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THE CODE ON WAGES, 2019: AN ANALYSIS

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ABSTRACT

Indian wage law used to be a genuine mess. Four separate statutes, each with its own habit, meant employers spent more time figuring out which rule applied than actually paying people fairly and plenty of workers simply slipped through the gaps between them. The Code on Wages set out to fix this by folding all four into one statute. What I find most significant though isn't the consolidation itself but who now falls under it: - the Code widens the definitions of "employer" and "employee" enough that formal and informal workers finally sit under the same protective framework. Parliament passed it back in 2019, yet it sat unenforced for six years before finally taking effect on 21 November 2025, alongside the three other labour codes.

Real economic growth can't mean lifting some workers while others are left behind, that approach doesn't close gaps it widens them. None of this is a new insight either. Article 43 of the Constitution rose the same concern decades before the Code existed, calling for wages that let people live with dignity rather than merely survive. The logic holds up on its own terms to a worker who feels financially secure tends to invest more in their work, not just clock in and out. Seen this way industrial democracy stops being some abstract ideal on a syllabus and starts looking like a basic condition for a society that actually wants to call itself fair.

Economic history backs this up in its own quiet way. When wages stay pinned at subsistence level for too long, that's rarely a sign of a healthy economy - it's usually an early sign of decline. The Code on Wages appears to take that lesson seriously, framing wage protection as part of long-term growth strategy rather than treating it as a cost to be trimmed wherever possible. Its connection to Digital India reinforces this, since enforcing these protections at scale now depends heavily on digital infrastructure. Whatever practical difficulties come up during rollout, the direction the law is pointed in still seems like the right one.

1. INTRODUCTION

The Code on Wages, 2019 brings together four separate pieces of labour legislation into a single framework: the Payment of Wages Act, 1936, the Minimum Wages Act, 1948, the Payment of Bonus Act, 1965, and the Equal Remuneration Act, 1976. With this Code taking effect, all four of these earlier statutes stand repealed. The underlying aim of the Code is to create a uniform system for timely wage payment and guaranteed minimum wages that applies across sectors and is not limited by any wage ceiling. Because its reach extends across such a broad range of industries, understanding its central features has become essential for employers and workers alike. Lawmakers pursued this consolidation for two main reasons: first, to modernise legislation that had grown out of step with contemporary economic conditions, and second, to resolve the inconsistent definitions that different statutes had assigned to identical terms. The overarching goal was to strengthen productivity and support broader economic growth. Though Parliament passed the Code back in August 2019, it did not actually become operative law until the Government notified it — together with the Industrial Relations Code, the Code on Social Security, and the Occupational Safety, Health and Working Conditions Code — on 21 November 2025, simultaneously repealing twenty-nine older central labour statutes in one of the largest single-day legislative consolidations in India's history.[1]

India continues to face a wage crisis that bears heavily on its informal workforce.[2] The Code represents an attempt to respond to several dimensions of that crisis. Wages and productivity sit at the heart of worker welfare and business sustainability alike, since the fundamental reason people seek employment is to secure a dignified standard of living. Income earned through work serves that purpose in two ways: it allows workers to meet their basic needs, and it assures them that they are being fairly compensated for their labour's contribution to the broader welfare of the state. Correspondingly, the state carries a duty to guarantee fair wages and decent living standards, both to develop human capital and to advance the economic goals that would otherwise remain out of reach. At the same time, the wages an enterprise can offer are naturally constrained by its economic viability and profitability. Every business must therefore weigh its capacity to pay against both the imperative of fair compensation and its broader social responsibilities.

2. Tracing the History of Wage Legislation in India

India's engagement with wage regulation dates back to the 1860s, when the government passed the Employers' and Workmen's (Disputes) Act. This measure was largely enabling in character, empowering magistrates to resolve wage-related disputes summarily, while also creating penal consequences for workers who breached their contracts. By 1929, the Royal Commission on Labour — convened as the Industrial Disputes Act was taking shape — confirmed that this older Act had effectively fallen into disuse.[3] Around the same period, the Bengal and Bombay provincial governments, in 1921 and 1922 respectively, turned their attention to legislating around industrial dispute resolution and the creation of wage boards. This led to the establishment of Boards of Conciliation and Courts of Inquiry tasked with resolving industrial disagreements. Provincial governments assumed statutory authority in this space to mediate between labour and management and create a level playing field for dispute resolution. Taken together, these developments laid important groundwork for the evolution of India's wage protection policies.

During the Second World War, the Defence of India Rules gave the government expanded powers to keep industrial production running without interruption.[4] As the interim government took shape, it announced a five-year legislative and administrative programme in September 1946, built around several key commitments:

1. Requiring sweated industries to comply with statutory minimum wage requirements.

2. Standardising wages and employment terms across major industries, while establishing appropriate wage differentials between different occupational levels within a given industry.

3. Promoting "fair wages" wherever industrial capacity allowed, with due regard to each industry's ability to pay.

To address deteriorating industrial relations and preserve both peace and productivity, a tripartite conference was convened. Its resolution held that wage-setting mechanisms should serve the interests of both consumers and producers, that excessive profits ought to be curbed through taxation and similar measures, and that cooperative effort between employers and workers was essential to securing fair compensation alongside reasonable returns on industrial capital.[5] The Industrial Policy Resolution that followed placed particular emphasis on establishing statutory minimum wages and encouraging fair wage agreements within the organised sector.[6]

3. The Committee on Fair Wages: Living Wage, Minimum Wage, and Fair Wage as a Triad

Looking at wealthier nations, the Committee noticed something worth borrowing: wages there tended to track two things closely — what industries could actually afford, and what workers in comparable jobs were already earning. They brought that same thinking into the Indian context and arrived at a fairly practical conclusion. A minimum wage couldn't just keep someone alive; it had to leave enough room for that person to stay productive over time. Practically speaking, that meant building in some allowance for schooling, medical care, and other things people genuinely need to function well, not just survive.

From there, the Committee laid out a rough framework. Minimum wages would mark the floor, below which nothing could fall, while what an industry could realistically afford — weighing both its current position and where it seemed headed — would set the upper limit. Somewhere between those two points, actual wages would get worked out, and a handful of factors would shape exactly where: what similar work paid nearby, how much labour was available, how national income was spread across the economy, and where the industry sat geographically and financially.[9] When collective bargaining happened properly, without one side having disproportionate leverage, the resulting wages tended to land close to what the Committee considered fair.[10] Where that balance broke down — say, because workers lacked real bargaining power — formal wage-fixing machinery was meant to step in and correct it.

The Supreme Court took up this exact question of what a minimum wage should actually cover in Unichoyi v. State of Kerala.[11] Testimony before the Committee split into two camps. A smaller group argued minimum wages should stick to life's essentials and nothing more. Most witnesses disagreed, insisting comforts like a child's schooling or basic medical treatment belonged in the calculation too. The Committee came down on the side of the majority, and that broader interpretation has stuck ever since, shaping how industrial tribunals have approached the issue. At bottom, the Act was never meant to do just one job — it's meant to keep the worker going and, just as importantly, keep the household around them stable enough that the worker stays effective over the long run.

4. Understanding the Framework of Wage Fixation

Kamani Metals Ltd. v. Their Workmen[12] put the difficulty of this exercise plainly. Setting a wage structure means walking a line: on one side sits the basic demand of social justice, that workers get paid enough to actually improve their lives, and on the other sits a harder economic truth — pile too much wage burden onto an industry, and you start pulling capital away from places where it could have done more good. Making things messier still, no two situations look alike. A factory in one state faces completely different pressures than one in another, and the same goes for different industries and even individual firms within the same industry. Faced with that much variation, courts have had to work out some general rules over time just to keep things manageable. The most basic one is straightforward: every worker gets a minimum wage, period, regardless of whether the business employing them is a small outfit or a large, well-funded one. Size and financial standing don't factor into it. This is the floor, and nothing is allowed to go below it.

There's a second rule sitting alongside that first one, and it's a bit more nuanced. Wages also need to be "fair" — enough to cover decent food, clothing, and shelter, and enough to keep a worker functioning well through access to things like education and basic healthcare — but this has to stay within what the particular type of establishment can actually afford to pay. So really, two things end up shaping a fair wage: how much a business can earn, and how demanding the work itself is. And it's worth being clear that "fair wage" isn't the same thing as "living wage." A living wage goes further, aiming not just to keep someone afloat but to give them some real comfort and a bit of a safety net for emergencies or old age. Fair wage sits somewhere in between — above the hard floor of the minimum wage, but below the more ambitious target the living wage represents.

The Supreme Court added more texture to this in Killick Nixon Ltd. v. Union,[13] pointing to several other things worth weighing when fixing wages: how wages compare nationally, what's driving wage levels within that specific industry, how much relief different salary brackets get from rising costs, how much sacrifice it's reasonable to ask of workers for the sake of the wider public good, what serves the national economy best, and finally, whether the company itself can actually absorb the extra financial load.

5. Key Features of the Code on Wages, 2019

• A Unified Definition of "Wages"

One of the Code's central achievements is establishing a single, consistent definition of "wages" that now applies uniformly across what were previously the Payment of Bonus Act, the Minimum Wages Act, and the Payment of Wages Act. Under this definition, if total remuneration — excluding gratuity and retrenchment compensation — includes components exceeding 50% (or another threshold the Central Government may notify) of the total, the portion above that threshold must be treated as "wages" for purposes of the Code. Employers designing compensation structures need to pay close attention to this rule. The Code on Wages (Central) Rules, 2026, notified on 8 May 2026, have since operationalised this and related provisions, prescribing formats for wage slips and statutory registers and standardising how the daily wage is converted into hourly and monthly figures — the hourly rate is derived by dividing the daily wage by eight, and the monthly rate by multiplying the daily wage by twenty-six.[14] The Code also introduces separate definitions for "employee" and "worker."[15] Notably, "employee" is defined more broadly than "worker," extending to those engaged in supervisory or administrative functions. Working journalists and sales promotion employees are explicitly brought within the definition of "worker."

The Code defines "contract labour" as workers — other than regular part-time employees — engaged by a contractor for work at an establishment, with employment terms and social security coverage governed accordingly. Curiously, beyond this definition, the term "contract labour" does not otherwise appear substantively elsewhere in the Code.

• Equal Remuneration Provisions

Consistent with the Equal Remuneration Act, the Code prohibits wage discrimination between employees performing the same or similar work, and similarly bars discriminatory recruitment practices for such roles.[16] It is worth noting that under the earlier Act, "remuneration" was defined somewhat loosely to include wages, salary, and any additional payments in cash or kind. Under the new Code, however, the components that count as "wages" for equal remuneration purposes leave some room for ambiguity. The Supreme Court's decision in **Vishaka & Ors. v. State of Rajasthan[17]** remains instructive here: the Court held that workplace harassment of women constitutes a violation of fundamental rights, undermining

gender equality and the right to life and liberty, and that such incidents logically also implicate the right to practise any profession under **Article 19(1)(g).**

• Determining Minimum Wages and the Floor Wage

The process by which the appropriate government determines minimum wages under the Code closely mirrors the procedure previously followed under the Minimum Wages Act. Crucially, no government can fix a minimum wage below the floor wage set by the Central Government, and where an existing minimum wage already exceeds that floor, it cannot be reduced to match it.[18] In practice, however, this floor-wage guarantee remains a work in progress: although the Code on Wages (Central) Rules, 2026 lay out how the floor wage is eventually to be fixed — based on minimum living standards covering food, clothing, and housing, in consultation with a Central Advisory Board and the state governments, and revised at intervals of no more than five years — the Central Government had, as of mid-2026, still not notified an actual floor-wage figure. Until it does, the older National Floor Level Minimum Wage of roughly ₹176 to ₹178 a day, fixed in 2017 continues to operate only as an advisory benchmark, and the wage that actually binds an employer remains whatever figure the relevant state government has separately notified for that skill category and geographic zone.[19] Because labour sits in the Concurrent List, enforcement of the Code more generally has also proceeded unevenly across states — some have already notified their own rules aligned with the central framework, while others were, as of mid-2026, still working from drafts.[20]

• Claims, Penalties, and Enforcement

The Code does away with the old patchwork of claims authorities and replaces it with one (or in some cases several) appointed by the appropriate government. Interestingly, it also flips the usual burden of proof: it's now up to the employer to show that wages, bonus, or other dues were actually paid, not up to the worker to prove they weren't. If either side is unhappy with how a claim is decided, they have ninety days to appeal to the Appellate Authority, and once an amount is confirmed as owed, it can be recovered the same way arrears of land revenue are collected. Workers also get more time to act: the limitation period for filing a claim now stands at three years, a substantial jump from some of the older Acts, which gave workers as little as six months.

Penalties follow a similar rethink. Rather than treating every violation as a criminal matter, the Code grades punishments and leans toward decriminalisation where it reasonably can. A first instance of underpayment draws

a fine of up to ₹50,000, but if it happens again within five years, the employer could face a fine up to ₹1,00,000, imprisonment for up to three months, or both. Obstructing an Inspector-cum-Facilitator is treated more seriously, with fines reaching ₹1,00,000, while contraventions that don't fall into a specific category attract a fine capped at ₹20,000. Most of these offences aren't a one-way ticket to prosecution, though: they can typically be compounded, meaning the employer pays roughly half the maximum fine and the matter ends there. That option disappears for repeat offenders, and even for a first-time lapse, the law requires that the employer be given a chance to fix the problem before any prosecution begins.[21]

• The Constitutional Foundations of Wage Legislation

India's Directive Principles of State Policy, operating alongside the Fundamental Rights, provide the constitutional bedrock for social welfare legislation of this kind.[22] The role of the state has evolved dramatically from a narrow "night-watchman" model — limited to policing and basic administration — into that of a comprehensive welfare state involved in nearly every aspect of a citizen's life.[23] Modern industrial jurisprudence in India is grounded in the pursuit of socio-economic equality, aiming to resolve the competing interests of employers and workers through fair and equitable means that preserve industrial peace and, in turn, support sustained economic growth.[24]

The Supreme Court has repeatedly invoked Articles 42 and 43 of the Constitution in expressing concern for worker welfare. Article 21, read together with Article 42, has been interpreted expansively to encompass the right to live with dignity. Article 42 not only prohibits discriminatory employment practices but has also been instrumental in protecting workers' interests during pregnancy, providing much of the constitutional impetus behind the Maternity Benefit Act, 1961.

Article 43 directs the state to work — whether through legislation, economic organisation, or other means — toward securing workers a living wage that allows for leisure and social wellbeing. The Minimum Wages Act, 1948 was itself a response to the exploitation and social injustice faced by unorganised labour, mandating minimum wage payments irrespective of an employer's capacity to pay. In **Hindustan Antibiotics v. Workmen**,[25] the Supreme Court rejected the argument that wage fixation in public sector undertakings should differ from that in private companies, reasoning that such a distinction would run counter to Articles 39 and 43. When the constitutional validity of minimum wage fixation was challenged as an unreasonable restriction on the freedom of trade under Article 19(1)(g), the Court held that although such fixation does constrain that freedom, the restriction is reasonable given the public interest at stake and its alignment with the Directive Principle in Article 43.[26]

Labour falls within the Concurrent List under India's constitutional scheme, meaning both state and central governments hold law-making authority over it. The Code seeks to convert older, fragmented laws into a more transparent and accountable structure, extending minimum wage protection regardless of where a worker is employed. It now governs wages and bonus payments across any trade, industry, business, or manufacturing activity — whereas previously, differing definitions across establishments created considerable litigation and administrative burden. The Code goes some way toward easing that complexity.

The Code upholds every worker's right to basic sustenance,[27] regardless of the establishment they work for, while offering statutory protection for minimum wages. One of its more notable features is that minimum wage fixation now accounts for both geographic region and worker skill level. To promote transparency and accountability, the Code also introduces digital inspection mechanisms, including computerised, jurisdiction-neutral inspections that rely on electronically shared information, such as fee assessments and related data. It bars gender-based discrimination in both wage payment and recruitment for comparable work. Ultimately, when the state's constitutional obligations and citizens' moral responsibilities work in tandem, society as a whole benefits.[28]

6. Benefits of the Code on Wages, 2019

Whatever criticisms the Code has attracted — and it has attracted several, discussed below — it is worth setting out plainly what it actually improves upon, for workers, employers, and the wider economy alike.

3 **For workers:**

- **Minimum wage coverage that actually applies to everyone.** No matter which sector someone works in, how big their employer is, or whether their pay crosses some old wage ceiling, they're now guaranteed a minimum wage. That's a real step up from the earlier Minimum Wages Act, which only covered a fixed list of "scheduled employments" and left plenty of workers outside its reach entirely.
- **A real foothold for informal workers.** Since protection is no longer tied to being in a scheduled industry, workers in the informal and unorganised economy — arguably the group labour law has historically served worst — are finally brought into the fold. Gig

and platform workers get similar recognition through the connected Code on Social Security.[29]

- **Wages that are harder to fudge.** Fixed wage periods, compulsory digital wage slips, and clearly capped deductions together make it much tougher for an employer to quietly delay payment or under-report what's owed, since there's now a digital trail to check against.
- **Getting justice doesn't take forever anymore.** With one claims authority replacing the old scattered system, the burden of proof shifted onto the employer, and three years instead of a few months to actually file a claim, a worker who's been shortchanged has a realistic shot at pursuing it.
- **Equal pay that doesn't bend by gender.** The protections against gender-based pay and hiring discrimination under the old Equal Remuneration Act haven't just carried over — they've been reinforced.

For employers:

- **Four laws collapsed into one.** Businesses no longer have to juggle separate compliance checklists, registers, and inspecting bodies across four different statutes. Having it all under one roof cuts down a lot of the repetitive paperwork.
- **Fewer fights over definitions.** Because "wages" now means the same thing everywhere instead of shifting depending on which Act you're reading, a lot of the old disputes over how bonus, gratuity, or PF should be worked out simply don't come up anymore.

• Digitised, less discretionary inspections. Web-based, jurisdiction-neutral inspections and electronically maintained records reduce opportunities for arbitrary or repetitive physical inspections, and create a more predictable compliance environment.

• Decriminalisation of minor lapses. The compounding of most offences — allowing first-time or minor contraventions to be settled through a fine rather than prosecution — reduces employers' exposure to criminal liability for procedural or inadvertent lapses.

For the economy and the state:

• Support for the Ease of Doing Business agenda. Simplified, digitised compliance is expected to help India's standing on international ease-of-doing-business benchmarks, a stated objective behind the broader labour codes reform.

• Formalisation of the informal economy. By bringing unorganised and gig workers within a recognised legal and, increasingly, social-security framework (via e-Shram registration and aggregator contributions), the Code supports a gradual shift of informal employment into a more visible, better-protected, and more easily taxed part of the economy.[30]

• Alignment with Digital India. The Code's reliance on electronic wage slips, digital registers, and web-based inspection dovetails with the government's broader digitisation push, and creates the underlying data infrastructure — such as the e-Shram portal — that other welfare schemes can subsequently build upon.

• A foundation for further reform. As the first of the four labour codes to be enacted, the Code on Wages effectively set the template — on definitions, on claims mechanisms, on digital compliance — that the Industrial Relations, Social Security, and Occupational Safety Codes have since built upon.

7. Recent Developments and Ongoing Debate (2025–2026)

The Code's real test began only once it was actually notified. Central rules under the Code remained in draft for several months after the Code itself came into force: the Ministry published the draft Code on Wages (Central) Rules, 2025 for public consultation on 30 December 2025, before finalising the Code on Wages (Central) Rules, 2026 on 8 May 2026.[31] A complementary and much-discussed development has been the formal recognition of gig and platform workers — for the first time in Indian labour law — under the linked Code on Social Security, with aggregators such as ride-hailing and delivery platforms now required to register workers on the e-Shram portal and contribute toward a social security fund capped at 5% of amounts paid to such workers. Onboarding has been gradual: several major platforms had registered by mid-2026, though enrolment still represented a modest fraction of the country's estimated gig workforce, which the government expects to more than double by the end of the decade.[32]

The reform has not gone unchallenged. Ten central trade unions, banding together on a joint platform that included AITUC, INTUC, CITU, and HMS, called a nationwide general strike

on 12 February 2026. Coal mining, banking, ports, and transport all felt the disruption across several states. Their argument centered on a few specific grievances: the codes raise the thresholds before key protections even kick in, they open the door wider for fixed-term and contract hiring, and they make union registration and collective bargaining harder through added procedural steps. Not everyone agreed with that reading, though. The government, along with unions aligned with it such as the Bharatiya Mazdoor Sangh, pushed back with the opposite framing — calling this a modernisation that was long overdue and one that finally brings protection to workers the law used to simply ignore. Employer groups weighed in from yet another angle, worried less about the substance of the reform and more about how fast it's being rolled out, especially given what the transition could cost smaller and mid-sized businesses.[33]

Strip away the politics for a moment, though, and the Code's actual design still holds up well. A single definition of wages, a statutory floor wage, quicker claims resolution, and compliance handled digitally — these are genuine upgrades over the tangled system that came before. But design on paper is one thing; delivery is another. Whether the Code lives up to what it promises hinges on a few open questions: how soon the floor wage actually gets notified, whether states bring their own rules in line with the central framework instead of dragging their feet, and how well the government manages the pushback it's still facing.

Conclusion

India had too many overlapping wage laws for too long, so bringing them together into a single Code made sense as a reform. Now that it's actually in force, employers don't have to deal with several regulatory bodies just to stay compliant, and the confusing mix of definitions that used to trip everyone up is gone. That alone should make running a business simpler and make legal obligations easier to actually understand. Maintaining separate registers across four different laws is also a thing of the past now.

The Code goes further than what came before it in another way too — it reaches unorganised sector workers, who can no longer legally be paid below whatever minimum wage the appropriate government has set. White-collar employees are covered as well, which suggests lawmakers wanted this protection to reach nearly every kind of worker, and that's a genuinely good sign for where Indian labour law is headed. Still, it's worth flagging one issue that could cause friction down the line: the 20% cap on bonus payments might end up shortchanging

employees who perform well above average. And there's a bigger gap too — since the floor wage hasn't actually been notified yet, one of the Code's biggest promises is, for now, only half-kept.

Footnotes

1. Government of India, Ministry of Labour and Employment, notification dated 21 November 2025 bringing the Code on Wages, 2019, the Industrial Relations Code, 2020, the Code on Social Security, 2020, and the Occupational Safety, Health and Working Conditions Code, 2020 into force, and simultaneously repealing twenty-nine central labour statutes; see DLA Piper GENIE, 'New Labour Codes Usher in a New Era of Compliance' (2025) and Lexology, 'Labour Codes Go Live' (22 November 2025).

2. According to the National Sample Survey Office (2010), roughly 49% of India's 400 million-strong workforce depends on wages for basic subsistence.

3. The Royal Commission on Labour was constituted in 1928, chaired by H. H. Whitley, with N. M. Joshi and Dewan Chaman Lal as members.

4. Rule 81A of the Defence of India Rules, issued January 1942.

5. The Industrial Truce Resolution was adopted at a government-convened meeting in December 1947.

6. Industrial Policy Resolution announced 6 April 1948.

7. As defined by the International Labour Organisation, the minimum wage is the least amount of remuneration an employer must pay a worker for work performed in a given period, which cannot be reduced by contract or collective agreement.

8. Secunderabad Club v. State of Andhra Pradesh (1997) I LLJ 434.

9. Ministry of Labour and Employment, Report of the National Commission on Labour (2002).

10. Ananda Prakash, Labour Law and Labour Relations (1987) 82.

11. Unichoyi v. State of Kerala (1961) I LLJ 631.

12. Kamani Metals & Alloys Ltd. v. Their Workmen (1967) 2 S.C.R. 463.

13. Killick Nixon Ltd. v. Union (1975) LLJ 53 SC.

14. Code on Wages (Central) Rules, 2026, G.S.R. 343(E), notified 8 May 2026 under s. 67 of the Code on Wages, 2019; see TeamLease RegTech, 'Code on Wages (Central) Rules, 2026' (May 2026) and PRS Legislative Research, 'Code on Wages (Central) Rules, 2026' summary.

15. The Code on Wages Act, 2019, s. 2(k).

16. Equal Remuneration Act, 1976, s. 4.

17. Vishaka & Ors. v. State of Rajasthan (1997) 6 SCC 241.

18. Ministry of Labour and Employment, Report on the Working of the Minimum Wages Act, 1948 (2013).

19. See CalcGuru, 'Minimum Wages in India (2026) — Rates, Floor Wage, Skills & State Guide' and Lawsikho, 'Minimum Wages & the National Floor Wage: Wage Code 2026', both noting the floor wage remained un-notified as of mid-2026, with the 2017 National Floor Level Minimum Wage of approximately ₹176–178/day continuing as a non-binding reference figure.

20. See Beacon Filing, 'India Labour Code Tracker: State Status 2026' and Omnivoo, 'India Labour Codes Implementation Status 2026', tracking state-by-state variation in rule notification as of mid-2026.

21. See Medium (Anushka J.), 'Offences and Penalties under the Code on Wages, 2019' (2026); Shardul Amarchand Mangaldas & Co, 'The Code on Wages 2019: Key Provisions'; greytHR, 'Code on Wages, 2019 — State-wise Code on Wages Acts'; and TaxTMI, 'The Code on Wages, 2019 — Part III', summarising ss. 52–56 and the claims/appeal procedure.

22. Minerva Mills v. Union of India AIR 1980 SC 1789.

23. State of Mysore v. Workers of Gold Mines AIR 1958 SC 923.

24. Mahesh Chandra, Industrial Jurisprudence, in Labour Law and Labour Relations (2nd ed., Bombay, Tripathi 1976).

25. Hindustan Antibiotics v. Their Workmen AIR 1967 SC 948.

26. Bijoy Cotton Mills v. State of Ajmer AIR 1955 SC 3.

27. Olga Tellis & Ors. v. Bombay Municipal Corporation AIR 1986 SC 180.

28. Chakradhar Jha, Judicial Review of Legislative Acts (1st ed., LexisNexis 1974) 254.

29. Code on Social Security, 2020, ss. 113–114, 142; Social Security Rules, 2026, r. 48(2); see Bhatt & Joshi Associates, 'India's Gig Economy Workers Under Social Security Code 2020' (2026).

30. See Press Information Bureau, 'Social Security for Gig and Platform Workers' (29 January 2026), and The Tribune, 'Centre to Cover Gig Workers Under Social Security Schemes by 2029-30'.

31. Ministry of Labour and Employment, draft Code on Wages (Central) Rules, 2025 (published 30 December 2025); Code on Wages (Central) Rules, 2026, notified 8 May 2026.

32. See The Tribune, '12 Lakh Gig Workers, 20 Aggregators Registered on e-Shram Portal So Far' (29 June 2026), and Medianama, 'Gig Workers' e-Shram Registration Might Be Mandatory for Platforms' (April 2026).

33. See Business Standard, 'Trade Unions' Strike Against the Labour Codes Gets Mixed Response' (12 February 2026); Deccan Herald, "War on Working People': Trade Unions Hit Out at Labour Codes' (21 November 2025); and The AIDEM, 'February 12, 2026: A General Strike in the Shadow of a Systemic Crisis'.