

Supplementary material

Table S1. Table of the relevant studies

Study, source of the information (Sorted from general to specific topics)	Method	Country	Specific areas of the regulation and study results	Period
Hague Conference on Private International Law (2012). Permanent bureau: A preliminary report on the issues arising from international surrogacy arrangements	Legal comparative analysis	Netherlands	Comprehensive overview of the legal aspects of surrogacy of the Member States of the Hague Conference on Private International Law, including information about permission, disallowance, or tolerance within the framework of legislation.	The current legislation
Brandão P, Garrido N (2022). Commercial surrogacy: An overview	Literature review	Portugal	Research on surrogate treatment by women without a uterus, and also the use of surrogacy with single men and same-sex male couples. Analysis of the related ethical dilemmas.	Published literature since 2000
Patel A, Kumar P, Sharma PSVN (2020). “The miracle mothers and marvelous babies”: Psychosocial aspects of surrogacy – a narrative review	Ethical outlook and case studies	India	Various outlooks and dilemmas of the clinicians, patients, and parties contracting for surrogacy, dilemmas for the child born out of surrogacy. Focus on the role of mental health professionals in surrogacy arrangements.	The current approach to the issue
Arvidsson A, Johnsdotter S, Essén B (2015). Views of Swedish commissioning parents relating to the exploitation discourse in using transnational surrogacy	Qualitative research (Interviews)	Sweden	Negotiation of the commissioning parents about the present approach on surrogacy. Argumentation of the commissioning parents against the exploitation discourse conclusion: it is uncertain for commissioning parents if the surrogate mothers are well protected in the surrogacy arrangements.	The current research
Duffy DA, Nulsen JC, Maier DB, Engmann L, Schmidt D, Benadiva CA (2005). Obstetrical complications in gestational carrier pregnancies	Retrospective analysis	USA	The report of the two cases of severe obstetrical complications in gestational carrier pregnancies. The review of the clinical experience and comparison of the results with results reported in the literature.	The current approach to the issue
Finkelstein A, Mac Dougall S, Kintominas A, Olsen A (2016). Surrogacy law and Policy in the U.S.: A national conversation informed by global lawmaking	Legal comparative analysis	USA	Introduction to the international surrogacy industry and how surrogacy is currently regulated in the U.S. and across the globe. Presentation of the key arguments for and against the legalization of surrogacy.	The current approach to the issue

Twine FW (2011). Outsourcing the womb: Race, class, and gestational surrogacy in a global market	Critical and comparative analysis	USA	The study points to the dynamic development of assisted reproduction technologies, which brings with it the risk of globalization of the gestational surrogacy industry. Due to the inconsistency of legal regulations worldwide, it is not only surrogate mothers that can be abused, but also children born from surrogate motherhood.	The current approach to the issue
Fidan Y (2016). Legal discussions on surrogate motherhood	Legal and ethical analysis	Turkey	Surrogacy from the point of view of Islamic law generates cultural, juridical, individual, and social problems. Also, society is sceptical of this provision because of these five principles which are recognized by society: conservation of life, protection of generations, protection of intelligence, protection of property, and protection of religion.	The current approach to the issue is based on Islamic law and religious principles
Whittaker A (2016). From 'Mung Ming' to 'Baby Gammy': A local history of assisted reproduction in Thailand	Qualitative research - Media material review from Thai and English-language sources	Thailand and Australia	Due to the public revelation of illegal practices, assisted reproduction was brought into disrepute. It was obvious that the Thai Medical Council Guidelines had failed to prevent commercial surrogacy and ova donation. So, in 2015 new legislation was introduced for closing down the commercial international assisted reproduction trade. Emphasis is placed on ethical and religious dilemmas for Thai assisted reproduction.	The current approach to the issue
Piersanti V, Consalvo F, Signore F, Del Rio A, Zaami S (2021). Surrogacy and "procreative tourism". What does the future hold from the ethical and legal perspectives?	Legal and ethical analysis	Italy	Italian law does not allow surrogacy. However, the ban leads Italian citizens to use foreign options. The study analyses these aspects of the Italian adaptation. When deciding on surrogacy, courts in an international context take into account several factors, without a legal or ethical consensus, which should be prioritized. These factors are: the best interests of the child, the rights of the gestational mother, the genetic link between the child and genetic parents, and the goals of the couple who signed the surrogacy contract.	The current approach to the issue is based on Italian law and a comparison with foreign legislation is given
Hibino Y (2022). Ongoing commercialization of gestational surrogacy due to globalization of the reproductive market before and after the pandemic	Literature review and Qualitative	Japan	The closure of state borders during the 2020 COVID-19 pandemic has brought an intensified commercial focus on this contentious topic. The commercialization of	The current approach

	research (Interviews)		surrogacy occurred thanks to the enormous development of tourism in this area. The author of the study states that commercialization should be stopped by carefully examining the reality of the surrogacy process, which has also happened in India, Thailand, and Cambodia.	
Frati P, La Russa R, Santurro A, Fineschi B, Di Paulo M, Scopetti M, et al. (2021). Bioethical issues and legal frameworks of surrogacy: A global perspective about the right to health and dignity	Systematic literature research; critical evaluation of the international legislation	Italy	Lack of cross-border surrogacy regulations in low-income countries can undermine the dignity and rights of women, because even modest economic compensation determines significant purchasing power.	The current approach
Khvorostianov N (2023). The motives behind post-Soviet women's decisions to become surrogate mothers	Data analysis of online discussion group (inductive thematic analysis)	Israel	Research has pointed out the motivations for surrogacy: (1) to solve financial problems (ranges between \$10,000 and \$20,000. The median annual income of an employed Russian woman is about \$4200) (2) to use surrogacy as a form of employment (3) to experience an additional pregnancy, and (4) to realize oneself as a person through a socially valuable act.	Data analysis from the online discussion group from February 2017 to January 2018
Blazier J, Janssens R (2020). Regulating the international surrogacy market: The ethics of commercial surrogacy in the Netherlands and India	Analysis of ethical aspects	Netherlands	Commercial surrogacy is not inherently unethical, but it can lead to the following issues. Exploitation by coercion is an issue in an unequal society, and it occurs in all forms of low-paying labour. Banning commercial surrogacy would not solve this as it would only remove this opportunity for women to alleviate their poverty. The problem to be addressed is to reduce inequality. The commodification of children is a non-issue in surrogacy because payment for reproductive labour is necessarily different from payments for existing children.	Based on a literature review of current legislation in the Netherlands and India