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Marsh People and Investments

Global Legislative Update

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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:

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Section 1

Highlights

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Americas	
Argentina	Minimum wage increased
Canada	Employment insurance premium rates for 2027 issued Equal pay regulations for federally regulated employers now effective Minimum wage increased in Manitoba Sick leave note requirements change in Manitoba Input on expansion of pay equity legislation requested in New Brunswick Changes to labor code introduced in Nova Scotia Proposal to ease pension fund unlocking in Ontario Minimum wage increased in Ontario Minimum wage increased in Prince Edward Island Minimum wage increased in Saskatchewan
United States	Pension Benefit Guaranty Corporation waives reporting for attrition events, effective immediately 2027 retirement plan limits projected Pension Benefit Guaranty Corporation proposes to codify policy on monetary penalties Executive order on childhood vaccines issued Department of Labor sharpens its focus on access to behavioral health Retirement plan amendments for recent laws due by December 31 Final rule implements executive order to end illegal discrimination in federal contracts Roundup: Employer resources on employee voting rights/trends Roundup: Employer resources on tax deduction for overtime pay Roundup: Employer resources on H-1B reforms Roundup: State paid family and medical leave contributions and benefits

Americas (continued)	
United States (continued)	Domestic partner benefits remain popular, but present challenges Roundup: State accrued paid leave mandates Beyond COBRA: State laws add complexity to continuation coverage Group fixed-indemnity plans pose legal and tax issues Transportation plans offer valued benefits, but pose compliance issues User's guide to SECURE 2.0 Roundup: Employer resources on the changing landscape of DEI Roundup: Employer resources on noncompete restrictions Some states require group health plan sponsor reporting Resources for tracking state and local retirement initiatives Roundup: Employer resources on states' recent equal pay laws Roundup: Employer resources on states' recreational marijuana laws Roundup: Employer resources on minimum wage increases Roundup: Employer resources on hairstyle nondiscrimination laws Ground ambulance balanced billing law enacted in Alabama Law addressing artificial intelligence in insurance coverage enacted in Alabama Bereavement leave to expand in California Provider contract termination notice law enacted in California Employers face new requirements when considering employees' out-of-state criminal history in San Francisco 2027 paid family medical leave contributions reduced in Colorado Expansion of workplace monitoring laws require employer action in Connecticut Broad workforce law that includes expanded wage transparency requirements enacted in Connecticut Menopause-related coverage required in Delaware Pharmacy benefit manager law enacted in Delaware Law expands coverage for mental health conditions in Delaware Prepaid Health Care Act form HC-5 for 2027 issued in Hawaii Law to ban disparate impact employment discrimination enacted in Illinois Paid jury duty leave will be required in Illinois Telehealth law enacted in Maryland Employers to notify employees of immigration inspection of employment records in Massachusetts Association Self-Funded Health Benefit Plan Coverage Act enacted in Mississippi Insurance law mandates gender detransition coverage in Montana Employers required to report employee separations in New Jersey Independent contractor/employee classification rules adopted in New Jersey Employee access to personnel records to expand in New York 2027 paid family medical leave rates issued in New York Benefit and leave laws vary in Puerto Rico

Americas (continued)	
United States	Protections for employees with criminal records expanded in Washington Safeguards for immigrants enacted that require employer action in Washington
Asia Pacific	
Australia	Financial service reforms planned Stronger requirements for response to modern slavery in supply chains proposed Regulator to strengthen investment governance standards Ban on noncompete clauses for lower- and middle-income workers proposed Minimum gig worker standards introduced Accounting standard change to impact superannuation funds Privacy reforms proposed Improvements to the efficiency of climate-related disclosures proposed
China	Sick leave pay rules discontinued in Shanghai
India	Employee Provident Fund Organization wage ceiling increased
Japan	Minimum wage to increase in 15 prefectures
Singapore	Proposal to raise child care leave and fully fund statutory child-related leave
Thailand	Employee Welfare Fund begins
Europe, Middle East and Africa (EMEA)	
European Union	Court rules on applicable law for cross-border employment Agreement on changes to social security coordination rules finalized Roundup: Employer resources on EU's pay transparency directive
Austria	Pension reforms encourage older workers to stay employed and strengthens retirement provision
Egypt	Employers must prepare and submit internal workplace regulations
France	Patient copayment decrees published Out-of-pocket medical costs to decrease Sick pay duration for certain nonexempt long-term conditions will be limited Reform of permanent disability compensation to change
Guernsey	Minimum wage increased in Channel Islands
Mauritius	Certain leave entitlements expanded

Europe, Middle East and Africa (EMEA) (continued)	
Netherlands	Tax advantage of 30% expat ruling to be reduced
Qatar	Labor market modernization measures enacted
South Africa	Additional public holiday for November 2026 announced
Spain	Employers must provide more employment information to employees Employers face new reporting obligations for pension schemes
United Kingdom	New employer obligations on workplace sexual harassment and harassment by third parties in Great Britain issued Duty to notify workers about their right to join trade unions delayed to 2027 in Great Britain Trade unions will have a right to access workplaces for organizing and recognition in Great Britain Time to bring employment tribunal claims extended in Great Britain Statutory bereavement leave to be introduced 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	**Currently effective**
Development	**Career** **Minimum wage increased** The monthly minimum wage rate increased to 383,800 ARS in September 2026, up from 376,600 ARS. The other planned increases for 2026 are: 391,200 ARS (October); 398,800 ARS (November); and 406,400 ARS (December). For 2027, the following increases have been announced: 414,200 ARS (January); 422,000 ARS (February); 429,600 ARS (March), and 437,000 ARS (April).
Resources	Law (Spanish) (Government, September 8, 2026)
Argentina (previously covered, with an upcoming effective date)	
Development	**Career — Wealth** • Severance liability fund to be established — key date: November 1, 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)	
Status	**Effective January 1, 2027**
Development	**Career — Health** **Employment insurance premium rates for 2027 issued** On January 1, 2027, the Employment Insurance (EI) premium rates will be C$1.64 per C$100 of insurable earnings for employees and C$2.30 for employers. The 2027 premium rate for residents of Quebec covered by the Quebec Parental Insurance Plan will be C$1.29 per C$100 of insurable earnings; employers will pay C$1.81 per $100 of insurable earnings. The maximum annual contribution for a worker in Quebec will increase by C$17.62 to C$913.32, and the employer rate will increase by C$24.67 to C$1,278.65 per employee. EI premium rates are different for residents of Quebec because the province administers its own parental insurance plan. The maximum insurable earnings in 2027 will increase to C$70,800, up from C$68,900 in 2026. The maximum annual EI contribution for a worker will increase by C$38.05 to C$1,161.12, and by C$53.27 for employers to C$1,625.57 per employee).
Resources	Canada Employment Insurance Commission confirms 2027 Employment Insurance premium rate (Government, September 14, 2026)

Canada (previously covered, soon to be effective)	
Status	**Effective October 26, 2026**
Development	**Career** **Equal pay regulations for federally regulated employers now effective** Equal Pay Regulations will take effect on October 20, 2026, following their proclamation on May 6, 2026. The Regulations strengthen the "equal pay for equal work" provisions enacted as part of Bill C-86 (Budget Implementation Act, 2018, No. 2) by prohibiting federally regulated employers from paying different wage rates based on an employee's employment status where employees perform substantially the same kind of work. They also impose specific obligations on temporary help agencies, including requirements to pay equal wages and prohibitions on charging certain fees to workers. *Two Interpretations, Policies and Guidelines* on equal treatment and temporary help agencies administer these changes. Highlights of the regulations include: • Employees must be paid fairly, regardless of employment status (for example, full-time, part-time, casual or temporary), subject to legitimate exceptions such as bona fide seniority and merit systems. • Employees may request a review of their wage rate. Employers must respond within 90 days, complete the review, and either increase the wage or confirm that the current wage is compliant and provide supporting reasons. • Key terms are clarified and defined, including employment status, full-time, part-time, permanent and temporary employment, and industrial establishment (which accounts for remote work and atypical workers in transportation). The regulations also clarify requirements for seniority/merit systems, methods for calculating wage rates, exceptions to the equal wage requirement, record-keeping obligations, and the notices that employers must post. • A two-year transition period is provided to allow adaptation of existing collective agreements. • Temporary help agencies are prohibited from charging certain fees to individuals in connection with their employment (or must instead pay the equivalent amount to the worker). They are also prohibited from paying an employee less than the rate paid by the client to its own employees.
Resources	Order (Government, May 6, 2026); Equal Treatment — IPG-122 (Government, May 6, 2026) and Temporary help agencies — IPG-123 (Government, May 6, 2026)
Canada — Manitoba (previously covered, now effective)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On October 1, 2026, the minimum wage increased 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 — Manitoba (previously covered, now effective)	
Status	**Currently effective**
Development	**Career — Health** **Sick leave note requirements change** Beginning October 1, 2026, Bill 11 amends Manitoba's Employment Standards Code and limits when employers may require medical sick notes. Highlights include: • Employers may only request a sick note if the absence lasts more than one week, or the employee has been absent from work due to illness or injury on more than 10 scheduled workdays in the same calendar year. A workday includes both partial and full days. • The list of acceptable providers of sick notes is expanded to require employers to accept sick notes from licensed health professionals outside Manitoba when the employee received care there, for example a physician, physician assistant or clinical assistant; a registered nurse, nurse practitioner or registered psychiatric nurse; a psychologist; or a midwife. • Employers must reimburse employees for the cost of sick notes, subject to specified submission and payment timelines. These changes bring Manitoba in line with similar recent legislative reforms elsewhere in Canada.
Resources	Bill 11 (Legislature)
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 by October 30 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 — Nova Scotia (new)	
Status	**Effective April 1, 2027**
Development	**Career** **Changes to labor code introduced** On April 1, 2027, new measures expanding overtime pay eligibility and requiring tips and gratuities to be paid to workers will take effect. Measures allowing the recovery of unpaid earnings owed by employers will take effect on a date yet to be proclaimed. The measures are included in Bill 256, Labour Standards Code, which received Royal Assent on September 18, 2026. Highlights include: • Workers who work more than 44 hours per week will be entitled to overtime pay. Currently, the overtime threshold is more than 48 hours per week. • Overtime pay will apply to hours a worker volunteers to work, and is permitted to work, in addition to overtime hours they are required to work. • A new statutory scheme will require gratuities and tips be paid to workers. Employers may still operate a tip-sharing pool, subject to certain criteria.
Resources	Bill 256 (Legislature, September 18, 2026)
Canada — Ontario (new)	
Status	**Proposal**
Development	**Wealth** **Proposal to ease pension fund unlocking** On August 18, 2026, Ontario's Ministry of Finance launched a consultation on proposed amendments to the General Regulation under the Pension Benefits Act that would make it easier to unlock pension funds held in locked-in accounts. Comments were due by October 2, 2026, and no implementation date has been proposed. If adopted, eligible locked-in account owners could apply to their financial institution to unlock their funds, giving individuals greater flexibility to access retirement savings that are currently subject to locked-in restrictions. Highlights of the proposals include: • Full unlocking of life income funds and locked-in retirement income funds. • Full unlocking of locked-in retirement accounts if the balance is less than 40% of the Year's Maximum Pensionable Earnings. • Applications would include a requirement for spousal consent. Currently, limited amounts of pension funds can only be unlocked under various financial hardship and other nonhardship provisions.
Resources	Unlocking pension funds in locked-in accounts (Ontario Regulatory Registry, August 18, 2026)

Canada — Ontario (previously covered, now effective)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On October 1, 2026, the minimum wage increased 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 (previously covered, now effective)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On October 1, 2026, the rate increased to C$17.30/hour, up from C$17/hour, and it will increase again to C$17.60/hour on April 1, 2027.
Resources	Minimum wage order (board and lodging) (Government, April 2, 2026)
Canada — Saskatchewan (previously covered, now effective)	
Status	**Currently effective**
Development	**Career** **Minimum wage increased** On October 1, 2026, the minimum wage in Saskatchewan increased 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 **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	⚠ **Currently effective**
Development	**Wealth** **Pension Benefit Guaranty Corporation waives reporting for attrition events, effective immediately** The Pension Benefit Guaranty Corp. (PBGC) has announced a new reporting waiver, effective immediately. Technical Update 26-1 waives reporting for any attrition event with a reporting deadline on or after September 18. This means reporting will generally not be required for attrition events that occurred during 2025 and later plan years. **Attrition events.** Plan sponsors must notify PBGC when the number of active participants drops below 80% of the number at the beginning of the current plan year. Reporting can be triggered by a single-cause event (such as a corporate transaction, spinoff, or mass layoff) or attrition. A single cause event can happen at any time, but attrition events are measured only at year-end (and don't include participants previously reported to PBGC due to a single-cause event). The new announcement waives reporting of attrition events, but not single-cause events. **No reporting required for 2025 attrition events.** The deadline for reporting an attrition event is the PBGC premium due date for the plan year after the event year — generally October 15 for a calendar-year plan. Reporting for 2025 plan year events would have been due October 15, 2026 (later for noncalendar year plans), but the waiver eliminates the requirement. **Waiver in anticipation of future regulatory changes.** Event reporting is meant to give early warning of circumstances warranting additional review. However, PBGC has found that reporting attrition events rarely helps identify plans that present an increased risk to the agency's insurance program, and that the administrative burden likely outweighs the value of the reports. Although the waiver is temporary, it will remain in effect until such time as PBGC amends its event-reporting regulations to make the waiver permanent.
Resources	GRIST, September 18, 2026 margaret.berger@marsh.com and brian.kearney@marsh.com

US (new)	
Status	**Effective January 1, 2027**
Development	**Wealth** **2027 retirement plan limits projected** Every key Internal Revenue Code (IRC) limit for qualified retirement plans will rise from 2026 to 2027, according to projections by Marsh People and Investments. The 2027 limits will reflect increases in the Consumer Price Index for All Urban Consumers (CPI-U) from the third quarter of 2025 to the third quarter of 2026. Marsh's estimates are determined using the tax code's cost-of-living adjustment and rounding methods, the CPI-U through August, and estimated CPI-U values for September. Figures can't be finalized until after September CPI-U values are published in October. IRS usually announces official limits for the coming year in late October or early November. The GRIST cited below shows Marsh's projections of the 2027 limits along with the actual 2026 amounts for comparison.
Resources	GRIST, September 14, 2026 margaret.berger@marsh.com and james.chaken@marsh.com

US (new)	
Status	**Proposal**
Development	**Wealth** **Pension Benefit Guaranty Corporation proposes to codify policy on monetary penalties** A new proposed regulation from the Pension Benefit Guaranty Corp. (PBGC) would codify the agency's policy on monetary penalties for failure to timely provide certain required filings and notices. The proposal would also add detail on the factors PBGC considers when assessing or waiving penalties. Comments were due September 21, 2026, and PBGC specifically requested comments on the following: • What mitigating and aggravating factors PBGC should consider when reviewing violations and determining whether to assess or waive penalties • Whether PBGC should adjust the initial $25 and $50 penalty levels to account for inflation from 1995 to the present.
Resources	margaret.berger@marsh.com and matthew.calloway@marsh.com GRIST, September 3, 2026

US (new)	
Status	⚠ **Currently effective**
Development	**Health** **Executive order on childhood vaccines issued** A recent executive order has put childhood vaccine policy back in the spotlight, signaling the Trump administration's continued push to reshape federal vaccine recommendations. But an executive order does not itself change the law, employer health plan coverage, or school vaccination requirements. So what should employers be watching now? Marsh's blog below breaks down what the order does, and does not do, and what it could mean for employers going forward.
Resources	katharine.marshall@marsh.com What employers need to know about the executive order on childhood vaccines (Marsh, August 19, 2026)

US (new)	
Status	**Currently effective**
Development	**Health** **Department of Labor sharpens its focus on access to behavioral health** Regulators at the Department of Labor (DOL) recently announced in Field Assistance Bulletin 2026-03 that they will focus their Mental Health Parity and Addiction Equity Act (MHPAEA) comparative analysis enforcement in three categories of nonquantitative treatment limitations (NQTLs) and reiterated that they will not pursue enforcement actions related to portions of a 2024 final rule that amended a 2013 final rule. Specifically, the DOL's narrowed enforcement focus for requests for NQTL comparative analyses is now limited to the following three categories: treatment exclusions, medical necessity standards and review process, and network adequacy and provider reimbursement methodologies. While enforcement priorities will focus on these three areas, regulators emphasized that they remain committed to protecting access to behavioral health benefits, and they will continue to investigate other NQTLs, particularly in response to participant complaints. The DOL also confirmed that they will not enforce portions of the 2024 final rule pertaining to the meaningful benefits standard, prohibition on discriminatory factors and evidentiary standards, relevant data evaluation requirements, and related requirements for comparative analyses that would have otherwise applied beginning in 2026. Additionally, the DOL also released helpful guidance intended to provide streamlined expectations to plans and issuers with regard to their MHPAEA compliance obligations. The recent guidance gives meaningful insight, with practical tips, into how the DOL currently expects group health plans to manage their MHPAEA compliance obligations. Many plan sponsors may be in a holding pattern with their NQTL comparative analyses, awaiting new regulations that likely will take some time for regulators to finalize. Regardless, plan sponsors should thoroughly review their group health plans and policies through the lens of the recently issued guidance and make any necessary changes in the interim — particularly if the plan has an NQTL that may cause a barrier to behavioral health access.
Resources	cheryl.hughes@marsh.com Field Assistance Bulletin 2026-03 (DOL, September 8, 2026)

US (updated)	
Status	⚠ **December 31, 2026 deadline**
Development	**Wealth** **Retirement plan amendments for recent laws due by December 31** 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 this article apply to both individually designed and preapproved plans. Some sponsors may have only a few (if any) 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@marsh.com and margaret.berger@marsh.com GRIST, September 25, 2026
US (previously covered, soon to be effective)	
Status	⚠ **Effective October 26, 2026**
Development	**Career** **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	
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 Marsh'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** **2026 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@marsh.com and katharine.marshall@marsh.com GRIST (regularly updated), and Paid family and medical leave: Snapshots across the US (regularly updated)

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@marsh.com and patty.cartwright@marsh.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@marsh.com and katharine.marshall@marsh.com Roundup: State accrued paid leave mandates (Marsh, 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@marsh.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@marsh.com and cheryl.hughes@marsh.com GRIST, August 19,2026

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@marsh.com and cheryl.hughes@marsh.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@marsh.com, matthew.calloway@marsh.com, and brian.kearney@marsh.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@marsh.com and dorian.smith@marsh.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 Marsh and third-party resources. This listing is updated periodically and may not always reflect the latest development in every locality.
Resources	margaret.berger@marsh.com and brian.kearney@marsh.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 Marsh'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 — Alabama (previously covered, partially effective)	
Status	⚠ **October 1, 2026, for in-network providers and January 1, 2027, for out-of-network providers.**
Development	**Health** **Ground ambulance balanced billing law enacted** Under 2026 Act 349 (SB 369), fully insured plans must reimburse in-network (INN) ground ambulance providers and emergency medical service providers at a rate of 200% of Medicare and out-of-network (OON) ground providers at a rate of 180% of Medicare. The applicable Medicare rate is the one used for zip code 35642. These providers cannot bill plan participants for the remaining balance, except that INN and OON emergency medical service providers may bill for the INN cost-sharing amount. The effective date is October 1, 2026, for INN providers, January 1, 2027, for OON providers.
Resources	rich.glass@marsh.com 2026 Act 349 (SB 369) (Legislature, April 6, 2026)

US — Alabama (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Health** **Law addressing artificial intelligence in insurance coverage enacted** Act 2026-589 (SB 63) regulates the use of AI in prior authorizations and utilization review processes. The law does not prohibit AI for fully insured plans but requires the Department of Insurance to adopt rules and enforce the law. Highlights include: • Prior authorization. Insurers must base determinations on the participant's medical history, clinical circumstances unique to the participant, and other relevant clinical information. Insurers also must annually certify that any AI use does not rely on group data sets, is applied fairly and equitably, and does not result in unlawful discrimination. Any adverse decision arising must be made by a licensed physician or healthcare professional. • Utilization review. Insurers must disclose any AI use in their policies and procedures and attest that outcomes are subject to periodic review and comply with the Health Insurance Portability and Accountability Act (HIPAA). Alabama generally does not apply its insurance laws extraterritorially to fully insured plans issued outside the state, and the law does not affect self-funded ERISA plans.
Resources	rich.glass@marsh.com Act 2026-589 (SB 63) (Legislature, April 16, 2026) and Fair Chance Ordinance (Government)

US — California (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career — Health** **Bereavement leave to expand** Governor Newsom signed SB 1149 into law, expanding the definition of "family member" for job-protected bereavement leave to include one designated person identified by the employee on an annual basis. A designated person is any individual related to the employee by blood or whose association with the employee is the equivalent of a family relationship. The expanded definition of family member takes effect January 1, 2027. Under the law, employers with five or more employees are required to provide up to five days of bereavement leave upon the death of a family member, currently defined as a spouse, child, parent, sibling, grandparent, grandchild, or domestic partner. The leave is unpaid and must be used within three months of the date of death. However, employees can use vacation, personal leave, accrued sick leave, or other available compensatory time off. Expanding the definition of family member aligns the law with recent changes (AB 1041) made to the California Family Rights Act and the state's paid sick leave law (Healthy Workplace Healthy Family Act), both effective January 1, 2023. Similar changes (SB 590) were also made to the state's paid family leave law, effective July 1, 2028. California employers should review their leave policies, specifically the definition of family member, for alignment with these changes, employee handbooks for updated definitions and train staff accordingly should also be reviewed.
Resources	katharine.marshall@marsh.com SB 1149 (Legislature, September 27, 2026)

US — California (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Health** **Provider contract termination notice law enacted** In recent years, employers sponsoring healthcare service plans (including HMOs) have seen health system contract negotiations potentially affect network access in California. A new law addresses that issue. Under 2026 Ch. 306 (AB 2613), these plans must provide at least 60 days written notice to participants assigned to a provider terminating from the network or assigned to a provider that has admitted at least one enrollee to a terminating acute care hospital in the last 12 months. Plans must also send a subsequent notice if a provider renews the contract or decides not to terminate the contract within 10 business days of approval by the Department of Managed Health Care. The law does not affect self-funded ERISA plans.
Resources	rich.glass@marsh.com AB 2613 (Legislature, September 18, 2026)

US — California — San Francisco (new)	
Status	⚠ **Currently effective**
Development	**Career** **Employers face new requirements when considering employees' out-of-state criminal history** San Francisco has expanded its Fair Chance Ordinance to prevent employers from using out-of-state criminal convictions or arrests for conduct that is lawful in California related to abortion-related healthcare, drag performances, gender-affirming care, and spontaneous abortion in making certain employment-related decisions. The changes also include additional notice and procedural requirements, and increased penalties for violations. The amendments became effective on August 10, 2026.
Resources	Ordinance No. 128-26 Expanding protections — Fair Chance Ordinance (Government, July 10, 2026)
US — Colorado (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **2027 paid family medical leave contributions reduced** Colorado decreased the overall contribution rate for paid family and medical leave (PFML) from 0.88% (2026) to 0.86% (2027) of wages. Employers with 10 or more employees nationally must contribute half of that amount. Smaller employers are not required to contribute, but covered employees must still contribute the other half. In addition, the FAMLI Division adopted slight revisions to their regulations. Highlights include: • Benefits. An employee can submit a "Neonatal Care Leave Certification Form," signed by a healthcare provider, to document the reason for neonatal care leave. The form is available on the My FAMLI+ portal. Leave taken from employment does not include situations where an employee replaces the absence with additional work meant to offset the absence (e.g. picking up a shift to cover their absence). • Private plans. Private plan approval will now last indefinitely until/unless otherwise terminated. Previously, the duration was capped at eight years.
Resources	rich.glass@marsh.com Rules & Guidance (Government)

US — Connecticut (new)	
Status	**Currently effective**
Development	**Career** **Expansion of workplace monitoring laws require employer action** Connecticut recently enacted Public Act No. 26-73 that expands existing workplace monitoring laws as of October 1, 2026. Highlights include: • "Electronic monitoring" is defined as "the collection of information on an employer's premises concerning employees' activities or communications by any means other than direct observation, including the use of a computer, telephone, wire, radio, camera, electromagnetic, photoelectronic or photo-optical system." • Employers must list the specific workplace locations where electronic monitoring happens. They must also post the notices directly in those locations. • Employers must give every new employee a plain-language written statement before they start working. This statement must list the prohibited activities that allow the employer to monitor workers without prior notice (such as investigating suspected legal or company violations). • Employers do not need to disclose specific monitoring locations if they have reasonable safety or security grounds, or if the workplace is an airport. • Noncompliance will result in penalties ranging from $500 to $3,000.
Resources	Public Act 26-73 (Legislature, June 4, 2026)

US — Connecticut (previously covered, now effective)	
Status	**Currently effective**
Development	**Career — Health** **Broad workforce law that includes expanded wage transparency requirements enacted** A broad workforce law (HB 5003) expands the wage transparency requirements and other employer actions, beginning October 1, 2026. Highlights of the wage transparency requirements include: • Employers are required to post the wage range and a general description of benefits in internal and public job postings. Previously, Connecticut only required employers to prove the wage range upon request of an applicant or at the time an offer was made. • Benefits means health insurance benefits, retirement benefits, fringe benefits, paid leave, and any other compensation other than wages to be offered with a position. • Anti-retaliation protections are expanded to prohibit refusing to interview, hire and promote or to terminate any applicant or employee for exercising their rights. • Punitive damages are no longer available, but the statute of limitations is extended from one to two years. • The provisions apply to any position where the duties are performed within the state or outside of the state when the employee must report directly to a supervisor, office or other worksite located within the state. Other employment changes worth highlighting include: • Employers are required to provide reasonable break times for an employee to express breast milk, in addition to scheduled breaks — prior law only permits use of existing meal/break time. • The prohibition on employment promissory notes (such as repayment of training costs) are expanded to all employers — currently, it only applies to employers with 26 or more employees. Certain exceptions remain. • Employers must provide written notice of the right to reasonable accommodations for a disability under the federal Americans with Disabilities Act to new employees at the commencement of employment; existing employees within 120 days of October 1, 2026; and any employee who notifies the employer of their disability within 10 days. An employer may comply with these notice obligations by conspicuously displaying a poster created by the Connecticut DOL. • Employers with 100 or more employees are required to create a guide for their employees on the pay codes used for overtime and commonly used pay differentials such as on-call pay, hazard pay, call-back pay, holiday and weekend pay, or geographic pay differentials.
Resources	Governor Lamont signs legislation protecting worker's rights (Governor's office, May 11, 2026) and HB 5003 (Legislature)

US — Delaware (new)	
Status	⚠ **Effective for policies issued, renewed, or modified on or after January 1, 2028**
Development	**Health** **Menopause-related coverage required** A new law will require all individual, group, and blanket insurance policies to cover medically necessary diagnostic services and treatment for menopause, perimenopause, and menopause and perimenopause symptoms. The mandate includes FDA-approved hormone replacement therapy (HRT). Prior authorization and step therapy are prohibited for HRT.
Resources	rich.glass@marsh.com 2026 Ch. 482, SB 319 (Legislature, September 8, 2026)

US — Delaware (new)	
Status	⚠ **Effective for contracts entered into or amended on or after March 8, 2027.**
Development	**Health** **Pharmacy benefit manager law enacted** A new law will prohibit a pharmacy benefit manager (PBM) from retaliating against a pharmacy that discloses information to a government agency or in any proceeding that pertains to potential violations of state or federal law or regulations. Current law defines PBMs broadly to include any "entity that contracts with pharmacists or pharmacies on behalf of a person."
Resources	rich.glass@marsh.com 2026 Ch. 481, SB 721 (Legislature, September 8, 2026)

US — Delaware (new)	
Status	⚠ **Effective for policies issued, renewed, or modified on or after January 1, 2028.**
Development	**Health** **Law expands coverage for mental health conditions** A new law will expand an existing insurance requirement for plans to cover serious mental illnesses and drug and alcohol dependencies, expanding the scope to encompass medically necessary services for mental health (MH) disorders or substance use disorders (SUDs), as those terms are used in the federal Mental Health Parity and Addiction Equity Act. Plans must place at least one formulation of an FDA-approved SUD drug on the lowest-cost formulary tier. Plans must also cover medically necessary out-of-network services without additional cost to participants if in-network options are unavailable within applicable network access standards. If a plan covers MH/SUD benefits in any classification, it must provide meaningful benefits. Insurers must provide a copy of the nonquantitative treatment limitation analysis to participants, prospective participants, and providers within 30 days of request.
Resources	rich.glass@marsh.com 2026 Ch. 480, SB 22 (Legislature, September 8, 2026)
US — Hawaii (new)	
Status	⚠ **Form must be filed by December 31, 2026**
Development	**Health** **Prepaid Health Care Act form HC-5 for 2027 issued** The Prepaid Health Care Act (PHCA) requires employers to offer health coverage to all eligible employees in the state. An employee may waive coverage under the employer's health plan if certain conditions apply, including having other health coverage. To claim an exemption, the employee must complete and provide Form HC-5 (Employee Notification to Employer) to the employer. This notice is binding for only one year, so exempt employees must annually complete a new form by December 31, using the current calendar year's form. The employer must keep this form on file.
Resources	rich.glass@marsh.com Information on Prepaid Health Care (Department of Labor)

US — Illinois (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career** **Law to ban disparate impact employment discrimination enacted** Illinois recently enacted the Civil Rights Safeguard Act (Public Act 104-0744), that codifies disparate impact liability under the Illinois Human Rights Act as of January 1, 2027. The law bans practices, policies, or underwriting criteria that appear to be neutral, but result in discriminatory effects, unless they serve a substantial, legitimate, and nondiscriminatory business interest that cannot be met by a less discriminatory alternative. The law is in response to the changes in federal policy regarding disparate impact liability.
Resources	Public Act 104-0744 (Legislature)

US — Illinois (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career — Health** **Paid jury duty leave required effective January 1, 2027** Under 2026 Pub. Act 104-0683 (HB 4844), employers with more than 25 employees must provide paid leave for jury duty at employees' regular rate of pay. The law does not limit the leave duration or cap the amount of reimbursement. Current law already requires employers of all sizes to provide job-protected leave. Employees must give notice to employers by giving a copy of the summons within 10 days of issuance.
Resources	rich.glass@marsh.com 2026 Pub. Act 104-0683 (Legislature, July 31, 2026)

US — Maryland (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Health** **Telehealth law enacted** A telehealth law repeals the existing temporary telehealth license scheme managed by the Board of Professional Counselors and Therapists, replacing it with a licensing exemption for licensed professionals who meet certain standards. Under 2026 Ch. 242 (HB 1483), counselors may provide care to individuals in the state if they meet all these requirements: • Are licensed and in good standing in another state • Maintain an established client-counselor relationship outside of Maryland • Are unable to provide in-person counseling because the client is located in Maryland • Provide services for the purpose of continuity of care up to six months after locating to Maryland.
Resources	rich.glass@marsh.com 2026 Ch. 242 (HB 1483, April 28, 2026) (Legislature) and HB 5620 (Legislature)
US — Massachusetts (new)	
Status	⚠ **Currently effective**
Development	**Career** **Employers to notify employees of immigration inspection of employment records** Massachusetts employers must provide written notice to all employees within 48 hours of receiving a Federal Immigration & Customs Enforcement (ICE) notice of inspection for Forms I-9 or other employment records unless federal law requires otherwise under the new Protect Act (HB 5620) that became effective on August 5, 2026. Noncompliance will result in penalties of $200 to $500. The law does not specify the contents of the notice or a specific delivery method.
Resources	Protect Act (Government, August 2026)

US — Mississippi (new)	
Status	⚠ **Currently effective**
Development	**Health** **Association Self-Funded Health Benefit Plan Coverage Act enacted** Mississippi passed the Association Self-Funded Health Benefit Plan Coverage Act, aiming to expand coverage options for professional and trade associations. Under SB 2704, state residents may obtain self-funded association health plan coverage that is subject to the laws of another state. The plan and the association must have existed for at least three years. Approval by the insurance commission is required.
Resources	rich.glass@marsh.com SB 2704 (Legislature, March 16, 2026)
US — Montana (new)	
Status	⚠ **Currently effective**
Development	**Health** **Insurance law mandates gender detransition coverage** Montana enacted a law that requires fully insured plans, the state governmental plan, and the state's Medicaid and Children's Health Insurance Programs with a gender transition benefit to also cover gender detransition treatment with equivalent cost sharing. HB 682 requires this coverage even if the plan later drops gender transition benefits. The law also establishes a statute of limitations for minors who bring tort actions for injuries suffered because of treatment. The law took effect on October 1, 2026. Montana 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@marsh.com HB 682 (Legislature, May 13, 2026)
US — New Jersey (new)	
Status	⚠ **Currently effective**
Development	**Career** **Employers required to report employee separations** New Jersey employers are now required to electronically report employee separations to the Department of Labor and Workforce Development through their portal within seven days of separation of employment. The law was enacted in 2022, but implementation was delayed until the portal was completed.
Resources	Employer response portal (Department of Labor and Workforce Development) and P.L. 2022, Chapter 120 (Legislature, November 3, 2022)

US — New Jersey (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Career — Health — Wealth** **Independent contractor/employee classification rules adopted** The New Jersey Department of Labor and Workforce Development (NJDOL) recently adopted new regulations that clarify the statutory ABC test for determining whether a worker is an independent contractor or employee under New Jersey's Unemployment Compensation Law, Wage and Hour Law, and the Wage Payment Law. The final regulations scaled back on several of the controversial proposals issued in 2025. Under the final regulations, an employer must prove all three "prongs" of the ABC test to classify a worker as an independent contractor: 1. The worker has been and will continue to be free from control or direction over the performance of services, both under the worker's contract of service and in fact 2. Work performed is either outside the usual course of the business for which the work is being performed, or the work is performed outside of all the places of business of the enterprise, and 3. The worker is customarily engaged in an independently established trade, occupation, profession or business. The regulations, which also provide enforcement guidelines, took effect on October 1, 2026.
Resources	NJDOL adopts clear rules on worker classification to protect workers' rights, level the playing field for businesses (NJDOL, May 5, 2026)

US — New York (new)	
Status	⚠ **Effective November 8, 2026**
Development	**Career** **New York to expand employee access to personnel records** On November 8, 2026, a new law will create a right for New York employees and former employees to access, review, and challenge information in their personnel records. The law adds Section 210-b to the New York Labor Law and applies broadly to public and private employers. Highlights include: • Negative information is added to their personnel records if that information could affect their employment, promotion, transfer, compensation, or disciplinary actions. • Employees can review their personnel records twice per calendar year. Notification and review because of the placement of negative information in the personnel record does not count toward that limit. • Personnel records must be maintained during employment and for at least three years after separation, although other federal, state, or local laws may require longer retention. • Employees may submit written responses disputing information in their personnel records. • Collective bargaining agreements are not superseded if they provide at least substantially similar access to personnel records. • Broad anti-retaliation protections include prohibiting employers from making certain immigration-related threats or actions to employees or their family or household members. • Violations are punishable by fines ranging from $500 to $2,500, and the law is enforced by the New York Attorney General. Employers should update personnel recordkeeping practices, develop or revise procedures for responding to personnel record requests, and establish a procedure for alerting employees when negative information is added to their records. The Governor has asked the legislature to address several uncertainties for both employers and employees; however, until the amending legislation is enacted in early 2027, these requirements will be in effect.
Resource	Assembly Bill A2107 (Legislature)

US — New York (new)	
Status	⚠ **Effective January 1, 2027**
Development	**Career — Health** **2027 paid family medical leave rates issued** New York's Department of Financial Services posted rates for 2027 paid family leave (PFL) benefits. Employee PFL contributions will increase from 0.432% (2026) to 0.452% (2027) of an employee's wages. The maximum annual employee contribution will be $451.81 (2027), up from $411.91 (2026). Employers do not contribute to the PFL fund. New York also has a disability benefits law (DBL), where employee contributions are set by statute at 0.5% of wages up to a maximum of $0.60 per week. The state's paid family and medical leave (PFML) program consists of PFL and DBL.
Resources	rich.glass@marsh.com Decision on premium rate for paid family leave benefits and maximum employee contribution for coverage beginning January 1, 2026 (Department of Financial Services, August 29, 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@marsh.com GRIST, August 12, 2024

US — Washington (new)	
Status	⚠ **Different dates apply**
Development	**Career** **Protections for employees with criminal records expanded** Washington's changes to its Fair Chance Act that put further restrictions on employers' review and use of criminal information took effect on July 1, 2026, for employers with 15 or more employees. It will apply to smaller employers on January 1, 2027. Highlights of the changes include: • Employers cannot ask about criminal history or run background checks until after extending a conditional offer of employment. • Before taking any adverse action based on conviction history, employers must conduct, document and provide a written individualized assessment. • New notice and disclosure requirements are imposed. • Civil penalties for noncompliance are increased. • Protections not only apply to hiring but also apply to current employees regarding promotions, demotions, suspensions and terminations. • Taking adverse action based on arrest records or juvenile conviction records is strictly prohibited, with limited exceptions.
Resources	HB 1747 (Legislature, April 21, 2026); Information on the Fair Chance Act (Office of the Attorney General)

US — Washington (previously covered, now effective)	
Status	⚠ **Currently effective**
Development	**Career** **Safeguards for immigrants enacted that require employer action** On October 1, 2026, the Immigrant Worker Protection Act took effect, requiring employers to post a notice and contact each employee within five business days after a federal agency launches an inspection of employment eligibility records (I-9 forms). The intent is to increase fairness and transparency in the workplace for immigrant workers. Highlights include: • Employers must provide the notice in English and the five other most common languages used in Washington. • Employers must inform each impacted worker of the results of the I-9 inspection. • Employers must give workers information about their rights and statewide resources. • Employers still do not have to give federal immigration agents access to their nonpublic places of business or employee data without a judicial warrant. The Attorney General's Office has issued guidance on these rights. • Employers may not prevent workers from exercising their rights under this law or punish or fire a worker for doing so. • The Attorney General's Office can investigate and take legal action. Workers can also sue to stop violations or recover damages.
Resources	The Immigrant Worker Protection Act (Legislature, March 30, 2026)

US (previously covered, with upcoming effective dates)	
Development	**Career** • Trapped at Work Act amended in New York — key date: December 19, 2026 • Bias against menopause-related conditions banned in Illinois — key date: January 1, 2027 • 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** • Paid parental leave eligibility requirements reduced in San Francisco, California — key date: January 1, 2027 • 2027 healthcare expenditure rates published in San Francisco, California — key date: January 1, 2027 • 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 • Some 2027 paid family medical leave rates announced in New Jersey — 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 • 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 **Health** • 2027 affordability percentage for employer health coverage increases — key date: January 1, 2027 • Upper prescription drug limit set in Colorado — key date: January 1, 2027

US (previously covered, with upcoming effective dates) (continued)	
Development	**Health (continued)** • 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 • Telehealth parity law enacted in Alaska — 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 • 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 • 2027 hotel medical rates announced in Seattle, Washington — 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

US (previously covered, with upcoming effective dates) (continued)	
Development	**Health (continued)** • 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** • Retirement plan amendments for recent laws due by December 31, 2026 — key date: December 31, 2026 • 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	⚠ **Planned reforms**
Development	**Wealth** **Financial service reforms planned** Australia's Minister for Financial Services recently announced a Financial Services reform package, which will cover six major topic areas: • Protections for members of Australian Prudential Regulation Authority-regulated superannuation funds • Financial advice reform • Compensation Scheme of Last Resort • Protections in the self-managed superannuation fund sector • Reforms to address harmful lead generation • Enhanced managed investment scheme governance. Overall, each of the topic areas announced in this reform package is likely to require targeted consultation with industry and other stakeholders. It is likely that the Minister intends the reform package to be implemented prior to 2028, coinciding with the Federal Election.
Resources	Protecting consumers and the promise of superannuation in an evolving financial ecosystem (Treasury, August 19, 2026)

Australia (new)	
Status	**Proposal**
Development	**Career — Wealth** **Stronger requirements for response to modern slavery in supply chains proposed** Australia's Attorney-General launched a public consultation on "Strengthening Australia's response to modern slavery in supply chains." The consultation points to introducing stronger requirements for how organizations identify, manage, and remediate modern slavery risks across their operations and supply chains. The consultation closed on September 25, 2026. Highlights of the consultation include: • Stronger accountability measures, including a possible new criminal offense for "failing to prevent" modern slavery. This would shift the emphasis beyond reporting and require organizations to show they have effective, proportionate, risk-based controls embedded in their business processes. • Enforcement options, remedies for victims, and a possible Deferred Prosecution Agreement (DPA) framework for modern slavery matters. DPAs could create a structured path for cooperation, remediation, and compliance improvement, rather than relying only on enforcement action. For superannuation trustees, the consultation matters both for trustee operations — such as outsourced administration, contact centers, facilities, and technology supply chains — and for investment value chains, where expectations on stewardship and due diligence continue to increase, especially in higher-risk sectors and in private markets and real assets.
Resources	Consultation (Government, July 16, 2026)

Australia (new)	
Status	**Consultation closes on February 3, 2027**
Development	**Wealth** **Regulator to strengthen investment governance standards** The Australian Prudential Regulation Authority (APRA) has issued a consultation on a package of reforms intended to strengthen investment governance in the superannuation industry and reduce the likelihood of member harm. The proposed reforms form part of APRA's multi-year agenda to improve governance standards, with particular attention on the platform trustee segment where product design, investment choice architecture, and operational dependencies can add complexity and heighten execution risk – this direction suggests a push for clearer accountability and enhanced oversight across the end-to-end investment lifecycle. Trustees may wish to review current investment governance arrangements, including board and committee oversight, documentation and decision records, third-party governance, and assurance activities. Finalized standards are expected in the first half of 2027 and, subject to consultation, the new framework could commence on January 1, 2028.
Resources	APRA issues plans to strengthen trustee investment governance (APRA, September 30, 2026)

Australia (new)	
Status	**Proposal**
Development	**Career** **Ban on noncompete clauses for lower- and middle-income workers proposed** The government released an exposure draft of the Competition and Fair Work Legislation Amendment (Banning Unfair Non-Competes) Bill 2026 (Bill) and invited comments through October 2, 2026. If enacted, the Bill would ban certain post-employment restraints, restrict how these clauses may be drafted, and introduce significant penalties for noncompliance. The measures could become effective in July 2027. The Bill builds on the Government's commitment, announced in the March 2025 Budget, to prohibit noncompete clauses for low- and middle-income workers, and follows a July 2025 consultation on noncompetes and other restraints affecting employee mobility. Highlights of the proposals include: • Noncompete clauses would be banned for employees earning less than the high-income threshold (currently AU$190,100, excluding commissions and most other incentives, and adjusted annually). • Nonsolicitation clauses that prevent a departing employee from recruiting former colleagues would be banned, regardless of their income. • The measures would apply to new agreements and to existing arrangements amended after commencement. • Post-employment restrictions designed to protect confidential information or prevent misuse of client relationships would still be permitted. • "Cascading" provisions — which use multiple time periods or geographic areas to increase the chance that at least one restriction would be enforceable — would be prohibited. • Penalties for breaches would generally be capped at AU$109,200 for employers and AU$21,840 for individuals.
Resources	Reform to noncomplete clauses and other restraints on workers — draft legislation (The Treasury, September 7, 2026)

Australia (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Minimum gig worker standards introduced** On August 17, 2026, the Fair Work Commission introduced the first set of minimum standards for gig economy delivery workers (this includes on-demand delivery of good, beverages or supermarket groceries) and who are engaged through digital labour platforms (DLPs), such as websites and apps. The standard is expected to apply to around 250,000 gig workers. Laws passed in 2023 and 2024 had given gig workers more rights to negotiate minimum pay and conditions, and they had authorized the Fair Work Commission to set standards for pay and insurance. The Interim On-Demand Employee-like Minimum Standards Order sets minimum standards for certain workers who perform on-demand delivery work including: • A minimum hourly rate of pay (AU$31.30) that is more than the minimum wage. DLPs must also pay gig workers a top-up amount if they have been paid less than the "earnings floor" for hours worked over a defined earnings period. • Gig workers must be paid for "engaged time" between accepting a job and delivery completion. • Gig workers are responsible for maintaining third party insurance for vehicles used for deliveries. • DLPs must: provide gig workers with certain information to fulfil each delivery; ensure a "reasonable level of cover" for personal accident insurance; issue a "Gig Worker Information Statement" to all gig workers; notify certain significant changes to affected gig workers; establish a platform feedback forum that fulfils certain criteria to facilitate discussion with gig workers; keep and retain records; provide dispute resolution procedures. Gig workers also have the right to take unpaid time off.
Resources	Interim on-demand delivery employee-like worker minimum standards order (Fair Work Commission, August 11, 2026)

Australia (new)	
Status	**Effective for annual reporting periods starting on or after January 1, 2028**
Development	**Wealth** **Accounting standard change to impact superannuation funds** A new accounting standard change in Australia will change how superannuation funds show and explain information in their financial statements. The changes apply to annual reporting periods starting on or after January 1, 2028, but funds can choose to use it earlier. Under AASB 2026-4, which clarifies how AASB 18 Presentation and Disclosure in Financial Statements and related amendments to AASB 107 Statement of Cash Flows apply to superannuation entities, funds will need to review some parts of their reporting framework. For super funds, the main changes are about how entities present financial statements and report cash flows. Superannuation entities will still need to use the statement of profit or loss and statement of statement of cash flow formats required by AASB 1056, instead of the general formats in AASB 18 and the revised AASB 107. Some dividends received and interest paid or received can also be counted as operating cash flows. Overall, the changes aim to make super fund reporting clearer and more consistent, while keeping the sector's existing reporting framework in place.
Resources	savannah.ranasinghe@mercer.com AASB 2026-4 (Federal Register of Legislation, September 16, 2026)

Australia (new)	
Status	**Proposal**
Development	**Career — Health — Wealth** **Privacy reforms proposed** The Attorney-General's Department (AGD) issued proposed reforms and a consultation to the Privacy Act 1988 (Cth). The package is designed to modernize privacy settings for the digital economy and strengthen compliance, enforcement, and remedies. The consultation closed on September 18, 2026. Highlights of proposals include: • A new "fair and reasonable" test for handling personal information. The focus would move away from a notice-and-consent model toward an outcomes-based assessment of whether a data practice is appropriate in context. Relevant factors would include reasonable expectations, transparency, proportionality, and the impact on individuals. • Updated definitions and stricter consent requirements. The reforms would broaden the definition of "personal information" and expand "sensitive information" to better reflect digital tracking and new technologies. Consent would need to be specific and unambiguous, which could lead to greater scrutiny of bundled consents and default settings. • Greater transparency and stronger breach obligations. The consultation also proposes clearer requirements around the use of "computer programs" including AI, along with tighter expectations for breach response and notification.
Resources	tasnima.bhuiyan@mercer.com Consultation (Government, August 31, 2026)

Australia (new)	
Status	**Proposal**
Development	**Wealth** **Improvements to the efficiency of climate-related disclosures proposed** A consultation that sought feedback on efficiency-enhancing reforms to the sustainability reporting framework, as announced in the Federal Budget 2026-27, closed on October 2, 2026. Three main topics were addressed: • The already-legislated transition from the provision of "limited assurance" regarding climate-related disclosures, to the requirement to have "reasonable assurance" on making disclosures. This transition is currently legislated to take effect from July 1, 2030. "Reasonable assurance" is a higher standard and raises several issues for reporting entities. The consultation paper sought feedback on scaling back this requirement, by deferring it to 2035, applying it only to more mature sustainability metrics or retaining the limited assurance requirement. • The need for further guidance from the Australian Securities and Investment Commission and standards bodies to complement the existing array of published guidance. To this end, Treasury requested feedback on aspects of the reporting requirements that require further definition. • Further guidance to define the boundaries on information required for climate-related disclosures and additional resources to help reporting entities determine these boundaries. Beyond the specific proposals, the consultation also considered the need to improve alignment between domestic frameworks and applicable international standards, and potential revisions to the Registered Company Auditor experience requirements.
Resources	anthony.williams@marsh.com Improving the efficiency of climate-related financial disclosures (The Treasury, August 23, 2026)
Australia (previously covered, with upcoming effective date)	
Development	**Wealth** • Capital gains tax and negative gearing changes enacted — key date: July 1, 2027

China — Shanghai (new)	
Status	⚠ **Currently effective**
Development	**Health** **Sick leave pay rules discontinued** Shanghai has discontinued its local sick leave pay rules under the Notice of the Shanghai Municipal Labour Bureau on Strengthening Administration of Employees' Sick Leave to Ensure Employees' Livelihood during Sick Leave (Hu Lao Bao Fa [1995] No. 83)) (Circular 83). The Shanghai labour authority confirmed that Circular 83 ceased to be effective from August 15, 2026, meaning that the national standards now apply. Previously, Shanghai maintained its own sick leave pay rules, which linked sick leave payments to an employee's years of service. By contrast, the national standard sets a single minimum rate for all employees (80% of the local minimum wage). Employers may choose to pay more generous sick leave pay. Shanghai's current minimum wage is 2,740 RMB/month, so the minimum sick leave pay is 2,192 RMB. Employers that already provide more generous sick leave pay must continue to do so unless employees agree to changes.
Resources	Circular 83 (Chinese) (Shanghai Human Resources and Social Security Bureau) and National Standards (Chinese) (Ministry of Human Resources and Social Security, March 12, 2021)
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 **Wealth** • Transfer of enterprise annuity personal accounts to ease — key date: January 1, 2027
Hong Kong (previously covered, with upcoming effective date)	
Development	**Career — Health** • General holidays for 2027 published — key date: January 1, 2027

India (new)	
Status	⚠ **Currently effective**
Development	**Career — Wealth** **Employee Provident Fund Organization wage ceiling increased** Effective September 17, 2026, the maximum wage ceiling under the Employees' Provident Fund Organisation (EPFO) increased to 25,000 INR, up from 15,000 INR, bringing an estimated 5.1 million additional employees within the scope of mandatory EPFO coverage. The maximum wage ceiling is used to determine mandatory coverage under the Employees' Provident Fund (EPF), the Employees' Pension Scheme (EPS), and the Employees' Deposit Linked Insurance (EDLI) Scheme. The increased statutory wage ceiling for mandatory coverage is included under Chapter III of the Code on Social Security, 2020, and better reflects current wage levels — it was last increased in 2014. Highlights of the changes include: • Employees earning wages (that is minimum 50% of total remuneration or any other percentage in the company) up to 25,000 INR per month, and who meet the other eligibility conditions, will now fall within mandatory coverage. • Employees who were previously excluded from EPS membership because of their salary level and who currently earn up to 25,000 INR must now be enrolled, with contributions payable from September 17, 2026. • Employers who were previously contributing to the EPF on a wage cap of 15,000 INR (even if their actual wages exceeded that amount) now must contribute on a revised wage cap of 25,000 INR, or on actual eligible wages if these are less than 25,000 INR. This revised cap does not restrict employers from making contributions on uncapped wages exceeding 25,000 INR. Employer and employee contributions remain unchanged (12% each). • For the September 2026 payroll month, employers must split the contribution calculation when they digitally report wages and EPFO contributions, applying the old wage ceiling of 15,000 INR for the period September 1-16, 2026, and the revised wage ceiling of 25,000 INR for the period September 17-30, 2026.
Resources	ansh.gandhi@marsh.com and jyotsna.tiwari@marsh.com Notification of wage ceiling (Government, September 17, 2026) and wage ceiling FAQs (Government, September 17, 2026)
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	**Career** **Minimum wage to increase in 15 prefectures** Hourly minimum wage increases for 15 prefectures began on October 1, 2026. The increases include: Chiba (¥1,195, up from ¥1,140); Gifu (¥1,121, up from ¥1,065); Hokkaido (¥1,131, up from ¥1,075); Hyogo (¥1,172, up from ¥1,116); Kagawa (¥1,093, up from ¥1,036); Kanagawa (¥1,279, up from ¥1,225); Mie (¥1,143, up from ¥1,087); Miyagi (¥1,098, up from ¥1,038); Niigata (¥1,108, up from ¥1,050); Osaka (¥1,231, up from ¥1,177); Saitama (¥1,196, up from ¥1,141); Tochigi (¥1,125, up from ¥1,068); Tokyo (¥1,280, up from ¥1,226) and Toyama (¥1119, up from ¥1,062).
Resources	Announcement (Japanese) (Government, September 3, 2026)
Macao (previously covered, with upcoming effective date)	
Development	**Career — Health** • Annual leave to increase — key date: January 1, 2027
New Zealand (previously covered, with upcoming effective date)	
Development	**Career — Health** • Changes to accrual of annual and sick leave enacted — key date: August 6, 2028

Singapore (new)	
Status	**Proposal**
Development	**Career — Health** **Proposal to raise childcare leave and fully fund statutory child-related leave** Measures announced in Singapore's 2026 National Day Rally Speech on August 23, 2026, included proposed increases to child care leave (CCL) for eligible working parents, as well as government funding for statutory child-related leave. Under the proposed changes, CCL would increase to eight days per parent per year for parents with one child aged up to 12; 10 days per parent per year for parents with two children; and 12 days per parent per year for parents with three or more children. At present, CCL is capped at six days per parent for children aged up to six, and two days per parent for children aged seven to 12, regardless of the number of children. The government is also considering other changes, including increases to parental leave, which covers maternity leave, paternity leave, and the Shared Parental Leave scheme. The Prime Minister announced that the government will cover the full cost of all statutory child-related leave schemes, up to the applicable reimbursement limit, including Central Provident Fund contributions. This is intended to reduce employer costs and help offset the impact of the proposed CCL increase. The Prime Minister also encouraged employers to adopt workplace cultures that better support parents.
Resources	National Day Rally Speech (Government, August 23, 2026) and Childcare leave (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 • Annual leave of certain outsourced workers increased — key date: Beginning in 2029
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 **Career** • Minimum wage to increase — key date: January 1, 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, now effective)	
Status	**Currently effective**
Development	**Wealth** **Employee Welfare Fund begins** The new Employee Welfare Fund (EWF) began on October 1, 2026 — the start date had been postponed one year. Employers with more than 10 employees in Thailand must register their employees and contribute to the EWF, which aims to support employees' financial security upon their termination or death, and address current socioeconomic issues. Employers and employees who are subject to the EWF will be required to make monthly contributions at the following rates: • From October 1, 2026, to September 30, 2031, the contribution rate is 0.25% of the employee's wage. • From October 1, 2031, onwards, the contribution rate will increase to 0.5% of the employee's wage. The EWF was established in 1998 under the Labor Protection Act B.E 2541 (1998) (LPA) but had not been fully implemented. However, three Ministerial Regulations issued in November 2024 announced the start of contributions in October 2025, which was then postponed to October 1, 2026.
Resources	vinithorn.thipputsakaew@marsh.com Royal Decree prescribing the period for the commencement of the Collection of Accumulated Funds and Contributions to the Employee Welfare Fund, B.E. 2568 (2025) (Thai) (Government)

Section 5

Europe, Middle East and Africa (EMEA)

European Union (EU) (new)	
Status	⚠ **Currently effective**
Development	**Career** **Court rules on applicable law for cross-border employment** On July 9, 2026, the Court of Justice of the European Union (CJEU) issued a ruling on what employment law applies to an employee who lives and normally works in one EU Member State, but the employer is based in another. The ruling concerned a French employee who worked mainly in France for an IT services employer in Switzerland. He was dismissed using Swiss termination rules, which do not require a pre-dismissal meeting or reasons in the dismissal letter. He said that French law should have been applied, although his contract was subject to Swiss law. The CJEU ruled that where an employee and an employer have chosen a governing law, national courts should generally apply that chosen law — even if it gives the employee less protection. That said, the national courts must still look at the real-world facts of the employment relationship (for example, where the work is carried out and how the contract is performed). If those objective circumstances show a closer connection to another country, the national court may conclude that a different law should apply.
Resources	Ruling (CJEU, July 9, 2026)

EU (new)	
Status	⚠ **Revised coordination rules are expected to apply within two years.**
Development	**Career** **Agreement on changes to social security coordination rules finalized** Revisions to the European Union's (EU) social security coordination regulations (EU Regulations 883/2004 and 987/2009) were formally agreed to on September 28, 2026. This is the first update of the regulations in 10 years, and the changes are intended to strengthen enforcement, increase digitalization, and reduce fraud. The revisions focus on five key areas: unemployment benefits, long-term care benefits, access to welfare benefits for economically inactive persons, family benefits, and applicable legislation for posted workers and persons working in two or more member states. The regulation will enter into force when it is published in the Official Journal, but the revised coordination rules — including systems, forms, and administrative practices — are expected to apply within two years. The revisions will require employers to carefully plan the social security aspects of EU assignments before work begins; they should also review their policies for business travel, secondments, and postings, especially for short trips that may currently be handled informally. Highlights of the changes impacting the assignment of workers and individuals working in two or more member states include: • Before sending a worker to another EU member state, employers will need to notify the host country in advance and request a certificate showing which social security law applies (known as a Portable Document A1, or PDA1). The A1 certificate helps prevent employees from paying social security contributions in both their home and host countries, and it also avoids unnecessary registration and payroll steps for employers. However, notification will not be required for stays of no more than three consecutive working days within a 30-day period, or for business trips. • Workers (including self-employed workers) posted to another member state for up to 24 months will still be able to remain covered by the social security system of their home country, if they are not replacing another posted worker. However, workers must already have been subject to the home-country social security system for at least three months before the assignment begins. • Clarification of the criteria that must be used to determine which social security system applies to workers who work in two or more member states. Factors that will be considered include where central management is located and key organizational decisions are made.
Resources	Social security coordination: Council gives final green light to updated rules (Council of the EU, September 28, 2026)

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 (Marsh, regularly updated)
EU (previously covered, with upcoming effective dates)	
Development	**Career** • Gender pay gap reporting to be phased in — key date: June 7, 2027 • Enforcement date for certain high-risk artificial intelligence systems extended — key date: December 2, 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

Au

Austria (new)	
Status	⚠ **Effective dates vary**
Development	**Career — Wealth** **Pension reforms encourage older workers to stay employed and strengthen retirement provision** Measures that will encourage individuals who have reached statutory retirement age to continue working and strengthen pension benefits will take effect in 2027 and 2028, respectively. Highlights include: **Continued employment** • From 2027, individuals may remain in their current job after deferring retirement or move to a different role and draw their pension benefits. • Employees who work beyond retirement age will no longer pay pension insurance contributions. • Individuals who have reached statutory retirement age and continue working will be able to earn up to €1,250 per month or €15,000 per year tax-free. The tax-free allowance will apply only to individuals with at least 40 years of contributions before retirement. For women, a transitional rule will apply until 2033, beginning at 34 insurance years, in line with the phased increase in the statutory retirement age. Special rules will also apply to people who retired before July 1, 2026. **Improving occupational retirement provision** • From 2028, employees will be permitted to invest employer contributions under the "Abfertigung Neu" system into a new "Vorsorge-Veranlagungsgemeinschaft" (provision investment community) to pursue higher returns through more growth-oriented investment options. • Employees will also be permitted to transfer vested severance entitlements into a Pensionskasse free of charge, even if they have not previously had a Pensionskasse arrangement (Standardprodukt zur Übertragung von Vorsorgeansprüchen or SpÜV). • Other changes include lower asset management costs and automatic consolidation of dormant severance scheme accounts. • This structure will not provide a minimum return guarantee, and early withdrawal will not be allowed if employment ends through dismissal or mutual agreement. Early withdrawal will be permitted if an employee experiences financial hardship, such as serious illness or long-term unemployment. • Pension funds will also gain greater flexibility in investment strategy through an expanded life-cycle model, alongside improved tax treatment of voluntary employee contributions.
Resources	Law (German) (Legislature, September 23, 2026)

Belgium (previously covered, with upcoming effective date)	
Development	**Career — Health** • 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
Egypt (new)	
Status	⚠ **Currently effective**
Development	**Career — Health** **Employers must prepare workplace regulations** Effective August 14, 2026, employers in Egypt with 10 or more employees must prepare and submit internal work regulations (regulations), together with supporting documentation, for the Labor Directorate's approval. The measures are included in Decree 162 of 2026, published in the Official Gazette on August 13, 2026, and did not contain a transitional period. Decree 162 provides further details on measures under Law No. 14 of 2025. Highlights of the Decree 162 include: • The decree provides a nonexhaustive list of the matters that employers must include in the regulations. They must address recruitment and hiring; contracts and personnel files; training; performance and promotion, including the use of measurable performance criteria; transfers, secondments, and assignments; wages and benefits; working hours, rest periods, overtime, and work patterns; leave; workplace safety; termination; employee duties; investigation procedures and timelines; employee protections, including prohibitions on forced or compulsory labor and unlawful wage deductions; and, disciplinary breaches and penalties. • Employers cannot use the regulations to reduce protections and benefits that employees already receive under more favorable terms. • Employers must submit their regulations to the Labor Directorate. The regulations will take effect after 30 days if the directorate neither certifies nor objects to them. • Employers must periodically review and update their regulations and related policies, and follow the same approval and certification process.
Resources	Decree 162 (Government, August 29, 2026) and Labour Law No. 14 of 2025 (Arabic) (ILO)

France (new)	
Status	⚠ **Effective January 1, 2027.**
Development	**Health** **Patient copayment decrees published** Four decrees governing the transfer of costs from the Social Security system to supplementary health insurance plans have been published and they will take effect on January 1, 2027. The decrees increase the applicable "ticket modérateur" (patient copayment) ranges for: • Medicines with low or moderate therapeutic value • Medical transport • Medical devices • Dental care. These decrees do not set the final copayment rates. Instead, they expand the regulatory ranges within which the exact rates will later be determined in accordance with the Social Security Code, specifically through a decision by the National Union of Health Insurance Funds (UNCAM).
Resources	Decree 2026-810 (French) (Legifrance, August 22, 2026); Decree 2026-812 (French) (Legifrance, August 22, 2026); Decree 2026-811 (French) (Legifrance, August 22, 2026); and Decree 2026-809 (French) (Legifrance, August 22, 2026)

France (new)	
Status	⚠ **Currently effective**
Development	**Health** **Out-of-pocket medical costs to increase** On October 1, 2026, increased out-of-pocket medical costs for insured individuals took effect. A decree dated September 11, 2026, increases the two annual per-person caps to: • €70 for medical deductibles (franchises médicales) • €70 for flat-rate copayments (participations forfaitaires) As a result, the combined annual cap increased to €140, up from €100. An insured person who reaches both caps must pay up to €140 in deductibles and copayments. This is the first increase since these caps were introduced in 2005 and 2008. The amounts are deducted from Social Security reimbursements and cannot be reimbursed by health insurance, so they remain fully borne by the insured individual.
Resources	Decree 2026-858 (French) (Legifrance, September 12, 2026)

France (new)	
Status	⚠ **Effective October 15, 2026.**
Development	**Health** **Sick pay duration for certain nonexempt long-term conditions will be limited** France continues to introduce measures aimed at reducing absenteeism. A decree published on September 18, 2026, shortens the period during which Social Security sick pay is available for "nonexempt" long-term conditions (ALD). Starting October 15, 2026, daily sickness benefits will be payable for a maximum of one year, down from the current three years. The main conditions classified as nonexempt ALDs are mild depression (33%) and musculoskeletal disorders (32%).
Resources	Decree 2026-866 (French) (September 18, 2026)

France (new)	
Status	⚠ **Effective November 1, 2026.**
Development	**Health** **Reform of permanent disability compensation to change** On November 1, 2026, new decrees and an order will change the compensation system for victims of workplace accidents and occupational diseases (AT/MP). Currently, an employee who suffers permanent disability after a workplace accident or occupational disease may receive compensation based on a single disability rate, comprising a lump-sum payment if the permanent disability rate is below 10%, or an annuity if the permanent disability rate is 10% or higher. From November 1, compensation will be determined using two separate rates: • "Occupational permanent disability" will compensate for the impact of the accident or disease on work ability and earning capacity. • "Functional permanent disability" will compensate for impairment to physical and mental integrity, as well as permanent functional limitations. This reform follows a change in case law, after the Court of Cassation ruled that the workplace accident/occupational disease annuity did not compensate for permanent functional impairment. The Court therefore distinguished between occupational loss and functional impairment, so that both work-related harm and personal harm can be compensated.
Resources	Decree 2026-354 (French) (Legifrance, May 10, 2026) and Order of 7 May 2026 (French) (Legifrance, May 10, 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
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
Guernsey, Channel Islands (new)	
Status	**Effective October 1, 2026**
Development	**Career** **Minimum wage increased** On October 1, 2026, the hourly minimum wage increased to £13.10 for employees aged 18 years or older (up from £12.60), and to £11.80 for 16- and 17-year-olds (up from £11.35). The maximum tax offset for employer-provided accommodation is £118/week, up from £113/week.
Resources	Minimum wage (Government)

Mauritius (new)	
Status	**Effective dates vary.**
Development	**Career — Health** **Certain leave entitlements expanded** Measures in Mauritius's Economic and Financial Measures (Miscellaneous Provisions) Act 2026, which amends the Workers' Rights Act 2019, expand and strengthen several leave entitlements. Highlights include: • Paid menstrual leave (effective August 13, 2026). Employees who experience severe menstruation-related symptoms and disorders are entitled to one day of paid menstrual leave per month. For employees taking menstrual leave during their first six months of service, that leave will not interrupt the continuous service period required to qualify for vacation and sick leave. • Maternity and adoption leave (effective January 1, 2027). Female employees will be entitled to 26 weeks of maternity leave on full pay, with the option to take an additional 26 weeks on half pay. The entitlement also applies to employees who adopt a child younger than 12 months. The current provision granting two additional two weeks for multiple births will be discontinued. • Paternity leave (effective January 1, 2027). Paternity leave will increase to six weeks, up from four.
Resources	Economic and Financial Measures (Miscellaneous Provisions) Act 2026 (Government, August 13, 2026) and Workers' Rights Act 2019 (Government)
.Netherlands (new)	
Status	⚠ **Effective January 1, 2027.**
Development	**Career** **Tax advantage of 30% expat ruling to decrease** Effective January 1, 2027, the tax advantage of the 30% expat ruling will decrease to 27%. The expat ruling enables employers to pay a percentage of salaries tax-free for a foreign or posted workers to the Netherlands, subject to the employer and worker fulfilling certain criteria. The tax deduction applies only to the salary exceeding a maximum amount — from 2027, this amount will be €50,436 although the salary threshold amount varies, depending on the employee's age and educational qualifications.
Resources	30% ruling: compensation for expats down to 27% (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 (previously covered, with upcoming effective date)	
Development	**Career — Health** • Employers must proactively prevent 'workplace mobbing' — key date: Three months after promulgation
Qatar (new)	
Status	⚠ **Effective datesvary.**
Development	**Career — Health** **Labor market modernization measures enacted** Qatar recently enacted labor law amendments aimed at modernizing the labor market and strengthening enforcement. The measures are set out in Law No. 9 of 2026, which amends certain provisions of Law No. 14 of 2004. Several measures require implementing decisions before they become fully operational. Highlights of the changes include: • The Ministry of Labor (MoL) may expand the labor law's coverage to include part-time and freelance workers or issue further regulations to address them. • Workers in certain designated occupations may be required to obtain training and examination certificates from centers accredited by the MoL. • Noncompete restrictions are increased to two years, up from one, for workers that have access to clients or confidential business information. • The recruitment sector will be subject to stronger ministerial oversight, including licensing procedures and operating conditions. • Labor disputes must be first submitted to the MoL to attempt amicable settlement before referral to the Labour Dispute Resolution Committee. • The rules on the right to strike are strengthened and include the provision of prior written notification to the employer and the MoL. Other requirements include restrictions on location and duration of the strike and the ability to hire temporary replacement workers (subject to ministerial approval). Employers may terminate employment without notice or end-of-service entitlements where an employee incites others to strike for unlawful reasons and disrupts the business. • The wage protection framework and the MoL's enforcement powers are strengthened to include the potential suspension of certain ministerial transactions, publication of repeat violators, and financial penalties for recruitment-related violations. • Organizations with 100 or more employees must establish joint employer-employee committees to address work-related matters.
Resources	Law No. 9 of 2026 (Arabic) (Government)

Romania (previously covered, with upcoming effective date)	
Development	**Wealth** • Private pension framework from 2027 revised — key date: January 5, 2027
Saudi Arabia (previously covered, with upcoming effective date)	
Development	**Health** • Insurance Authority requires medical insurance policies to waive prior approval limits — key date: November 1, 2026
Serbia (previously covered, with upcoming effective date)	
Development	**Career** • Minimum wage to increase — key date: January 1, 2027
Slovenia (previously covered, with upcoming effective date)	
Development	**Career — Wealth** • Pension reforms will increase retirement age — key date: Beginning in 2028
South Africa (new)	
Status	**Currently effective**
Development	**Career** **Additional public holiday for November 2026 announced** South Africa has declared Wednesday, November 4, 2026, an additional public holiday to allow citizens to vote in the local government elections. The holiday was published in the Official Gazette on September 8, 2026. If a public holiday falls on a day an employee normally works, the employee is entitled to double their ordinary wage if they work on that day. If the employee does not work on the public holiday, they are still entitled to their ordinary wage for that day, provided it is a day they would normally have worked.
Resources	Proclamation Notice 346 of 2026 (Government, September 4, 2026)

Spain (new)	
Status	**Currently effective**
Development	**Career — Health — Wealth** **Employers must provide more employment information to employees** From October 5, 2026, employers in Spain must provide employees with expanded information about the essential terms of their employment and working conditions. These requirements are set out in Royal Decree 723/2026 which partially implements European Union (EU) Directive 2019/1152 on transparent and predictable working conditions. Highlights of the Royal Decree include: • The information must be given, in writing or electronic format, to all employees before they start work, provided their employment is expected to last for a minimum of four weeks. Employees already employed as of October 5 can also request this information, and employers must respond within 30 working days. The Ministry of Labor and Social Economy is expected to publish a standardized template disclosure document for compliance. • The information can be included in the employee's written employment contract. The employer must provide any missing details in additional written documentation. • The information must include the identity of the parties; start date; expected duration of the employment relationship (for fixed term contracts); role and location (including job duties, probation period, workplace arrangements, requirement to work in multiple locations, professional classification); working time (work schedule, scheduling procedures, overtime, shift work, and vacation entitlements); pay and remuneration information (basic salary; supplementary payments, frequency and method of payment; how variable pay is calculated and the criteria for payment); the use of algorithmic or automated decision-making systems and information about those systems; and, equality and workplace protections. • Employees expected to work internationally must receive information in advance, including assignment duration; salary payment currency; other payments/allowances; and, repatriation conditions (if applicable). • Additional information requirements apply for assignments within the EU and European Economic Area.
Resources	gloria.villar@marsh.com Royal Decree 723/2026 (Spanish) (Government, September 15, 2026) and Directive 2019/1152 (Eur-Lex, July 11, 2019) and Briefing (Spanish) (Marsh, September 2026)

Spain (new)	
Status	**Currently effective**
Development	**Wealth** **Employers face new reporting obligations for pension schemes** From October 5, 2026, companies must provide information on the pension arrangements in place, and the annual contributions made for each employee under measures included in Royal Decree 723/2026 of 9 September, which transposes Directive (EU) 2019/1152 on transparent and predictable working conditions in the EU. Specifically, employers must comply with an additional information obligation, as part of the "general information" to be provided to employees. The company must provide information on voluntary improvements to Social Security protection, as well as identify the pension plans and funds promoted for the benefit of employees and the contributions made to them. This includes Employment Pension Plans, Group Insurance Policies used to implement pension commitments, Insured Qualified Pension Schemes (PPSEs), and accident insurance covering retirement, incapacity or death contingencies, insofar as they supplement Social Security coverage. The State Public Employment Service (SEPE) will publish a model information document. Employers must provide the information to new employees from October 5, 2026, and to current employees within 30 days of the employee submitting a request, provided that the information is not already in the employee's possession.
Resources	marta.jankowska@marsh.com Royal Decree 723/2026 (Spanish) (Government, September 15, 2026) and Directive 2019/1152 (Eur-Lex, July 11, 2019)
United Arab Emirates (previously covered, with upcoming effective date)	
Development	**Health** • Unified national health insurance system to be introduced — To be introduced

United Kingdom — Great Britain (new)	
Status	⚠ **Effective October 30, 2026**
Development	**Career** **New employer obligations on workplace sexual harassment and harassment by third parties issued** On October 30, 2026, the law on sexual harassment will be strengthened, and employers will also be liable for harassment of workers by third parties. The measures are included in the Employment Rights Act. The Act generally does not apply in Northern Ireland. Highlights include: • **Sexual harassment.** Under the current law, employers must take "reasonable steps" to prevent sexual harassment but this will be expanded to "all reasonable steps." The government is expected to issue regulations in 2027 setting out what will count as reasonable steps. These could include: risk assessments; action plans and policies; reporting mechanisms; and procedures for handling complaints. However, the Advisory, Conciliation and Advisory Service (Acas) has indicated that what is considered reasonable will depend on factors such as the organization's size, industry sector, and the nature of the work carried out. • **Harassment by third parties.** Workers will be able to bring an employment tribunal claim against their employer if they are harassed by a third party during employment and the employer has not taken all reasonable steps to prevent it. This includes harassment that is sexual, or related to age, disability, gender reassignment, race, religion or belief, sex, or sexual orientation. Employers will also need to take steps to prevent harassment of employees by third parties. "Third parties" are broadly defined and could include clients, customers, contractors, visitors, and members of the public, etc. • **Confidentiality clauses.** During 2027, any agreement between an employer and a worker that prevents the worker from making an allegation or disclosure about relevant harassment or discrimination, or the employer's response to it, will be void.
Resources	Employment Rights Act (Government, December 18, 2025) and Harassment Law Changes (Acas, August 26, 2026)

UK — Great Britain (new)	
Status	⚠ **Delayed until January 1, 2027**
Development	**Career** **Duty to notify workers about their right to join trade unions delayed to 2027** The government announced on September 25, 2026, that the requirement for employers to provide workers with a statement of their right to join a trade union has been postponed to January 1, 2027 — the measures had been due to take effect on October 30, 2026. The government has also shared additional information about the steps employers will need to take. The measures are included in the Employment Rights Act 2025. Highlights include: • The government confirmed that it will issue a standard statement for employers to use, which they may only amend to add workplace-specific details. Employers must also include a link to, or copy of, the Certification Officer's list of trade unions. • The statement must give neutral information on the right to join a trade union, including union functions, any recognized unions or statutory access agreements, and a summary of statutory rights. • The statement must be given to new workers alongside the written statement of employment particulars. For existing workers, it may be provided directly or indirectly, provided it remains reasonably accessible, and must be issued annually by April 5. If provided indirectly, workers must be told where to find it and receive annual reminders. • If there is a change to recognized unions or statutory access agreements, the statement must be reissued within one month.
Resources	Consultation outcome (Government, September 25, 2026); Employment Rights Act (Government, December 18, 2025) and Trade Union Reform (Government, August 20, 2026)

UK — Great Britain (previously covered, soon to be effective)	
Status	⚠ **Effective October 30, 2026**
Development	**Career** **Trade unions will have a right to access workplaces for organizing and recognition** Trade unions will gain a new statutory right of access to an employer's workplace with the aim of recruiting/organizing and gaining union recognition. 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 any unreasonable interference with the employer's activities should be minimized. 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 may 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. Further breaches 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	⚠ **Currently effective**
Development	**Career** **Time to bring employment tribunal claims extended** On October 1, 2026, the time limit for bringing most employment tribunal claims increased from three to six months, extending the period during which employers may be exposed to claims. The measure is included in the Employment Rights Act. In Scotland, this change is expected to take effect on November 9, 2026. The Act generally does not apply in Northern Ireland. Highlights include: • The new limit applies where the "relevant date" of the event (such as dismissal or alleged detriment) is on or after October 1, 2026. Events that occurred before this date generally remain subject to the three-month limit. • In addition, the Arbitration, Conciliation and Advisory Service (Acas) recently extended its early conciliation period from six to 12 weeks. As a result, claimants could have nearly 10 months to bring a claim. Employers should continue to carefully document employment decisions and retain any other potentially relevant evidence in case a claim is brought.
Resources	The Employment Tribunal (Extension of Time Limits) (Miscellaneous Amendments and Transitional Provisions) Regulations 2026 (Legislation, July 6, 2026) and Employment Rights Act (Government, December 18, 2025)

UK — Great Britain (new)	
Status	⚠ **Effective in April 2027**
Development	**Career — Health** **Statutory bereavement leave to be introduced** On September 22, 2026, the government responded to an earlier consultation on the introduction of statutory bereavement leave ('leave'), confirming that the new right will provide two weeks of unpaid leave starting in April 2027. Bereavement leave is included in Section 18 of the Employment Rights Act 2025, and it will be brought into force through secondary legislation. The government will also publish guidance. Highlights include: • All employees will be entitled to leave from the first day of employment. No proof of bereavement will be required. • Bereavement will include the death of a spouse, civil partner, partner in a committed long-term relationship (whether or not they live together), parent, adult child or sibling (including biological, adopted, step and half), plus any equivalent parental relationship arising from kinship and foster care; spouses, civil partners, other parent or committed partner, intended partner. It will also cover pregnancy loss before 24 weeks for intended coparents and intended parents in surrogacy arrangements (including termination and IVF embryo loss, but not for IVF embryo loss pre-transfer). • The two weeks of leave can be taken in blocks of at least one day. Leave must be taken within 56 weeks of the bereavement (or knowledge of it). Leave entitlement will be prorated based on the employee's average working pattern over two weeks. • For leave taken within the first eight weeks following a bereavement, employees will need to notify their employer only before the employee starts work for that day, or as soon as is reasonably practicable. For leave taken after the first eight weeks, employees will have to provide one week's notice. Currently, eligible bereaved employees are entitled to statutory Parental Bereavement Leave and Pay on the death of a child up to the age 18, or after a stillbirth after 24 weeks of pregnancy. Employed parents may also be entitled to statutory maternity, paternity and shared parental leave and pay, subject to meeting eligibility criteria. Statutory sick pay is available to employees who experience physical symptoms associated with pregnancy loss, subject to the usual eligibility criteria.
Resources	Make Work Pay: Leave for bereavement including pregnancy loss (Government, September 22, 2026) and Employment Rights Act 2025 (Government, December 18, 2025)

UK (previously covered, with upcoming effective date)	
Development	**Career — Health** • Equality Action Plan requirement introduced for gender pay gap and menopause issues in Great Britain — key date: 2027 • 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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