

Amendment to the Remote Working Regulation on Hybrid Working

A. Introduction

The Regulation Amending the Remote Working Regulation (“**Amending Regulation**”) published in the Official Gazette dated 25 September 2026 and numbered 33381 has amended the Remote Working Regulation (“**Regulation**”) published in the Official Gazette dated 10 March 2021 and numbered 31419.

The Amending Regulation can be accessed [here](#).

B. Amendment

Remote working acquired a statutory basis with the amendment made in 2016 to Article 14 of Labour Law No. 4857 (“**Labour Law**”), whereby remote working was defined as an employment relationship established in writing, based on the employee performing the work obligation at home or outside the workplace by means of technological communication tools, within the scope of the work organisation established by the employer.

The procedures and principles of remote working were subsequently regulated by the Regulation, which entered into force in 2021. The Regulation requires remote working agreements to be made in writing and to include matters such as the description of the work, the manner of its performance, its duration and place, remuneration, equipment and communication; it also sets out the principles regarding the arrangement of the workspace, the coverage of production costs, data protection and occupational health and safety.

Since Article 4 of the Regulation, titled “Definitions”, defines a “remote worker” as an employee who performs all or part of the work obligation by working remotely, there was no legal obstacle, even before the amendment, to applying the hybrid working model in which work is carried out at the workplace on certain days and remotely on others. However, the

Regulation did not contain an express provision specifically governing hybrid working and how the workplace and remote working days would be determined.

With the Amending Regulation, the following paragraph has been added to Article 9 of the Regulation, titled “Determination of Working Time”:

“(2) It may be agreed that part of the work obligation is performed at the workplace and part of it through remote working. In such case, the days on which the employee will work at the workplace and remotely, as well as the working hours, shall be determined in the employment agreement.”

Accordingly, the hybrid working model, which is widely used in practice, has been expressly regulated in the Regulation.

C. Impact of the Amendment in Practice

Following the amendment, in employment relationships where the hybrid working model is applied, the days on which the employee will work at the workplace and remotely, as well as the working hours, will need to be expressly set out in the employment agreement.

Although the Amending Regulation does not contain a specific transitional provision regarding existing employment agreements, it would be advisable to review the existing contractual arrangements in light of the new provision in employment relationships where the hybrid working model is currently applied.

That said, the Amending Regulation does not provide for the level of detail at which the workplace and remote working days and the working hours must be determined, or for any specific procedure for subsequently changing the agreed working arrangement. These matters will need to be assessed in light of the characteristics

of the specific employment relationship and the contractual arrangements between the parties.

D. Conclusion

With the Amending Regulation, which entered into force on 25 September 2026, hybrid working, which is widely used in practice, has

been expressly regulated in the Regulation, and it has become mandatory to determine the days on which the employee will work at the workplace and remotely, as well as the working hours, in employment relationships where the hybrid working model is applied.



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