



Human Rights Protection in Antitrust Law: Integrating the Principle of Dignified Justice into Antitrust Policy in Europe and Asia

Rory Jeff Akyuwen¹, Muchtar Anshary Hamid Labetubun², Ruetaitip Chansrakaao³

^{1,2}Faculty of Law, Universitas Pattimura, Ambon, Indonesia,

³Faculty of Humanities and Social Sciences, Valaya Alongkorn Rajabhat University under the Royal Patronage, Thailand.

✉ Corresponding author : rjakyuwen@gmail.com.

Abstract

Human rights must be integrated into Antitrust law to ensure social justice and protection for vulnerable groups, considering that the dominant economic approach often overlooks the negative impacts of monopolistic and anti-competitive practices on the fundamental rights of individuals and communities. The aim of this research is to analyze how the integration of the principle of dignified justice in Antitrust law can strengthen human rights protection in Europe and Asia, as well as to evaluate the extent to which Antitrust law in both regions has currently accommodated human rights protection. This research uses a normative legal method with legislative, conceptual, and comparative approaches to analyze the integration of the principle of dignified justice in Antitrust law in Europe and Asia, and to assess human rights protection through qualitative analysis of relevant regulations, doctrines, and court rulings. The research findings show that the integration of the principle of dignified justice in Antitrust law in Europe and Asia strengthens human rights protection by creating a balance between entrepreneurial freedom and protection for vulnerable groups. Europe, through regulations such as the TFEU and initiatives like the Digital Markets Act, has made more progress in accommodating human rights, while Asia, though beginning to adopt the principle of justice in countries like Japan and Indonesia, still faces challenges in harmonizing regulations and enforcing the law. Collaboration and the adoption of best practices are expected to further strengthen human rights protection in Antitrust law in both regions. The research recommends that countries in Europe and Asia need to explicitly integrate human rights principles, particularly dignified justice, into the formulation and implementation of competition law to ensure the protection of vulnerable groups.

Keywords: Antitrust law, Dignified Justice, Human Rights.

A. INTRODUCTION

Human rights are fundamental principles that guarantee the dignity, freedom, and equality of every individual (Dicky Eko Prasetyo, Muh. Ali Masnun, Arinto Nugroho, Denial Ikram, 2024) . In various national and international legal systems, human rights has become the basis for the formation of public policy, including in antitrust law (Chigara, 2019). Antitrust law aims to prevent anti-competitive practices that can harm consumers, small businesses and the market as a whole (Spulber, 2023). However, in its implementation, antitrust law often focuses more on economic aspects, such as market efficiency and consumer welfare, without considering the human rights dimension in depth. In fact, anti-competitive practices such as monopolies, cartels, and abuse of dominant positions can have a negative impact on the basic rights of individuals and vulnerable groups in society (Soomro & Yuhui, 2023).

In Europe, antitrust policy has developed systematically within the legal framework of the European Union. The European Commission acts as the main regulator ensuring that markets remain competitive and free from harmful practices (Spulber, 2023). One of the main principles of European antitrust law is the protection of consumer interests, often measured from the perspective of price, innovation and product choice. However, there is another dimension that has not been fully accommodated, namely how antitrust policy can protect fundamental human rights, such as the right to work, the right to equal economic access and the right of local communities to develop in a fair environment (Makris, 2021). In some cases, large companies that have market dominance often suppress small and medium-sized businesses, thus limiting economic opportunities for certain groups (Kapeliushnikov,

2023). This shows that an antitrust law approach that is only based on economic efficiency is not enough to create a truly fair and sustainable business ecosystem.

In Asia, approaches to antitrust law vary widely, depending on the political, economic and social context of each country. Japan and South Korea, for example, have fairly mature antitrust policies with strict enforcement mechanisms (Read, 2012)(Djafar, 2022). Japan, through its Fair Trade Commission, has attempted to maintain market balance by cracking down on business practices that are detrimental to competition (Van Uytsel & Uemura, 2021). Similarly, South Korea has the Korea Fair Trade Commission (KFTC) which is tasked with overseeing anti-competitive behavior, especially those carried out by large conglomerates or chaebols (Putra & Prinanda, 2023). However, in several other Asian countries, antitrust law is still in its development stage and tends to focus more on encouraging investment and economic growth than on protecting economic justice (Soomro & Yuhui, 2023). In Indonesia, for example, antitrust law has begun to receive attention since the establishment of the Business Competition Supervisory Commission (KPPU) (Zairul Alam & Tejomurti, 2022).

However, the main challenges faced are the still weak awareness of the importance of healthy business competition and the low capacity of law enforcement in handling cases of competition violations. In addition, in some cases, the government actually gives special treatment to certain companies, which indirectly creates monopolistic or oligopolistic practices that are detrimental to small businesses and the wider community (Hoofnagle et al., 2019). The differences in approaches between Europe and Asia in regulating business competition show that there is still a gap in integrating human rights principles into antitrust policies. This is further complicated

when multinational companies operate in multiple jurisdictions with different legal systems. Companies with dominant market power often have the ability to influence regulations in certain countries, creating unfair market structures. As a result, the rights of workers, consumers, and small businesses are often marginalized in the dynamics of global competition.

In this context, there is a need to adopt a more comprehensive approach in antitrust law, which not only considers economic aspects, but also the values of justice and protection of human rights. One concept that can be used to bridge this gap is the principle of dignified justice. This concept emphasizes that the law must be oriented towards respect for human dignity and social justice in a broader sense (Hennette-Vauchez, 2011)(Bima & Jacob, 2023). By integrating this principle into antitrust law, antitrust policy can become a more effective tool in creating an inclusive and equitable business environment. The application of the principle of dignified justice in antitrust law can provide several important benefits. This principle can ensure that competition regulation not only serves to maintain market efficiency, but also to protect vulnerable groups from the negative impacts of unfair business practices (Korže, 2019)(Hasbullah, 2023). For example, in cases of abuse of dominant positions by large companies, antitrust policies based on dignified justice can include aspects of protection for small business actors so that they continue to have access to competitive markets.

The principle of dignified justice can strengthen the relationship between antitrust law and international standards on human rights (Anisah & Hadi, 2023). Organizations such as the United Nations (UN) and the International Labor Organization (ILO) have long emphasized the importance of ensuring that economic

policies do not ignore the rights of workers and local communities (Rantanen et al., 2020). By integrating the principle of dignified justice, competition regulation can be more aligned with these global standards, thereby strengthening the legitimacy of the law in the international context (Susilowati, 2020). This approach can also help create a more sustainable business environment. In recent decades, there has been an increasing awareness of the importance of corporate social responsibility, which emphasizes that companies are not only responsible to shareholders, but also to society at large (Sanclemente-Téllez, 2017). By implementing the principle of dignified justice in antitrust law, large companies can be encouraged to adopt more ethical, transparent, and socially oriented business practices (Crane, 2024). However, there are several challenges that must be faced in integrating the principle of dignified justice into antitrust policy.

One of them is resistance from large business actors who have an interest in maintaining their market dominance. In addition, in many countries, economic policies are often more influenced by political factors and the interests of business elites, so that legal reforms oriented towards social justice can face significant obstacles (Fadillah, 2023). Therefore, an effective strategy is needed to advocate the importance of this approach, either through legal mechanisms, public education, or cooperation between the public and private sectors. Research on the integration of human rights in antitrust law has become an increasingly relevant topic in recent decades. Several studies have highlighted the importance of considering human rights aspects in formulating and implementing antitrust policies, both in Europe and Asia. One study that discusses the harmonization of antitrust law in the Southeast Asia region emphasizes that competition policies must be adjusted to support economic recovery,

especially after global challenges such as the COVID-19 pandemic. This study highlights the need for a legal framework that can ensure healthy and fair competition among ASEAN countries (Maretta et al., 2024).

In addition, other studies discuss the problems of regulating competition in a political and economic context. This study highlights that antitrust policies aimed at increasing economic efficiency should consider restrictions on the freedom of action of large companies for the sake of fairer growth (Kalianda, 2020). In Indonesia, the presence of Law No. 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition has provided an important meaning in maintaining healthy business competition. However, its implementation still faces various challenges, including in terms of law enforcement and business actor awareness (Tulung & Yusuf, 2024). Furthermore, textbooks on business antitrust law in Indonesia discuss the role of the Business Competition Supervisory Commission (KPPU) in enforcing antitrust law. This book provides a comprehensive view of the regulation and implementation of antitrust law in Indonesia (Lubis et al., 2017)(Bostoen & Petit, 2024).

In the international context, research on the responsibilities of multinational corporations under international human rights law highlights the need for multinational companies to comply with human rights standards in their operations, including in business competition practices. This study emphasizes the importance of corporate accountability and social responsibility in maintaining individual and community rights (Prihandono & Khairunnisa, 2016). In addition, research on the role of antitrust law in economic development emphasizes that antitrust law has a role not only in economic development alone, but also in distributive justice and regulation of practices

that are detrimental to society (Zaid & Aufa, 2022). Overall, previous studies show that the integration of the principles of justice and human rights in antitrust law is an important aspect that needs to be considered. A holistic and inclusive approach to formulating antitrust policies can ensure that in addition to achieving economic efficiency, the policy also protects the basic rights of individuals and promotes social justice in society. Although there are various studies that discuss antitrust law and its relationship to human rights, there is still a research gap that needs to be addressed.

Most of the existing studies focus more on the economic and market efficiency aspects in the application of antitrust law, while the aspect of human rights protection has not received sufficient attention in the formulation of antitrust policies. This creates a gap in understanding how antitrust law can be integrated with the principle of dignified justice to protect the rights of individuals and groups vulnerable to anti-competitive practices. Research conducted in Europe tends to focus on consumer protection in the context of competition. Previous studies have discussed how antitrust policy aims to create market efficiency and improve consumer welfare by controlling the behavior of dominant companies. However, this approach often ignores the social impacts of certain business practices on local communities, workers, and small businesses. Meanwhile, although there is discussion about corporate social responsibility in protecting human rights, direct integration between antitrust policy and human rights protection in the context of antitrust law is still minimal in the literature.

In Asia, studies on antitrust law have focused more on aspects of economic development and investment. Many countries in Asia are still in the early stages of developing effective antitrust policies, so their main priority is to attract investment

and encourage market growth. As a result, human rights protection is often not a primary focus in competition regulation. Several studies that have highlighted antitrust law in Asia have shown that there are still major challenges in implementing the law, including the low capacity of competition supervisory institutions, weak law enforcement, and the influence of politics and big business interests in the policy-making process. Furthermore, although several studies have discussed the principle of justice in antitrust law, the principle of dignified justice as a holistic approach has not been widely adopted in previous studies. Many studies still use the classical approach that only focuses on distributive justice and economic efficiency, without considering individual dignity in the context of competition. In fact, the concept of dignified justice can be an important framework for assessing how antitrust policies can be designed to protect fundamental human rights, including the right to work, economic rights, and the right to fair treatment in business.

In addition, the studies that have been conducted tend to be normative and focus more on analyzing existing regulations without presenting strong empirical studies on the impact of antitrust law on human rights. It is still rare to find studies that directly examine how large companies use their market dominance to influence regulations or limit economic access for certain groups. Case studies on the real impact of competition policy on human rights are also still limited, so further research is needed to explore how certain business practices can harm individuals and vulnerable groups in society. From a policy perspective, although there have been several efforts to harmonize antitrust law at the regional level, there has been no approach that specifically accommodates human rights protection in antitrust policy. In Europe, although the European Commission has implemented a strict policy against anti-

competitive practices, the human rights aspect has not been a major factor in law enforcement. Meanwhile, in Asia, approaches to antitrust law are still very diverse and there has been no regional agreement that explicitly links competition policy to human rights protection.

Based on this research gap, this study aims to contribute by examining how antitrust law in Europe and Asia can be integrated with the principle of dignified justice in order to strengthen human rights protection. The formulation of the problem in this study is: (i) how can the integration of the principle of dignified justice in antitrust law strengthen the protection of human rights in Europe and Asia? And (ii) how has antitrust law in Europe and Asia currently accommodated the protection of human rights?.

The urgency of research on the integration of the principle of dignified justice in antitrust law in Europe and Asia is very important, considering the ever-changing and increasingly complex development of the global economy, and its impact on the protection of human rights. In recent decades, the digital economy and globalization have brought new challenges that require more attention to how antitrust law can protect the rights of individuals and vulnerable groups, while still supporting freedom of business and innovation (Bostoen & Petit, 2024). As the dominance of large companies in the global market increases, the phenomenon of monopoly and anti-competitive behavior increasingly threatens the welfare of consumers and small businesses (Yulianti et al., 2022). Therefore, in-depth research is needed on how the principle of dignified justice can be integrated into antitrust law in various regions, especially in Europe and Asia. In Europe, the integration of the principle of social justice in antitrust law has become part of a broader legal framework, as seen in

European Union regulations such as the Treaty on the Functioning of the European Union (TFEU) and the European Convention on Human Rights (ECHR).

In these regulations, there are efforts to maintain a balance between freedom of business and protection of consumers and small businesses. However, despite this fairly advanced regulation, challenges remain in ensuring that the application of antitrust law can encompass human rights principles more comprehensively, especially in sectors related to the digital economy. For example, with the rapid development of digital platforms, antitrust law in Europe must be able to adapt to this new situation, to prevent abuse of market power by large technology companies that can harm consumers and create injustice. Therefore, this research is important to understand more deeply how antitrust law in Europe can be more effective in protecting human rights and creating a fairer and more inclusive market. On the other hand, in Asia, although several countries such as Japan, South Korea, Indonesia, and India have begun to adopt regulations oriented towards protecting human rights in the context of antitrust law, their implementation is still limited and often not a top priority in their economic policies. Various countries in Asia face major challenges in terms of law enforcement capacity, harmonization of regulations between countries, and corporate awareness of the importance of integrating social justice principles into their businesses.

With a large and diverse population, and a fairly high level of economic inequality, protection of vulnerable groups and small business actors is very crucial. Therefore, research on the application of the principle of dignified justice in antitrust law in Asia will provide very important insights to improve and strengthen existing policies and regulations, with the aim of creating a fairer, more transparent market that

protects the rights of all parties. In addition, with the development of the digital economy connecting the European and Asian markets, there is an urgency to conduct research that focuses on how the two regions can collaborate in designing and implementing antitrust law that is not only effective in maintaining competition, but also sensitive to human rights issues. In this regard, research can focus on efforts to harmonize regulations that can overcome the major differences between the two regions. For example, differences in legal systems, approaches to consumer protection, and the implementation of principles of justice in business practices. International collaboration between countries in Europe and Asia will be very important to create a consistent legal framework that can be implemented globally.

Overall, the urgency of this research lies in the need to adapt antitrust law to the principles of dignified justice in facing global economic challenges, especially amidst the rapid development of digital technology that exacerbates economic inequality and harms consumers and small business actors. By examining the application and integration of the principle of fairness in antitrust law in Europe and Asia, this research can make an important contribution to the formation of fairer, more transparent policies based on better human rights protection. In this context, this research is not only relevant for the development of legal theory, but also for the formulation of policies that can ensure a fair and sustainable market in the future.

Research related to antitrust law and its connection to human rights has indeed been conducted by three previous studies, namely: first, the study by Inawati, et al. (2024) which focuses on the implementation of antitrust law and cartel prohibition in the business sector in Indonesia, with special emphasis on the low legal awareness of business actors, obstacles in law enforcement, regulatory oversight challenges, and the

ineffectiveness of existing regulations, including their relation to human rights (Inawati, Rahmadi Meiliyan, 2024). Further research was conducted by Kastrup (2025), who analyzed the relationship between human rights violations and unlawful behavior according to antitrust law, as well as systematically and teleologically analyzing the Brazilian legal system to assert that CADE (Administrative Council for Economic Defence) has the authority to address human rights violations in the context of antitrust law enforcement (Kastrup, 2025). Another study was conducted by Waller (2025) that discusses the integration of aspects of administrative law theory (particularly regarding discretion), transparency in antitrust enforcement, and a democratic approach to competition policy (Waller, 2025). One of the proposals from this research is the reform of the obligations of antitrust law enforcement agencies to thoroughly explain their policy priorities and certain individual decisions, especially in cases where investigations have been conducted in depth but not proceeded to the enforcement stage. Of the three studies mentioned above, this research is original because the discussion of antitrust law from the perspective of dignified justice has not been thoroughly analyzed by the previous three studies.

This study uses a normative legal research method, namely research that focuses on the study of applicable legal norms, both in the form of laws and regulations, court decisions, and legal doctrines (Marzuki, 2017). This method was chosen because this study aims to analyze how antitrust law in Europe and Asia can be integrated with the principle of dignified justice in order to strengthen the protection of human rights. With this method, the study will explore relevant legal sources and conduct a comparative analysis of antitrust policies in the two regions. In this study, several approaches are used to gain a more comprehensive understanding of the

relationship between antitrust law and human rights protection. First, this study uses a statute approach that focuses on the analysis of laws and regulations governing antitrust law and human rights in Europe and Asia. This approach aims to identify the extent to which the laws in force in both regions have accommodated the principle of dignified justice in antitrust policies. In addition, this study also applies a conceptual approach to understand and explore the concept of dignified justice in the context of antitrust law.

This concept will be examined from the perspective of legal theory and legal philosophy to assess how the principle of dignified justice can be used as a basis for formulating a more inclusive and fair antitrust policy. Furthermore, a comparative approach is used to compare the antitrust law systems in Europe and Asia. Through this approach, the study will identify similarities and differences in the implementation of antitrust policies in both regions, as well as examine how each jurisdiction integrates human rights protection into their regulations. This approach is expected to provide insight into best practices that can be applied in a global context to strengthen human rights protection in antitrust law.

This study uses three types of legal materials as the basis for the analysis, namely primary, secondary, and tertiary legal materials (Muhaimin, 2020). Primary legal materials include laws and regulations relating to antitrust law and human rights protection, both at the national and international levels. In Europe, the legal materials to be studied include the Treaty on the Functioning of the European Union (TFEU), European Union antitrust regulations and guidelines, and important decisions from the Court of Justice of the European Union (CJEU). Meanwhile, in Asia, this study will examine various competition regulations, such as the Japanese Competition Act

(Antimonopoly Act), the South Korean Competition Act, and Law No. 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition in Indonesia. In addition, international standards related to human rights, such as the Universal Declaration of Human Rights (UDHR) and the Guiding Principles on Business and Human Rights from the UN, will also be used as the main references in this analysis. In addition to primary legal materials, this study also uses secondary legal materials, namely books, scientific journals, legal articles, and previous research that discusses antitrust law, human rights, and the principle of dignified justice.

These secondary legal materials serve to support the analysis of primary legal materials and provide a broader academic perspective on the issues studied. As a complement, this study also uses tertiary legal materials, which include legal encyclopedias, legal dictionaries, and other reference sources that help in understanding relevant legal concepts. These tertiary legal materials play a role in clarifying the legal terminology used in the study, so that the analysis carried out is more systematic and structured. Data collection in this study was carried out through library research (Sugiyono, 2019), namely by tracing various legal documents, academic journals, books, and scientific publications related to antitrust law and human rights. This literature study aims to obtain relevant legal sources as a basis for analyzing the integration of the principle of dignified justice in antimonopoly policies. In addition, this study will also analyze court decisions related to antitrust law and human rights protection, both in Europe and Asia. By examining court decisions, this study can identify how antitrust law has been applied in real cases and how the courts interpret the relationship between antitrust policies and human rights.

Analysis of these court decisions will also help in evaluating the effectiveness of law enforcement in protecting human rights from anti-competitive business practices. The sources used in this study will be obtained from various legal and academic databases, such as Westlaw, HeinOnline, Google Scholar, SSRN, and the official websites of related legal institutions. With systematic data collection techniques, this study is expected to obtain comprehensive legal materials to support the analysis carried out. The data that has been collected is analyzed using a qualitative analysis method (J. Moleong, 2017), namely by reviewing and interpreting the contents of laws and regulations, legal doctrines, and relevant court decisions. This analysis is carried out systematically through several stages. First, a descriptive analysis is carried out, namely by describing and grouping various regulations and legal doctrines related to antitrust law and human rights. This analysis aims to provide an initial understanding of how antitrust policies in Europe and Asia have been regulated and how human rights protection has been accommodated in existing regulations.

Second, an interpretive analysis is conducted, namely by interpreting legal regulations based on the principle of dignified justice and relevant legal theories. At this stage, the study will test the extent to which applicable antitrust law can provide protection for human rights, and whether there are gaps in regulations that need to be fixed. Third, a comparative analysis is conducted, namely by comparing the legal systems in Europe and Asia to find differences, similarities, and the advantages and disadvantages of each system in integrating human rights into competition policy. Through this analysis, the study can identify best practices that can be applied in various jurisdictions to increase the effectiveness of antitrust law in protecting human

rights. Fourth, a normative-prescriptive analysis is conducted, namely by compiling recommendations on how antitrust law can be developed to better respect human rights based on the principle of dignified justice. This analysis aims to provide theoretical and practical contributions to the formulation of antitrust policies that are more inclusive, fair, and oriented towards the protection of fundamental human rights. With systematic research methods and diverse approaches, this study is expected to provide in-depth insight into the relationship between antitrust law and human rights, as well as offer concrete solutions in integrating the principle of dignified justice into antitrust policies in Europe and Asia.

B. RESULT AND DISCUSSION

1. Integration of the Principle of Dignified Justice into Antitrust law to Strengthen Human Rights Protection in Europe and Asia

The principle of dignified justice serves as a foundation for creating a legal system that respects human dignity (Vatter, 2020)(Via Dianti et al., 2024). In the context of antitrust law, this principle plays an important role in ensuring that freedom of business does not create injustice that harms vulnerable groups such as consumers, small businesses, and workers (Ezrachi, 2016)(Schmidt-Kessen, 2025). In Europe and Asia, the integration of this principle is increasingly relevant amid the dynamics of globalization, digitalization, and economic inequality. By instilling dignified justice, antitrust law can be an instrument to strengthen the protection of human rights (HAM) (Ardyansyah & Rizal, 2023).

Antitrust law in Europe has a strong foundation in the Treaty on the Functioning of the European Union (TFEU). Articles 101 and 102 of the TFEU

explicitly regulate the prohibition of anti-competitive agreements and abuse of dominant position in the market. The focus of this regulation is to create a fair and competitive market, which ultimately protects consumers and business actors from exploitation by large companies (Uffer, 2023). The principle of dignified justice is reflected in this regulation through efforts to create a balance between freedom of business and protection of individual rights (Usanti et al., 2023). For example, the European Convention on Human Rights (ECHR) in Article 1 of Protocol 1 recognizes the right to own property, including the right to run a business. However, this right is balanced by the public interest in preventing losses due to anti-competitive practices (Komaling, 2023).

One example of a case that illustrates the relationship between antitrust law and human rights protection is *United Brands Company v. Commission* (1978). In this case, a large company that has a dominant position in the banana market in Europe was found to have abused its power by setting unfair prices and killing competition. This decision not only protects business competition but also consumers' rights to obtain products at fair prices (Uffer, 2023). Unlike Europe, antitrust law in Asia shows quite significant variation among its member countries. However, the principle of dignified justice is beginning to be integrated into the national policies of many countries. For example, in India, the Competition Act, 2002 prohibits agreements that inhibit competition and abuse of dominant positions. This law protects small businesses and consumers from anti-competitive practices that can disrupt the economic welfare of society (Widhiyanti, 2020).

In Indonesia, the principle of dignified justice is reflected in Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business

Competition. This law regulates the prohibition of price fixing, market control, and other monopolistic practices that are detrimental to small businesses and consumers (ASMAH, 2022). In addition, the Business Competition Supervisory Commission (KPPU) has an important role in ensuring healthy and fair business competition (Ningsih, 2022). The Grab Indonesia vs. KPPU case is a real illustration of how the principle of dignified justice is implemented. In this case, the online transportation company was accused of abusing its dominant position to control the market and hinder competition. KPPU's actions to crack down on this anti-competitive behavior demonstrate a commitment to protecting the rights of small businesses and consumers (Mertosono, 2022)(Effendi, 2020). At the regional level, both Europe and Asia have collective efforts to strengthen fair business competition. In Europe, supervision is carried out by the European Commission, which works with national authorities in member countries to enforce competition regulations.

In addition, the General Data Protection Regulation (GDPR), although focused on data protection, also plays a role in preventing large companies from misusing consumer information to strengthen their dominant position (Rumesten et al., 2012). In Asia, frameworks such as the ASEAN Competition Action Plan (ACAP) 2025 are efforts to create a competitive and fair regional market. ACAP not only aims to encourage economic integration but also to protect the interests of society, including consumers and small businesses, from unfair business practices (Saragih, 2018). In addition, the principle of dignified justice is also supported by global approaches such as the United Nations Guiding Principles on Business and Human Rights (UNGPs). This guideline emphasizes that companies have a responsibility to respect human

rights, including in keeping their business practices fair and competitive (Fasterling & Demuijnck, 2013).

Although the principle of fairness has become an integral part of antitrust law in Europe and Asia, its implementation still faces various challenges. One of the main obstacles is the differences in the level of economic development and legal systems in Asia (Walter, 2024). Developing countries often have limited institutional capacity to enforce antitrust law effectively. In Europe, although the legal framework is well established, coordination between national and supranational authorities sometimes faces obstacles, especially in handling cross-border cases. In addition, lobbying practices by large corporations can influence government policies, creating potential bias that is detrimental to the interests of society. Another challenge is the emergence of the digital economy, where large companies such as Google, Amazon, and Facebook often use their dominant positions to control the market. In Asia, regulations regarding digital platforms are still relatively new, so they need to be strengthened to prevent negative impacts on small businesses and consumers (Ong & Toh, 2023).

To overcome these challenges, comprehensive strategic steps are needed. First, countries need to strengthen their legal frameworks to be more adaptive to technological changes and globalization. In Asia, harmonization of competition regulations among ASEAN member states can be a first step towards creating a more competitive market (Setianingrum & Hawin, 2020). Second, strengthening the capacity of supervisory institutions such as the KPPU in Indonesia or the Competition Commission in India is essential to ensure that violations can be identified and prosecuted effectively. Third, education and public awareness about the importance of fair competition need to be improved, so that the public can play an active role in

supporting the implementation of the law (Ginsburg & Wright, 2024). Fourth, international cooperation between Europe and Asia can also be a solution to address global challenges such as the digital economy. For example, the exchange of experiences between the European Commission and competition authorities in Asia can help accelerate the adoption of best practices in enforcing antitrust law. The integration of the principle of dignified justice into antitrust law in Europe and Asia is an important step towards strengthening human rights protection. Regulations such as the TFEU in Europe and Law No. 5 of 1999 in Indonesia demonstrate how this principle is applied to create a competitive and fair market. Despite the challenges, a collaborative approach and human rights-oriented values can ensure that antitrust law serves as an instrument to protect human dignity in economic relations. Thus, the integration of this principle not only supports inclusive economic growth but also reflects a commitment to social justice at the global level.

2. How Do Current Antitrust laws in Europe and Asia Accommodate Human Rights Protection?

Antitrust law plays a crucial role in keeping markets competitive and preventing anti-competitive practices that can harm society at large. In addition to creating economic efficiency, this law also provides social benefits, including protecting the rights of consumers, workers, and small business actors (Soomro & Yuhui, 2023). In recent years, attention to the integration of human rights principles into antitrust law has increased, especially amid global demands for sustainability, social justice, and corporate responsibility (Díaz-Cruces et al., 2024). However, the implementation of human rights protection in antitrust law still shows significant variations between regions such as Europe and Asia. The European Union (EU) is

known as a pioneer in the development of antitrust law that aims not only to protect the market but also to promote social values and human rights. The basic framework of antitrust law in the EU is regulated by Articles 101 and 102 of the Treaty on the Functioning of the European Union (TFEU).

Article 101 prohibits agreements between companies that could restrict competition, such as cartels, while Article 102 regulates abuse of a dominant position that could distort competition in the internal market (Al Kautsar, 2023). One of the important breakthroughs in the integration of human rights protection in the EU is the enactment of the Corporate Sustainability Due Diligence Directive in 2023. This regulation requires large companies to identify, prevent and mitigate negative impacts on human rights and the environment throughout their supply chains. Companies with more than 500 employees and an annual turnover of €150 million are required to comply with this provision, including ensuring that their activities are free from human rights violations such as child labor, forced labor or discrimination. This initiative reflects the EU's commitment to the principle of sustainability, which is not only oriented towards the environment, but also towards human dignity (Dempere et al., 2024).

On the other hand, the implementation of the Digital Markets Act (DMA) is an important step in ensuring fair competition in the digital sector (Cauffman & Goanta, 2021). This regulation is aimed at "gatekeepers," namely large technology companies such as Google, Amazon, and Meta, which have dominant market power (Suhendar et al., 2023). The DMA prohibits exclusivity practices and forces companies to open their ecosystems to other business actors. By providing a fairer space for small companies and preventing abuse of market dominance, the DMA indirectly protects

the economic rights of consumers and small business actors, which is also part of human rights protection (Podszun, 2023). However, while EU regulation provides a strong foundation, a major challenge is ensuring harmonization of implementation across member states. Differences in legal systems, enforcement capacities, and national priorities can create gaps in human rights protection. In addition, there is criticism that antitrust law still focuses too much on economic aspects, such as market efficiency, rather than broader social goals. In Asia, antitrust law shows significant variation across countries, reflecting differences in levels of economic development, legal systems, and policy priorities. In general, the approach to human rights in the context of antitrust law is still at an early stage, with some exceptions in more legally developed countries (Widhiyanti, 2020).

In Japan, for example, antitrust law is governed by the Antimonopoly Act of Japan, enacted in 1947 and overseen by the Japan Fair Trade Commission. This law prohibits anticompetitive practices such as cartels, monopolies, and abuse of dominant position. Meanwhile, the integration of human rights into this law has not been explicitly regulated, but Japan has shown progress in corporate social responsibility through voluntary initiatives by large companies (Taris et al., 2024). South Korea also has a well-established antitrust law system through the Monopoly Regulation and Fair Trade Act (MRFTA). Under the supervision of the Korea Fair Trade Commission (KFTC), this law prevents monopolistic and cartel practices. However, like Japan, the aspect of human rights protection has not been an explicit element of competition policy. However, the South Korean government has begun to encourage sustainability initiatives involving human rights, especially in the technology and manufacturing sectors (Gaung Aidaferti Zelina CH, 2023).

Developing countries in Asia, such as Indonesia, India, and the Philippines, face different challenges. In Indonesia, antitrust law is regulated by Law Number 5 of 1999 concerning the Prohibition of Monopolistic Practices and Unfair Business Competition. This law is designed to create a competitive market and protect the interests of the community. However, human rights protection in this context more often emerges through sectoral regulations, such as employment laws or consumer protection (Khon et al., 2023).

Meanwhile, India has a antitrust law framework governed by the Competition Act 2002, which is overseen by the Competition Commission of India. In recent years, India has shown a greater interest in social issues in competition policy, especially in the digital and e-commerce sectors. For example, the Indian government has issued regulations aimed at protecting consumer rights in digital markets, including a ban on exclusionary practices that are detrimental to small businesses (Febrianti et al., 2022).

One of the main differences between the European and Asian approaches to antitrust law is the level of attention paid to human rights issues. The European Union, with a more developed and integrated legal framework, has been able to develop regulations that incorporate principles of social justice, human rights and sustainability. On the other hand, Asia, which consists of countries with different levels of legal development, is still in the process of building awareness of the importance of integrating human rights into competition policy (Fallah Shayan et al., 2022). However, there is great potential for collaboration between the two regions. For example, the EU's experience in implementing the Supply Chain Law can serve as a model for Asian countries to improve human rights protection in business activities. Conversely, Asia, with its unique market dynamics, can provide insights on how to

integrate social and economic objectives in the context of rapid economic growth (Hariram et al., 2023).

Despite progress, challenges in integrating human rights protection into antitrust law remain significant. One of the main challenges is the lack of awareness among business actors about the importance of human rights in business. Many companies view human rights regulations as an additional burden rather than an integral part of their business strategy. Furthermore, uneven enforcement capacity, especially in developing countries, is often a major obstacle to ensuring that existing regulations are implemented effectively (Nasution et al., 2023). To address these challenges, a holistic and collaborative approach is needed. Some steps that can be taken include (Spulber, 2023):

- a. Increasing education and awareness. Business actors need to be given an understanding of the importance of human rights in the business context and the long-term benefits of regulatory compliance.
- b. Regulatory harmonization. International efforts to harmonize antitrust law and human rights regulations can help create a more consistent global framework.
- c. Strengthening law enforcement. Countries need to increase institutional capacity to enforce antitrust law and ensure that human rights violations are dealt with firmly.
- d. International cooperation. Collaboration between the European Union and Asian countries can be an important step in sharing best practices and building a more inclusive framework.

Integrating human rights protection into antitrust law is an important step towards creating a market that is not only competitive, but also fair and sustainable (Schmidt-Kessen, 2025). The European Union has demonstrated a strong commitment to linking competition policy to human rights principles, although there are still challenges in implementation at the member state level. In Asia, although initial steps have been taken, the approach to human rights in antitrust law still requires further development (Horváth, 2024). With closer cooperation between Europe and Asia, and a commitment to strengthening law enforcement and awareness of the importance of human rights, the world can move towards a fairer and more sustainability-oriented antitrust law system. This approach will not only deliver economic benefits, but also ensure that human rights are respected throughout the global supply chain.

C. CONCLUSION

The integration of fairness principles into antitrust law in Europe and Asia strengthens human rights protection by creating a balance between freedom of enterprise and protection of vulnerable individuals and groups. In Europe, regulations such as the TFEU and ECHR uphold fair and competitive markets, protecting consumers from exploitation. Examples such as the United Brands case demonstrate how the implementation of antitrust law protects consumer rights. In Asia, while there is variation in implementation, laws such as those in India and Indonesia are beginning to integrate fairness principles to protect small businesses and consumers. Challenges such as the digital economy require strengthening regulation and international cooperation, ensuring that antitrust law remains relevant in protecting human dignity. Antitrust law in Europe has made significant progress in accommodating human rights

protection, with regulations such as the TFEU and initiatives such as the Digital Markets Act (DMA) and the Corporate Sustainability Due Diligence Directive integrating social justice and human rights principles into business practices.

In Asia, while antitrust laws such as those in Japan, South Korea and developing countries such as Indonesia and India have begun to address human rights protection, this approach is still limited and often not a top priority. Key challenges in both regions include regulatory harmonization, enforcement capacity and corporate awareness of the importance of human rights in business. However, with collaboration and adoption of best practices, antitrust law in Europe and Asia can further strengthen human rights protection. Integrating the principle of dignified justice into antitrust law in Europe and Asia is essential to strengthening human rights protection, by ensuring a balance between freedom of enterprise and protection of vulnerable individuals and groups. In Europe, regulations such as the TFEU, ECHR and more recent initiatives such as the Digital Markets Act (DMA) and the Corporate Sustainability Due Diligence Directive have integrated social justice and human rights aspects into business practices, creating fair and competitive markets. Meanwhile, in Asia, while antitrust law has begun to address human rights protection, its implementation is still variable, and challenges such as the digital economy and enforcement capacity remain obstacles. Therefore, regulatory harmonization and international collaboration are key to ensuring that antitrust law not only promotes economic growth but also protects human dignity more effectively in both regions.

The research recommends that countries in Europe and Asia need to explicitly integrate human rights principles, particularly dignified justice, into the formulation and implementation of competition law to ensure the protection of vulnerable groups.

REFERENCES

- Al Kautsar, I. (2023). Memaknai Persaingan Usaha Yang Berkeadilan Dan Menyejahterakan Dalam Perspektif Keadilan Sosial. *Yurispruden: Jurnal Fakultas Hukum Universitas Islam Malang*, 7(1), 59–79. <https://doi.org/10.33474/yur.v7i1.19983>
- Anisah, S., & Hadi, S. (2023). The Human Right to a Fair Trial in Competition Law Enforcement Procedures: A Rising Issue in Indonesian Experiences. *Laws*, 12(3), 55. <https://doi.org/10.3390/laws12030055>
- Ardyansyah, R. A., & Rizal, S. (2023). Instrument for Protection and Enforcement of Human Rights in Indonesia. *Rechtenstudent*, 4(3), 289–302. <https://doi.org/10.35719/rch.v4i3.304>
- ASMAH. (2022). The role of business competition law in online business: A comparative study of United Kingdom and Indonesia. *Cogent Social Sciences*, 8(1). <https://doi.org/10.1080/23311886.2022.2142398>
- Bima, M. R., & Jacob, J. T. (2023). The Age Threshold for Presidential Nominations in the Perspective of Dignified Justice Theory: Why is there a Court of Family (Mahkamah Keluarga) Issue? *Jurnal IUS Kajian Hukum Dan Keadilan*, 11(3), 403–422. <https://doi.org/10.29303/ius.v11i3.1301>
- Bostoen, F., & Petit, N. (2024). Antitrust rules and remedies against platforms' treacherous turns. *European Law Journal*, 1(1), 1–24. <https://doi.org/10.1111/eulj.12533>
- Cauffman, C., & Goanta, C. (2021). A new order: The digital services act and consumer protection. *European Journal of Risk Regulation*, 12(4), 758–774. <https://doi.org/10.1017/err.2021.8>
- Chigara, B. (2019). *Land Reform Policy: The Challenge of Human Rights Law* (1st ed.). Routledge.
- Crane, D. A. (2024). The Radical Challenge to the Antitrust Order. *Wake Forest Law Review*, 2(2), 399–450.
- Dempere, J., Udjo, E., & Mattos, P. (2024). The Entrepreneurial Impact of the European Directive on Corporate Sustainability Due Diligence. *Administrative*

- Sciences*, 14(10), 266. <https://doi.org/10.3390/admsci14100266>
- Díaz-Cruces, E., Méndez Rocalolano, M., & Zamora-Ledezma, C. (2024). Human Rights at the Climate Crossroads: Analysis of the Interconnection between Human Rights, Right to Climate, and Intensification of Extreme Climate Events. *Laws*, 13(5), 63. <https://doi.org/10.3390/laws13050063>
- Dicky Eko Prasetyo, Muh. Ali Masnun, Arinto Nugroho, Denial Ikram, N. (2024). Discrimination Related to Labour Age Limitation in Indonesia : A Human Rights and Comparative Law Perspective. *Suara Hukum*, 6(2), 228–254.
- Djafar, V. A. (2022). Competition Law Perspective on The Assessment of Conglomerate Merger in Indonesia (Case Study: PT. Aplikasi Karya Anak Bangsa (Gojek) with PT. Tokopedia). *Legal Brief*, 11(5), 3444–3455. <https://doi.org/10.35335/legal.xx.xx>
- Effendi, B. (2020). Pengawasan Dan Penegakan Hukum Terhadap Bisnis Digital (E-Commerce) Oleh Komisi Pengawas Persaingan Usaha (KPPU) Dalam Praktek Persaingan Usaha Tidak Sehat. *Syiah Kuala Law Journal*, 4(1), 21–32. <https://doi.org/10.24815/sklj.v4i1.16228>
- Ezrachi, A. (2016). Sponge. *Journal of Antitrust Enforcement*, jnw011. <https://doi.org/10.1093/jaenfo/jnw011>
- Fadillah, M. R. (2023). Urgensi Perlindungan Hukum Perdagangan Elektronik Dalam Perspektif Persaingan Usaha di Indonesia. *TIN: Terapan Informatika Nusantara*, 4(6), 389–394. <https://doi.org/10.47065/tin.v4i6.4591>
- Fallah Shayan, N., Mohabbati-Kalejahi, N., Alavi, S., & Zahed, M. A. (2022). Sustainable Development Goals (SDGs) as a Framework for Corporate Social Responsibility (CSR). *Sustainability*, 14(3), 1222. <https://doi.org/10.3390/su14031222>
- Fasterling, B., & Demuijnck, G. (2013). Human Rights in the Void? Due Diligence in the UN Guiding Principles on Business and Human Rights. *Journal of Business Ethics*, 116(4), 799–814. <https://doi.org/10.1007/s10551-013-1822-z>
- Febrianti, R., Hara, A. E., & Sunarko, B. S. (2022). Persaingan Kekuasaan Antara India dan Cina : Dari Kekuasaan Militer Sampai Dengan Konflik Siber. *Intermestic: Journal of International Studies*, 6(2). <https://doi.org/http://dx.doi.org/10.24198/intermestic.v6n2.3>

- Gaung Aidaferi Zelina CH. (2023). Cross-Border Competition Framework: Implementation Of The Extraterritoriality Principle In The Application Of Competition Law In Indonesia Under Law Number 5 Of 1999. *Santhet (Jurnal Sejarah Pendidikan Dan Humaniora)*, 7(1), 190–199. <https://doi.org/10.36526/santhet.v7i2.2283>
- Ginsburg, D. H., & Wright, J. D. (2024). Reimagining Antitrust Institutions: A (Modest?) Proposal. *Review of Law & Economics*, 20(1), 83–155. <https://doi.org/10.1515/rle-2023-0090>
- Hariram, N. P., Mekha, K. B., Suganthan, V., & Sudhakar, K. (2023). Sustainalism: An Integrated Socio-Economic-Environmental Model to Address Sustainable Development and Sustainability. *Sustainability*, 15(13), 10682. <https://doi.org/10.3390/su151310682>
- Hasbullah, M. A. (2023). Linking Anti-Trust Laws With Industrial Development: Highlighting The Prevalence of Anti-Trust Laws Within The Indonesian Manufacturing Sector. *International Journal of Criminal Justice Sciences. Criminal Justice Sciences (IJCJS)-Official Journal of the South Asian Society of Criminology and Victimology*, 17(1), 274–286. <https://doi.org/10.5281/zenodo.4756105>
- Hennette-Vauchez, S. (2011). A human dignitas? Remnants of the ancient legal concept in contemporary dignity jurisprudence. *International Journal of Constitutional Law*, 9(1), 32–57. <https://doi.org/10.1093/icon/mor031>
- Hoofnagle, C. J., van der Sloot, B., & Borgesius, F. Z. (2019). The European Union general data protection regulation: what it is and what it means. *Information & Communications Technology Law*, 28(1), 65–98. <https://doi.org/10.1080/13600834.2019.1573501>
- Horváth, A. M. (2024). *Sustainability and Competition Law in Hungary* (pp. 127–161). https://doi.org/10.1007/978-3-031-44869-0_8
- Inawati, Rahmadi Meiliyan, M. (2024). Legal Protection of the Interests of Fair Competition in the Business Sector: Analysis of Anti-Trust and Cartel Violations. *Research Horizon*, 4(3), 189–200.
- J. Moleong, L. (2017). *Metodologi Penelitian Kualitatif*. PT Remaja Rosdakarya.
- Kalianda, H. K. (2020). Problematika Pengaturan Persaingan Usaha Dalam Sistem

- Hukum Indonesia. *Wasaka Hukum*, 8(1), 9. <https://ojs.stihsa-bjm.ac.id/index.php/wasaka/article/view/49>
- Kapeliushnikov, R. I. (2023). The Russian labor market: Long-term trends and short-term fluctuations. *Russian Journal of Economics*, 9(3), 245–270. <https://doi.org/10.32609/j.ruje.9.113503>
- Kastrup, G. H. (2025). A new agenda for antitrust: human rights violations as anti-competitive conduct. *Journal of Antitrust Enforcement*, 13(1), 29–55. <https://doi.org/10.1093/jaenfo/jnae006>
- Khon, D. W. K., Baiquni, M. I., & Waspiah, W. (2023). Two Decades of Business Competition Law: How has Indonesian Competition Law Transformed? *Journal of Private and Commercial Law*, 7(1), 45–68. <https://doi.org/10.15294/jpcl.v7i1.44355>
- Komaling, K. M. (2023). Perlindungan Terhadap Hak-Hak Korban Perang Menurut Konvensi Jenewa 1949. *Lex Administratum*, 11(2).
- Korže, B. (2019). The Right of Small and Medium-Sized Enterprises to Positive Discrimination in Free Market Competition. *Danube*, 10(4), 321–346. <https://doi.org/10.2478/danb-2019-0017>
- Lubis, A. F., Anggraini, A. maria T., Toha, K., Kagramanto, L. B., Hawin, M., Sirait, N. N., Prananingtyas, P., Sukarmi, Maarif, S., & Silalahi, U. (2017). *Hukum Persaingan Usaha*.
- MAKRIS, S. (2021). EU Competition Law as Responsive Law. *Cambridge Yearbook of European Legal Studies*, 23, 228–268. <https://doi.org/10.1017/cel.2021.9>
- Maretta, Y., Tumangkeng, J. P., & Tedjokusumo, D. D. (2024). Harmonisasi Hukum Persaingan Usaha Di Kawasan Asia Tenggara: Pemulihan Perekonomian Pasca Pandemi Covid 19. *Jurnal Ilmiah Kajian Multidisipliner*, 8(6).
- Marzuki, P. M. (2017). *Penelitian Hukum: Edisi Revisi* (13th ed.). Kencana.
- Mertosono, T. (2022). Tugas Dan Wewenang Komisi Pengawas Persaingan Usaha Terhadap Transportasi Online. *Lex Privatum*, 10(4).
- Muhaimin. (2020). *Metode Penelitian Hukum*. Mataram University Press.
- Nasution, E. R., Siburian, H. K., Judijanto, L., & Sugianto, E. (2023). The Role of Competition Law in Encouraging Innovation and Competitiveness of Companies in West Java. *West Science Law and Human Rights*, 1(04), 141–148.

- <https://doi.org/10.58812/wslhr.v1i04.320>
- Ningsih, A. S. (2022). Business Competition Supervisory Institution: A Comparison between Indonesia and Thailand. *Jurnal Hukum Novelty*, 13(2), 253. <https://doi.org/10.26555/novelty.v13i2.a20631>
- Ong, B., & Toh, D. J. (2023). Digital Dominance and Social Media Platforms: Are Competition Authorities Up to the Task? *IIC - International Review of Intellectual Property and Competition Law*, 54(4), 527–572. <https://doi.org/10.1007/s40319-023-01302-1>
- Podszun, R. (2023). From Competition Law to Platform Regulation – Regulatory Choices for the Digital Markets Act. *Economics*, 17(1). <https://doi.org/10.1515/econ-2022-0037>
- Prihandono, I., & Khairunnisa, A. A. (2016). *Tanggung Jawab Korporasi Multinasional dalam Hukum HAM Internasional*. Airlangga University Press.
- Putra, A. S., & Prinanda, D. (2023). Kepentingan Korea Selatan Dalam Kegiatan Perdagangan di Wilayah Asean Melalui Asean-Korean Free Trade Area (AKFTA). *Dialektika: Jurnal Ekonomi Dan Ilmu Sosial*, 8(1), 162–174. <https://doi.org/10.36636/dialektika.v8i1.2292>
- Rantanen, J., Muchiri, F., & Lehtinen, S. (2020). Decent Work, ILO's Response to the Globalization of Working Life: Basic Concepts and Global Implementation with Special Reference to Occupational Health. *International Journal of Environmental Research and Public Health*, 17(10), 3351. <https://doi.org/10.3390/ijerph17103351>
- Read, D. M. (2012). Intellectual Property Rights: A Comparative Perspective on Asia, the EU, and North America. *Norteamérica, Revista Académica Del CISAN-UNAM*, 7(1). <https://doi.org/https://doi.org/10.22201/cisan.24487228e.2012.1.156>
- Rumesten, I., Irsan, & Samawati, P. (2012). *Hukum Ekonomi Internasional*. PT. Fikahati Aneska.
- Sanclemente-Téllez, J. C. (2017). Marketing and Corporate Social Responsibility (CSR). Moving between broadening the concept of marketing and social factors as a marketing strategy. *Spanish Journal of Marketing - ESIC*, 21, 4–25. <https://doi.org/10.1016/j.sjme.2017.05.001>

- Saragih, H. M. (2018). Indonesia dan Persaingan di Era Asean Economic Community. *Jurnal Masharif Al-Syariah: Jurnal Ekonomi Dan Perbankan Syariah*, 2(2). <https://doi.org/10.30651/jms.v2i2.1445>
- Schmidt-Kessen, M. J. (2025). The Relevance of Mandatory Human Rights and Sustainability Due Diligence for the Greening of EU Antitrust Law. In *Business and Human Rights* (pp. 123–146). Brill | Nijhoff. https://doi.org/10.1163/9789004715158_006
- Setianingrum, R. B., & Hawin, M. (2020). Harmonization of Competition Law: Research on The Transplantability of eu's Law into ASEAN. *Yuridika*, 35(3), 613. <https://doi.org/10.20473/ydk.v35i3.21179>
- Soomro, N.-E.-H., & Yuhui, W. (2023). Appraisal of existing evidences of competition law and policy: Bilateral legislative developments of Sino-Pak. *Heliyon*, 9(8), e18935. <https://doi.org/10.1016/j.heliyon.2023.e18935>
- Spulber, D. F. (2023). Antitrust and Innovation Competition. *Journal of Antitrust Enforcement*, 11(1), 5–50. <https://doi.org/10.1093/jaenfo/jnac013>
- Sugiyono. (2019). Metode Penelitian Kuantitatif, Kualitatif, dan R&D. *Bandung: CV. Alfabeta*.
- Suhendar, A., Setiadi, R., Artati, A., & Rohman, A. (2023). The New Trend: Why Indonesian Digital Start-Up Employees are Opting for Quiet Quitting? *WSEAS Transactions on Computer Research*, 11(1), 166–180. <https://doi.org/10.37394/232018.2023.11.15>
- Susilowati, C. M. I. (2020). The Philosophy Of Sentencing In Indonesia Based On Dignified Justice. *International Journal of Business, Economics and Law*, 22(1), 174.
- Taris, M. A., Purwana, V. C. P., & Ramdhani, N. M. (2024). Penguatan Standardisasi Produk Impor Pada E-commerce Di Indonesia Dalam Mengatasi Predatory Pricing (Studi Komparasi Kebijakan Anti-Monopoli Dengan Negara Jepang). *Forschungsforum Law Journal*, 1(03), 45–59. <https://doi.org/10.35586/flj.v1i03.9012>
- Tulung, S. V., & Yusuf, H. (2024). Analisis Regulasi Hukum Dagang Atas Persaingan Usaha Dalam E-Commerce Di Era Digital. *Jurnal Intelek Dan Cendikiawan Nusantara*, 1(2).

- Uffer, M. (2023). Competition Law. In *Sustainability through Participation?* (pp. 252–288). Brill | Nijhoff. https://doi.org/10.1163/9789004509382_011
- Usanti, T. P., Aryatie, I. R., & Moechthar, O. (2023). The Principle of Justice in the Weakness of Objective Rights Holders Against Privileges Rights Holders. *Media Iuris*, 6(2), 271–292. <https://doi.org/10.20473/mi.v6i2.41755>
- Van Uytsel, S., & Uemura, Y. (2021). *Regulating Competition Between Digital Platforms: The Japan Fair Trade Commission's Preference for Unfair Trade Practices* (pp. 45–72). https://doi.org/10.1007/978-981-16-0324-2_3
- Vatter, M. (2020). Dignity and the Foundation of Human Rights: Toward an Averroist Genealogy. *Politics and Religion*, 13(2), 304–332. <https://doi.org/10.1017/S1755048319000336>
- Via Dianti, P. O., Andini, M. A. P., Windari, R., & Da Silva, E. B. (2024). Comparison of Indonesian and Norwegian Laws regarding Criminal Responsibility of perpetrators with Intellectual/Mental Disabilities. *Jurnal Suara Hukum*, 6(1), 68–90. <https://doi.org/10.26740/jsh.v6n1.p68-90>
- Waller, S. W. (2025). Discretionary justice in antitrust. *Journal of Antitrust Enforcement*, 13(1), 17–28. <https://doi.org/10.1093/jaenfo/jnae035>
- Walter, Y. (2024). Managing the race to the moon: Global policy and governance in Artificial Intelligence regulation—A contemporary overview and an analysis of socioeconomic consequences. *Discover Artificial Intelligence*, 4(1), 14. <https://doi.org/10.1007/s44163-024-00109-4>
- Widhiyanti, H. N. (2020). The Urgency of Harmonizing Competition Laws in Moving Towards the ASEAN Free Trade Area. *Fiat Justisia*, 14(1), 48.
- Yulianti, S., Sova, M., Indrajaya, T., Supriani, M., (2022). The Efforts To Improve Products For Development Of Micro Small Medium Enterprises (Msmes) Based On Digital Creative Economy In The South Tangerang Region. *International Journal of Engagement and Empowerment*, 2(2), 191–200.
- Zaid, Z., & Aufa, M. F. (2022). Peran Undang-Undang Persaingan Usaha dalam Meningkatkan Pertumbuhan Ekonomi. *Jurnal Pamator: Jurnal Ilmiah Universitas Trunojoyo*, 15(1), 89–99. <https://doi.org/10.21107/pamator.v15i1.14282>
- Zairul Alam, M., & Tejomurti, K. (2022). Are The Interests Of Business Actors And

Consumers Balanced In The Indonesian Competition Law? *Dialogia Iuridica*,
14(1), 095–123. <https://doi.org/10.28932/di.v14i1.5114>