The Output®

QUARTERLY BULLETIN

2nd Quarter 2025

20 Years Dedicated to Competition

ACTECON

Knowledge Connect: Bridging Jurisdictions, Elevating Knowledge – Roundtable Insights

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Dear Reader,

We are proud to announce that ACTECON has been ranked Tier-1 in Competition Law in Türkiye by Legal 500—a recognition of our team's collective dedication and pursuit of excellence, and a heartfelt thank you to our clients and colleagues for their trust and support.

As we release the second quarterly edition of The Output®, we are seeing important changes in competition law, international trade, and regulatory enforcement, both in Türkiye and around the world.

In Türkiye, the Turkish Competition Authority ("TCA") has continued to reinforce procedural discipline with sanctions against undertakings obstructing on-site inspections, while reiterating the critical nature of compliance with merger control standstill obligations. The TCA's decisions not only demonstrate its zero-tolerance stance but also signal a heightened sensitivity toward digital traceability and communications. Moreover, landmark cases such as the Tofaş-Stellantis transaction underscore the TCA's growing willingness to condition approvals on investment commitments.

From a legislative perspective, the adoption of the new Communiqué on Specialisation Agreements has brought Turkish competition law closer to EU standards, tightening market share thresholds and requiring businesses to re-evaluate longstanding arrangements. Meanwhile, the publication of the TCA's 2024 Annual Report shows an intensive pace in investigations and sanctions.

Beyond Türkiye, international regulators have intensified their scrutiny of labour market restrictions, digital intermediation practices, and environmental compliance. Cases involving global platforms, pharmaceutical inputs, and green economy transitions highlight the span of the emerging enforcement trends and challenge undertakings to adopt an integrated, anticipatory approach to legal compliance that goes well beyond traditional notions of competition risk.

In this issue of The Output® we also spotlight the key takeaways of the inaugural Knowledge Connect roundtable, which we organized in May 2025 in Istanbul, which brought together leading Knowledge Counsels from across Europe, including the United Kingdom, to reflect on the future of legal knowledge management in antitrust practice.

As always, we thank our clients, colleagues, and peers for their continued engagement and trust. We hope The Output® serves as a valuable guide and reference as you navigate a rapidly transforming legal and regulatory environment.

Sincerely,

ACTECON Team

ISSN 2687-3702

Published by
© ACTECON, 2025
Çamlıca Köşkü Tekkeci Sk.
No:3-5 Arnavutköy Beşiktaş
34345 Tel: 90 212 211 50 11

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Type of Publication
Periodical

Graphic Design
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In this issue:

June Cases Highlight Consequences of Hindering On-Site Inspections

The TCA imposed administrative fines on several companies for hindering on-site inspections, enforcing the rule that such interference triggers an immediate fine of 0.5% of the company's annual turnover. These have become substantial. In its June decisions, the TCA reiterated this strict approach.

In the decision published on 16 June 2025, it was found that during the on-site inspection at the headquarters of Arzum Elektrikli Ev Aletleri A.Ş. ("Arzum"), which began at 10:30 on 15 January 2025, employees deleted WhatsApp messages from their mobile devices.

The inspection experts determined that some employees had used the 'clear chat' feature to delete WhatsApp conversations. These deletions were evident by the fact that the chat remained visible in the app interface, but the content was missing, with deletion times verifiable through the app's interface. The deleted conversations were further confirmed by examining the devices of chat counterparts.

Experts also found that some employees had uninstalled and reinstalled the WhatsApp application on their devices to delete chat histories. Technical analysis revealed WhatsApp file paths created at 10:50, marking the time of reinstallation.

In another decision published on 30 June 2025, it was established that during the on-site inspection at Serin Beton İnş. Taah. İnş. Malz. Hafr. Taş. Gıda San. ve Tic. Ltd. Şti. ("Serin Beton"), which started at 10:30 on 20 August 2024, a company employee deleted WhatsApp messages from their mobile device at 10:38, as identified through WhatsApp log files.

Some deleted WhatsApp messages were partially recovered from local backups, but messages exchanged between the backup time and the deletion time were unrecoverable. Additionally, the WhatsApp interface showed that another message had been deleted using the 'delete for everyone' feature.

The employees who had performed the deletion claimed that they had erased the messages to prevent document images from remaining on their personal phones, that no explicit instruction had been provided to refrain from deleting data during the inspection, and that the message had been deleted because it had been accidentally sent to the wrong recipient.

The TCA assessed these actions as hindering the on-site inspection and imposed an administrative fine on Arzum and Serin Beton equal to 0.5% of their 2023 gross revenues.

Can Group Fined for Premature Tekfen Shares Acquisition

The TCA sanctioned the Can Group (a shareholder of Tekfen Holding) for gun-jumping, by acting as if it had obtained approval to acquire Tekfen shares before clearance was granted. While the substantive assessment of Can Group's acquisition of Tekfen is still underway, the fine imposed highlights the Board's strict approach towards procedural infringements aimed at safeguarding the effectiveness of merger control enforcement in Turkish competition law.

According to the announcement of the TCA, the Board determined that Can Group's attempt to acquire direct and indirect control of Tekfen Holding A.Ş.'s ("Tekfen") shares constitutes a transaction subject to approval. Since the parties acted as if approval had been granted despite the Board's absence of a decision, an administrative fine of TRY 10.9 million (EUR 0.38 million) was imposed on Can Group economic entity as the acquiring party.

The announcement also states that the acquisition of sole control over Tekfen will not be legally valid until the Board takes its final decision. Furthermore, the Board decided that Can Group (including its affiliate ARY Holding) must refrain from carrying out any transactions or actions that may lead to the acquisition of control over Tekfen during this process. The announcement stresses that the substantive review regarding the competitive effects of the share transfer is still ongoing and that a final decision on the transaction will follow the completion of this assessment.

The case highlights the importance of complying with Turkish merger control rules, particularly the standstill obligation. Undertakings must ensure that transactions are not closed or implemented before obtaining clearance from the TCA, as premature execution may result in significant administrative fines regardless of the transaction's ultimate approval.

New Communiqué on Specialisation Agreements Introduces Stricter Thresholds

The TCA issued a new Block Exemption Communiqué No. 2025/2 on Specialisation Agreements, published in the Official Gazette dated 26 June 2025 ("Communiqué"). This Communiqué repeals the previous Communiqué No. 2013/3 ("Repealed Communiqué"), which had been in force since 2013. The new Communiqué aligns Turkish practice with Commission Regulation (EU) 2023/1067 of 1 June 2023, which applies Article 101(3) of the TFEU to specific categories of specialisation agreements ("Commission Regulation").

With the Communiqué, certain fundamental concepts have been revised to achieve terminological consistency. The total market share threshold of 25%, which was previously required to benefit from the block exemption under the Repealed Communiqué, has been reduced to 20% in line with Article 3 of the Commission Regulation. Additionally, according to Article 3/2 of the Commission Regulation, if the parties in a downstream market also use the specialised product, the 20% threshold must be independently satisfied both in the downstream market and in the specialised product market.

Moreover, whereas the Repealed Communiqué required that the market shares be calculated based on data from the previous calendar year, the Communiqué, in line with Article 4(b) of the Commission Regulation, now also allows using the average of the last three calendar years if the previous year's data does not accurately reflect the parties' positions in the market.

Under the Repealed Communiqué, if the parties' market shares exceeded 30%, the exemption would remain valid for one additional year; if their market shares were between 25% and 30%, the exemption would remain valid for two years. In parallel with the Commission Regulation (Article 4(d)), the Communiqué provides that if the market share is initially below 20% but subsequently exceeds this threshold in any of the relevant markets, the exemption will remain valid for two years following the moment the threshold is first exceeded.

The Communiqué also introduces a transition period. It explicitly provides a transition process for agreements that benefited from the exemption under the Repealed Communiqué but do not meet the requirements of the new Communiqué. In this regard, such agreements must be brought into compliance with the new Communiqué within two years of its entry into force. During this period, the prohibition under Article 4 of the Competition Law will not apply. Under the Commission Regulation, agreements in force as of 30 June 2023 that do not meet the exemption conditions stipulated in Commission Regulation but comply with the exemption conditions stipulated in Regulation (EU) No. 1218/2010 ('Repealed Commission Regulation'), will continue to benefit from the exemption between 1 July 2023 and 30 June 2025.

Since the new Communiqué narrows the market share threshold, it is important that existing specialisation agreements are reviewed for compliance with the new Communiqué and that particular attention is paid to the 20% market share threshold in future agreements.

Highlights of TCA's 2024 Annual Report

The 2024 Annual Report ("Annual Report"), outlining the Turkish Competition Authority's activities for the year, was published on 28 May 2025. It includes general information about the TCA, its objectives, and key activities carried out in 2024. During the year, the TCA reviewed 311 merger and acquisition cases, 166 competition infringement cases, and 10 exemption and negative clearance applications.

The sectoral breakdown of completed investigations shows that the top five investigated sectors were the food industry; chemicals and mining; culture, arts, entertainment, recreation, sports, gambling, and education; automotive and transportation; and information technology and platform services. In 2024, the number of cases concluded involving allegations of competition violations reached its highest level in the last four years, with over half (53%) initiated ex officio.

In 2024, the TCA issued decisions on 198 acquisitions, 105 joint ventures, six privatisations, and two mergers within the scope of merger and acquisition transactions. Of the 282 applications submitted, 274 were approved unconditionally, and eight were approved conditionally, in line with the applicable legal provisions. Notably, no applications concerning mergers, acquisitions, joint ventures, or privatisations were rejected.

The TCA imposed administrative fines totalling TRY 7.5 billion (approximately EUR 215 million), tripling the amount from the previous year. The most heavily sanctioned sectors were information technology and platform services, the food industry, and construction, which together accounted for approximately 85% of the total fines.

Investigation into Ready-Mixed Concrete Producers Concluded

The investigation launched in December 2022 into certain ready-mixed concrete producers operating in Ankara and Kırıkkale provinces for alleged violation of Article 4 of the Competition Law was completed on 23 May 2025. Undertakings are reminded that price-fixing, market allocation, or information exchange among competitors remain subject to scrutiny and strict enforcement under Article 4 of the Competition Law.

The investigation focused on allegations that certain undertakings operating in the relevant markets engaged in anti-competitive conduct, including agreements or concerted practices aimed at fixing the sales prices of ready-mixed concrete, allocated regions and customers, and exchanged competitively sensitive information, all of which constituted violations of Article 4 of the Competition Law.

During the investigation, the Board rendered interim decisions resulting in settlement agreements with five undertakings, which led to the imposition of administrative fines totalling TRY 65,125,619 (approximately EUR 1.86 million).

Subsequently, the investigation into the remaining parties concluded with Board decision No. 24-31/726-308 dated 25 July 2024. The Board determined that several undertakings in Ankara and Kırıkkale had infringed Article 4 by object through practices involving regional and customer allocation, price-fixing arrangements for ready-mixed concrete, and the systematic exchange of competitively sensitive information.
The Board imposed an additional administrative fine of TRY 120,200,000 (approximately EUR 3.43 million) on the parties found to have violated the law.

Undertakings are reminded that price-fixing, market allocation, or information exchange among competitors remain subject to scrutiny and strict enforcement under Article 4 of the Competition Law.

World Credit Card Program Cooperation Agreements: Individual Exemption Reassessed

The TCA launched a review under Article 13 of the Competition Law to assess whether the individual exemption previously granted to the World Credit Card Program Cooperation Agreements should be revoked and concluded that, in their current form, the agreements no longer qualify for individual exemption. Accordingly, on 23 May 2025 the Board decided that these agreements must be amended and re-notified to the TCA within nine months, or the cooperation under the World Program must be terminated within that time frame.

The Board's reassessment examined restrictions imposed on World Program member banks in providing services to each other's merchants, prohibitions barring member banks from joining alternative co-branded card programs, and limitations on advertising, promotion, campaign activities, and service conditions conducted by member banks under the program.
For the relevant agreements to qualify for the individual exemption, the Board required these amendments:

i. Narrow the prohibition on offers to merchants already served under the World Program by another member bank to exclude cases where merchants seek competing offers intending to switch providers.
ii. Eliminate the "waiting periods" before another member bank can serve merchants whose previous affiliation ended.
iii. Ensure member banks retain full autonomy over card fees, annual membership fees, and maximum contractual interest rates for credit cards.
iv. Guarantee a minimum nine-month card migration period following a member bank's withdrawal from the World Program.

For the relevant agreements to qualify for the individual exemption, the Board required these amendments. This outcome underscores that individual exemptions are dynamic and subject to continuous scrutiny under Article 13 of the Law.

18 Undertakings Settled with TCA in Hazelnut Market Inquiry

The investigation concerning the alleged Article 4 of the Competition Law infringement by 21 undertakings engaged in hazelnut trading in Trabzon province was concluded on 21 May 2025 with settlements for 18 of the parties.

The investigation was initially triggered by documents obtained during an on-site inspection at Ferrero Fındık İthalat İhracat ve Ticaret AŞ ("Ferrero"), following the TCA's Decision No. 22-50/734-M, dated 3 November 2022. These documents suggested that local traders were exchanging competitively sensitive information—such as purchase prices and market strategies—which could reduce market uncertainty and restrict competition.

As a result of the evidence, the TCA launched a full investigation into 21 undertakings. 18 of these companies applied for settlement, admitting to the infringement. The TCA confirmed that the undertakings had violated Article 4 by engaging in direct communication and strategic information exchange, ultimately harming the competitive process in the hazelnut supply chain.

TCA Sanctions Refractory Material Manufacturers for Collectively Increasing Prices

The TCA investigated allegations that several refractory materials manufacturers operating in Türkiye violated Article 4 of the Turkish Competition Law by coordinating price increases. On 14 May 2025, the TCA concluded that agreeing on prices to be submitted in tenders constituted a breach of competition law.

An investigation was launched to determine whether Asmaş Ağır Sanayi Malzemeleri İmal ve Tic. AŞ ("Asmaş"), Daussan Refrakter AŞ ("Daussan"), Kümaş Manyezit AŞ ("Kümaş"), Haznedar Durer Refrakter Malzemeleri San. ve Tic. AŞ ("Haznedar"), Piromet Pirometalurji Malzeme Refrakter Mak. San. ve Tic. AŞ ("Piromet") and Remsan Refrakter Malzeme San. ve Tic. AŞ ("Remsan") violated Article 4 of the Turkish Competition Law.

Haznedar applied for leniency under the Regulation on Active Cooperation for Detecting Cartels and subsequently settled. Daussan and Remsan also concluded the investigation through settlement.

The case file revealed that Daussan and Piromet had agreed on the prices to be submitted in tenders. The correspondence indicates that rival undertakings Daussan and Piromet communicated about pricing in tenders and agreed on prices to be submitted. Similarly, Daussan and Asmaş were found to have coordinated price offers for a tender involving furnace spraying products. Haznedar and Remsan were also found to have engaged in price fixing, customer allocation, and the exchange of competitively sensitive information in tenders.

As a result of the investigation, administrative fines were imposed on Asmaş, Daussan, Haznedar, Piromet, and Remsan for violating Article 4 of the Competition Law. Kümaş received no administrative fine as there was no evidence of a violation.

Historic First: TCA Approves Tofaş-Stellantis Deal with Groundbreaking Investment Commitments

On 18 April 2025, the TCA approved Stellantis Otomotiv Pazarlama A.Ş's ("Stellantis Türkiye") acquisition of Tofaş Türk Otomobil A.Ş. ("Tofaş") following the acceptance of the second commitment package submitted by the parties. The TCA's decision to condition its approval on specific investment commitments sets a historic precedent. This move is expected to influence national and international policy by exemplifying a proactive and forward-looking approach to competition policy.

The initial commitment package submitted by the parties in October 2024 was deemed insufficient and rejected by the TCA. However, the TCA found the second commitment package, which included an investment plan, measures related to the distribution/sales channel, and commitments to protect domestic production, sufficient to address the competition concerns related to the transaction. The investment plan, which aims to increase Tofaş's production and export capacity, is expected to benefit the automotive industry and its suppliers, as well as boost employment.

Measures aimed at eliminating the restrictive effects of distribution channels on consumer preferences and competing brands also played a key role in the TCA's decision. In this context, the aim was to prevent dealers affiliated with the parties to the transaction from becoming "one-stop shops."

The TCA decision to condition its approval on specific investment commitments represents a first in the Authority's history. This decision is expected to contribute to national and international jurisprudence by exemplifying a dynamic, forward-looking approach to competition policy.

Anti-Trust on the Menu: EC Fines Delivery Companies EUR 329 M

On 2 July 2025, the European Commission ("EC") imposed fines totalling EUR 329 million on Delivery Hero SE ("Delivery Hero") and Glovoapp23 SA ("Glovo") for participating in a cartel within the online food delivery sector across the EEA. This marks the Commission's first decision addressing a cartel in the labour market and the first instance of sanctioning anti-competitive conduct facilitated by a minority shareholding in a competitor.

Key Findings:

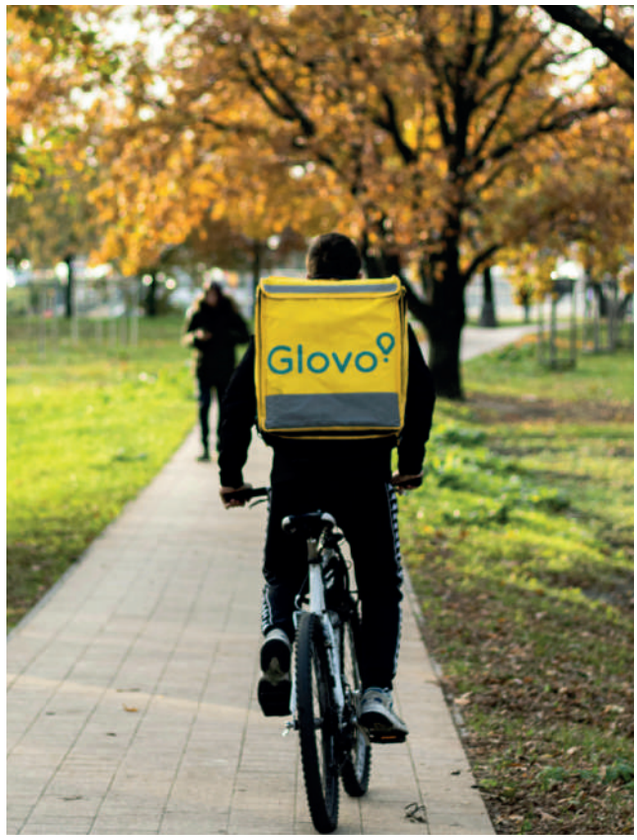
• Non-Poaching Agreement: Following Delivery Hero's acquisition of a minority stake in Glovo in July 2018, both companies agreed not to hire each other's employees. This arrangement expanded beyond initial limited clauses to a general non-solicitation agreement.

• Exchange of Commercially Sensitive Information: The companies shared confidential data, including pricing strategies, costs, and market plans, enabling them to align their business conduct and reduce competitive uncertainty.

• Market Allocation: Delivery Hero and Glovo agreed to divide national markets within the EEA, refrain from entering each other's territories and coordinate market entries where neither was present, effectively eliminating competition between them.

These practices, facilitated by Delivery Hero's minority shareholding in Glovo, were found to constitute a single and continuous infringement of Article 101 of the TFEU and Article 53 of the EEA Agreement. Fines Imposed: EUR 223,285,000 on Delivery Hero, and EUR 105,732,000 on Glovo. Both companies admitted their involvement and agreed to settle the case, receiving a 10% reduction in fines under the Commission's 2008 Settlement Notice.

This case underscores the EC's commitment to addressing anti-competitive practices, particularly those affecting labour markets and facilitated by corporate shareholdings.



EC Fines Apple for Repeating Anti-Steering Practices through Its Online Intermediation Services

The EC launched an investigation on 25 March 2024 into Apple Inc.'s continued steering restrictions on developers via the App Store, violating the DMA and decided on 23 April 2025, to fine Apple EUR 500 million. In its reasoned decision published in June 2025 regarding the relevant investigation, the EC assessed that Apple did not allow developers to inform, redirect, and sell alternative offers available outside the App Store to customers free of charge.

The EC determined that developers were unable to communicate directly with users about more advantageous offers without a link to an external website, and that the fees requested by developers in exchange for user actions exceeded what was deemed 'necessary and proportionate.' A similar case had previously been brought against Apple in 2020, when the EC launched an antitrust investigation concerning the App Store rules applied to music streaming applications, following a complaint by Spotify. In that case, Apple was also found to have imposed anti-steering restrictions that prevented developers from informing users about alternative offers outside the App Store. These restrictions were deemed neither necessary nor proportionate under EU competition rules.

In its reasoned decision published in June 2025 regarding the relevant investigation, the EC assessed that Apple did not allow developers to inform, redirect, and sell alternative offers available outside the App Store to customers free of charge. This effectively prevented developers from offering alternative commercial terms or distribution methods alongside or outside the App Store. Following the decision, Apple is now required to remove existing technical and commercial restrictions and refrain from implementing similar measures in the future.

Accordingly, the DMA investigation mirrors the earlier antitrust case, with the key difference being that Apple's obligations now stem from its gatekeeper status rather than from holding a dominant position in the relevant market. The EC's decision demonstrates its strict enforcement of the Digital Markets Act against gatekeepers, reiterating anti-competitive practices previously addressed under competition law. Apple and other designated gatekeepers must now reassess their commercial and technical practices to align with DMA obligations and mitigate substantial financial and reputational risks.

Belgian Competition Authority Fines Pharma Companies for Collusion in Pharmacy Product Placement

On 24 April 2025, the Belgian Competition Authority ("BCA") imposed administrative fines on Johnson & Johnson Consumer ("Johnson&Johnson"), Boehringer Ingelheim ("Boehringer"), and Haleon Belgium ("Haleon") for longstanding anti-competitive practices concerning the display of over-the-counter ("OTC") medicines sold in pharmacies. The case confirms that even indirect restrictions on competition, such as manipulating in-store visibility, are considered serious infringements under competition law.

The fines stem from the companies' longstanding coordination under a joint Space Management Project ("SMAN"), which had been in operation for over 15 years. This project involved jointly designing and implementing planograms, visual tools used to determine the layout and shelf placement of OTC products in pharmacies.

The BCA's investigation concluded that the companies excluded rival products from planogram design and implementation processes, favoured their own OTC products through preferential placement strategies and manipulated in-store visibility in ways that influenced consumer behaviour in a manner that restricted competition.

These coordinated practices were found to distort competition by limiting the visibility and availability of competing products, ultimately reducing consumer choice.

All three companies submitted settlement applications during the investigation. Following the acceptance of these applications, the BCA imposed a total administrative fine of EUR 11.25 million across the three undertakings.

The decision underscores the BCA's vigilance in addressing collusion not only in pricing or market allocation but also in retail presentation strategies that subtly restrict market access. It reinforces that even indirect forms of competitive interference, such as controlling in-store visibility, can constitute serious breaches of competition law.

Swiss Competition Authority First-Ever Cartel Fines for Active Ingredient Collusion

On 10 April 2025, the Swiss Competition Authority ("SCA") imposed its first-ever cartel fines in the pharmaceutical sector following an investigation into anti-competitive practices involving N-Butylbromide Scopolamine/ Hyoscine ("SNBB"), the active ingredient in the widely used anti-spasmodic drug Buscopan and its generic equivalents.

The SCA found that seven pharmaceutical companies, Boehringer Ingelheim, Alkaloids of Australia, Alkaloids Corporation, Alchem, C2 Pharma, Linnea, and TransoPharm, participated in a cartel involving an agreement on a minimum sales price for SNBB, coordination on market quota allocation, and the exchange of commercially sensitive information regarding supply and pricing strategies.

A total administrative fine of CHF 600,000 was imposed on the parties whose settlement applications were accepted during the investigation process. In addition, C2 Pharma, which applied for leniency, received full immunity from fines; and TransoPharm and Linnea were granted partial immunity in recognition of their cooperation.

This landmark decision reflects the SCA's increasing enforcement activity in the life sciences sector. It sends a clear message that collusion on pharmaceutical inputs, particularly those critical to widely used medications, will face regulatory scrutiny. It also highlights the expanding use of leniency and settlement procedures in cartel enforcement within Switzerland.

EC Fines Car Manufacturers and Association Over End-Of-Life Vehicles Recycling Cartel

On 1 April 2025, the EC imposed fines totalling approximately EUR 458 million on 15 leading car manufacturers and the European Automobile Manufacturers' Association ("ACEA") for their involvement in a cartel that restricted competition in the recycling of end-of-life vehicles ("ELVs") over 15 years.

The investigation revealed that between 2002 and 2017, 16 automotive manufacturers-including Mercedes-Benz and the industry association ACEA-engaged in coordinated conduct that distorted competition in the ELV recycling market across the European Economic Area. According to the Commission, the cartel members:

- Agreed not to pay vehicle dismantlers for recycling ELVs, thereby suppressing downstream market incentives;
- Exchanged sensitive commercial information regarding their contractual practices with dismantling companies to align their positions; and
- Jointly withheld information on recycling performance, such as the proportion of vehicle materials that were reused, recycled, or recovered, and the volume of recycled content used in new vehicles.

ACEA was found to have facilitated and sustained the cartel by organising regular meetings and communications among the participant companies. In setting the fines, the Commission considered several factors, including the scale of affected vehicles, the gravity and duration of the infringement, and the geographic scope of the cartel. Several participants cooperated under the Commission's Leniency Programme:

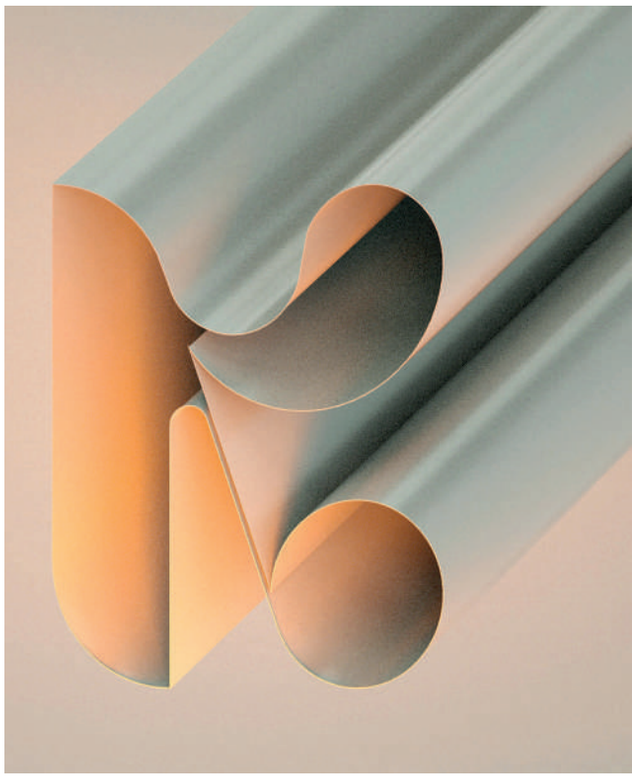
- Mercedes-Benz, as the whistleblower, received full immunity from a fine of approximately EUR 35 million;
- Stellantis (including Opel), Mitsubishi, and Ford were granted reduced fines for their cooperation.

Moreover, under the 2008 Settlement Notice, all undertakings benefited from a 10% reduction in their fines for acknowledging their involvement and accepting liability.

This decision underscores the EC's firm stance against collusion in sustainability-related markets and signals heightened scrutiny of coordination that undermines environmental transparency, especially in sectors critical to circular economy objectives.

EC Acts Against Circumvention of Tariffs on Imports of Graphite Electrode Systems

In June 2025, the EC announced that it has addressed measures against the circumvention of anti-dumping duties on imports of graphite electrode systems ("GES") from China and has extended their scope to include imports of artificial graphite in the form of blocks or cylinders.



The announcement noted that the anti-dumping duty rate to be applied to artificial graphite imported from China has been set at 74.9%.

The EC extended the scope of the anti-dumping measures after its investigation revealed that the measures imposed on graphite electrode systems originating in China were being circumvented through imports of artificial graphite, the main raw material used in GES production, from China into the EU. It was found that the artificial graphite imported into the EU was subsequently being processed into graphite electrode systems. The EC concluded that the practice lacked substantial economic justification and primarily aimed to circumvent the anti-dumping duties applied on Chinese GES imports.

The EC clarified that artificial graphite in powder or paste form, used in other applications such as lithium-ion batteries for electric vehicles and consumer electronics like smartphones and computers, is excluded from the extended measures.

EC Acts Against Unfair Imports of Vanillin from China

The EU has taken action against dumped vanillin imports from China.

On 12 June 2025, the EC announced that it had started imposing definitive anti-dumping duties of 131.1% on vanillin imports originating in China, i.e. the world's largest producer and exporter of vanillin.

Vanillin is commonly used in food products, perfumes, and pharmaceuticals. The EC noted that these measures aim to protect EU producers from unfair trading practices.

The anti-dumping duties followed an investigation, initiated in May 2024, which established that dumped vanillin imports from China caused material injury to the EU industry. It was also emphasised that the duties are intended to help EU-based vanillin producers compete on more equal terms with their Chinese counterparts.

Türkiye Concludes Safeguard Extension Investigation into Flat Glass Imports from Iran

On 16 May 2025, the Turkish Ministry of Trade concluded its safeguard extension investigation on imports of flat glass products classified under customs tariff codes 70.04, 70.05, and 70.06 originating from Iran, pursuant to Communiqué No. 2025/3 on Safeguard Measures in Imports.

The investigation found a significant increase in imports of flat glass products originating from Iran during the period. Despite an additional 5% customs duty, these imports continued to represent a substantial share of the Turkish market. The removal of this measure is expected to sustain imports due to Iran's excess production capacity, low domestic demand, and geographic proximity to Türkiye. The average unit prices of imports of Iranian imports remain significantly below global and domestic prices, threatening the competitiveness of local producers. Iran ranked as the third-largest exporter of flat glass products to the world and Türkiye in 2021 and 2022, accounting for more than 20% of Türkiye's total imports of these products.

Consequently, a safeguard measure imposing an additional financial duty on imports of the concerned product from Iran has been adopted for a period of three years, including the provisional period. The additional financial duty has been set at USD 36 per ton for the first year, USD 35 per ton for the second, and USD 34 per ton for the third.

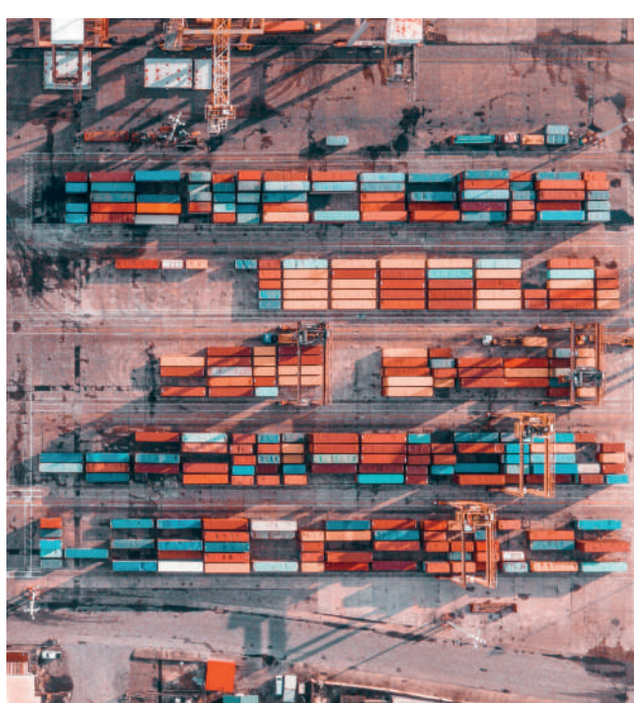
Türkiye Publishes Final Disclosure in Expiry Review of Polystyrene Imports from Iran

On 16 May 2025, the Turkish Ministry of Trade published the final disclosure report of the expiry review investigation on imports of polystyrene products classified under customs tariff code 3903.19.00.00.00 originating from Iran.

The final disclosure report states, regarding the continuation or recurrence of dumping, that (i) the calculated dumping margin in the original investigation was 11.3% of the CIF value for the companies based in Iran, which is significantly high; (ii) Iran, as one of the major global suppliers of the concerned product, possesses a substantial production capacity and export potential that could be directed toward the Turkish market; and (iii) the unit export prices of the concerned product originating in Iran are below the global average unit export prices for the concerned product.

Regarding the continuation or recurrence of injury, the report notes that (i) the imports from Iran maintained a significant market share, (ii) these imports undercut and depressed the prices of the domestic industry by 10% and 20% of the CIF value during the investigation period, and (iii) despite existing measures, the market share of the domestic industry declined and key economic indicators of the domestic industry such as production, domestic sales volume, end-of-period stock levels, stock turnover rate, equity capital, profitability, and cash flow deteriorated.

Accordingly, after the submission of the comments of the interested parties, the final findings and evaluations will be compiled in the investigation report and submitted to the Board for a final decision.



EC Takes Action Against Unfairly Subsidised Imports of Mobile Access Equipment from China

On 28 April 2025, the EC decided to impose definitive countervailing duties on imports of mobile access equipment ("MAE") from China.

The Commission's decision aims to protect the EU MAE sector, which includes companies operating in many EU member states and employing more than 3,000 people, from unfair trade practices.

The Commission's anti-subsidy investigation found that unfair Chinese subsidies, including land use rights below fair value, preferential financing, and tax breaks, have made it difficult for the EU industry to compete with imports from China. This has occurred despite the strong increase in MAE demand, leading to significant market share losses.

Anti-subsidy duties imposed to level the playing field range from 7.3% to 14.2% and are applied in addition to anti-dumping duties imposed on imports of MAE from China in January 2025. Total anti-dumping and countervailing duties currently range from 20.6% to 66.7%.

U.S. Targets Southeast Asian Solar Panel Imports with Tariffs

On 22 April 2025, the United States Department of Commerce announced its intention to impose customs duties of up to 3,521% on solar panels imported from Cambodia, Thailand, Malaysia, and Vietnam, following the conclusion of a year-long trade investigation.

The investigation concluded that manufacturers in these countries had benefited from unfair government subsidies and engaged in dumping practices by selling solar panels in the U.S. at prices below production cost. As a result, the U.S. has decided to impose sharply differentiated tariffs based on the degree of cooperation during the investigation and the extent of anti-competitive pricing detected.

Key measures include:
• A maximum tariff of 3,521% on certain Cambodian producers that did not cooperate with the investigation,
• A 41% tariff on Jinko Solar operating in Malaysia,
• A 375% tariff on Trina Solar operating in Thailand.
The final decision on these tariffs now rests with the U.S. International Trade Commission, with a ruling expected in June 2025.

Principle Decision Regarding SMS Verification Code Method in Türkiye

On 26 June 2025, the Personal Data Protection Board of Türkiye ("KVK Board") issued a Principle Decision outlining key procedures and principles for processing personal data through SMS verification codes in the provision of products and services.

The KVK Board particularly highlighted using a single SMS code approval to cover multiple purposes, such as membership, commercial electronic communication permission, and data processing permission, risks misleading the persons concerned. It also emphasised that such collective approval methods undermine the transparency of data processing processes and compromise the validity of explicit consent.
In this context, the KVK Board stated that data controllers must:
• provide clear and comprehensible information about the purpose for which the SMS code is requested,
• obtain separate explicit consent for different data processing activities,
• not make commercial electronic communication consent a prerequisite for the provision of any product or service.

The Board also stressed that data controllers must provide information to data subjects comprehensibly, ensuring it is not obscured by other content.

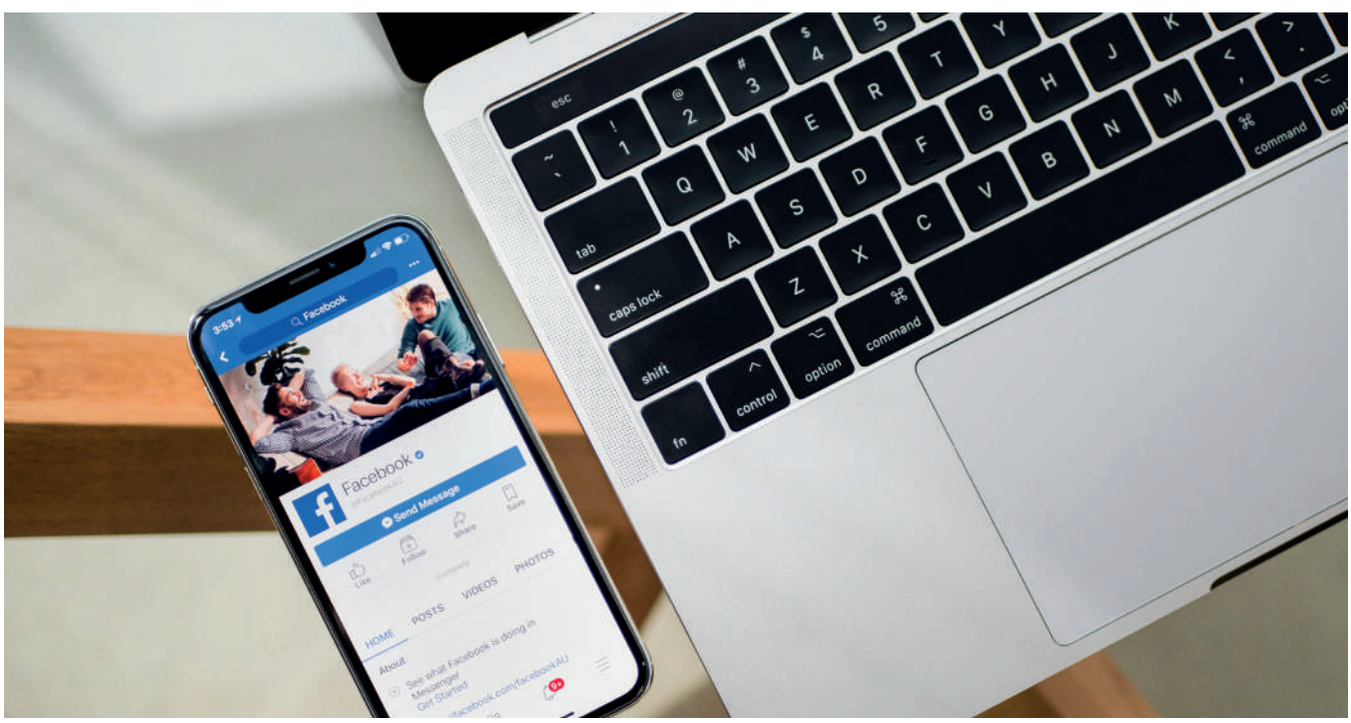
The decision explicitly states that data controllers violating these principles may face administrative sanctions under Article 18 of the Turkish Personal Data Protection Law.

Italian Data Protection Authority Fines Company for Using Employee's Private Messages

On 25 June 2025, the Italian Data Protection Authority ("Garante") announced that it had imposed an administrative fine of EUR 0.42 million on Autostrade per l'Italia S.p.A.

The fine was imposed because the company processed personal data obtained from the employee's private Facebook profile and Messenger and WhatsApp chats unlawfully to justify dismissal. The Garante found that the data had been collected via third parties, shared in a private context, and used without legal grounds.

The decision stresses that broad accessibility of data on social media platforms does not grant employers unrestricted processing rights. The company's actions violated fundamental data protection principles, notably data minimisation and purpose limitation.



EU Agrees on a New Procedural Regulation to Accelerate Cross-Border GDPR Enforcement

On 20 June 2025, the European Parliament and the Council of the European Union have provisionally agreed on a new Regulation. It introduces procedural rules for the implementation of the General Data Protection Regulation ("GDPR").

The new regulation enhances cross-border data protection investigations by standardising cooperation among national data protection authorities and imposing binding time limits, including a 15-month limit for the lead supervisory authority to issue a draft decision. The Regulation also reinforces procedural rights for complainants and companies, ensuring access to investigation information and the opportunity to submit their views.

The Regulation will enter into force after final approval of the Council and the Parliament, aiming to accelerate decision-making processes and increase transparency in GDPR cross-border investigations decisions.

European Data Protection Board Issues Key Opinions on International Data Transfers

On 6 May 2025, the European Data Protection Board ("EDPB") adopted an opinion on the EC's draft adequacy decision under the GDPR regarding the European Patent Organisation ("EPO"). The Board also issued an opinion on the EC's proposal to extend the validity of the UK adequacy decisions under both the GDPR and the Law Enforcement Directive ("LED"). Additionally, the EDPB agreed to grant observer status to the Personal Data Protection Agency of Bosnia and Herzegovina.

At the request of the EC the Board issued an opinion on the Commission's draft adequacy decision concerning the EPO. Once formally adopted by the Commission, this will mark the first adequacy decision relating to an international organisation rather than a country or region. In its opinion, the Board positively notes that the EPO data protection framework is largely aligned with the European Union data protection framework, including those related to data protection rights and principles.

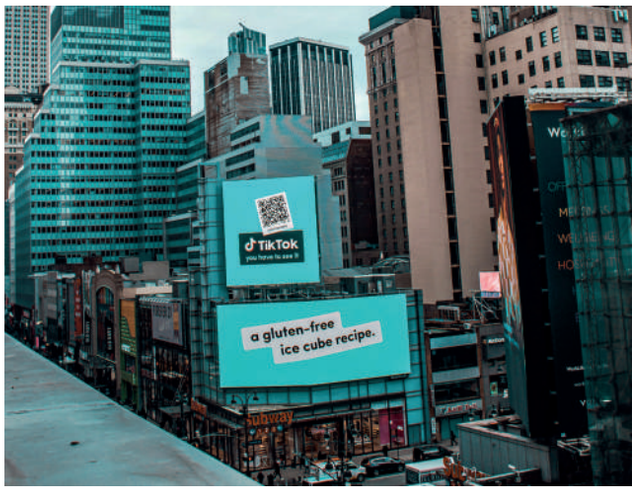
The EDPB opinion, requested by the Commission, focuses on the proposed six-month extension of the two UK adequacy decisions under the GDPR and the LED, which are due to expire on 27 June 2025. The opinion specifically pertains to the proposed extension and does not evaluate the level of personal data protection in the UK. The EDPB will assess this aspect following the Commission's review, should the renewal of the UK adequacy decisions be proposed.

Irish Data Protection Commission Fines TikTok EUR 530 M over EEA User Data Transfers to China

On 2 May 2025, the Irish Data Protection Commission ("DPC") issued its final decision after investigating transfers of EEA users' personal data to China by TikTok Technology Limited ("TikTok"). The inquiry assessed the legality of these transfers and whether TikTok's provision of information to users regarding these transfers complied with GDPR transparency requirements.

The decision found TikTok in violation of the GDPR regarding its transfers of EEA user data to China and its transparency obligations. The decision imposes fines totalling EUR 530 million and requires that TikTok bring its data processing practices into compliance within six months. It also orders the suspension of TikTok's transfers to China if compliance is not met within this time frame.

In this inquiry, TikTok Ireland was tasked with assessing whether Chinese law provided a level of protection equivalent to that of EU law. The decision concludes that TikTok's transfers to China violated Article 46(1) of the GDPR, as the company failed to verify, ensure, and demonstrate that the supplementary measures and Standard Contractual Clauses (SCCs) were effective in guaranteeing that the personal data of EEA users transferred through remote access received a level of protection essentially equivalent to that required within the EU.



Türkiye Issues Good Practice Guide on Personal Data Protection in the Payment and E-Money Sector

On 11 April 2025, the Turkish Personal Data Protection Authority ("KVKK") and the Turkish Payment and Electronic Money Institutions Association have jointly issued a Good Practice Guide aimed at enhancing the protection of personal data within the payment and e-money sector.

The Guide addresses the growing volume and sensitivity of personal data processed through digital financial services, such as money transfers, POS transactions, utility bill payments, and mobile payments. It is designed to align data protection practices with ongoing technological developments in the financial ecosystem.

It outlines the principles, legal obligations, and technical and administrative safeguards that must be observed by electronic money institutions, payment service providers, and other data controllers in the sector.
Key areas clarified in the Guide include:
• Definitions of data controllers and data processors specific to payment and e-money operations
• The scope of data subjects and categories of personal data processed
• Legal conditions for processing and transferring personal data
• Specific obligations imposed on data controllers
• Required data security measures tailored to financial services.

This Guide serves as a sector-specific roadmap for ensuring compliance with Turkish data protection legislation (Law No. 6698) and reflects the KVKK's focus on proactive regulatory guidance in high-risk, data-intensive industries. It also provides a critical compliance framework for stakeholders navigating the intersection of fintech innovation and data privacy.

"Beyond the Billable: The Evolving Role of Knowledge Lawyers in Antitrust"

By Dr Hanna Stakheyeva

Introduction

"Two heads are better than one"—but what happens when you bring together a room full of curious, strategic minds with deep expertise in law, policy, and knowledge management? You begin to redefine what legal excellence looks like in the modern age.

The inaugural Knowledge Connect roundtable hosted by ACTECON in Istanbul on 16 May 2025, marked a significant milestone as the first hybrid international reception focused on knowledge professionals in competition law. It marked the first dedicated forum bringing together Knowledge Counsels in the field of competition law, with a specific focus on the strategic function of legal knowledge management. Istanbul, a city historically known for bridging cultures, proved the perfect setting to explore how knowledge professionals now bridge jurisdictions, disciplines, and expectations within global law firms and enforcement landscapes.

What began as a modest idea—sparked by shared conversations and a growing sense of under-recognised potential — has grown into a collective ambition: to give visibility, structure, and momentum to a role that has long operated behind the scenes. The roundtable ultimately brought together an exceptional group of professionals: Anna Biganzoli (Bredin Prat), Annabel Borg (Eversheds Sutherland), Sarah Brown (Mayer Brown), Peter Citron (White & Case), Simon Dodd (Skadden), Julia Do Vale (Cleary Gottlieb Steen & Hamilton), Nina Frie (White & Case), Joanna Goyder (Freshfields), Cecelia Kye (Jones Day), Johnny Shearman (Greenberg Traurig), Friso van Deursen (Executive Coach), and Daniela Lisa Zulli (Freshfields).

What unfolded was a conversation marked by openness, mutual respect, and a clear ambition to shape the future of knowledge work in law.

What is a Knowledge Counsel? Not every firm has one — but perhaps they should. I like this comparison of a Knowledge Counsel with the Swiss army knife —versatile, precise, and ready for the challenge. The Knowledge Counsel — also known as a Professional Support Lawyer/PSL, Knowledge Manager, or by other titles — is a unique legal professional who may not generate billable hours but is indispensable to a firm's long-term success. We monitor legal and regulatory developments, lead thought leadership initiatives, develop internal knowledge resources, champion training and development, and increasingly contribute to strategic planning.

Many of us came to this role through side doors—former fee-earners, academics, case handlers, policy thinkers. The richness of these journeys was a theme that resonated deeply. We shared experiences—both the rewarding and the frustrating. There was a strong sense of alignment around the challenges we face: the tendency for Knowledge Counsels to be under-recognized, the misalignment of performance metrics that are still largely built around fee-earning models, the frustration when so-called "trends" are extrapolated from isolated incidents rather than sustained developments, etc. These aren't new issues but hearing them echoed across jurisdictions and firms reinforced their significance.

More importantly, however, we focused on practical and forward-looking responses. We explored how structured systems can support knowledge continuity and preserve institutional memory. We reflected on the value of hybrid roles that allow PSLs to engage with client work directly while maintaining the independence needed to develop long-term strategies. There was broad recognition of the importance of real-time monitoring tools (e.g. VABLE, EisphorIA etc.)—that enable us to stay ahead of legal and regulatory developments across multiple jurisdictions. And we acknowledged the need for greater visibility, whether through consistent internal engagement or more formal external recognition, to build trust and credibility within the legal function. Through candid conversations and forward-looking reflections, we examined how knowledge professionals are reshaping legal practice across borders, and what structural,

cultural, and institutional changes are needed to support their continued evolution.

In dynamic practice areas such as competition law — where changes are frequent, rapid, and complex — the role becomes even more critical. Yet, many firms are only just beginning to appreciate the full value these professionals bring. But the tide is turning. Knowledge professionals are being included (although rarely) in Legal 500 submissions, asked to join pitch teams, and in some cases, promoted to partner-level strategy roles. Our challenge now is not just to do the work—but to own the narrative.

Here I have tried to capture the main themes, insights, and practical takeaways from the Knowledge Connect. In a time of regulatory complexity, global uncertainty, and rising demands on legal services, the Knowledge Counsel is a great contribution to how firms adapt, compete, and lead. Let's look at some of the key takeaways of the Knowledge Connect.

1. From 'Archivist' to 'Architect of Excellence'
There was a time—not so long ago—when the role of a Knowledge Counsel was viewed as administrative: a highly skilled editor, perhaps, or the trusted keeper of precedents. Today, that perception is no longer just outdated—it's counterproductive.

The role of Knowledge Counsels has clearly evolved. No longer limited to managing precedents or internal databases, knowledge professionals are now expected to contribute strategically. Their responsibilities include monitoring and forecasting regulatory changes, conducting cross-border risk analysis, leading (internal/external) training initiatives, as well as deciding on and integrating artificial intelligence tools, etc. The Knowledge Counsels can be referred to as "architects of excellence," shaping the legal function's future by bridging experience with innovation.

In competition law, where regulatory frameworks are as dynamic as they are fragmented, we do far more than interpret rules. At Knowledge Connect, we saw that clearly. This role is now essential. A quiet yet indispensable force shaping not only how firms think but how they serve. With regulatory divergence across jurisdictions, clients and colleagues alike rely on Knowledge Counsels to simplify, synthesize, and sometimes, to see around the corner.

2. Fee-Earning, Visibility, and Value Creation
The roundtable delved into the evolving role of Knowledge Counsels in law firms' economic models—focusing on a central question: how do we define "value" in a role that is strategic but not always billable?

While not direct revenue generators, Knowledge Counsels significantly impact firm-wide performance. Some firms are experimenting with hybrid roles—e.g., combining billable work with knowledge initiatives—to stay connected to client work without displacing fee-earners. Others are exploring ways to monetise high-impact outputs like tailored briefings or strategic insights that directly support client relationships.

Importantly, visibility was seen as just as vital as revenue. Building trust through internal mentoring, training, and pitch support positions Knowledge Counsels as more than content creators—they are strategic advisors and enablers of firm innovation.

The key takeaway: law firms must ensure knowledge professionals are empowered as proactive, high-impact contributors, not simply reactive support.

3. Ratings & Recognitions
The recognition of Johnny Shearman, a PLS, in Legal 500 UK 2022 highlights a growing—though still rare—acknowledgment of the strategic contributions of Knowledge Counsels in legal directories traditionally reserved for fee-earners. While PSLs are not typically ranked, exceptions should be made when individuals demonstrate significant visibility, client engagement, and firm-wide strategic impact. Inclusion is more likely when PSLs are featured in submissions alongside partners and associates and receive positive mentions in client feedback.

To promote such recognition effectively, firms should treat these distinctions as opportunities for both external visibility and internal engagement. Externally, announcements can

be shared across press channels, websites, LinkedIn, and client-facing materials. Internally, these achievements can be used to demonstrate the value of PSLs beyond knowledge management—supporting discussions around leadership inclusion, compensation, and promotion pathways.

Positioning PSLs for future recognition requires a strategic approach. Submissions should highlight client-facing knowledge work, involvement in regulatory strategy, legal innovation, and cross-border coordination. Contributions to thought leadership and participation in global forums (e.g., ICN, OECD, IBA) also add weight. PSLs should be formally included in team structures and work highlights in submission documents, with partners encouraged to acknowledge their impact in interviews.

Ultimately, while directory recognition for PSLs remains an exception, it reflects a broader shift in how law firms understand and value knowledge roles. With intentional positioning and demonstrable impact, Knowledge Counsels can rightfully earn their place among ranked legal professionals.

4. Performance Evaluation
The roundtable included a critical discussion that firms should implement appraisal systems that recognise both measurable outputs and qualitative impact, ensuring fairness, strategic alignment, and long-term engagement, as well as contribution to the visibility of the firm.

5. Complexity as Our Canvas
The globalization of competition enforcement has added new layers of complexity to the responsibilities of Knowledge Counsels. Competition law can no longer be viewed through a purely national lens. Jurisdictional boundaries are increasingly blurred, as illustrated by recent decisions under the EU's Foreign Subsidies Regulation and the expanded cross-border reach of authorities in merger control. However, while enforcement is globalizing, regulatory interpretations remain highly fragmented. Each jurisdiction brings its own legal logic, priorities, and political context—resulting in a global puzzle without a uniform playbook.

This is precisely the environment in which Knowledge Counsels excel. Global firms increasingly rely on knowledge teams to track these divergences, anticipate regulatory shifts, and tailor strategies to local realities. Moreover, the politicisation of competition law adds another dimension of uncertainty. Terms like "national security" are becoming embedded in merger control and FDI screening frameworks—often without clear definition. This gives authorities broad discretion and introduces subjective criteria into what was once a more technical domain. In such a landscape, Knowledge Counsels must move beyond doctrinal analysis to incorporate geopolitical awareness, policy trends, and risk forecasting into their daily work.

In short, complexity is not a challenge to be avoided—it is our canvas. It is where Knowledge Counsels create value by making sense of uncertainty, helping firms remain both compliant and competitive across jurisdictions.

6. Trends, Caution, and Strategic Communication
Staying informed about emerging trends is essential, but participants cautioned against over-interpreting individual cases or drawing premature conclusions. Even regulators, it was noted, are mindful of not setting unintended precedents too quickly.

While trends are essential for anticipating regulatory shifts, the speakers cautioned against jumping to conclusions:

"Don't make trends up," one warned, pointing to cases where multiple similar outcomes didn't necessarily signal a doctrinal shift. The CMA's approach to behavioural remedies and the so-called return of the efficiency defence (Vodafone/Three merger) was cited as examples where one should avoid over-reacting to the development.

Despite this need for caution, understanding where regulatory attention is concentrated—such as in areas like digitization, artificial intelligence, and labour markets—remains critical. For Knowledge Counsels, this awareness underpins effective client risk assessments, shapes timely thought leadership and informs internal training efforts. The challenge lies in balancing agility with restraint: interpreting signals without overstating them.

7. Promoting a Knowledge-Sharing Culture
Fostering a culture of collaboration and knowledge sharing remains a work in progress in many law firms. While the value of shared knowledge is widely acknowledged, formal structures alone are not enough to embed it into daily practice. Promoting a truly knowledge-driven culture requires both institutional support and informal engagement.

One effective approach discussed was the use of informal initiatives—such as regular "coffee chats" with associates—to create a safe, open space for discussing knowledge needs, identifying gaps, and exchanging practical insights. These informal touchpoints help surface everyday challenges that may not be captured through formal reporting lines or databases. Over time, such efforts can build trust, reduce silos, and encourage proactive participation in knowledge activities.

Ultimately, embedding a knowledge-sharing mindset into the firm's culture involves aligning incentives, recognising contributions, and making it clear that collaboration is not ancillary—but central—to legal excellence and client service. Knowledge sharing should not be perceived as a loss of value, but rather as a means of strengthening collective expertise and enhancing overall firm performance. Knowledge-sharing initiatives should be acknowledged, valued, and potentially integrated into performance evaluations.

8. Career Paths

It is important to move away from viewing knowledge roles as fixed or one-directional career paths. In practice, there are examples of professionals transitioning from knowledge roles back into fee-earning positions—and in some cases, even progressing to partnership. This flexibility not only reflects the evolving nature of legal careers but also serves as a strategic tool for talent retention.

Allowing movement between knowledge and fee-earning roles supports long-term engagement by recognising the diverse skills and interests of legal professionals over time. It also helps firms adapt to changing priorities, making better use of institutional knowledge and legal expertise across different areas of practice. Maintaining this permeability between tracks reinforces the message that knowledge roles are integral to the firm's success—not secondary—and that career development within them can be dynamic, rewarding, and aligned with broader leadership opportunities. Ultimately, the decision rests with the individual—whether returning to a purely fee-earning role is the right move at that stage of their professional journey.

9. Balancing Firm Strategy and Culture

The roundtable also explored the cultural and strategic nuances surrounding the role of knowledge professionals within law firms. As mentioned earlier, one key theme was the absence of a universal approach to fee-earning expectations. While some Knowledge Counsels prefer to remain fully dedicated to non-billable, strategic support work, others find value in maintaining a partial client-facing role. This divergence often reflects deeper cultural differences within firms—between those that view knowledge work as integral to business development and client service, and those that still treat it as distinct from revenue-generating activities.

The conversation also addressed the question of advancement and recognition. Specifically, participants considered whether PSLs should be eligible for partnership. While making partner is not always viewed as essential, what emerged as more critical was the need for visibility at the senior leadership level and meaningful influence over decision-making. In this sense, formal titles matter less than ensuring that knowledge professionals are included in strategic discussions and recognised as contributors to the firm's long-term success.

This balance—between strategic integration and cultural fit—continues to shape how knowledge roles are perceived and developed across jurisdictions and practice areas.

The Road Ahead

The rise of the Knowledge Counsel function is not just a shift in legal operations—it is a redefinition of what legal leadership looks like in the 21st century. As regulation becomes more politicised, enforcement more globalised, and legal practice more complex, the demand for agile, strategic knowledge professionals will only grow. What began at Knowledge Connect was more than an event—it was the launch of a new chapter. A collective recognition that Knowledge Counsels are no longer support functions at the margins of legal practice, but strategic enablers at its core. They simplify complexity, connect jurisdictions, anticipate change, and anchor institutional memory. They are as vital to client value as they are to internal culture and resilience.

The path forward calls for more than recognition—it requires structure, investment, and community. Firms should revisit how they measure value, design performance frameworks, and define leadership. The momentum is real—but the work is only just beginning. Istanbul was a starting point, not a destination. The conversations we began must continue—across borders, sectors, and institutions. Because the knowledge economy within legal services is not a side project. It is the infrastructure on which the future of law will be built.

Let's keep building—together. To those who joined us in Istanbul—thank you. And to those who couldn't—this is only the beginning. We are proud to spotlight a role that deserves far greater recognition. If you are part of this growing space — or considering establishing a knowledge function within your firm — we'd love to connect.

Acknowledgment: *In addition to all the participants of the Knowledge Connect, I would like to express my heartfelt gratitude to ACTECON for their exceptional support throughout the development and launch of this initiative. A special thank you goes to my colleagues—listed in alphabetical order by surname—Bahadır Balkı, Reşat Eraksoy, Dr. Fevzi Toksoy, and Sera Yıldız for their unwavering support and contributions. I am also deeply grateful to Serenay Kivik for her outstanding behind-the-scenes efforts and seamless coordination of logistics, which were instrumental to the project's success.*

ACTECON Champions Women in Competition: Supporting W@CompetitionTR Breakfast

ACTECON was proud to support the W@CompetitionTR Breakfast, a dynamic event that brought together mentors and mentees for an inspiring exchange of experience, ideas, and encouragement.

We wholeheartedly embrace the values of this important network and reaffirm our commitment to empowering women in the field of competition law.

Navigating National Security in Competition Law: ACTECON at UCL's Competition Law 2.0 Conference

ACTECON's Knowledge Counsel, Hanna Stakheyeva, contributed to the Competition Law 2.0 Conference, hosted by the Cambridge/UCL Competition Law and Public Policy Hub at UCL Faculty of Laws, with insights on national security considerations in the EU and Türkiye.

Engagements like these not only spark meaningful debate but also reinforce the global network of professionals shaping the future of competition law and policy.

ACTECON remains committed to supporting clients as they navigate increasingly complex regulatory challenges.

ACTECON Ranked Tier-1 in Competition Law by Legal 500: A Shared Success

We are proud to share that ACTECON has been ranked Tier-1 in Competition Law in Türkiye by Legal 500—a prestigious recognition that reflects the depth, rigor, and dedication embedded in all that we do.

This milestone is not just a label—it is the collective achievement of the ACTECON team, whose shared vision, collaboration, and intellectual commitment continue to define our path forward.

We extend our sincere thanks to our clients and peers for their continued trust and support. This recognition motivates us to aim higher, think deeper, and keep challenging boundaries in competition law and policy.

Knowledge grows. Success is shared. Goals are always meant to be pushed further.

ACTECON Connects at ACC Europe 2025: A First-Time Experience to Remember

What an inspiring few days at ACC Europe – Association of Corporate Counsel's Annual Conference in Barcelona! From insightful panels to energizing conversations, ACTECON was proud to take part in this premier gathering of in-house counsel and legal professionals from across Europe.

We're especially grateful to everyone who visited our booth—whether reconnecting or meeting us for the first time, each interaction was truly valued. The sessions offered timely perspectives on today's legal challenges, and we congratulate all speakers and organizers for curating such a thoughtful and engaging program.

A special thanks to Müge Bulat Çetinkaya, Eva Argilés, Genco Türkmen, and the entire ACC Europe team for making our first conference experience so smooth and welcoming.
We return from Barcelona inspired, informed, and looking forward to what lies ahead. Until next time, ACC Europe!

ACTECON at Lawment Fest

We were proud to take part in Lawment Fest as a platinum sponsor and host the special session where our Managing Partner Bahadır Balkı and Counsel Mustafa Ayna explored the intersection of legal rules and strategic market thinking.

In this dynamic session, we demonstrated once again that Competition Law is not just about compliance—it's about understanding market behaviour and designing smart solutions. Participants gained insight into real-world advisory practices and had the opportunity to learn more about ACTECON's values and approach to competition policy.

20 Years Dedicated to Competition

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ACTECON is an advisory firm combining competition law, international trade remedies and regulatory affairs. We offer effective strategies from a law & economics perspective, ensuring that strategic business objectives, practices, and economic activities comply with competition law, international trade rules and regulations.