

Employment Law in Egypt: Decrees on Working Hours, Recruitment, Settlements, Inspections, and More

Introduction

This alert summarises the key supplementary decrees recently issued in the implementation of the new labour law no. 14 of 2025 (the “**Labour Law**”). While additional decrees are still anticipated, the most recent decrees are outlined below:

- decree no. 267 of 2025 regulating the training process for the trainees (“**Internship Decree**”);
- decree no. 272 of 2025 regulating employment operations domestically and abroad (the “**Employment Recruitment Decree**”);
- decree no. 270 of 2025 regulating the reporting obligations to the labour directorate (the “**Reporting Obligations Decree**”);
- decree no. 288 of 2025 determining the cases and activities requiring continuous work without a standard rest period, as well as strenuous work in which rest periods are counted as actual working hours (the “**Continuous and Strenuous Work Decree**”);
- decree no. 289 of 2025 regulating working hours in industrial establishments (the “**Industrial Working Hours Decree**”);
- decree no. 291 of 2025 regulating overtime work and overtime compensation (the “**Overtime and Compensation Decree**”);
- decree no. 292 of 2025 determining basic and overtime working hours (“**Working Hours Decree**”);
- decree no. 299 of 2025 establishing a committee for amicable settlements and individual labour disputes (the “**Amicable Settlement Decree**”);
- decree no. 319 of 2025 organising inspections through monthly surprise campaigns (the “**Inspection Decree**”); and
- decree no. 320 of 2025 regulating workplace inspections at night and outside official working hours (the “**Night-time Inspection Decree**”).

This publication is merely a brief overview of the Labour Law’s supplementary decrees and may not be treated as a legal opinion or relied on in any manner whatsoever. Separate legal advice should be sought, where appropriate.

Internship Decree

I. Overview

Internship provisions were previously regulated under decree no. 175 of 2003 (the “**Previous Internship Decree**”). The Internship Decree has replaced the earlier decree in respect of any conflicting provisions.

II. Key Provisions

An intern is defined as “any person who joins an employer to learn a profession, a trade, or a craft against a wage for a limited duration in accordance with mutual agreement between the intern or their guardian and the employer” (the “**Intern**”). The new definition widens the inclusion of the Interns, given it does not include the thirteen (13) to eighteen (18) years old age restriction, previously included under the Previous Internship Decree. However an Intern’s age must not be less than fourteen (14) years old.

The Internship Decree establishes a new central committee, presided over by the Minister of Labour, to focus on, among others, the development and enhancement of the internship programmes and their integration with the practical market. The committee also facilitates effective partnerships with the private sector and coordination among stakeholders, conducts awareness and promotional campaigns, especially for MSMEs, and leverages technology and innovative approaches to enhance apprenticeships, support the green economy, and enable a just transition by equipping workers with future-ready skills.

Licensed entities authorised to conduct employment and training activities may supply establishments with interns or nominate them for specific occupations that match their interests and mental and physical abilities.

III. Key Obligations

- The apprenticeship agreement must be in writing and executed in three (3) copies: one (1) to be given to the intern or their guardian, as applicable; one (1) retained by the employer; and one (1) kept by the competent labour office.
- The agreement must specify the duration which shall be no less than one (1) year and no more than three (3) years unless otherwise justified by necessity. This period is to be divided into successive stages, at least three (3), consistent with the principles of learning the trade or profession.
- The agreement must further specify the trainee’s monthly wage or allowance for each stage on a progressive basis, provided that the amount in the final stage is not less than the statutory minimum wage.
- Employers must, among others:
 - o create a paper or electronic file for each intern that includes, among others, their name, the trade or occupation in which they are apprenticed, their skill level at the time of enrollment, and any other relevant documents;

- provide the labour office with a statement listing the interns and their details, as well as the names of those supervising their training and any subsequent changes;
- submit a report to the labour office at the end of each training stage confirming the intern's successful completion of that stage; and
- grant interns the same social, cultural, and health benefits enjoyed by the establishment's employees.
- The employer is also responsible for safeguarding the intern's health and safety by ensuring occupational safety measures and a secure work environment, notifying the intern's guardian (if a minor) and the competent labour office of any accidents and taking immediate action for medical assistance, and insuring the intern against work-related injuries in accordance with the Social Insurance and Pensions Law No. 148 for 2019.

Employment Recruitment Decree

I. Overview

Employment operations domestically and abroad were previously regulated under Decree No. 135 of 2003. The Employment Recruitment Decree has replaced the earlier decree in respect of any conflicting provisions.

The Employment Recruitment Decree establishes a comprehensive regulatory framework governing among others private and electronic recruitment agencies, electronic recruitment platforms, and entities engaged in facilitating employment opportunities inside Egypt and abroad. It also regulates licensing requirements, operational obligations, reporting mechanisms, fees, inspections, and enforcement measures, thereby implementing the relevant provisions of the Labour Law.

II. Scope of Application

Offshore and onshore recruitment services are carried out by the Ministry of Labour's specialised departments. Additionally, these services may be delivered through a diverse network of trusted and licensed providers. These include government ministries and public authorities for their workforce, Egyptian public and private sector companies engaging in international contracts within their business scope, as well as ministry-licensed private recruitment agencies; both traditional and digital.

The Employment Recruitment Decree applies to all employment and recruitment activities carried out within the Arab Republic of Egypt or aimed at placing Egyptian workers in employment abroad. Its provisions extend to both physical and electronic recruitment operations and apply irrespective of whether such activities are conducted directly or through intermediaries.

III. Key Provisions

As under the previous framework established by the Employment Recruitment Decree, no entity may engage in employment recruitment activities unless duly licensed by the Ministry of Labour or the competent Labour Directorate. However, the Employment Recruitment Decree broadens the scope of regulation by expressly extending its application to electronic recruitment platforms and modern employment facilitation mechanisms.

It further confirms that employers are prohibited from employing employees through labour contractors or manpower supply intermediaries.

Licenses issued to companies prior to the enactment of the Labour Law shall remain valid until their expiry. Upon renewal, such licenses must comply with the provisions of the new Labour Law and its implementing regulations. Companies licensed under the previous regime are required to regularise their status in accordance with the new legal framework within a maximum period of one (1) year from the Labour Law's effective date, including fulfillment of the revised capital and insurance requirements.

The Employment Recruitment Decree provides for an extensive list of obligations and reporting requirements on the licensed entities. These include full compliance with ministry instructions and

guidelines, ratification of agreements made with employers, and confidentiality restrictions. It further adds few conditions that must be met in job postings, such as minimum and maximum salaries.

1. Licensing

The agency must be established as one of the following legal forms, joint stock company, partnership limited by shares, limited liability company, or one-person company.

For onshore recruitment:

- minimum issued or paid-up capital of EGP 250,000 (two hundred and fifty thousand Egyptian pounds); and
- capital must be 100% (one hundred per cent) Egyptian-owned.

For offshore recruitment, or both onshore and offshore:

- minimum capital of EGP 500,000 (five hundred thousand Egyptian pounds);
- an absolute majority of founders and board members must be Egyptian; and
- Egyptians must collectively own at least 51% (fifty-one per cent) of the company's capital.

2. Electronic Recruitment Platforms

For the first time, Egyptian law introduces a regulatory framework governing the electronic recruitment of Egyptians domestically and abroad.

Under the new rules, recruitment employment services through websites, pages, or digital platforms are prohibited without obtaining a specific license from the competent authority, except in limited exceptions for already licensed private employment agencies.

Licensed digital operators are subject to core employment-placement rules, tailored licensing procedures, and prescribed government fees. The framework further sets detailed technical, accessibility, transparency, and user-experience standards for digital platforms, alongside stringent cybersecurity, data protection, and incident-reporting obligations aligned with Egypt's data protection and cybercrime laws.

Non-compliance, particularly with information security requirements, may result in license revocation.

Existing digital employment platforms are granted a one (1)-year transition period to regularise their status, marking a significant step toward enhancing market integrity, user trust, and regulatory oversight in Egypt's growing digital recruitment sector.

3. Fee Consideration

License entities are prohibited from charging employees any fees for job placement; such costs may only be charged to employers. However, they may collect an administrative fee of up to 1% (one per cent) of the employee's first-year wage only, without deducting it from the employee's salary and without imposing any additional charges. This fee may be collected only after the employee has been successfully placed in a job, whether domestically or abroad, and must be calculated in Egyptian pounds based on the Central Bank of Egypt (the "CBE") exchange rate at the time of contracting.

4. Financial Guarantees

A license is issued only after the company provides a security deposit of no less than EGP 1,000,000 (one million Egyptian pounds), either in cash or as an unconditional, irrevocable bank guarantee issued by a bank registered with the CBE, in the company's name and in favour of the Ministry of Labour. This guarantee must remain valid for the entire license period. The company is required to replenish the deposit within 15 (fifteen) days of official notification if any amount is deducted due to fines, compensation, or unlawfully collected fees, in accordance with the Labour Law.

IV. Conclusion

The Employment Recruitment Decree represents a significant modernisation of the regulatory framework governing employment mediation and recruitment activities in Egypt. While preserving the core principles established under the 2003 regime, this framework introduces clearer licensing requirements, stronger financial safeguards, enhanced oversight, and expanded worker protection measures, particularly in relation to overseas and electronic recruitment.

Reporting Obligations Decree

I. Overview

In accordance with Article 36 of the Labour Law, the Reporting Obligations Decree imposes a reporting obligation on employers to provide physical or electronic statement to the competent Labour Directorate, including the number of the employees, their qualifications, positions, age, nationalities, and salaries, within thirty (30) days of their enrolment.

II. Key Obligations

Employers shall provide the competent Labour Directorate, within January of each year, with:

- any amendments occurred to the information stated in the first paragraph;
- number of vacancies; and
- statement of the assessment of anticipated needs based on educational and professional status for the following year.

Submissions may be made electronically or physically.

Deadline to submit is thirty (30) days from the date of the Reporting Obligations Decree.

Continuous and Strenuous Work Decree

I. Overview

As part of the implementation of Egypt's Labour Law, the Ministry of Labour has issued the Continuous and Strenuous Work Decree determining cases and activities in which work must continue without a standard rest period, as well as strenuous work in which rest periods are counted as actual working hours

The Continuous and Strenuous Work Decree updates Ministerial Decree No. 122 of 2003 (the **"Previous Decree"**), which was issued pursuant to the old labour law no. 12 of 2003. While both decrees regulate the same categories of work, the new framework modernises and expands the scope of regulated activities and aligns the rules more closely with current labour practices and occupational health and safety standards.

II. Key Provisions

As under the previous regulatory framework, the Continuous and Strenuous Work Decree is based on the principle that employees are entitled to rest periods during the working day and may not work for extended consecutive hours without a break. However, it continues to permit exceptions for activities that, by their nature or due to technical requirements, require continuous operation, as well as for strenuous or hazardous work where rest periods are treated as part of actual working time.

1. Continuous Work Without a Standard Rest Period

Compared to the Previous Decree, certain activities previously classified as requiring continuous work have been removed, including:

- work in equipment rental shops for weddings and funerals;
- plastic manufacturing activities; and
- the activities of the Alexandria Onion Port Exchange Committee.

At the same time, the Continuous and Strenuous Work Decree expands the scope of continuous work to expressly include certain activities carried out through electronic and digital platforms, including delivery work, ridesharing or on-demand transportation services.

The Continuous and Strenuous Work Decree further imposes additional obligations on employers and responsible managers, including granting appropriate compensatory rest periods, ensuring that such arrangements do not affect the calculation of regular working hours, overtime, or the wages due in respect of each. It further provides that continuous working hours may not exceed six (6) actual hours, or five (5) consecutive hours for drivers.

2. Strenuous Work Without a Standard Rest Period

As under the Previous Decree, the Continuous and Strenuous Work Decree identifies a range of strenuous and hazardous activities, including metal smelting, welding, battery manufacturing, asphalt and rubber production, tanneries, and work involving prolonged exposure to dust, fumes, or toxic substances, in which rest periods are counted as part of actual working hours.

While the Continuous and Strenuous Work Decree largely retains the same categories of strenuous and hazardous work identified under the previous framework, it expands and clarifies the scope of such activities by expressly including work performed in environments involving continuous exposure to dust or toxic fumes, as well as construction and building works carried out under harsh climatic conditions, such as extremely high or low temperatures. In these cases, rest periods are counted as part of actual working hours.

In respect of such strenuous activities, employers are further required to comply with all applicable occupational health and safety requirements and to adopt the necessary measures, safeguards, and precautions to mitigate physical, mechanical, biological, chemical, and environmental risks, and to ensure a safe working environment.

Industrial Working Hours Decree

I. Overview

Industrial Working Hours Decree has been issued pursuant to the Labour Law to regulate working hours in industrial establishments subject to its provisions. The Industrial Working Hours Decree provides specific guidance on the organisation of daily and weekly working hours in industrial settings, while reaffirming the general statutory limits applicable to working time.

Previously, working hours in industrial establishments were regulated under Law No. 133 of 1961 (the “Law”), which determined applicable limits through ministerial designation and imposed sector-specific restrictions.

The Industrial Working Hours Decree preserves any more favourable benefits granted to employees under individual or collective employment contracts or internal work regulations of industrial establishments.

II. Key Provisions

Under the Law, designated industrial establishments were prohibited from employing workers for more than forty-two (42) hours per week, excluding meal and rest periods. The previous framework further restricted employees from working in more than one (1) industrial establishment and generally prohibited overtime work unless expressly authorised by the Minister of Industry.

By contrast, the Industrial Working Hours Decree adopts the general working-time structure under the Labour Law, providing that actual working hours may not exceed eight (8) hours per day or forty-eight (48) hours per week, with rest and meal periods excluded from the calculation of actual working time.

It further permits employers to require additional working hours in cases of operational necessity or exceptional circumstances, subject to compliance with the overtime rules and compensation mechanisms set out under the Labour Law.

Overtime and Compensation Decree

I. Overview

The Overtime and Compensation Decree regulates the use of overtime work under Egypt's Labour Law by limiting overtime to cases of exceptional necessity and requiring employers to notify the competent Labour Directorate within seven (7) days, specifying the reasons and duration rather than obtaining prior approval as was previously required. The Overtime and Compensation Decree regulate the mandatory minimum overtime compensation for daytime overtime and nighttime overtime, with additional protections for work performed on weekly rest days. It also caps total daily working time, including overtime, and requires employers to distribute overtime fairly to safeguard workers' health and weekly rest entitlements.

II. Key Provisions

The Overtime and Compensation Decree regulates the use of overtime work under Egypt's Labour Law by restricting overtime to cases of exceptional necessity and requiring employers to notify the competent Labour Directorate within seven (7) days, stating the reasons and duration.

This establishes a mandatory minimum overtime compensation of at least 35% (thirty-five per cent) above the normal hourly wage for daytime overtime and 70% (seventy per cent) for nighttime overtime.

If the work is performed on a weekly rest, the employee is entitled to double their pay for that day in addition to a rest day in the following week.

The Overtime and Compensation Decree caps total daily presence hours at twelve (12) hours and requires overtime to be allocated fairly among workers to safeguard health and weekly rest entitlements.

It further strengthens compliance by obliging employers to keep detailed paper or electronic records of overtime hours, justifications, timing, and related wages.

The Overtime and Compensation Decree also empowers the Supreme Council for Social Consultation to set sector-specific annual overtime limits, reflecting enhanced regulatory oversight of working hours practices. A decree is expected to be issued within three (3) months.

Working Hours Decree

I. Overview

The Working Hours Decree clarifies the calculation of basic and overtime working hours for preparatory, supplementary, guarding, and cleaning work under the Labour Law. The Working Hours Decree provides detailed definitions of these work categories and confirms that actual working hours must not exceed forty-eight (48) hours per week, while overtime is capped at twelve (12) hours per week, with a maximum of two (2) overtime hours per day.

It applies to supplementary, cleaning, security, and preparatory works that require work before or after normal hours or involve uninterrupted operations.

II. Key Provisions

Egypt's Ministry of Labour issued Ministerial Decree No. 292 of 2025, clarifying how basic and overtime working hours are calculated for, supplementary, cleaning, security, and preparatory work under the Labour Law. The Working Hours Decree defines these categories as follows:

- **Supplementary Works:** tasks required after official working hours or those needed for business continuity;
- **Cleaning Works:** all tasks performed by cleaning workers to maintain tidiness and order in workplaces and facilities, including disinfection and sanitisation of vital areas and equipment, whether before, after, or during operational pauses, to ensure a healthy and safe environment in line with occupational health standards;
- **Security Works:** work performed by guards, firefighters, security personnel, or staff operating electronic surveillance, aimed at safeguarding people, properties, equipment, and sensitive data, both during official hours and after; and
- **Preparatory Works:** all tasks needed to prepare the workplace, machines, equipment, or operational systems before the official working hours start, enabling the facility to begin daily operations efficiently.

The Working Hours Decree confirms that actual working hours may not exceed forty-eight (48) hours per week, while overtime is capped at (twelve) 12 hours per week, with a maximum of (2) two overtime hours per day unlike standard overtime rules. The rules specifically apply to supplementary, cleaning, security, and preparatory works that require work before or after regular hours or uninterrupted operations.

For employers, the decree increases compliance obligations around working time planning, overtime approval, and health and safety controls, particularly in manufacturing, utilities, logistics, IT, and service sectors.

Amicable Settlement Decree

I. Overview

The Amicable Settlement Decree establishes a formal framework for the amicable settlement of individual labour disputes under the Labour Law.

II. Key Provisions

The Amicable Settlement Decree allows either employers or employees to request an amicable settlement within ten (10) days of a dispute by submitting a request to the amicable settlement committee, which is to be established and composed of the employee or their representative, the employer, and the president of the competent Labour Directorate or their delegate (the “Committee”).

The Committee is required to attempt settlement within twenty-one (21) days from the date the request was submitted.

Where a settlement is reached, the agreement must be ratified by the labour court to become enforceable. If it fails, however, the dispute is referred to the labour court along with a detailed Committee report, and a hearing is held within twenty (20) days of the referral.

The Amicable Settlement Decree also introduces accelerated procedures for dismissal disputes, in line with the Labour Law. Labour courts are required to issue a ruling on dismissal cases within three (3) months from the date of the first hearing. If the court, based on the submitted documents, rules in favour of the employee, it will order the employer to pay the employee's salary from the date of dismissal, up to a maximum of six (6) months. Such ruling shall be final. Any amounts ruled as salary under the above point will be deducted from any compensation subsequently awarded to the employee, if applicable.

Employers should factor these strict timelines and documentation requirements into their dispute management strategies, as the new framework significantly shortens resolution periods and increases early-stage oversight by labour authorities.

Inspection Decree

I. Overview

The Inspection Decree introduces a structured, nationwide framework for labour inspections through monthly sudden inspection campaigns supervised directly by the Ministry of Labour. The Inspection Decree grants labour inspectors broad authority to enter establishments without prior notice, at any time, in coordination with the relevant Labour Directorates.

It establishes a Central Labour Inspection Committee responsible for implementing the monthly inspection plans and reporting findings, recurring violations, and proposed corrective measures to the Minister of Labour.

II. Key Provisions

The Inspection Decree was issued granting labour inspectors broad powers to conduct sudden inspections at any time, day or night, without prior notice, in coordination with the relevant Labour Directorates. The Inspection Decree establishes a monthly, nationwide inspection plan overseen by a Central Labour Inspection Committee operating under the direct supervision of the Ministry. Inspection results must be reported monthly to the Minister of Labour, including recurring violations and proposed corrective measures.

The Inspection Decree significantly increases regulatory scrutiny and enforcement risk, as inspections may now occur without warning and across all sectors. Companies should ensure continuous compliance with labour laws, maintain up-to-date documentation, and strengthen internal audit and compliance processes to mitigate exposure during unannounced inspections.

Night-time Inspection Decree

I. Overview

The Night-time Inspection Decree regulates the conduct of labour inspections at night and outside official working hours, expanding the enforcement powers of the Ministry of Labour. The Night-time Inspection Decree authorises inspectors to enter workplaces freely between sunset and sunrise or beyond normal business hours, particularly in establishments operating night shifts, seasonal activities, or employing women or children, as well as workplaces presenting heightened health and safety risks.

It also defines the circumstances warranting such inspections, including emergency safety situations and verification of compliance with rest periods and closing time requirements.

II. Key Provisions

Egypt's Ministry of Labour issued a new ministerial decree regulating night-time and out-of-hours labour inspections, granting inspectors the authority to enter workplaces freely between sunset and sunrise or outside official business hours. For the purposes of the Night-time Inspection Decree, a nighttime inspection is defined as any inspection conducted between sunset and sunrise, while inspections outside official working hours are those determined by the competent administrative authority to be carried out outside official working hours, for the inspectors performing them.

The Night-time Inspection Decree targets establishments with night shifts, seasonal operations, employment of women or children, or heightened health and safety risks, and specifies circumstances justifying such inspections, including emergency safety concerns and compliance with rest and closing time rules. Employers are required to fully cooperate with inspectors and provide all requested documents, while inspection authorities must maintain periodic statistical reporting to enhance oversight and transparency.

The Night-time Inspection Decree increases inspection exposure beyond standard working hours and reinforces the need for continuous compliance, particularly in high-risk or shift-based operations. Companies should ensure that employment records, safety measures, and working time practices are consistently compliant, as inspections may occur at night or without prior notice.