CAPITAL

Global Employment Solutions

WELCOME TO

EMPLOYMENT MATTERS

THE QUARTERLY REPORT FROM CAPITAL GES

THE WORLD'S MOST TRUSTED
EMPLOYMENT SOLUTIONS PARTNER

CONTENTS

EMPLOYMENT MATTERS

Welcome to Employment Matters, the all-new quarterly report from Capital Global Employment Solutions.

After over 15 years of Capital's previous newsletter, Taxing Issues, we have completely rebuilt our quarterly report to focus more specifically on the issues that face employment businesses all over the world. We will use this new publication to provide useful updates, insights, and analysis from our team of experts, helping you stay informed on the issues that face your business.

In this issue, we provide feature articles on the Maternity, Paternity and Parental Leave rights in Europe as well as a piece highlighting the latest developments in the Gig Economy.

There are four additional sections which will become regular features in each report: 'Ask an Expert' where a member of our team talk about their day to day role in Capital GES, 'Making Employment Easy', a section where we provide you with a client related case study and a '2 minute Primer' which will provide an employment related snapshot of a specific country. Finally, in the 'Employment Bulletin' we list any important employment related changes within the 30 countries we provide services in across Europe, Latin America and Southern Africa.

I hope you find this new edition useful, and I welcome your feedback at news@capital-ges.com

Matt Walters
SVP Operations
matt.walters@capital-ges.com

GIG ECONOMY UPDATES

During 2018, there will be many high-profile tribunals and cases heard surrounding employment rights for those working in the Gig Economy. Following on from January's article, below are updates in relation to the high profile cases of Uber, and Deliveroo, as well as the new cases that have occurred since January this year.

GIG ECONOMY UPDATES

UBER

On December 20th 2017, following a challenge brought by a group of taxi drivers in Barcelona, the European Court of Justice (ECJ) ruled that Uber is officially a transport company. Uber had argued that it was a computer services business not a transport company. During the ruling, the ECJ acknowledged that Uber provides an intermediation service that is integral to the service through connecting by means of a smartphone app. However the ECJ found the main component of Uber is the transport service they provide and therefore Uber must be classed 'as a service in the field of transport' not as an information society service. As a result of the ECJ ruling, Uber will now be required to accept stricter regulation and licensing within the EU as a taxi service.

Last November after the Employment Appeal Tribunal, (EAT) upheld the decision by the Employment Tribunal (ET) that two of its drivers are workers for the purposes of the Employment Rights Act 1996 (ERA). Uber began on the appeal of this decision. Uber initially thought it could go straight to the Supreme Court bypassing the Court of Appeals. However, this was rejected and
The Court of Appeals will now hear this case later this year.

On 8th February this year, Uber won a major legal battle in France on over the employment status of one of it drivers when the French tribunal court ruled in its favour. The case centred on a driver, Florian Menard, who had argued he was not self-employed and his service contract with Uber should be reclassified as an employment contract. The tribunal said that Mr Menard was free to drive his hours and choose or refuse his trips. The French tribunal ruled that Uber was not the driver's employer and that Uber was in the business of intermediation and not that of a transport services. This is a different ruling to the UK courts and contradictory to what the European Court of Justice (ECJ) ruled in December 2017.

DELIVEROO

Following on from November's case where the Central Arbitration Committee (CAC) rejected the application by the Independent Workers Union of Great Britain (IWGB) concluding that the Deliveroo riders were self-employed as opposed to employed and not entitled to collective bargain rights. In March 2018 the IWGB on behalf of the Deliveroo riders have asked for a judicial review of the case.

THE DOCTOR'S LABORATORY

In March the Independent Workers' of Great Britain (IWGB) won collective bargaining rights on behalf of couriers at NHS provider The Doctor's Laboratory. This win comes after last year where on behalf of the Independent Workers Union of Great Britain (IWGB) secured worker status (previously they were classified an independent contractors) for couriers at The Doctor's Laboratory. As a result of achieving collective bargaining, the couriers (who distribute blood samples and pathology samples to the NHS laboratories.) will now be able to negotiate with their employer. Additionally the IWUGB has launched a £1 million holiday pay claim against TDL on behalf of the couriers.

PIMLICO PLUMBERS

In February, the highest profile case to date took place in the highest court. The Supreme Court heard the Smith v Pimlico Plumbers case in London. This appeal followed a Court of Appeals ruling last February where the Court of Appeals upheld the decision by the EAT and ET that Mr Smith, a former Pimlico plumber was a worker and therefore entitled to basic worker rights such as holiday pay and the national minimum wage. Over two days in February, the Supreme Court reconsidered the

GIG ECONOMY UPDATES

question if Mr Smith was a 'worker' or whether he was in 'employment'. The decision made will be revealed in March and could have serious implications for the other employment status cases currently being heard.

GRUBHUB IN THE US

In February this year the first gig economy case regarding employee versus independent contract status took place in the US. A federal judge in San Francisco ruled that Raef Lawson, a former driver for the food delivery business Grubhub was classified correctly as an independent contractor. Mr Lawson had argued that he was an employee. The judge ruled the independent contractor decision because Grubhub lacked necessary control over its drivers. Since February, Mr Lawson has filed an appeal with the 9th Circuit Court of Appeals. The appeal will be heard later this year or early next year.

WHAT IS UP NEXT?

The UK government announced on the 7th February (following on from the Taylor Review on working conditions published last July) that they would review employment rights to improve conditions for millions of workers, including those workers in the gig economy. This report will be released in June. The EU also announced that they would be reviewing legislation as well. In terms of ongoing cases, the Pimlico Plumbers decision is to be announced soon and Uber and Deliveroo still have other cases that are going through various stages. It is hoped that with some legislation and the final stage cases there will be more clarity in relation to employment law and holiday status for the many individuals who work in the Gig Economy.

2 MINUTE PRIMER:

FRANCE

2 MINUTE PRIMER: FRANCE

FIXED-TERM CONTRACT EXTENSIONS

Fixed-term contracts are permitted in limited circumstances and can be renewed twice without exceeding a total maximum period of 18 months.

TERMINATION RULES

Terminations in France are complex and are often a negotiated process. France does not allow at-will termination of employment for employers. Contracts may be terminated by mutual agreement or unilaterally for due cause (misconduct, unfit for the role, extinction of the role). The employer cannot terminate fixed-term contracts early.

Employees can appeal to a court if they considered the dismissal unjustified.

TERMINATION COSTS

Employees who have at least one-year's seniority are entitled to severance pay. Severance pay is calculated as 1/5 of a monthly salary for each year of seniority. For seniority of 10 years or more, they also receive 2/15 of a monthly salary for each year of seniority.

Notice periods start from 1 month for seniority up to 2 years going up to 2 months for employees with more than 2 years' seniority. Employees must receive holiday pay for untaken leave and salary until the end of the notice period.

STATUTORY PAID HOLIDAY

Statutory paid holiday entitlement:

- 30 days per year for employees working 6 days per week
- 25 days per year for employees working 5 days per week.

PARENTAL LEAVE

Maternity: Minimum maternity leave in France is 16 weeks.

Births	Pre-Natal Leave	Post-Natal Leave
Single	6 weeks*	10 weeks
Multiple	24 weeks	22 weeks

*There is the option to decrease pre-natal leave by up to three weeks so that the post-natal period can be longer. During maternity leave, employees receive an indemnity from the social security authorities. The benefit corresponds to the average basic pay of the preceding three months, up to a ceiling of €84.90 per day (for 2017).

2 MINUTE PRIMER: FRANCE

PARENTAL LEAVE

Paternity: Fathers can take paternity leave within the four months following the birth.

Births	Paternity Leave
Single	11 days
Multiple	18 days

Fathers receive a daily allowance from the social security authorities and the employer is not obliged to maintain the employee's remuneration during leave although some collective agreements may require the employer to do so.

PARENTAL LEAVE

After the child is born and once the maternity leave is over, parents can take shared unpaid parental leave or request to work part-time. Parents share parental leave and this leave can last between one and three years. In order for the parental leave to be granted the employee must have at least one year of seniority in the organisation at the date of birth of the child. Similar parental leave rights apply in the case of adoption. This leave is granted for an initial period of one year, which may be extended twice – until the child turns three.

If parents do not opt for parental leave, an employee may opt to work part-time (minimum of 16 hours per week) for the same period (between one and three years).

PROBATION PERIODS

Probation varies according to the position of the employee.

Employee Position	Probation Period
Blue Collar	2 Months
Supervisors and Technicians	3 Months
Managerial	4 Months

Probation periods are renewable once for 2 or 3 months provided it is included in the contract.

Fixed-term contracts can also include a probationary period but this may not exceed one day per week of the contract's duration. It must be limited to two weeks in case of a contract lasting six months or less, or up to one month for contracts lasting more than six months.

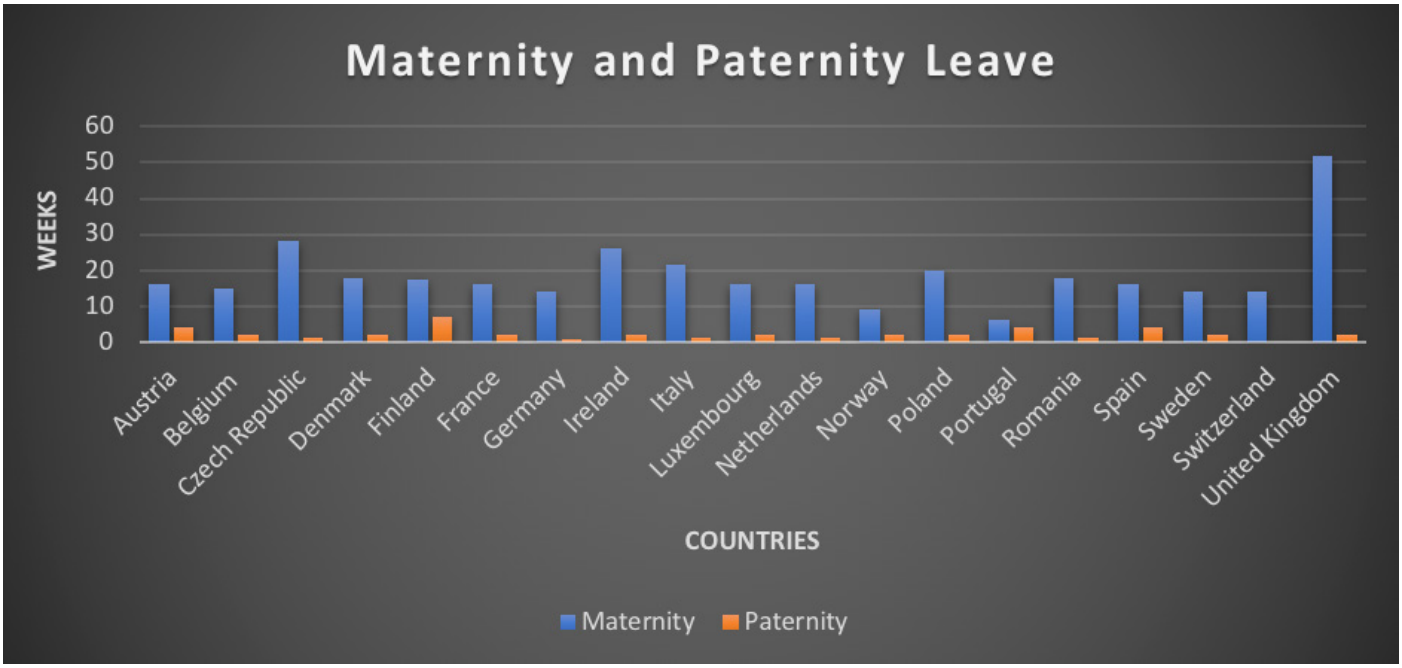
MATERNITY, PATERNITY AND PARENTAL LEAVE IN EUROPE

MATERNITY, PATERNITY AND PARENTAL LEAVE IN EUROPE

When it comes to family leave entitlements there are various types of leave available across the European Union following the birth of a child. Whether it's maternity leave for new mothers, paternity leave for new fathers or parental leave for one or both parents, this leave is defined as a protected form of leave of absence from employment for new parents.

For member states in the EU and other European countries such as Norway, Iceland and Switzerland, there are two pieces of legislation (directives) that contribute to the rights of working parents and family leave. The 1992 Maternity Leave Directive was introduced to protect pregnant workers and workers who have recently given birth. This directive set the minimum period of maternity leave at fourteen weeks with a compulsory two weeks leave after the birth. The 2010 Parental Leave Directive followed which introduced stronger leave conditions for both male and female workers.

While each country has transposed the current directives (1992 and 2010) into their own legislation, the maternity, paternity and parental leave vary depending on each country's own social, economic and cultural circumstances. As a result, the local legislation differs in each country and that is why there are diverse forms of maternity, paternity and parental leave seen across Europe.



MATERNITY, PATERNITY AND PARENTAL LEAVE IN EUROPE

MATERNITY LEAVE

Maternity leave is a protected leave of absence for employed women during a pregnancy and after a birth. All European countries offer a form of leave to be taken by mothers and, because of each country's own legislation, the length of the leave and the pay rate varies. In most EU countries, to be eligible for maternity allowance a woman must have worked enough hours or paid social security contributions.

In most countries, expectant mothers are entitled to a month's leave before the birth (pre-natal) and take their remaining leave after the child's birth. The length of maternity leave varies from the maternity directive recommendation of 14 weeks (Sweden, Germany, and Switzerland) to the average 18 weeks in most other countries. Italy and Poland offer maternity leave periods reaching past 20 weeks and both Ireland (42 weeks) and Czech Republic (28 weeks) offer extended leave periods to new mothers. In Portugal and the UK maternity leave can be shortened in favour of sharing parental leave after the mother has taking the mandatory maternity leave.

Most allowances are paid by the state however there are some countries where the employer (Switzerland, UK, Italy, Germany France and Finland) pays the allowance. In most countries, women receive an allowance equal to at least 50% of their previous salary or in some countries (Ireland), they are paid at a flat weekly rate. In Belgium and the UK, new mothers receive a mixed entitlement allowance. For example, in Belgium, the mother receives 82% allowance during the first month and then a capped allowance equal to 75% for the remaining weeks of her leave. In the UK, new mothers receive pay for the first 6 weeks at 90% of the average weekly earnings and the remaining 33 weeks at a weekly pay of £145.18.

Countries such as Ireland and Spain offer additional maternity leave although this is generally unpaid. New mothers in Ireland are entitled to 42 weeks' maternity leave but only 26 weeks are paid, at a weekly rate of €240. Similarly, new mothers in Spain are entitled to take an unpaid year off following their maternity leave.

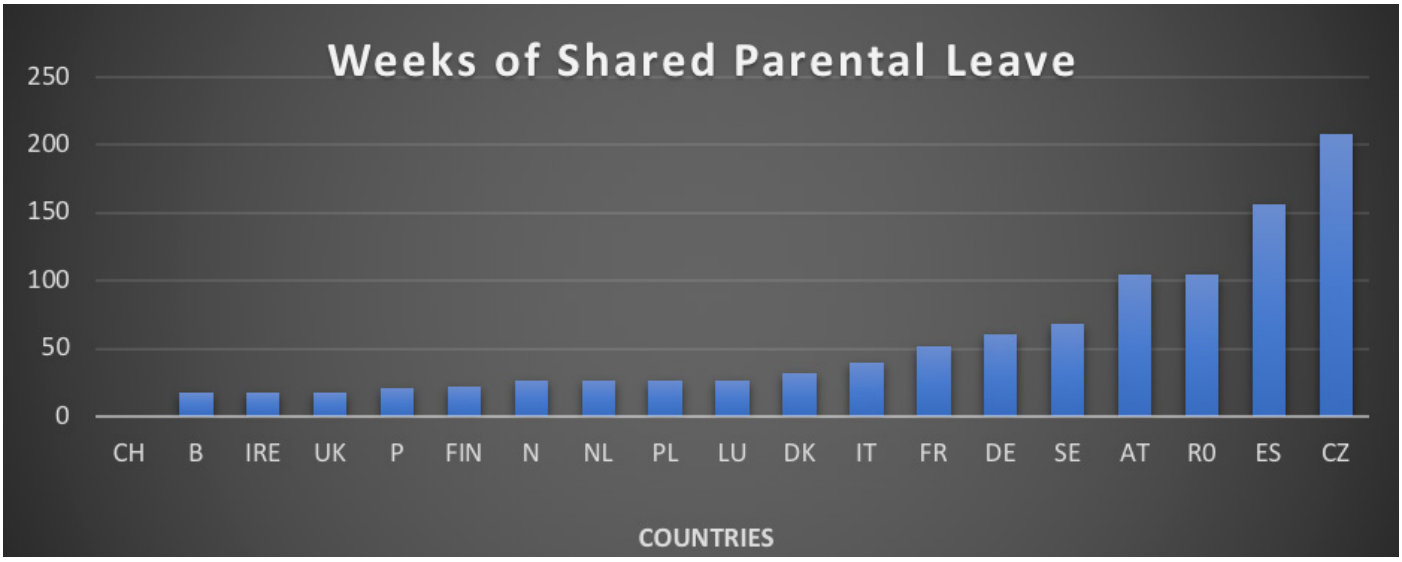
PATERNITY LEAVE

Currently there is no statutory paternity leave stipulated in the EU Directives, although most European countries now offer some form of paternity leave. Paternity leave is generally shorter than maternity leave with the average leave period for new fathers at two weeks. New fathers in countries such as Spain and Austria receive one month of leave while others in countries such as Netherlands, Italy and Germany receive less than a week. Paternity leave is still relatively new to some countries with Ireland (2016) and Czech Republic (2018) only receiving statutory paternity leave in the last three years. Switzerland does not offer statutory paternity leave, although a vast majority of employers offer three to five days.

In terms of rate of pay, most countries' paternity allowance follow the same pattern as maternity allowance. Paternity allowance is normally subject to the number of hours worked and the number of social contributions paid over a period. Paternity leave is paid in some countries by the employer (Luxembourg, Romania, and U.K) while the rest are paid a daily flat rate by the state with countries Denmark, Sweden and Czech Republic receiving an allowance of between 50-80% of salary. New fathers in Belgium receive a mixed allowance, out of their 10 days leave they are paid 100% salary for the first three days by their employer and an 82% allowance for the next 7 days by the state. In the UK and Ireland, new fathers are paid two weeks' leave at a weekly rate of £145.18 and €240 respectively. In some countries paternity leave can also be unpaid, with new fathers in Finland receiving only 18 paid days of the 54 days' leave and, in the Netherlands, only two of their five days' leave.

In some countries, paternity leave is merged into parental leave and fathers are expected to take their allocated time off to help with childcare. In the new EU work-life proposal currently being discussed, the EU aims to have a compulsory ten days' paid paternity leave for each member state.

MATERNITY, PATERNITY AND PARENTAL LEAVE IN EUROPE



PARENTAL LEAVE

Parental leave is generally taken after maternity and paternity leave although in Portugal and the UK paid parental leave can be now transferred to the father when a mother shortens her maternity leave. The length of parental leave varies from country to country, from as little as the EU directive's eighteen weeks (Ireland, Belgium), to the European average of twenty-six weeks (Netherlands, Finland, Denmark, Italy), right up until the child is three years old (Czech Republic, Austria, Romania and Spain). Switzerland offers no parental leave at all.

As the EU directive does not stipulate whether the parental leave needs to be paid, the payments in each country vary. The countries who offer paid (whether by state or employer) parental leave are Portugal, Denmark, Italy, Poland, France, Germany and Romania. Some countries offer a fixed amount such as Belgium, Luxembourg and United Kingdom, or an allowance, for example, Czech Republic offers 220,000 CZK per child. Parents in countries such as Ireland, Spain, France and the Netherlands receive unpaid leave.

Although parental leave is seen as a new initiative in some countries, the Nordic countries have been offering shared parental leave for decades. Nordic countries Denmark, Finland, Norway and Sweden are leaders when it comes to paid parental leave. In some countries, the mother only takes parental leave but in the Nordic countries, it is often shared equally between the mother and the father. The introduction of the 'daddy quota' to Sweden and Norway in the 1990s has meant that new fathers are allocated designated childcare leave. Unlike some parental leave this allocated time is non-transferable and will be lost if the fathers do not use it.

The length and rate of pay varies in each country. Sweden offers 480 days' paid parental leave, which is divided, into 90 days for each parent with the remaining 300 days shared. In Sweden, parents receive a mixed entitlement with an 80% salary allowance for 390 days and the final 90 days at a flat rate. Norway offers 49 weeks at 100% salary or 59 weeks at 80% salary. Finland offers 6 weeks for the father alone (out of 158 days' parental leave). Both parents can share the remaining leave and are paid a flat rate by the state. Denmark offers 32 weeks parental leave (after the mother has taken her 18 weeks) during which a monthly allowance is paid by the state.

Germany, Austria and Italy all offer bonus month incentives provided both parents share parental leave.

MATERNITY, PATERNITY AND PARENTAL LEAVE IN EUROPE

In Austria, leave is offered until the child is three years old. If both parents share the leave, then the length of time allowed under each scheme is extended by approximately 20%; for example if parents take 12 months' leave they get an extra two months or if they decide to take 30 months leave they get 6 extra months. Parents in Austria have the option of five different paid schemes for parental leave ranging from a fixed amount to a flat rate amount depending on the leave chosen. Generally, the longer the leave, the lower the monthly rate e.g. €1000 per month for 12 months, or €430 per month for 30 months. In Germany, parents are entitled to a combined sum of 14 months paid parental leave (Elterngeld) at 65% salary provided the father has taken at least two months' leave. If they choose Elterngeld plus parents can take 14-28 months leave by claiming only half of the parental allowance. In Italy, parents are entitled to 6 months each but cannot exceed 10 months in total. Parents receive eleven months (one extra month) if the father takes no less than three months' leave. Parental leave allowance in Italy is equal to 30% of pay.

In Portugal and the UK, the mother can shorten her leave in exchange for shared parental leave. In Portugal, parents have the choice to take between 120 and 150 days of initial parental leave after the mother mandatory period of maternity leave (6 weeks). Parents are paid at 100% previous salary by the state. Since 2015, in the UK, mothers have been able to reduce maternity leave in exchange for shared parental leave (SPL). Mothers and fathers can still take their two weeks leave and split the other fifty weeks between them at a flat weekly rate of £145.18.

WHAT'S NEXT FOR PARENTAL LEAVE IN EUROPE?

For the last few years the E.U. have been drafting up a new proposal which is aimed at improving the working and living conditions of working parents. This work-life balance proposal is to help make it easier for mothers to stay in the workplace and to ensure fathers use their parental leave more fully. The proposal includes paternity, parental and carers' leave as well as improved maternity leave rights. The new proposal that is currently being discussed by the EMPL committee would hopefully aim to streamline parental leave across the EU member states as right now length and pay vary considerably. Once the proposal report with the proposed amendments have been agreed by the committee, the report will move to the stage of trilateral dialogue between the Parliament, Council of the EU and European Commission.

“

CAPITAL GES HAVE BEEN IMMENSELY USEFUL IN SATISFYING OUR PARTICULAR REQUIREMENTS FOR LOCALISED PAYROLL IN MULTIPLE COUNTRIES. TO ACT AS THE EMPLOYER OF RECORD ACROSS SEVERAL JURISDICTIONS IS AN ESPECIALLY DIFFICULT TASK TO GET RIGHT WITHIN THE TIMEFRAMES THAT WE’VE NEEDED.

”

UK-based international expansion specialist

TALK TO STEVE

ASK AN EXPERT:

STEVE BLOW

BIO

Steve joined Capital GES in October 2014 as a Business Development Executive. Steve was based in the head office in Neuchâtel before moving to the US where he supported the US-based clients, before returning to the company's head office in Neuchâtel in March. Steve has worked in a number of different countries, including Canada, UK, Brazil, New Zealand and Switzerland, which has given him good grounding to help people who are working globally.

Q: HOW LONG HAVE YOU BEEN WITH CAPITAL GES?

I have been with Capital GES for over three years. I spent eighteen months in the United States where I was supporting our U.S. clients. I recently returned to Switzerland where I am now sales team leader.

Q: DESCRIBE YOUR ROLE

My job is varied. It encompasses both account management and sales. The majority of the time I am managing our key accounts providing them with solutions. I also deal with the individual contractors and employees. My role as Team Leader is to provide advice, support, and knowledge to the sales team when developing new clients and partnerships.

Q: MOST CHALLENGING PART OF YOUR JOB?

One of the most challenging and interesting parts of the job is the constant changes in each country. It is important for sales to know what is happening in each country in terms of the regulatory changes. We have a fantastic R&D department that works solely on this and provides the most up-to-date information on these regulations for us, which we can then pass on our clients.

ASK AN EXPERT:

STEVE BLOW

Q: MOST REWARDING PART OF YOUR JOB?

No two days are the same so that makes this role enjoyable. Every contract has different nuances. Everything is continuously evolving so there is always something new happening, which is very rewarding.

Q: WHAT IS THE KEY TO GETTING A NEW WORKER ONBOARDED QUICKLY?

The key to getting a new worker onboarded quickly is setting the correct expectations with all parties and ensuring that the relevant information is accurate from the outset. By engaging with everyone at the beginning, you are able to set expectations and ultimately everyone works together more effectively resulting in a swift onboarding process.

Q: WHAT DO YOU THINK WILL CHANGE FUNDAMENTALLY IN THE NEXT 18 MONTHS?

It is very evident that technology will change fundamentally in the next 18 months. Looking back a year or two ago technology processes were different to how they are today. I think that particularly the introduction of GDPR in May will have a great impact on how companies exchange and store information, which in turn will influence the technology we use and the workflows that depend on it.

MAKING EMPLOYMENT EASY

MAKING EMPLOYMENT EASY: HOW TO EMPLOY STAFF IN GERMANY AT VERY SHORT NOTICE

CLIENT: US-BASED COMPANY

REGION: GERMANY

CHALLENGE

A US-based company in the technology space approached Capital GES when they had completed an acquisition, which, in part, included four workers based in Germany. As our client had no previous entity or desire to incorporate in Germany they were unable to payroll these workers internally. The company asked Capital GES to manage the payroll and benefits and employ the staff in Germany within the company's deadline of one month.

SOLUTION

Capital GES provided the company with our Employer of Record (EOR) solution. By using our EOR/International PEO solution, we became the workers' legal employer. This means that we manage the entire employment relationship along with all social security costs, social benefits and statutory rights afforded to the employees.

The company presented us with a one-month deadline from start to finish. This month's work included organising contracts, engaging with workers and making the transition. For Capital GES to achieve this deadline, all our departments worked closely together. Our sales team made sure when engaging with the client and workers that all information received was accurate from the outset and that all parties' expectations were set. By receiving accurate information, Capital GES was able to complete the process swiftly.

RESULTS

By working closely with the client, workers and internally we were able to manage expectations, complete the process and meet all the requirements to have Capital GES's EOR solution implemented correctly and on time. This resulted in the employees being taken over without any disruption between the previous and new employers and, importantly, being paid correctly and on time. For the client this significantly reduced complexity and overheads in time and resources that otherwise would have been invested in understanding a foreign country's processes and regulations for company formation and employment.

EMPLOYMENT BULLETIN

EMPLOYMENT BULLETIN

EUROPE COURT OF JUSTICE RULINGS
REDUNDANCY

The European Court of Justice (ECJ) has held that pregnant workers can be dismissed in a collective redundancy situation and are not entitled to priority treatment, save to the extent that national law provides it. However, it must be noted that in UK law there is a special protection granted to women who are at risk of redundancy while on maternity leave, who are entitled the right of first refusal of suitable alternative employment.

CZECH REPUBLIC
PATERNITY

With effect from 1st February 2018, fathers will be entitled to paid paternity leave of seven days to be taken within six weeks of the birth of a child or placement of an adopted child under the age of seven. Fathers will receive an allowance equal to 70% of their usual salary, paid directly by the social security office.

GERMANY
STATE PENSION

The employer's contribution to the state pension has decreased from 9.35% in 2017 to 9.30% in 2018.

MATERNITY PROTECTION ACT

Amendments to the Maternity Protection Act become effective on January 1st, 2018. The aim of the new regulation is to ensure a modern and responsible approach to maternity leave.

LUXEMBOURG
PATERNITY

From January 2018 paternity leave will be extended allowing fathers to take 10 days' (up from 2 days') paternity leave within two months of the child being born. Employees receive full salary from the employer.

NETHERLANDS
MINIMUM WAGE INCREASE

The statutory minimum wage is €1,578.00 per month for those aged 22 and older as of 1st January 2018. The government adjusts the minimum wage twice a year in January and July.

UNITED KINGDOM
TAYLOR REVIEW RESPONSE

In February, The UK Government has promised an overhaul of employment rights to improve conditions

for millions of workers, including those in the Gig Economy. The changes include stricter enforcement of holidays and sick pay rights.

STATUTORY MATERNITY PAY INCREASE

Maternity pay is paid for up to 39 weeks: 90% of average weekly earnings for the first 6 weeks followed by either £145.18 (2018/2019) or 90% of average weekly earnings, whichever is lower, for the next 33 weeks. This increase takes effect on 1st April 2018.

STATUTORY SICK PAY INCREASE

The rate of statutory sick pay is also increasing to £92.05 with effect from 6th April 2018.

MINIMUM WAGE INCREASE

For most employees the minimum hourly wage as of 1st April 2018 is £7.83.

SOUTH AFRICA

A national minimum wage will be introduced for the first time. From May 1st 2018 the minimum wage rate will be 20 ZAR per hour.

OTHER PIECES
EUROPE

WORKING TIME

In the case of Ville de Nivelles v Matzak, the court has held that stand-by time spent at home must be viewed as 'working time' where constraints placed on the worker by the employer significantly restrict the worker's ability to pursue personal and social interests (i.e. non-work interests). Mr Matzak, a volunteer firefighter, was allowed to stay at home on call but had to be ready to attend the fire station within eight minutes of receiving a call. Mr Matzak was not paid for the time when he was on standby and, because he had to be ready very quickly to attend his job, the activities he was able to carry out while on stand-by were severely restricted.

UNIONS: INDUSTRIAL WORKERS HOURS REDUCED IN GERMANY

In Germany, Industrial workers (IG Metall) in south-west Germany won the right to reduced working hours as part of a deal in February. These industrial workers will now be able to reduce their weekly hours from 35 to 28 for up to two years to look after their families (elderly or sick relatives, or children), They will also receive a 4.3% pay rise from April.

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GET IN TOUCH

For more information on how Capital GES can help your company expand in a safe and compliant way, please contact our team of experts for more information.

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SWISS OFFICE
Matt Walters
matt.walters@capital-ges.com
+41 32 732 97 00

UK OFFICE
Nick Broughton
nick.broughton@capital-ges.com
+44 7539 337 563

US OFFICE
Javier Romeu
javier.romeu@capital-ges.com
+1 954 803 4362

BRAZIL OFFICE
Ana Vizzotto
ana.vizzotto@capital-ges.com.br
+55 31 3194 8150

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