

Introduction

The first quarter of 2026 has been marked by a significant wave of implementing decrees issued pursuant to Egypt's labour law no. 14 of 2025 (the "**Labour Law**"). These developments reflect a clear regulatory intent to move beyond high-level legislative principles towards a detailed and enforceable compliance framework governing employment relationships, working conditions, and employer obligations.

While the majority of these decrees do not introduce entirely new concepts, they serve to operationalise and supplement the provisions of the Labour Law by expanding employer obligations, increasing administrative requirements, and strengthening enforcement mechanisms.

This newsletter provides a comprehensive overview of the key decrees issued in Q1 2026, as well as late 2025 decrees coming into practical effect, together with an analysis of their practical implications for employers operating in Egypt.

1. Employment Structuring, Training and Recruitment

Internship and Training Framework (Decree No. 267 of 2025)

The updated internship regime reflects a policy focus on workforce development and integration between education and employment.

While retaining the core structure of the previous framework, the decree broadens the definition of interns and introduces a more formalised approach to training programmes. It requires written agreements, structured training stages, progressive remuneration, and detailed record-keeping.

The decree also provides for the establishment of a central committee tasked with overseeing training programmes, as part of a broader institutional effort to align training with market needs and future skills development.

Employment Records and Reporting Obligations (Decree No. 270 of 2025)

Employers are now subject to enhanced reporting obligations to labour authorities. These include the requirement to submit detailed data on employees within thirty (30) days of hiring, as well as annual updates covering workforce composition, vacancies, and anticipated hiring needs.

While these requirements may appear administrative in nature, they form a critical component of the broader enforcement framework, enabling authorities to monitor labour market trends and compliance more effectively.

Employment Recruitment and Digital Platforms (Decree No. 272 of 2025)

This decree represents a significant modernisation of the legal framework governing recruitment activities.

Most notably, it extends regulation to electronic recruitment platforms, introducing licensing requirements, technical standards, and data protection obligations. This reflects the growing importance of digital hiring channels and the need to regulate them in line with broader labour and cybersecurity frameworks.

The decree also imposes strict rules on recruitment agencies, including capital requirements, financial guarantees, and restrictions on charging fees to employees. Employers are also prohibited from engaging workers through unlicensed intermediaries.

These changes are likely to have a direct impact on hiring strategies, particularly for companies relying on third-party recruiters or digital platforms.

2. Working Hours and Operational Flexibility

A central theme across Q1 developments is the detailed regulation of working hours, reflecting an effort to balance operational flexibility with employee protection.

Continuous and Strenuous Work (Decree No. 288 of 2025)

The updated framework governing continuous and strenuous work reflects an attempt to modernise legacy regulations and adapt them to evolving business models.

While maintaining the principle that employees are entitled to rest periods, the decree recognises that certain activities, particularly those requiring uninterrupted operations, may justify deviations. Notably, it expands the scope of continuous work to include activities performed through digital and platform-based models.

At the same time, the decree reinforces safeguards by limiting continuous working hours and requiring compensatory rest. It also expands the classification of strenuous work, particularly in environments involving exposure to heat, dust, or hazardous substances.

From a compliance perspective, employers must carefully assess whether their operations fall within these categories, to ensure that appropriate safeguards and documentation are in place.

Working Hours Framework (Decrees Nos. 289, 290, 291, and 292 of 2025)

The new decrees collectively establish a more structured and transparent regime governing working hours, rest periods, and overtime.

At a general level, the standard working period remains capped at eight (8) hours per day and forty-eight (48) hours per week. However, the above-mentioned decrees introduce greater nuance in how working time is calculated, particularly in relation to rest periods, intermittent work, and preparatory or supplementary activities.

For example, the regulations now clearly distinguish between actual working hours and periods of presence at the workplace, while also recognising that certain categories of work may fall outside standard schedules but remain subject to specific limits.

In parallel, the overtime framework has been significantly tightened. Overtime is now restricted to cases of necessity, must be documented, and requires notification to the competent labour authority. Compensation thresholds for overtime have been formalised, with minimum uplifts of 35% (thirty-five per cent) for daytime work and 70% (seventy per cent) for night-time work, alongside additional protections and compensation for work performed on rest days.

Importantly, the regulations impose strict caps on total working time, including overtime, and require employers to maintain detailed records of working hours and overtime arrangements.

These changes collectively signal a shift towards greater transparency and traceability of working time practices, with a clear expectation that employers maintain robust documentation systems.

3. Employee Welfare and Social Policy Developments

Workplace Nursery Obligations (Decree No. 48 of 2026)

One of the most notable developments this quarter is the introduction of a detailed framework governing employers' obligations to provide childcare support. The decree reflects a broader policy objective of enhancing workforce participation, particularly among women, by ensuring access to safe and regulated childcare facilities.

The obligation is triggered primarily based on the number of female employees within a single workplace. Employers with one hundred (100) or more female employees are required to either establish an on-site nursery or enter into a contract with a licensed external provider. For small businesses operating within a defined geographic proximity, the decree introduces a collaborative compliance model, allowing multiple employers to jointly establish or procure nursery services.

Beyond the headline obligation, the decree is highly prescriptive. It regulates licensing requirements, physical standards, accessibility, including for children with disabilities, environmental conditions of nurseries, and a cost-sharing mechanism for employees. Importantly, workplace nurseries fall fully within the broader regulatory framework applicable to childcare facilities, including supervision by the Ministry of Social Solidarity.

From a practical perspective, this development requires employers to reassess workforce demographics, real estate capacity, and HR benefits structures. In many cases, outsourcing arrangements with licensed providers may prove more viable than establishing on-site facilities.

Hazardous Work and Remote Areas Classification (Decree No. 49 of 2026)

Another key development is the formal classification of hazardous, difficult, and remote work, which directly impacts employee entitlements, most notably, additional annual leave.

The decree introduces a comprehensive, sector-specific list of activities classified as hazardous or harmful, such as manufacturing, oil and gas, healthcare, construction, agriculture, and waste management. It further designates certain geographically remote areas in which prevailing working conditions warrant the application of enhanced employment benefits.

Employees engaged in such activities or locations are entitled to an additional seven (7) days of annual leave, over and above standard entitlements. While this may appear modest at first glance, its operational implications are considerable, particularly in labour-intensive sectors.

The classification also has broader implications beyond leave entitlements. It is likely to influence health and safety expectations, inspection focus, and potential future regulatory developments, including compensation structures and insurance considerations.

Employers should therefore carefully assess whether any of their operations fall within the designated categories, particularly where activities involve exposure to chemicals, machinery, environmental hazards, or physically demanding conditions.

Child Employment and Training (Decree No. 50 of 2026)

The decree introduces one of the most detailed and compliance-heavy frameworks within the recent package of regulations. It governs not only the minimum age of employment, but also working conditions, prohibited activities, employer obligations, and enforcement mechanisms.

The decree confirms that children may not be employed before the age of fifteen (15) or completion of basic education, while permitting training from the age of fourteen (14) under strictly controlled conditions. It further imposes an extensive list of prohibited activities, particularly in hazardous industries such as manufacturing, mining, and chemical processing.

What distinguishes this decree is the breadth of employer obligations. Employers engaging children, whether for work or training, must comply with strict requirements relating to medical examinations, health records, workplace safety, social insurance, transportation, nutrition, and supervision. They are also subject to detailed reporting obligations, including maintaining dedicated records and notifying labour authorities of all relevant details.

In addition, the decree imposes strict limitations on working hours, prohibits overtime and night work, and provides enhanced leave entitlements for child workers.

Taken together, these requirements significantly raise the compliance threshold for any employer engaging young workers. In practice, many employers may choose to avoid such arrangements altogether unless strictly necessary, given the regulatory complexity and enforcement exposure.

4. Key Themes and Practical Implications

Across the various decrees issued in Q1 2026, together with late 2025 decrees recently entering into practical effect, several overarching themes emerge.

First, there is a marked shift towards greater regulatory detail. Although the Labour Law is framed in principle-based terms, its implementation is now being progressively operationalised through detailed executive decrees and implementing rules covering nearly all aspects of the employment relationship.

Second, compliance is becoming increasingly documentation-driven. Almost every decree introduces record-keeping, reporting, or notification requirements, thereby underscoring the importance of robust internal compliance systems.

Finally, employee protection remains a central policy objective, whether through enhanced leave entitlements, childcare support, or stricter regulation of working conditions.

5. Outlook for Q2 2026

Looking ahead, further implementing decrees are expected to be issued, particularly in areas where the Labour Law has not yet been fully operationalised. In addition, it is likely that enforcement activity will continue to increase as authorities test and refine the new framework.

Employers should therefore treat Q1 developments not as isolated updates, but as part of a broader and ongoing transformation of Egypt's labour and employment landscape.

Conclusion

The developments of Q1 2026 collectively mark a transition towards a more structured, transparent, and enforcement-driven labour regime in Egypt. While the new framework provides greater clarity, it also introduces a higher compliance burden and increased exposure to regulatory risk.

In this environment, proactive compliance, supported by strong internal processes, documentation, and legal oversight, will be critical for employers seeking to navigate the evolving regulatory landscape effectively.