six months or longer after their retirement. The pension amount increases by 25% for part-time employment between 55% and 80% of full-time hours, and by 15% for part-time employment that is equal to, or greater than, 33% but less than 55% of full-time hours. • The Decree specifies that the portion of a retirement pension compatible with employment or self-employment includes the maternity supplement and the supplement for reducing the gender gap. These supplements are increased or reduced in the same proportion as the pension amount, effective from the first day of the month following the start of the compatible employment. However, the supplement for pensions that are below the minimum is excluded. • Flexible retirement is incompatible with the economic supplement for delayed retirement. • Pensioners are not required to serve a minimum waiting period after retirement before beginning flexible retirement, and they retain healthcare and social protection benefits. • A pensioner who has previously been required to take early retirement will have their initial pension increased when they subsequently opt for flexible retirement. • The Decree also introduces changes to delayed retirement, including allowing the supplement to be received alongside active retirement (subject to a transitional period).
Resources	juanluis.alonso@mercer.com Royal Decree 416/2026 of May 27, 2026 (Spanish) (Government)

United Arab Emirates (new)	
Status	**Currently effective**
Development	**Wealth** **Employers responsible for entire pension contributions for low-earning employees** Beginning September 1, 2026, employers in the United Arab Emirates have to pay the full pension contribution (15% of the employee's salary) for eligible employees earning less than 20,000 AED and who are enrolled in the Ishtirak program under the Nafis program. This change eliminates the previous government-subsidized model where employers paid a reduced rate of 12.5% for Nafis-enrolled Emiratis earning less than 20,000 AED (with the government covering the remaining 2.5%). The 15% rate applies immediately for new hires, but the 2.5% government subsidy will be clawed back over a three-year period subject if eligibility criteria continue to be met.
Resources	claudia.maldonado@mercer.com Emerati Talent Competitiveness Council announces updates to 'Nafis' programme (Government, April 14, 2026)
United Arab Emirates (previously covered, with upcoming effective date)	
Development	**Health** • Unified national health insurance system to be introduced — To be introduced

United Kingdom (UK) (new)	
Status	**Proposal**
Development	**Career — Health** **Expanded rights for carers and parents of seriously ill children proposed** A consultation on potential reforms to employment rights for unpaid carers and parents of seriously ill children invites input through September 1, 2026. The consultation, which forms part of the government's Plan to Make Work Pay, sought feedback on how the rights introduced under the Carer's Leave Act 2023 are operating in practice. Policy options under consideration include: • Expansion of unpaid carer's leave, including the circumstances in which it may be taken and the individuals for whom it may be taken. • Introduction of paid carer's leave. • Creation of a right to return to the same or a similar role following an extended period of carer's leave. • Introduction of a new statutory entitlement to paid leave for parents of seriously ill children. Currently, employees with caring responsibilities are entitled to up to five days of unpaid carer's leave in any 12-month period to provide or arrange care for a dependent with a long-term care need. Dependents include a spouse or partner, child, parent, a member of the same household, or an individual who reasonably relies on the employee for care. Parents may access unpaid parental leave and, where applicable, paid neonatal care leave for a baby. Employees may also be entitled to reasonable unpaid time off for emergencies involving a dependent and may request flexible working arrangements.
Resources	Make Work Pay: Employment rights for unpaid carers and parents of seriously ill children (Government, July 15, 2026)

UK (previously covered, now effective)	
Status	⚠ **Currently effective.**
Development	**Career** **Regulator to apply new rules and guidance on nonfinancial misconduct** On September 1, 2026, the Financial Conduct Authority's final guidance on how serious nonfinancial misconduct (NFM) is assessed under the Code of Conduct and Fit and Proper regime took effect. These changes apply to firms regulated under the Senior Managers and Certification Regime and they intend to create consistent conduct standards for serious NFM across both banks and non-banks in the financial services sector. Therefore, work-related NFM incidents in non-bank firms fall under the FCA's Code of Conduct if the individual works in the financial services part of the business. Firms should have reviewed and updated their staff policies, reporting procedures, fit and proper assessments, and regulatory references before the September 2026 implementation. Highlights include: NFM covers serious breaches of regulatory responsibilities related to behavior at work, such as integrity and due care, even if not directly linked to financial services activities. This includes serious bullying, harassment, violence, and conduct that undermines dignity or creates a hostile or offensive work environment. The FCA's Policy Statement PS25/23 provides guidance to help firms apply the Code of Conduct and the Fit and Proper (FIT) test. The FIT guidance will consider certain serious nonfinancial misconduct in an individual's private life if it poses a material risk to regulatory standards. The new rules did not apply to incidents occurring before September 1, 2026 — those were handled under existing rules. In addition, various measures in the Employment Rights Act 2025 (ERA 2025) are relevant to the new FCA's framework. Under the ERA 2025, the time allowed to bring tribunal claims will be expanded (this could be introduced as early as October 2026) and the duty on employers to prevent sexual harassment strengthened (from October 1, 2026). From January 2027, individuals who are unfairly dismissed (for example due to incorrect disciplinary decisions related to NFM) will be entitled to unlimited compensation — currently, unfair dismissal compensation is capped at the lower of one year's pay or £118,223.
Resources	Nonfinancial misconduct in financial services (FCA, March 23, 2026)

UK — Great Britain (new)	
Status	⚠ **Effective October 30, 2026**
Development	**Career** **Trade union access draft code and regulations published** Trade unions will gain a new statutory right of access to an employer's workplaces under measures included in the Employment Rights Act 2025 (ERA), and a revised draft code of practice (laid in Parliament on July 6, 2026), together with secondary legislation that sets out the operational and procedural framework. The right applies where the employer has a minimum of 21 workers across their workplaces, and unions will not need to demonstrate any minimum level of support or membership. Highlights include: • Employers will have 15 working days to respond to a union's request for access. The trade union and the employer then have 25 working days to negotiate the terms of an access agreement before the case is referred to the Central Arbitration Committee (CAC) for decision. • Two or more trade unions may apply jointly for access for the same workers or allow different unions to access different groups of workers employed by the same employer. • Where the union and the employer fail to reach a voluntary access agreement, unions will be allowed to apply to the CAC for an order for access. There is a presumption in favor of granting access. • No access agreement will run for more than two years from the date it is agreed to by the parties or imposed by the CAC, unless the parties agree to extend it. • Access includes physical and digital access (up to once a week), usually during normal working hours but should minimize any unreasonable interference with the employer's activities. Employers must provide a meeting space and make available their usual communication methods. Visiting union officials must comply with employer's reasonable instructions. Workers should receive full pay for attending access meetings. • The CAC can refuse an access agreement where the employer already recognizes a union, has a statutory access agreement in place with a union, or is subject to a current recognition request. • A party can complain to the CAC about the breach of an access agreement within three months. If upheld, the CAC can order steps to ensure compliance. A further breach within 12 months could result in financial penalties of £75,000 to £500,000.
Resources	Code of practice: Right of trade unions to access workplaces (Department for Business and Trade, July 2026); Trade Unions (Right to Access Workplaces) Regulations 2026 (Government, July 6, 2026) and The Trade Unions (Right to Access Workplaces) (Required Information) Regulations 2026 (Government, July 6, 2026)

UK — Great Britain (new)	
Status	⚠ **Effective during 2027**
Development	**Career — Health** **Equality Action Plan requirement introduced for gender pay gap and menopause issues** During 2027, employers with 250 or more employees in Great Britain will be required to publish an Equality Action Plan (plan) setting out steps to improve workplace equality. Employers are encouraged to introduce and publish plans voluntarily in 2026. The requirement is included in the Employment Rights Act 2025 and will be supplemented by further regulations. In March 2026, the government published guidance outlining 18 recommended actions (six of which support menopause) and expectations on implementation, tracking and monitoring. Highlights of the steps employers must take include: • An action plan must be submitted for each separate legal entity that has 250 or more employees. • Employers should review workforce data and engage trade unions and/or employee networks to understand how menopause may affect staff. • Employers must select at least two of the 18 actions to include in their equality action plan, and confirm if each is new, in progress or embedded; at least two actions must be new or in progress. A minimum of one action must address the gender pay gap and at least one must support employees experiencing the menopause/menstrual health issues. • Employers must provide support text (up to 100 words) for each action, plus an overall narrative (up to 200 words). For new or in-progress actions, they must explain why each action was selected, how progress will be tracked, and how they will determine whether it is improving gender equality. They must also explain how embedded actions have integrated into the organization. Employers may change their selected actions, but they must always work on at least two. • Plans must be approved by a "responsible person" (such as a director, partner or senior officer) and submitted via the government's gender pay gap reporting service. Employers will be encouraged to publish plan information on their website. • Employers should monitor progress and review the plan annually; the guidance anticipates interim progress updates in the first two years and a more detailed review in year three.
Resources	Creating an action plan: Guidance for employers (Government, May 13, 2026) and Employment Rights Act 2025 (Government, June 1, 2026)

UK (previously covered, with upcoming effective date)

Development

Career — Health

- Introduction of mandatory payrolling of benefits-in-kind postponed — key date: April 2027

Health

- Government to gradually introduce real-time reporting of benefits-in-kind — key date: April 6, 2027

Wealth

- Significant pension scheme changes enacted — key date: Phased in between June 2026 and 2030
- Budget includes pension changes — key date: April 6, 2027
- Policy paper on inheritance tax and pensions death benefits — key date: April 6, 2027
- Finance Act 2026 includes framework for inheritance tax on pensions — April 6, 2027

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