

21/12/2023

## New mandatory procedures to be implemented since 2023

To comply with the new legislation, you now have to implement two new procedures.

### Moral harassment:

Since 9 April 2023, **all employers**, regardless the number of employees, must implement a procedure on moral harassment in compliance with the new requirements of the Law of 28 March 2023 (definition of the means available to victims of moral harassment, method of handling complaints, etc.).

Risks of failing to implement a procedure: **criminal fine of between EUR 251 and 2,500** and **ITM fine** in the event of an inspection.

### Whistleblowing:

Since 17 December 2023, **all private and public sector entities with 50 or more workers** must set up internal whistleblowing channels.

In this respect, an internal procedure detailing the access, management and follow-up of reports must be established in accordance with the requirements of the Law.

Risks of failing to implement a procedure: **administrative fine of between EUR 1,500 and 250,000**.

---

## KEY CONTACT

**Rosario GRASSO** Senior Partner

**Christian JUNGERS** Partner

**Anissa BALI** Partner

**Celine DEFAY** Partner

**Philippe NEY** Partner

**Christophe NEY** Partner

**Sandra RAPP** Counsel

**Laure WOEHLING** Counsel

