Implementation Status of the EU Whistleblowing Directive

Selected national highlights you need to know



Belgium, France, Ireland and **the Netherlands** all have whistleblowing policies in place that only (slightly) need to be adapted to cover the scope of the Directive



The draft bill in **Poland** suggests penalties for non-compliance including fines, restrictions of freedom or imprisonment for up to three years



Germany's former draft bill, which – in comparison to the Directive – included a much broader scope of areas of law to be included, was not passed before recent federal elections in September 2021



The **Spanish** draft bill suggests sanctions ranging from Euro 10,000 to Euro 300,000 for infringements in relation to whistleblowing regulation

Directive has been transposed into national law

Draft bill exists but was not passed by the Dec. 17 deadline

Draft bill does not exist yet. Deadline is expected to be missed

Whistleblowing legislation in place however not required to transpose the Directive because not part of the EU (For Norway, a transposition might be required if EEA EFTA States classify it as EEA relevant)

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