PCS

HR LAW BRIEF: CEE

22/2026



Dear Readers,

We are back with another edition of our HR Law Brief: CEE. Again, it's a 3-minute read to bring you up to speed with the latest news from Central-Eastern Europe.

If you need any support in the CEE region, let us know.



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POLAND: NEW ANTI-BULLYING FRAMEWORK

Amendments to the Polish Labor Code introduce a revised definition of workplace bullying and expand protection against discrimination. Bullying is defined as persistent, repeated or recurring behavior, while isolated incidents and justified professional criticism are excluded. The new rules also extend the scope of potential perpetrators to colleagues, subordinates and third parties. Employees subjected to bullying will be entitled to compensation of at least six times the national minimum monthly salary, with no statutory upper limit. Employers with at least 10 employees must introduce formal procedures for preventing bullying and discrimination. The amendments also extend protection against discrimination based on perceived characteristics or association with another person and strengthen protection against retaliation. Employers should update their anti-bullying and anti-discrimination procedures, while prioritizing regular training for employees and managers to prevent undesirable behavior and maintain a safe and respectful working environment. Employers should also focus on preventive measures, particularly the early detection of bullying and an appropriate response to any incidents, including remedial actions and support for employees affected by bullying.

EU: REVISED SOCIAL SECURITY RULES ON POSTING EMPLOYEES

Regulation (EU) 2026/2359 introduces changes to the coordination of social security systems for employees working across EU Member States. Although it entered into force on November 1, 2026, most provisions will apply from November 1, 2028. The maximum posting period will remain 24 months, subject to new conditions, including a requirement for employees to have been covered by the social security system of the employer's home country for at least three months before the posting. Employers will also be required to notify the competent authorities and request an A1 certificate before the posting begins. However, these requirements will not apply to business trips or activities lasting no more than three consecutive working days within a 30-day period (with some exceptions). A subsequent posting to the same country will generally require a two-month interruption. Employers should review their cross-border working arrangements, particularly posting procedures, advance notification requirements and the rules on A1 certificates.

HUNGARY: CHRISTMAS EVE BECOMES A PUBLIC HOLIDAY IN 2026

On November 3, 2026, Hungary adopted legislation designating December 24 (Christmas Eve) as a public holiday, giving employees an additional day off. The related decree amending the 2026 working-day arrangements removes the previously scheduled working Saturday on December 12, which had been intended to compensate for the additional day off. As a result, employees will not be required to work on December 12, 2026. It is recommended for employers to review their December work schedules, including shift arrangements and previously approved leave, and ensure that working time and payroll records are updated accordingly before the new rules take effect.

CZECH REPUBLIC: CHANGES TO EMPLOYMENT SUBSIDIES FOR PEOPLE WITH DISABILITIES

The Czech Republic has approved a draft amendment to the Employment Act aimed at improving employment opportunities for people with disabilities and reducing employers' administrative burden. The changes increase the maximum annual contribution towards operating costs from CZK 48,000 to CZK 90,000 (EUR 1,970 – 3,690) and shorten the minimum period for maintaining newly created jobs from three years to 12–24 months. However, financial support for creating such jobs will be reduced, while the maximum monthly wage subsidy for employees with disabilities will increase from CZK 18,600 to CZK 21,100 (EUR 760 – 870) as of January 1, 2027. The new rules are expected to enter into force on April 1, 2027. Employers should reassess their eligibility for available subsidies and factor the revised funding levels into their employment cost planning.

BULGARIA: PROPOSED CHANGES TO LENGTH OF SERVICE AND ANNUAL LEAVE FOR PART-TIME EMPLOYEES

Bulgaria has proposed changes to the calculation of length of service and paid annual leave for part-time employees. Under current rules, employees working at least four hours a day receive credit for a full day of service, while shorter working hours are calculated proportionally. Under the proposed rules, a full day of service would only be credited to employees working eight hours a day, with part-time employees accruing service proportionally to their working hours. For example, employees working four hours a day would accrue approximately six months of service for each calendar year worked. The entitlement to 20 days of annual leave would also be retained only for full-time employees, with part-time entitlements calculated proportionally. The proposals will now proceed through the legislative process. Employers should assess the potential impact on part-time employees' service records and annual leave entitlements.

LITHUANIA: NEW WAGE REPORTING AND PAY TRANSPARENCY OBLIGATIONS

From January 1, 2027, employers in Lithuania will be required to submit information on employees' gross wages, additional payments and paid working hours to Sodra, Lithuania's State Social Insurance Fund Board, which administers social insurance contributions and related data. The obligation will apply to companies of all sizes, with reports submitted by the end of each month for the preceding month. The new rules will also increase pay transparency. Sodra will publish average hourly wages for men and women at employers with at least eight employees, provided that each gender is represented by more than three employees. Employees will be entitled to request information on average pay in their job group, including gender-based comparisons, which employers must provide within one month. Employers should review their remuneration structures to ensure fair and consistent pay across employee groups and prepare the necessary payroll data and reporting procedures ahead of the new requirements.