

## Cross-National Comparative Study of Labor Laws between China, India and Pakistan

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**Abstract:** *The labour laws of China, India, and Pakistan are compared in this article. It shows how imitative isomorphic propensities and basic concepts of justice like equality, equity, and necessity may have resulted in labour law parallels in all the three nations. Unique cultural, social, and historical variables, on the other hand, have resulted in considerable variations in these labour regulations. Understanding these distinctions can help policymakers and corporate leaders make better decisions.*

**Key Words:** Cross-national, Comparative, Labor Laws, China, India, and Pakistan

### Importance of studying comparative Labor Laws

Since at least the late nineteenth century, progressive politicians, academics, public officials, and ordinary people in Europe and North America have been comparing labour and social policy experiences [Einhorn 1999]. The scholars were obviously inspired by the progressive and internationalist tradition in comparative labour studies, which was typified by the pioneering American industrial relations professor John R. Commons' work. Comparative research faces a conundrum: how can academics overcome the implicit prejudice, and often outright contempt, that comes from using the system they are most familiar with as a lens through which to study "other" systems? The study on the legal regulation of industrial conflict, dispute resolution, and workplace discrimination sought to address this issue by bringing together a group of senior scholars, each of whom was responsible for writing a report on country's system while also contributing to a thematic or integrative study.

Similarly, two reasons underpin the relevance of comparing labour laws across nations. The first reason is that job relationships are commonplace in many nations. In most nations, most employment is provided by local businesses. Nonetheless, each country's laws are sometimes similar and sometimes drastically different. Furthermore, when Multi-national Enterprises (MNEs) expand into other nations, they often face

labour laws that vary from those in their native country [Einhorn 1999]. As their operations grow and they recruit more local workers who are governed by various labour laws, MNEs must be able to comprehend, adapt, and adjust to the variations [Zhao 2014].

The necessity for countries to control relationships inside their own borders is the second reason. Policymakers may learn more about effective employment control methods in other countries by studying comparative labour laws [Andersson, R. 2016].

### Objective of the study

Regrettably, previous research has failed to adequately explain the variations and similarities in labour laws among nations. One possible issue is that MNEs may not fully comprehend the laws of other nations. They may be accused of breaking the laws of the nations in which they operate if this occurs. According to recent accusations, large foreign corporations operating in China might be affected. As a result, multinational corporations must examine the similarities and variations in labour regulations across nations in order to determine how to comply with international rules. As a consequence, worldwide economic cooperation and development will rise. Furthermore, comparative labour law study is required so that the government may determine

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how its labour laws compare to those of other nations.

Previous study looked at the legal needs of various countries in a variety of laws in depth. Previous study, for example, revealed changes in Chinese labour law in 2008 ([Fankhauser et al. 2015](#)) Other research has looked at the contrasts between Soviet-era labour laws and more recent Russian Federation labour laws ([Estrin & Prevezer 2010](#)), as well as the implementation of international labour laws. Nonetheless, a direct comparison of comparable labour laws in various nations is obviously required. This article provides that analysis.

### Research Methodology

The study's research started with interviews with practicing managers in China, India, and Pakistan, who were questioned about their nations' main labour laws. Later, the literature on labour law in China, India, and Pakistan was examined. The emphasis of this study was on the most prevalent labour law provisions across nations and cultures ([Schwartz 1999](#)). In addition, recent changes in labour laws in these countries were given particular attention ([Hakim 2016](#)). Searching the internet material accessible for legal firms that handle labour laws in several nations verified information about the latest modifications ([Wong & Saunders 2020](#)). The next step was to create a summary of the legislation of these three nations. This method's main aim was to compare and contrast the provisions in different nations.

### The Employment Relationship's Pervasiveness

Employers employ people all around the world. It is believed that there are over 3 billion individuals in employment relationships ([Spurk & Straub 2020](#)). This kind of employment relationship is a mutually agreed-upon transaction in which an employee agrees to work in exchange for a basic wage and perks and privileges from the employer. In accordance with, the employee achieves his or her goal of earning money, and the employer achieves its goal of acquiring the worker's services. Employees and employers will be prepared to participate in the work-for-work transactions that constitute the foundation of employment as long as they think it is in their best interests.

This symbiotic connection is, unsurprisingly, allowed and promoted by governments all over the globe. It helps not just both parties (employee and employer), but also additional participants. Employees' family members who get benefits in place of the employee's economic employment

benefits are included in this category ([Gevrek et al. 2017](#)). It also benefits business stakeholders, such as consumers who purchase products and services from the firm, owners who share profits, and communities where employers generate employment, thus enhancing the entire economic climate.

Employees and employers' interests, however, may not always align. Employers desire reduced expenses, and also greater production and improved eminence of exertion from their workers, while employees want more pay, better benefits, and job stability. There are asymmetrical advantages that may benefit one side over the other in certain circumstances. Employers may, for example, reduce pay and offer more unpleasant or hazardous working conditions than would otherwise be the case, taking advantage of their workers when there are few jobs available and many applicants.

In other cases, employees are in short supply and jobs are abundant. When this occurs, employees may engage in self-serving and unproductive behavior that is potentially detrimental to the business. This may contain captivating benefits of the services connection by abruptly leaving a job and working for an opponent, causing the employer's operations to be disrupted. In other cases, workers may take critical company information with them when they depart, inflicting damage to their former firm.

### Different Countries' Labor Laws

Every country's government has acknowledged the risk of exploitation, which may damage employees, as well as the risk of employee unproductive conduct, which could harm businesses. They have responded by enacting legislative safeguards to avoid worker exploitation, as well as safeguards for employers to limit unproductive employee conduct. However, each nation has enacted its own set of labour laws, influenced by cultural and historical factors ([Posthuma 2020](#)). Some laws are intended to ensure that workers have safe working conditions and that their rights are protected. Others are intended to make it illegal for employers to discriminate against workers built on their demography disparities ([Rissing & Castilla 2014](#)).

Certainly, in most cases, the labour laws of one nation do not apply in another ([Davidov, G, et al. 2015](#)). As a result, although the world's commercial relationships are extensive, each country's laws are distinct. This is one of the reasons why each country's labour laws reflect its own history and culture. Labor regulations have two consequences over the globe.

The first consequence of wide labour laws is that it is essential to comprehend the similarities that exist across the nations where they are situated. Finding similarities helps in reaching broad conclusions and reaching agreement on fundamental ideas that are generally relevant across nations. The most essential concept is that labour laws may help to foster justice in the workplace. There are three universally applicable criteria for evaluating justice, according to the generally recognized notion of justice: equality, fairness, and necessity [Kittel 2020]. Each of these three criteria may be used to illustrate how various kinds of labour laws can be utilized to promote fairness in the work relationship.

The equality principle supports laws requiring that all workers get the same result, such as in India and Pakistan, where all employees are entitled to at least 27 & 29 days of paid vacation each year respectively. Because all workers get the same bare minimum, this is an illustration of equality.

The equity principle supports laws that demand varied results for workers depending on certain reasonable and objective factors. The Equity Principle, for example, describes the impartiality of a regulation that compels workers who remain with the same business for a long time to take extra vacation days, as is the case in China. Because individuals who have remained faithful to the same business are rewarded with extra vacation, this is an example of equity. The need concept supports laws requiring better results for workers with higher needs. Pregnant women and nursing mothers, for example, are given particular rights under Pakistan's labour law. This enables them to fulfill their specific needs throughout childbirth and childrearing.

A second consequence of the variety of labour laws in various nations is the need to detect variations in labour laws across countries. Detecting discrepancies enables for comparison and contrast, which may aid policymakers in discovering new avenues to pursue. It may also propose advantages that companies might offer to their employees even if they are not legally obligated to do so. However, in order to recruit and maintain a loyal staff, they may voluntarily offer extra perks. One reason for giving the kinds of benefits identified by comparing labour laws is because their various provisions have been deemed essential and legal in other nations.

In the United States, for example, there is no federal legislation requiring private-sector employers to provide paid parental leave. This function is available in other countries, such as Pakistan and India. China, India, and Pakistan all offer 128 days of paid maternity leave [Ahmed &

Fielding 2019; Liu et al. 2020]. Employers in China could voluntarily implement a policy that would provide this type of paid leave, despite the fact that it is not required by law, many have done so.

As a result, researching labour regulations in various nations is critical. The laws of China, India, and Pakistan are compared in this article. These nations were selected because they have a big work force, have previously adopted labour laws, are continuously updating them, and have major parallels and variations in labour relations organization.

### Similarities in the Structure and Sources of Labor Law in Different Countries

Many countries have similar labour laws around the globe, however, the structure of labour laws and the origins of labour legislation are two of these parallels.

First, each nation has federal rules that apply across the board, as well as local regulations with varying requirements. There are uniform federal labour regulations in China, India, and Pakistan that offer a certain degree of protection to employees throughout the nation [Chan 2019]. Each nation, however, has labour regulations that are somewhat different in political units i.e. regions, provinces, or cities [Zuber 2020].

It's also worth noting that the variations across countries typically offer more safeguards for employees at the local level than at the national one. As a result, each country has realized the necessity of striking a balance between the need for national standards and the desire for local governments to offer extra safeguards to employees in their area [Yang 2017].

Second, each country has a number of labour regulations that are comparable. The federal labour legislation, the chief executive's proclamation, court judgments, and administrative agency rules are all included in these regulations, which start with the national constitution. These rules cover particular issues including equal employment opportunity, wage payment methods, and security [Chemerinsky 2019].

Despite cultural and historical variations, governments' processes for developing labour laws have a long history and certain commonalities. The idea of similarity mimicry states that if one organization sees another adopting a structure that fits it, it will imitate it [Palmer et al. 2008]. Although this hypothesis has been shown to explain why one business replicates another's structure, it can also describe

why one nation embraces structural essentials of another's labour legislation. Furthermore, these parallels may include labor-law obligations that are comparable. A government may decide to implement minimum wage levels if it observes that other nations have done so for the benefit of its workers. There are many instances of this in China, India, and Pakistan.

### **Similarities in Worker Protections and Benefits**

Given the structural and origins of labour laws in various nations, it's not unexpected that the historical effect of regulatory framework adoption in various nations has resulted in comparable legislation in China, India, and Pakistan [Fenwick et al. 2008]. Furthermore, each country has adopted a number of comparable regulations that adhere to the internationally recognized values of justice, equity, and nondiscrimination.

### **Minimum Wage**

There are national minimum wage laws in every country, with certain variations at the municipal level surrounded by particular dominions. In addition, since the time has passed, every state's minimum salary has risen. This is an illustration of the universality of the fairness principle based on equality. All three nations agree that workers should be paid at least a similar salary.

### **Overtime Pay**

In addition, each nation mandates that workers be paid 1.5 times their normal rate for overtime or hours worked over a specified threshold. Overtime pay eligibility, on the other hand, differs by country. Overtime pay for more exceeding 8 hours per day or 40 hours per week is paid in China [Chan, A. 2016]. In India, if a worker works in a factory for more than 9 hours on any given day or 48 hours in a given week, he or she is entitled to double pay for overtime. If a worker in Pakistan works for longer than the specified working hours, i.e. 9 hours per day and 48 hours per week, he is entitled to twice the standard salary as overtime compensation (200 percent of the normal wage). In all three nations, employees who work more than a specified amount of hours are entitled to greater pay.

### **Payroll Taxes for Social Insurance**

In addition, each nation mandates the payment of taxes depending on the amount of earnings received by workers. These taxes are intended to finance social insurance, retirement, and other programmes to which employees may be eligible at some time in their life. This is an illustration of the fairness principle based on necessity.

Employees in all three nations understand that, at some point in their life, such as when they retire, they will need financial assistance beyond what their company offers in terms of pay and benefits. These are all fascinating and essential worker safeguards. The majority of previous research has focused almost entirely on the extent to which labour regulations protect employees. This is a crucial subject. However, since employment is a partnership between employees and employers, the effect of labour laws on employers must also be considered.

### **Resemblance in Protections and Benefits for Employers**

Some parallels also exist in the kinds of safeguards given to companies against potentially unproductive worker conduct. Employers in all three nations have the freedom to select who they hire, but this right is limited. Employers in all three nations may also unilaterally terminate employment relationships without the employee's permission. This privilege, however, is subject to a wide range of limitations depending on the nation. An employee or an employer may terminate an employment relationship under this common law notion without having to show that they have a valid and lawful cause to do so.

However, some types of workers are afforded additional safeguards, such as tenured instructors, government servants, through collective bargaining agreements, and so on. Employers must typically be able to show that they established the rules, that the employee understood the rules, and that the employee disobeyed the rules for those employees. This is known as the "just cause" criterion for terminating an employee's job. China's labour regulations do not adhere to the employment-at-will concept. Their laws are more in line with the just cause criterion that other states have. Employers in China find it simpler to dismiss workers during their probationary phase. The employer and employee may then agree on a fixed-term employment contract for a certain length of period, or they can sign an indefinite-term employment contract for an indefinite period of time [Carnero et al. 2016].

In order to terminate an employment relationship beyond the probationary period, the employer must have set work rules, the employee must have been aware of the rules, and the employee must have broken the rules. Similar laws exist in India and Pakistan. In most cases, these regulations require the employer to show that the employee has broken severe work standards. Every nation provides some

safeguards for workers and certain assurances for businesses. Employees, on the other hand, are more protected by labour regulations than employers. This disparity is due mainly based on need impartiality. Establishments often ensure more probable supremacy in the work connection since they have the ability to replace employees with others. As a result, there is an uneven power imbalance favoring employers over workers. Employees, on the other hand, have a higher need for protection in the workplace than employers. The governments of each nation respond to this requirement by providing some kind of protection for employees.

### **Comparative Analysis of Similarities between Countries**

Different nations' labour laws obligate comparable organizational underpinnings, and the origins of those labour regulations are similarly comparable. Standardized laws throughout the nation, with modifications in local political authorities, provide the basic underpinnings. A national constitution, federal labour regulations, and other parallels may be found. This indicates that the mimetic isomorphism viewpoint may be useful in explaining how labour laws evolved across the world.

Even while the basic foundations and origins of labour regulations are identical, there are distinct variations. Despite the fact that all three nations have a minimum wage and mechanisms to raise it over time, the actual minimum wage amounts in each country are very different. This implies that other forces, such as the economic circumstances in each nation, at least somewhat limit the pressures of mimetic isomorphism. This also demonstrates that, although the idea of equal pay for equal labour may serve as a foundation for minimum wages, the equality provided is only inside the country, not beyond national boundaries. As a result, the scope of the comparison norm of equality and justice may be restricted to each country's boundaries.

In addition, certain labour laws' fundamental safeguards show considerable consistency. For example, all states give overtime compensation, and the regulations are identical, mandating overtime pay after 48 hours of work each week; yet, only China offers overtime pay after 8 hours of work per day. This demonstrates that employees are paid differently depending on the amount of hours worked based on the idea of equality, and that this concept has been implemented in various ways in different nations.

Similarities in employment protections and perks may have also been the consequence of mimetic isomorphism processes. Because

businesses are aware of the issues that may arise if they are unable to terminate the services of infertile employees, they will, of course, request that their government grant them some autonomy within their own commercial laws. Notwithstanding, certain commonalities in this respect, there are major variations across nations. When we compare China, India, and Pakistan, we can observe that both China and Pakistan offer better safeguards for employees against wrongful termination than India. Despite the fact that China and Pakistan approach it differently, both offer a kind of just cause criterion that is not often used in India. It might be claimed that in China and Pakistan, the need-based kind of fairness is more firmly reinforced by legal requirements than in India. As a result, many similarities across nations may be explained by mimetic isomorphism tendencies and widely recognized ideals of justice, yet substantial differences also exist.

### **Dissimilarities in Labor Laws across Countries**

Notwithstanding the fact that these three nations have a tendency to establish isomorphic legislation on certain subjects based on similar basic concepts of justice, there are still major disparities.

### **Dissimilarities in Workers Protections and Benefits**

#### **Holidays**

All three nations recognize the potential of paid time off on certain recognized holidays in some way. In China and Pakistan, employees are required to be reimbursed for specific holidays. Holidays in China and India, on the other hand, are not the same. India proclaims national holidays, but does not require all workers to pay their salary on certain days. The determination of which days are deemed holidays differs by country and is influenced by cultural, historical, and other factors. National labour laws utilize vacations to maintain the memory and continuity of these national objectives by providing time off for workers.

In China, paid holidays are mainly based on social and cultural history. New Year's Day, Lunar New Year's Day (also known as Chinese New Year or Spring Festival), Qing Ming Festival (Tomb-Sweeping Day), Labor Day (May 1st), Dragon Boat Festival, Mid-Autumn Festival, and National Day (October 1st) are all paid holidays in China. Paid vacations in India are based on a combination of international holidays and the country's unique political history.



The following paid holidays are observed in India: “Republic Day (January 26), Maha Shivaratri (March 11), Holi (March 29), Good Friday (April 02), Rama Navami (April 21), Mahavir Jayanti (April 25), Ramzan Id/ Eid-ul-Fitr (May 14), Buddha Purnima/ Vesak (May 26), Bakr Id/ Eid-ul-Adha (July 21), Independence Day (August 15), Muharram/ Ashura” [\[Almeida, R. 2015\]](#).

Certain holidays are designated as national gazette holidays by Pakistan's federal government, however all workers must be given paid holidays on such dates. Federal and provincial offices were shuttered and federal and local employees were paid. These federal holidays are commemorated by commemorating important cultural and historical events. The following holidays are being observed in Pakistan, “New Year's Bank Holiday (January 01), Kashmir Solidarity Day (February 05), Pakistan Day (March 23), Ramadan Start Holiday (April 14), Labour Day (May 01), Eid ul Fitr Holidays (May 10,11,12,13,14,15, depending on moon sighting), July Bank Holiday (July 01), Eid-ul-adha Holidays (July 20,21,22, depending on moon sighting), Independence Day (August 14)” [\[Qasmi 2017\]](#). The provision of mandatory paid vacations for example in China and Pakistan are based on the fairness equality in services legislation, since all workers get similar vacation time.

## Vacations

Additionally, such particular days off, all three nations, China, India, and Pakistan, mandate that workers be given paid vacation time. The vacation day schedule is not set in stone; rather, it is established by mutual agreement between the employee and the company. In India, irrespective of the duration of work in any company, all workers are entitled to 15 days of paid vacation each year, but employers may offer a greater number of vacation days [\[Chandra 2012\]](#). Employees in China are entitled to a minimum number of paid vacation days depending on their length of service with the firm, although employers may provide more. Those who have worked for one year but less than ten years are entitled to five paid days of leave, those who have worked for ten years but less than twenty years are entitled to ten paid days, and those who have worked for ten years are entitled to paid leave and those who have worked for 20 years are entitled to avail 15 paid days [\[Xie Z. Wages 2015\]](#). While Pakistan offers 14 days of paid yearly vacation in addition to official gazetted holidays, the Factories Act of 1934 additionally allows 10 days of casual leave with full pay for every employee and an

additional 16 days of sick or medical leave at half pay [\[Imran, H. A. 2020\]](#).

The need for paid leave is an example of equal justice in all three nations. Every employee is guaranteed the same minimum amount of vacation days. The necessity to raise the amount of paid vacation days depending on years of service in China and Pakistan is an example of equity-based impartiality. Longer-working employees are entitled to extra vacation days.

## Written Contract

The work relationship in China and India must be established in a written agreement signed by both the employee and the employer [\[Agarwala, R. 2013; Swider, S. 2015\]](#). A formal employment contract is not required in Pakistan. However, in certain cases, for example, for higher management, specialized sportsmen, and sales services experts, a formal employment contract is more frequent in Pakistan. In China and India, the need for a written contract may be viewed for example a consequence of twofold fairness values: fairness and necessity. All employment contracts must contain some basic assurances since both China and India require all employees to have written contracts, the need of a transcribed agreement helps to ensure that all employment arrangements are held to a same standard. As a result, the written contract is an example of justice based on equality. Employee standards are met in China and India because they need employees to be safeguarded by written contract conditions. Because written contracts are required by federal law, each worker will have a written contract to suit their requirements. As a result, the demand for written contracts is an example of demand-based equity.

## Differences in Employer Protections

Employer protections vary little from country to country. Nonetheless, this essay focuses on one of the most crucial issues.

## Non-Competition Agreements (NCAs)

Such contracts are lawfully binding commitments that prevent a worker from resigning as well as working for a rival of their company. These agreements are sometimes governed by various nations' labour laws. Employees may also utilize these agreements to prevent them from taking the knowledge they acquired from their first employer, such as data, client lists, proprietary and secret procedures, ways of conducting their operations, and so on, and disclosing it to a future company.

A worker may engage into a non-compete agreement in China with a rival for up to two years

if the employer pays the person for the non-compete agreement [Shangguan 2015]. These agreements, on the other hand, are usually only valid for top executives and if the geographic extent of the arrangement is acceptable. Furthermore, if the employee breaches the agreement, the employee may be required to pay damages to the employer. In India, non-compete agreements are usually prohibited [Flynn 2019]. Non-compete agreements are not prohibited by federal law in Pakistan; Non-compete agreements are typically limited in length, nature, and geographic extent by state laws and court decisions.

The fairness-based notion may be seen in the enforcement of non-competitive agreements in China and Pakistan. During the employee's time with the company, the employer has given them with valuable expertise and information. As a result, the employer has an equitable interest in preventing the loss of their intellectual property to rivals. The non-compete provision is illegal in India, according to the Indian Law of Contracts. Under section 27 of the "Indian Contract Act 1872", any agreement prohibiting a person from engaging in a profession, trade, or authorized business of any sort is invalid to that degree [Kumat 2019].

Non-compete clauses are often included in non-compete agreements in Pakistan. The language of such a provision may vary from prohibiting another business from competing while the limiting party is engaged to prohibiting an individual from working for a competitor after resigning [Caruso 2018].

### Differences between countries are compared

This study of labour regulations revealed a wide range of variations across nations. Thus, despite incentives to adopt comparable safeguards that may arise from mimetic isomorphism and widely recognized notions of justice, all labour laws in various nations do not account for all of their provisions.

Despite the fact that these three nations agree that some days should be declared holidays, the details vary greatly. As a result, establishing a certain number of holiday days is still an example of fairness based on equality, as it is applied equally to all workers; nevertheless, the criterion by which equality may be viewed is applied within nations, not between countries. Furthermore, when it comes to paid vacations, all three nations enable workers to avail paid vacations. However, both China and Pakistan have made this a widespread lawful obligation. While it might be claimed that the notion of justice based on equality is the main motivator of labour regulations

vacation rules in China, since individuals who have worked for their company for a longer period of time receive more vacation. In Pakistan, however, all workers are entitled to 28 days of vacation. Because everyone is treated equally, this seems to be a more equality-based form of fairness.

The need-based argument for fairness, on the other hand, is an alternate rationale for giving paid vacations. Employees, according to the needs-based reasoning, required break from work, since no one can work for the whole year. Employees in many countries seem to have the same urge to take some time off from work. As a result, although the needs-based concept of fairness explains why labour laws should mandate waged holidays, both Pakistan and China have finalized this obligation countrywide. Furthermore, demand-driven reasoning explains why Chinese employees receive more vacation time by working longer hours, while in India; everyone gets at least 28 days of vacation time. Is it more probable that Indian employees need additional vacation time, or is it more likely that their country's lawmakers have chosen to give it as a matter of policy? More in-depth study may go deeper into issues like these. Similarly, all three nations, namely China, India, and Pakistan, need written employment contracts.

This indicates that China and Pakistan are more likely to justify their written contract requirements on the basis of necessity and equity. Non-compete agreements, on the other hand, are governed by federal regulations that vary significantly from country to country. Non-compete agreements are usually enforceable in China, but not in Pakistan, and there is no federal legislation in India that mandates or bans such agreements. Although equality may be the foundation for executing China's non-competition agreements, one might argue that India will not enable them to pursue a more demand-driven strategy.

### Outcomes and Analysis

The research found that many concepts may be used to explain the similarities and variations in labour regulations across nations. All of the nations examined here have comparable structural underpinnings and labour legislation sources. Nonetheless, it is clear that each country's labour laws are intended to offer a framework for resolving power disparity amid workers and companies. However, mostly labour regulations protect employees more than they protect businesses. Employers frequently profit from unequal power imbalances, therefore this is likely to be the case.

As a result, it's not unexpected that most labour rules seem to be written with the fairness views of equality, equity, and necessity in mind. Another reason may be to blame for the disparities between these three nations. Workers in China and Pakistan appear to have superior labour law rights and benefits than employers, according to the laws examined in this research. India, on the other hand, seems to have chosen a different strategy in general. In many sectors, India seems to adopt a more laissez-faire attitude. This implies that labour regulations tend to enable employer-employee interactions to take their own course without being hampered by federal labour rules. The following are some of these areas. In India, businesses are usually not required to pay overtime for hours worked over 8 each day. All employees in India are not entitled to paid holidays or vacations, nor are they required to sign a formal employment contract ([Barrett & Sargeant 2016](#)).

Workers are protected by collective bargaining agreements and certain state laws, however, are entitled to these benefits. Several observers have suggested that there are discrepancies between the officially approved provisions of labour laws and how such laws are actually implemented. Future study will focus on a fair comparison of the actual execution of labour laws' protection and advantages for employees and businesses in various nations. For example, it would be fascinating to see if a more precise system or a more laissez-faire system is more successful in attaining the desired objectives of each country's labour laws.

## Conclusions

This article examined labour laws in China, India, and Pakistan, three large economies with complex and dynamic legal systems. Mimetic isomorphic tendencies were demonstrated to have encouraged each nation to imitate other states labor regulations. Furthermore, widely applicable concepts of justice may be utilized to clarify that different countries have different laws. These concepts include equality of treatment, fairness based on merit, and the protection of employees' needs. The perceived requirements for equality, fairness, and/or needs of workers in each nation may have resulted in both comparable and different labour laws in China, Pakistan, and India. Thus, the driving reasons behind the similarity of form that leads to identical labour regulations may be clarified by fundamental universal standards of justice included in models of equality, fairness, and the demand for justice ([Selznick 2020](#)).

However, the laws in these various nations continue to vary in terms of employee and employer rights. Variations in labour regulations may also be explained by differences in cultural, social, and historical circumstances. Nonetheless, both policymakers and corporate executives must be aware of these parallels and variances. This review of labour laws may help policymakers decide which laws to adopt or what modifications to promulgate regulations based on the law knowing or knowledge that had effectively implemented to different nations. It may also indicate to business leaders that they can offer advantages to their workers that go beyond their country's legal standards and are integrated into the legislation of other countries/regions.



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