

COMPETITION LAW AND THE TRADING OF HUMANS: INVESTIGATING THE NATURE AND EXTENT OF THE RELATIONSHIP BETWEEN GLOBAL ANTITRUST LEGISLATION AND HUMAN TRAFFICKING

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Abstract: *This article explores how global competition law shapes conditions for human trafficking. It argues that deregulated markets, narrow legal definitions, and opaque supply chains often enable exploitation, while corporate data protections hinder oversight. Case studies show how monopsony power, subcontracting, and digital platforms facilitate trafficking. The paper proposes integrating human rights into antitrust policy through expanded legal definitions, greater transparency, and the use of data and AI. It concludes that aligning competition law with anti-trafficking goals is essential to reducing systemic exploitation.*

Human trafficking is one of the oldest and most persistent forms of exploitation, and competition law is among the youngest branches of economic regulation. Despite operating in separate legal spheres, both intersect in ways which remain underexplored, particularly as global supply chains, labour markets, and corporate structures evolve. In today's economy, trafficking can thrive not merely in dark underbellies or lawless areas of society, but through the loopholes of modern legal and market systems.

How can this be so? This paper will examine the foundational assumptions of global antitrust law and policy, whether they enable trafficking, as well as potential reforms that competition frameworks could introduce as tools against it. Drawing on migration, labour, and anti-corruption law as well as a range of case studies as lenses, we can explore how competition policy may both hinder and help anti-trafficking goals in an increasingly globalised economy.

Historical Context and Legal Foundations

The origins of modern antitrust legislation can be traced back to the 1890 Sherman Antitrust Act, a landmark statute that laid the foundation for domestic and, eventually, international competition law. By the 1990s, many countries in South America and the post-Soviet bloc began implementing their own antitrust frameworks, while China's

Anti-Monopoly Law came into effect in 2008. Contemporary antitrust law, though relatively modern, has been shaped by older legislative domains like labour, migration, and anti-corruption law. Of these, labour law shares the most conceptual overlap with human trafficking and exposes some of the underdeveloped areas within antitrust when it comes to addressing exploitation.

In the European Union, the legal distinction between “undertakings” and “workers” illustrates one of the clearest examples of this gap. Under EU competition law, an “undertaking” refers to any entity engaged in economic activity and bearing financial risk.¹ This definition excludes workers and their unions, meaning that collective bargaining agreements are exempt from antitrust scrutiny. While this exclusion serves to protect workers’ rights, it also has the consequence of excluding undocumented or trafficked individuals from protection under both labour and competition law. As a result, victims of trafficking – many of whom lack legal status – are left without legal recognition if they attempt to collectively negotiate the conditions of their exploitation.

This creates a significant legal blind spot. Trafficked individuals, even when performing economically valuable labour, cannot access protections under Article 101 of the Treaty on the Functioning of the European Union (TFEU), which prohibits collusion and abuse of dominance. Even when legal exemptions are sought, the burden of proof falls on the trafficked person who often lacks legal support, language access, and institutional recognition, rendering these exemptions largely inaccessible.²

Employers can exploit this vulnerability by coordinating wage suppression for undocumented workers. Labour market dynamics, particularly monopsony power, allow dominant firms to reduce wages and working conditions without legal consequence. Advocate General Szpunar, in the *Elite Taxi v Uber Systems Spain* case, highlighted this dynamic, noting: “While this control is not exercised in the context of a traditional employer-employee relationship, one should not be fooled by appearances... Uber’s financial incentives and decentralised passenger-led ratings allow it to manage its drivers just as effectively—if not more so—than through formal managerial structures.”³ Uber, while highly visible, represents just one example. Many digital platform companies operate without significant regulatory oversight, and jurisdictions often hesitate to intervene in the name of protecting competitive markets. Ironically, this non-intervention can entrench monopolies and increase vulnerability to trafficking, as unregulated firms scale rapidly while outsourcing risk.

Human trafficking also flourishes under conditions of low legal permeability and high migration pressure. Traffickers exploit gaps in migration systems to offer forged documents, and false employment promises to those fleeing conflict, poverty, or unstable political regimes. Despite this, many jurisdictions with strict immigration policies maintain competition laws that promote cost-cutting and labour outsourcing—creating incentives to exploit vulnerable workers. A notable example is found in Cranford’s 2005 “Networks of Exploitation” study, which examined the Los Angeles cleaning industry. It found that undocumented Latino workers were consistently hired over unionised labour. These workers, recruited through informal social networks, were pressured to bring in friends and relatives to work long hours for low pay. Responsibility for

recruitment was outsourced to on-site supervisors, who prioritised cost reduction over fair hiring practices. Legal protections were virtually absent, and new hires were often required to perform hours of unpaid “trial” labour.⁴

This case illustrates how competition law can indirectly enable trafficking: first, through strong inter-firm rivalry in industries like cleaning, and second, through lack of oversight over labour agencies that function as economic actors without meaningful regulation. When weak labour laws intersect with deregulated competition environments, trafficking networks can operate with impunity. In this context, anti-corruption law also emerges as a key complement to antitrust. Both frameworks aim to protect the integrity of markets and prevent abuses of power. A combined approach that allows competition authorities to coordinate with anti-corruption bodies could strengthen investigations into supply chains, wage manipulation, and human rights abuses. Internal corporate compliance programs that address bribery and unethical labour practices could also serve as entry points for greater antitrust scrutiny in high-risk sectors.

Ultimately, the evolution of competition law has brought it into closer contact with issues of labour exploitation, but this intersection remains insufficiently addressed. A more integrated legal approach, one that considers trafficking as both a human rights and economic issue, is essential to reducing vulnerability and ensuring fairer market systems.

Globalization and Evolving Dynamics

Human trafficking manifests in various forms, the most common of which is forced labour. According to the United Nations Office on Drugs and Crime (UNODC), trafficking involves “the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit.”⁵ Common trafficking mechanisms include debt bondage (where individuals repay inflated debts through labour) fraudulent recruitment practices, and physical or psychological coercion. As globalisation accelerates, trafficking has become an increasingly complex and transnational issue, one whose implications are now reaching the attention of competition policymakers and enforcers.

Contrastingly, competition law focuses on promoting fair market conduct and maximising consumer welfare. Its remit has not traditionally included direct engagement with human rights violations like trafficking. Globalisation has, however, blurred the boundaries between economic regulation and social harm, exposing a need for competition law to expand its scope. The intersection between competition and trafficking lies particularly in supply chains, where market pressures and weak oversight can mask or even incentivise exploitation.

Modern supply chains span multiple tiers, from procurement and production to distribution, and trafficking can be facilitated at any stage. The drive for cost-efficiency, when combined with opaque contracting and inadequate auditing, can create environments where trafficked labour thrives. In many instances, liberal economic policies that promote deregulation and outsourcing also generate demand for low-wage and low-skill labour, often resulting in companies in the Global North benefiting from

exploitative conditions in the Global South, where weak labour protections and poor enforcement make trafficking more prevalent.

The cocoa industry in West Africa provides a compelling example. Despite years of international attention, child and forced labour remain pervasive in cocoa production in Côte d'Ivoire and Ghana. A 2024 report by the U.S. Bureau of International Labor Affairs emphasised the importance of “multistakeholder approaches” to reduce forced labour, but real progress remains limited.⁶ Global chocolate manufacturers often rely on complex supplier networks which makes it nearly impossible to trace the origin of raw materials or enforce labour standards. As the 2023 Côte d'Ivoire Trafficking in Persons (TIP) report noted, corruption and complicity continue to undermine law enforcement efforts.⁷ Audits are often superficial and fail to detect trafficking at local or national levels. Thus, even where formal policies against trafficking exist, structural weaknesses in the supply chain and in enforcement allow trafficking to continue. Competition law may inadvertently enable this through protections that shield firms from scrutiny in the name of commercial confidentiality, so compounding the issue is the difficulty in collecting reliable trafficking data.

Because trafficking often occurs in informal or illicit economies, statistics are fragmented and inconsistent.⁸ However, competition law generates robust datasets on market dominance, abuse of power cases, and digital platform activity that could help identify the economic environments most prone to trafficking. NGOs and regulators could use this data to pinpoint high-risk industries, supply chain vulnerabilities, or specific business models that rely on exploitative labour. Similarly, economic indicators such as employment patterns, corruption levels, and innovation rates could provide further insights, although it remains difficult to isolate the single most influential factor due to the data's complexity and inaccessibility.

A major barrier to progress is corporate control over critical trafficking-related data. Information about supplier relationships, working conditions, and sourcing practices is often treated as proprietary and therefore shielded under competition law. However, given the scale and severity of trafficking, it could be argued that this data should be made partially available for human rights oversight. Initiatives such as targeted transparency regulations or public-private data partnerships could give NGOs and regulators the tools needed to monitor risk within supply chains more effectively.

This is not a new proposal. Similar challenges exist in the financial sector, where data control by private institutions obstructs efforts to track trafficking-related financial transactions. In 2019, the World Economic Forum (WEF) warned that financial institutions often fail to distinguish trafficking from other illicit transactions, stating: “on their own, financial institutions struggle to identify and disrupt trafficking-related transactions because their data models cannot distinguish money-laundering transactions from trafficking ones.”⁹ Until technology improves to reliably differentiate such patterns, the most viable interim solution remains transparency, supported by legal frameworks that balance commercial confidentiality with the urgent need to protect human rights.

Supply chains which have long been considered logistical rather than legal spaces have become key battlegrounds for anti-trafficking efforts. Integrating competition law into initiatives, particularly through data-sharing and transparency, offers a valuable opportunity to reduce the systemic exploitation hidden behind market efficiencies.

Legislative Analysis

For the purposes of this economic discussion, the essay adopts a monopolistic competition model to explain the dynamics of human trafficking. In this context, traditional monopolies do not emerge due to relatively low barriers to entry, but nor does perfect or “workable” competition occur. The illicit nature of trafficking imposes unique criminal and financial risks that distort market behaviour. Within this irregular structure, traffickers supply differentiated ‘products’ – that is, victims with varying perceived utility to buyers, resulting in individualised demand curves for each trafficker.¹⁰ These characteristics reflect monopolistic competition’s key traits: product differentiation, market power, and freedom of entry and exit.

Monopsony conditions also appear in parallel. The labour supply for trafficked work is imperfectly elastic, particularly in vulnerable populations. As a result, traffickers can pay wages that are equal to or even below the supply price of labour, well beneath the worker’s marginal value product.¹¹ The further wages fall from a competitive equilibrium, the greater the likelihood of exploitation. In this way, labour market power, when combined with weak regulatory oversight, creates ideal conditions for trafficking, even within competitive markets. Ironically, policies designed to encourage competition may exacerbate these dynamics by ignoring the structural inequalities that traffickers will exploit.

Intermediaries are central to trafficking markets, especially in migration-related trafficking. In regions with high emigration rates traffickers face lower recruitment costs owing to the abundant supply of vulnerable individuals which effectively reduces their fixed costs and attracts more entrants into the market. These intermediaries can operate at either business-to-business or business-to-consumer, which expands the range of trafficking methods. This points to two ways in which competition law could be better integrated into anti-trafficking efforts: first, by broadening the legal definition of “undertaking” to include intermediaries; and second, by embedding a rights-based approach into fair competition policies. However, current competition law frameworks were developed to govern traditional markets of goods and services, and as such, they are poorly equipped to handle the complex and layered networks that trafficking relies on. While antitrust law defines an “undertaking” as any entity engaging in economic activity, many intermediaries operate outside formal recognition. This legal blind spot enables trafficking to flourish, as key actors remain invisible to enforcement mechanisms even while distorting markets.

Industries reliant on subcontracted labour, such as agriculture and construction, illustrate this issue. For example, in 2023, the U.S. Department of Labor found that Packers Sanitation Services had employed 102 children (primarily undocumented migrants) in hazardous roles within slaughterhouses across multiple states.¹² The adults responsible

for recruiting and supervising these children actively obstructed the investigation. A government spokesperson noted that such abuse occurs “when employers do not take responsibility to prevent child labour violations.”¹³ In this case, trafficked minors were funnelled through multiple recruitment and subcontracting layers, shielding primary employers from liability. This type of exploitative subcontracting creates unfair competitive advantages – and without a legal mechanism to hold intermediaries accountable, competition law may inadvertently support trafficking-friendly structures.

As markets evolve, digital platforms increasingly replace physical ones which offer direct or mediated access to goods and services. The black market has similarly adapted to online environments, exploiting the anonymity and speed of digital transactions. Enforcement responses have generally prioritised user privacy and online freedoms, making it difficult for regulators to pursue perpetrators. This regulatory tension between safeguarding internet freedom and enabling effective prosecution continues to challenge anti-trafficking efforts in the digital age. This tension is magnified by the emergence of platform-based work, with apps like Uber Eats offering a business interface through which self-employed individuals can offer services that meet minimum quality and logistical standards. This structure, however, also facilitates trafficking in two ways. First, it allows illicit services including trafficked labour to be concealed within legitimate online offerings. Second, it reduces the liability of the platform provider by framing trafficked individuals as “self-employed” rather than employees.

As Lianos, Countouris, and de Stefano observe, these “gig workers” often find themselves “in the grip of the so-called platform economy, controlled by machines and managed by algorithms, into the working of which they do not have any access or insight, and with no recourse to legal labour protections.”¹⁴ This loss of agency and lack of legal protection makes such workers, especially those trafficked, seem uniquely vulnerable. Without reform, digital labour platforms risk becoming enormous vectors for trafficking, offering plausible deniability to businesses while further obscuring the exploitative conditions endured by workers. Whether through subcontracting chains or digital gig platforms, economic actors exploit regulatory blind spots to reduce costs and shield liability. Updating competition law to reflect these realities by expanding definitions, increasing transparency, and recognising digital market risks, is essential to ensuring that competition does not come at the cost of human rights.

Conflicts and Challenges

Having examined antitrust frameworks and relevant case studies, we now turn to the inherent tensions between direct anti-trafficking measures and existing competition regulations. Many jurisdictions are reluctant to interfere with market practices that appear to enhance innovation and efficiency, largely because competition policy is explicitly designed to foster these outcomes. When unethical labour practices drive down production costs, accelerate innovation, and lead to cheaper consumer goods, a fundamental conflict emerges: whereas competition law encourages efficiency, anti-trafficking efforts demand protective (and often costlier) regulatory oversight.

Väyrynen (2005) underscores the gravity of this conflict by describing humans as the “ideal commodity” from a competition standpoint: “they do not easily perish, but

can be transported over long distances and can be used and re-sold.”¹⁵ Such logic is telling of the economic calculus that trafficking networks rely upon. When competition enforcement ignores human exploitation, regulatory blind spots emerge – especially during merger assessments, market inquiries, and antitrust investigations that fail to account for human rights risks embedded within global supply chains.

Internationally, the UN Office of the High Commissioner for Human Rights (OHCHR) affirms that each state bears responsibility for its acts or omissions that breach international human rights obligations.¹⁶ This reinforces the principle that antitrust authorities cannot absolve themselves from the consequences of private criminal actors operating within or alongside competitive markets—especially when those states are signatories to international treaties with enforceable human rights obligations. Many of these treaties have direct implications for competition law. For example, the UN Convention against Transnational Organized Crime includes several protocols relevant to migration and trafficking, one of which is the Protocol against the Smuggling of Migrants. Article 6.1 obligates states to criminalise the act of “[e]nabling a person who is not a national or a permanent resident to remain in the State concerned without complying with the necessary requirements for legally remaining in the State.”¹⁷

While this provision targets irregular migration, it also inadvertently enables the exploitation of trafficked persons by making them vulnerable to deportation threats. Crucially, it doesn’t account for the economic contributions of trafficked workers or their victim status. As such, it reinforces the asymmetry between open economic liberalisation, which benefits competition, and the systemic vulnerabilities that trafficking exploits. Empirical evidence supports this view through Peksen and Blanton, who found that a country transitioning from a heavily regulated economy to a fully liberalised one faces a more than 200% increase in the probability of trafficking for forced labour.¹⁸ This statistic indicates that when antitrust law facilitates neoliberal economic models without considering their social consequences, it indirectly contributes to conditions favourable to trafficking.

This is boosted by the intentional use of trafficked persons in low-level, high-risk roles such as recruitment, cash handling, or advertising. By assigning these risky tasks to victims, traffickers reduce their own exposure while shifting legal liability onto the exploited individuals.¹⁹ In such cases, victims may be prosecuted rather than protected, while businesses that benefit from this system remain untouched. The central contradiction is that antitrust promotes low-cost efficiency, while anti-trafficking demands costlier protective frameworks. This divergence creates a structural tension that today’s regulatory environments are not equipped to resolve.

The question of state responsibility in aligning competition law with anti-trafficking efforts is further complicated by the artificial separation of humanitarian concerns from economic regulation. In political discourse, social and economic objectives are often polarised between progressive approaches that prioritise social protection and conservative ones that champion deregulated markets. Antitrust policy, claims to support both consumer welfare and economic growth, yet it often fails to consider

labour rights in any meaningful way. The EU provides a useful illustration of this dilemma in stating that its competition law aims to “ensure fair and equal conditions for businesses, while leaving space for innovation, unified standards, and the development of small businesses.”²⁰ Despite some progress, such as the Corporate Sustainability Due Diligence Directive (2024), the core of EU competition policy remains focused on price, output, and market efficiency, with limited integration of labour protections or human rights safeguards.

Competition law portrays itself as a pillar of economic and social development that is designed to prevent market abuses. Yet it also incentivises the exploitation of vulnerable workers due to misalignment with labour law and rigid migration frameworks. Without meaningful coordination across these legal domains, competition policy risks perpetuating the very harms it should help prevent. To close these gaps, a fundamental rethinking of the foundations of competition law is required. Policymakers must broaden the scope of antitrust to include human rights considerations, especially as they relate to labour exploitation in global markets. Failing to do so will not only hinder efforts to combat trafficking but also undermine the legitimacy of competition law as a tool for equitable economic development.

Opportunities for Reform

As globalisation accelerates, competition authorities are uniquely positioned to play a central role in combating human trafficking through data collaboration, regulatory innovation, and proactive enforcement strategies. One promising avenue is their potential contribution to open data platforms shared among researchers, legislators, civil society organisations, and international institutions. These platforms could be leveraged by the UN, state anti-trafficking agencies, and NGOs to enhance bilateral, regional, and global cooperation which would enable timely information exchange and more effective interventions.

Artificial intelligence and machine learning technologies offer powerful tools in this space. They can facilitate seamless integration across large datasets while detecting patterns indicative of trafficking risk. Early success stories like FDRM, a supply chain risk management platform, demonstrate the promise of AI to flag trafficking vulnerabilities across complex supplier networks.²¹ These innovations enhance transparency and accountability without infringing on market freedoms, while also identifying high-risk industries that require closer scrutiny.

Beyond enforcement, AI can also improve the efficiency and reach of awareness campaigns which are critical to fostering compliance. For example, a study by the UK's Competition and Markets Authority (CMA) found that fewer than half of British companies surveyed could correctly identify anti-competitive practices such as market sharing, price fixing, and abuse of dominance.²² This highlights a major knowledge gap that can be addressed through more intelligent, targeted dissemination of compliance information using AI-driven systems. By improving awareness, competition authorities can directly reduce the conditions that enable trafficking alongside anti-competitive behaviour.

Additionally, competition law has the capacity to define and measure labour market power more precisely, distinguishing between its natural occurrence and its abuse in exploitative contexts. Advocates have suggested a framework of specific criteria for policy evaluation, such as an employer's ability to suppress wages below competitive levels, impose coercive contract terms, or capture disproportionate market share in any given labour segment.²³ These indicators have the potential to form the basis for targeted investigations or policy interventions, particularly in sectors known to attract trafficked labour.

Where direct market intervention is not viable, labour audits in high-risk industries or the enhancement of whistleblower protections can offer alternative solutions. These approaches encourage employees, particularly those vulnerable to retaliation, to speak out while also allowing regulators to proactively uncover trafficking practices before they distort labour markets or solidify into systemic abuse. Opportunities for progress also exist in routine regulatory actions, such as merger reviews. These proceedings often centre on price effects and innovation but can be expanded to include labour impacts. A forward-looking example is found in the Australian Competition and Consumer Commission's (ACCC) March 2025 draft update to its Merger Assessment Guidelines, which invited public comment on potential reforms. The ACCC proposed recognising labour exploitation as a form of non-price competitive harm, marking a significant step toward integrating social responsibility into antitrust evaluations.

The tools to align competition law with anti-trafficking objectives already exist. What is now required is the political will and regulatory permission to integrate them. By embracing digital tools as well as redefining market power and expanding review criteria, competition authorities can contribute meaningfully to dismantling the economic structures that allow trafficking to persist.

Conclusion

The intersection of antitrust and human trafficking reveals a complicated and somewhat overlooked dynamic, in which the pursuit of economic efficiency may unintentionally sustain exploitative practices. While competition law is intended to curb market abuse and encourage innovation, it too often overlooks the human toll embedded in deregulated labour markets, opaque supply chains, and narrow legal definitions of economic actors. As a result, the very frameworks meant to safeguard fair competition are routinely exploited by traffickers and intermediaries who operate in the legal blind spots.

Addressing this problem requires more than patchwork labour protections or reactive enforcement. What is needed is a fundamental reconceptualisation of antitrust policy that integrates human rights considerations into its foundational aims and expands the definition of market harm to include systemic exploitation. By enhancing transparency, redefining legal terminology to reflect modern economic realities, and leveraging technology, policymakers can begin to align competitive markets with reducing human trafficking. If competition law is to remain relevant in the context of globalised trafficking networks, it must evolve beyond a tool for protecting markets alone. It must evolve into a regulatory tool that not only protects markets, but the people who sustain them.

Notes

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