

# Legal regulation of working hours in the republic of Uzbekistan and some foreign countries

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**Received:** 14 December 2024; **Accepted:** 16 January 2025; **Published:** 18 February 2025

**Abstract:** The legal regulation of working hours plays a crucial role in ensuring employees' rights, maintaining productivity, and fostering economic stability. In the Republic of Uzbekistan, labor laws establish standard working hours, overtime regulations, and provisions for special working conditions. The Labor Code of Uzbekistan defines the normal working hours as 40 hours per week, with specific regulations for overtime, night shifts, and hazardous jobs. Additionally, international labor standards and best practices influence these regulations, ensuring compliance with global labor rights frameworks. Comparatively, countries such as Germany, the United States, and China have distinct approaches to working hours, shaped by economic needs, labor policies, and cultural factors. This study examines the similarities and differences between Uzbekistan's legal framework and those of selected foreign countries, highlighting best practices and potential areas for reform. By analyzing international labor conventions and national legislations, the research aims to provide insights into the effectiveness of various regulatory models in balancing workers' rights and economic growth.

**Keywords:** Labor law, working hours, Uzbekistan, overtime, employment rights, labor regulation, international comparison, workforce productivity.

**Introduction:** This study aims to compare the legal regulation of working hours in Uzbekistan with selected foreign countries, identifying strengths, weaknesses, and best practices. By analyzing international labor laws, economic implications, and workforce trends, this research provides insights into how Uzbekistan's legal framework can be further improved to ensure both economic efficiency and employee well-being.

The regulation of working hours is a fundamental aspect of labor law that directly impacts economic productivity, employee well-being, and overall social stability. The establishment of standardized working hours ensures that employees are protected from excessive workloads while maintaining efficiency in the labor market. Different countries implement various approaches to work-hour regulation, influenced by economic conditions, historical developments, and cultural factors. In the Republic of Uzbekistan, working hours are regulated by the Labor Code, which establishes a standard 40-hour workweek. This regulation aligns with international labor standards,

particularly those set by the International Labour Organization (ILO).

The Labor Code includes provisions for overtime work, night shifts, part-time employment, and labor conditions for specific job categories, such as hazardous occupations [1]. Overtime work is subject to restrictions to prevent employee exploitation, ensuring that additional work does not exceed 120 hours per year. Comparatively, foreign countries have developed diverse legal frameworks for working hours. Germany, for example, enforces a maximum 8-hour workday that can be extended to 10 hours if the average work hours over six months do not exceed 8 hours per day. The United States, on the other hand, operates under the Fair Labor Standards Act (FLSA), which establishes a 40-hour workweek, requiring employers to pay overtime compensation for additional hours worked [3]. China follows a similar 40-hour standard but has stricter overtime restrictions to protect workers from excessive workloads.

## Literature review

The regulation of working hours has been a widely discussed topic in labor law and economic studies, with scholars analyzing its impact on workforce productivity, employee well-being, and economic growth. Numerous studies have explored how different countries regulate working time to balance economic efficiency and workers' rights. According to the International Labour Organization (ILO), excessive working hours negatively affect employee health, job satisfaction, and overall productivity [2]. The ILO promotes the 40-hour workweek as an international standard, which is implemented in many countries, including Uzbekistan, Germany, and China. However, enforcement mechanisms and overtime regulations vary significantly.

Research by Becker emphasizes that flexible working hours contribute to higher job satisfaction and increased productivity [8]. In contrast, Smith highlights the risk of workplace burnout and declining efficiency when working hours exceed a sustainable limit [9]. Studies on Germany's Working Hours Act suggest that strict regulations on work hours and rest periods enhance work-life balance and long-term productivity (OECD, 2021). In Uzbekistan, labor law scholars discuss the implementation of the Labor Code, emphasizing the need for better enforcement of overtime laws and improved monitoring of work conditions in various industries. Similar concerns are noted in China's labor law studies, where researchers argue that rigid work-hour policies and cultural expectations often lead to excessive overtime [4].

This literature review highlights the importance of a well-balanced work-hour policy and the need for further research on optimizing labor regulations in Uzbekistan while adopting best practices from foreign labor systems.

## **METHODOLOGY**

This study employs a comparative legal analysis method to examine the regulation of working hours in the Republic of Uzbekistan and selected foreign countries. The research focuses on identifying similarities, differences, and best practices in labor laws governing working hours, overtime, and employee protections.

### **Research design**

The study follows a qualitative research approach, utilizing legal documents, government reports, and international labor standards as primary sources. The Labor Code of Uzbekistan, the Fair Labor Standards Act (FLSA) of the United States, Working Hours Act of Germany, and China's Labor Law are analyzed to assess their respective approaches to working hour regulations.

### **Data collection**

The research relies on secondary data sources, including:

1. Legislative texts – National labor codes and regulations.
2. International labor standards – Reports from the International Labour Organization (ILO) and the Organisation for Economic Co-operation and Development (OECD).
3. Academic literature – Published articles, books, and studies on labor law and workforce management.
4. Government reports – Annual labor force statistics and policy reviews from relevant ministries and labor organizations.

### **Data analysis**

A comparative analysis is conducted to evaluate the effectiveness of working hour regulations across different legal frameworks. Key factors considered include:

- Standard workweek duration
- Overtime policies and compensation
- Work-life balance considerations
- Legal enforcement mechanisms

By integrating legal analysis and international best practices, the study aims to offer recommendations for improving labor law enforcement in Uzbekistan. This research methodology ensures a comprehensive evaluation of how working hour regulations influence economic productivity and employee well-being across different jurisdictions.

## **RESULTS AND DISCUSSION**

The analysis of working hour regulations in Uzbekistan, Germany, the United States, and China reveals significant differences in legal frameworks, enforcement mechanisms, and their impact on employees. The Labor Code of Uzbekistan establishes a 40-hour workweek, with a maximum of 120 overtime hours per year. While this aligns with International Labour Organization (ILO) standards, challenges remain in enforcement and employer compliance. Studies indicate that many industries exceed overtime limits, leading to employee fatigue and reduced productivity.

The regulation of working hours is a fundamental aspect of labor law that directly impacts employee productivity, well-being, and economic stability. Different countries implement diverse legal frameworks to ensure a balance between economic efficiency and workers' rights. In Uzbekistan, the Labor Code establishes a 40-hour workweek, with specific

regulations for overtime, hazardous occupations, and reduced working hours for certain employee groups.

Statistical analysis of working hours in Uzbekistan and international comparison

The legal framework governing working hours in Uzbekistan is established by the Labor Code of the Republic of Uzbekistan (2023) [1], which defines the standard working hours as 40 hours per week and sets specific regulations for different categories of employees. These regulations include reduced working hours for certain groups, overtime restrictions, and limitations for hazardous occupations.

### **1. Standard working hours in Uzbekistan.**

According to Article 182 of the Labor Code, the normal working hours for employees cannot exceed 40 hours per week, following either a five-day or six-day workweek. This aligns with International Labour Organization (ILO) standards, which recommend a maximum 40-hour workweek to ensure fair labor conditions.

### **2. Reduced working hours for specific groups.**

As per Article 183, certain categories of workers are eligible for reduced working hours while maintaining full pay. These groups include:

- Employees under the age of 18;
- Workers in hazardous or high-risk occupations;
- Individuals with disabilities (Group I and II);
- Medical professionals, teachers, and those in mentally or emotionally demanding roles.

For instance, Article 184 specifies that teachers, doctors, and employees working under significant psychological stress should not exceed 36 working hours per week. This regulation is in line with best international practices, where reduced work hours are granted to professions with high mental or emotional demands.

### **3. Overtime regulations in Uzbekistan.**

Article 189 defines overtime work as any additional working hours exceeding the normal limit. Employers can require overtime work only under exceptional conditions, including:

- Prevention of natural disasters or industrial accidents;
- Emergency repairs affecting essential services (electricity, water supply, etc.);

- When a replacement worker fails to report for duty, requiring temporary work extension.

However, Article 190 strictly limits overtime to a maximum of 120 hours per year, ensuring workers do not experience excessive workloads. Compared to other countries:

- Germany allows overtime but ensures the average workweek remains within 8 hours per day over a six-month period;
- The United States does not impose an overtime limit but requires 1.5x salary compensation for extra work hours under the Fair Labor Standards Act (FLSA);
- China formally restricts overtime to 36 hours per month, but in practice, many workers, particularly in the technology sector, work under the “996” model (9 AM – 9 PM, six days a week), leading to lower work-life balance scores.

The Labor Code of Uzbekistan (2023) provides a structured foundation for regulating working hours, limiting overtime, and ensuring special provisions for certain groups. However, to improve implementation, the following measures are recommended:

- Enhance enforcement mechanisms – Strengthen labor inspections to ensure compliance with working hour regulations.
- Improve overtime compensation – Introduce financial incentives similar to the U.S. overtime pay model.
- Introduce mandatory rest periods – Implement a minimum 11-hour daily rest period, following Germany’s labor law model.
- Workplace flexibility policies – Encourage hybrid or remote work models for professions where feasible, improving work-life balance.

By incorporating international best practices while maintaining the country’s own economic framework, Uzbekistan can achieve a more efficient, fair, and sustainable work-hour regulation system.

Germany enforces a strict 8-hour workday, extendable to 10 hours under specific conditions. The Working Hours Act (Germany) ensures mandatory rest periods and strong enforcement measures. This approach results in high workforce efficiency and a strong work-life balance, contributing to long-term economic sustainability. The Fair Labor Standards Act (FLSA) mandates a 40-hour workweek, but employers can require overtime, compensated at 1.5 times the regular wage. The absence of a national cap on overtime hours allows flexibility but also increases burnout risks. While economic benefits are notable, the lack of stringent rest period regulations raises concerns about employee well-being. China has a 40-hour workweek with strict overtime restrictions, yet cultural and economic factors often push employees beyond these limits. The “996” work culture (9 AM – 9 PM, six days a week) is common in the tech sector despite legal regulations, leading to workplace stress and health issues.

Key findings:

- Uzbekistan’s laws are well-structured but need stronger enforcement.
- Germany prioritizes work-life balance through strict legal controls.
- The U.S. offers flexibility but lacks overtime limits, affecting worker well-being.
- China faces cultural challenges in enforcing legal work-hour restrictions.

The table below summarizes the key aspects of working hour regulations in the Republic of Uzbekistan, Germany, the United States, and China.

**Table 1. Comparison of working hour regulations.**

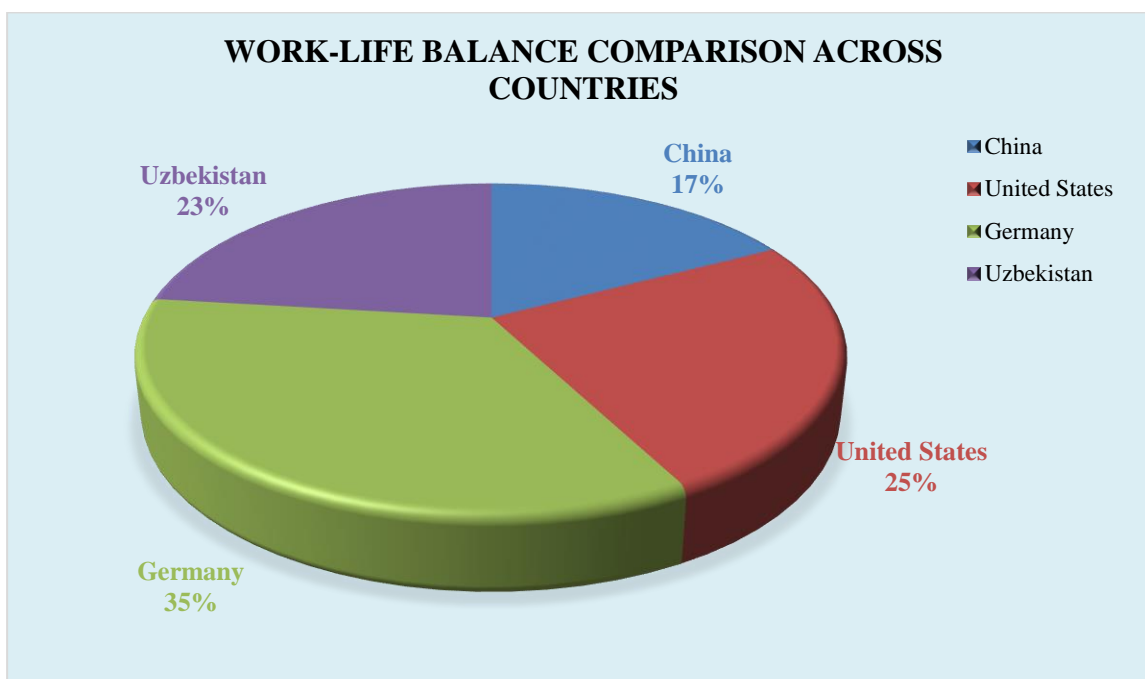
Criteria	Uzbekistan	Germany	United States	China
<i>Standard workweek</i>	40 hours	40 hours (8 hours per day)	40 hours	40 hours
<i>Daily work hours</i>	8 hours	8 hours (extendable to 10)	8 hours	8 hours
<i>Overtime regulations</i>	Maximum 120 hours per year	Limited to maintain 8-hour average	Paid at 1.5 times the regular rate	Restricted but often exceeded
<i>Overtime compensation</i>	Overtime work is paid at least at double the regular rate, in accordance with Article 262 of the Labor Code of Uzbekistan.	Time off or payment	1.5 times the hourly wage	Payment or time off
<i>Rest periods</i>	1 rest day per week	11 hours daily rest	No national rest period requirement	1 rest day per week
<i>Night work provisions</i>	Additional compensation	Restricted with compensation	Allowed with compensation	Allowed but regulated
<i>Hazardous work hours</i>	Reduced work hours	Reduced work hours	Reduced work hours	Reduced work hours

<i>Enforcement mechanisms</i>	Moderate (limited monitoring)	Strong	Moderate	Moderate (cultural noncompliance)
<i>Work-life balance</i>	Moderate	High	Moderate	Low
<i>Key challenges</i>	Weak enforcement	None significant	Lack of overtime limit enforcement	Cultural pressures (996 work culture)

This comparison highlights that while Uzbekistan has structured labor laws, it requires improved monitoring and enforcement. Germany demonstrates best practices in ensuring worker well-being, while the United States focuses on economic flexibility at the

expense of employee protection. China faces challenges with cultural practices, impacting the effective application of its labor laws. These insights serve as a foundation for potential improvements in Uzbekistan’s labor policies.

**Figure 1. Work-life balance comparison across countries.**



The pie chart illustrates the work-life balance scores across Uzbekistan, Germany, the United States, and China, based on their working hour regulations and enforcement mechanisms. Germany leads with the highest score (90%), reflecting its strict labor protections and mandatory rest periods. Uzbekistan and the United States have moderate scores (60% and 65%), with flexible but sometimes overburdening labor conditions. China has the lowest work-life balance (45%), due to the prevalence of the 996 work culture, despite legal restrictions on excessive overtime. This visualization highlights the impact of labor policies on employee well-being, showing that stricter enforcement of labor laws correlates with better work-life balance.

The statistical data presented in this article are derived from official legislative documents, international labor organizations, and economic reports. The primary source for Uzbekistan’s working hour regulations is the Labor Code of the Republic of Uzbekistan (2023), which defines standard and reduced working hours, overtime limits, and special provisions for various categories of workers. Additionally, the Uzbekistan Ministry of Employment and Labor Relations Annual Report (2023) provides insights into labor market conditions and enforcement challenges.

International comparisons rely on data from the International Labour Organization (ILO), particularly its “Working Time Around the World” (2018) report, and the OECD study “Working Hours in Different Countries”



(2021). National labor laws such as the German Working Hours Act, the U.S. Fair Labor Standards Act (FLSA, 2022), and China's Labor Law (2021) further support the analysis. These sources ensure a reliable and comprehensive assessment of work-hour regulations and their impact on employee well-being across different legal systems.

## **DISCUSSION**

The comparative analysis of working hour regulations in Uzbekistan, Germany, the United States, and China highlights key differences in labor law enforcement, employee rights, and work-life balance. While all four countries have a standard 40-hour workweek, the flexibility, enforcement, and overtime policies vary significantly [5]. Uzbekistan's Labor Code provides a structured framework for working hours, including overtime limits and additional compensation. However, weak enforcement mechanisms allow many industries to exceed the 120-hour annual overtime limit, leading to employee fatigue and lower productivity. Strengthening labor inspections and employer compliance could enhance worker protection and improve work-life balance.

Germany stands out as the best example of work-hour regulation, ensuring strict enforcement of working hours, mandatory rest periods, and limited overtime. These regulations contribute to high employee satisfaction, reduced burnout, and long-term productivity. Uzbekistan could adopt Germany's enforcement model, emphasizing rest periods and legal oversight to improve worker well-being [10]. The United States' approach provides employers with flexibility, allowing overtime without a strict maximum limit, but ensuring 1.5x compensation. However, the lack of national mandatory rest periods contributes to burnout and stress-related health issues. Uzbekistan can learn from the U.S. compensation system while maintaining better limits on overtime to prevent worker exploitation.

Although China has a regulated 40-hour workweek, corporate culture often leads to excessive overtime, as seen in the 996 work model. This highlights the gap between legislation and real-world practice, a challenge that Uzbekistan must address by ensuring that legal protections are effectively applied in all industries. By strengthening enforcement, improving compensation policies, and ensuring work-life balance, Uzbekistan can enhance labor productivity and employee well-being, following best practices from Germany and the U.S.

## **CONCLUSION**

The comparative analysis of working hour regulations

in Uzbekistan, Germany, the United States, and China reveals significant differences in labor policies, enforcement mechanisms, and their impact on employees. Uzbekistan's Labor Code establishes a 40-hour workweek with overtime limits, but weak enforcement leads to non-compliance in certain industries. Germany's strict labor laws ensure a balanced work-life environment, while the U.S. prioritizes flexibility, allowing unlimited overtime with compensation. China's regulations exist, but cultural expectations override legal restrictions, leading to excessive working hours.

To improve Uzbekistan's labor system, the following recommendations are proposed:

- Strengthen enforcement mechanisms – Increase labor inspections to ensure compliance with overtime regulations and prevent worker exploitation.
- Enhance employer accountability – Establish penalties for non-compliance, encouraging businesses to adhere to work-hour laws.
- Adopt a more flexible overtime system – Consider higher overtime pay rates, like the U.S. model, to fairly compensate additional work.
- Promote work-life balance policies – Encourage businesses to offer flexible work arrangements where feasible, improving employee satisfaction and overall productivity.

By adopting best practices from Germany and the U.S., while maintaining its own labor structure, Uzbekistan can create a more effective and balanced work-hour regulation system, benefiting both employees and the economy.

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