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QUARTERLY BULLETIN

3rd Quarter 2025

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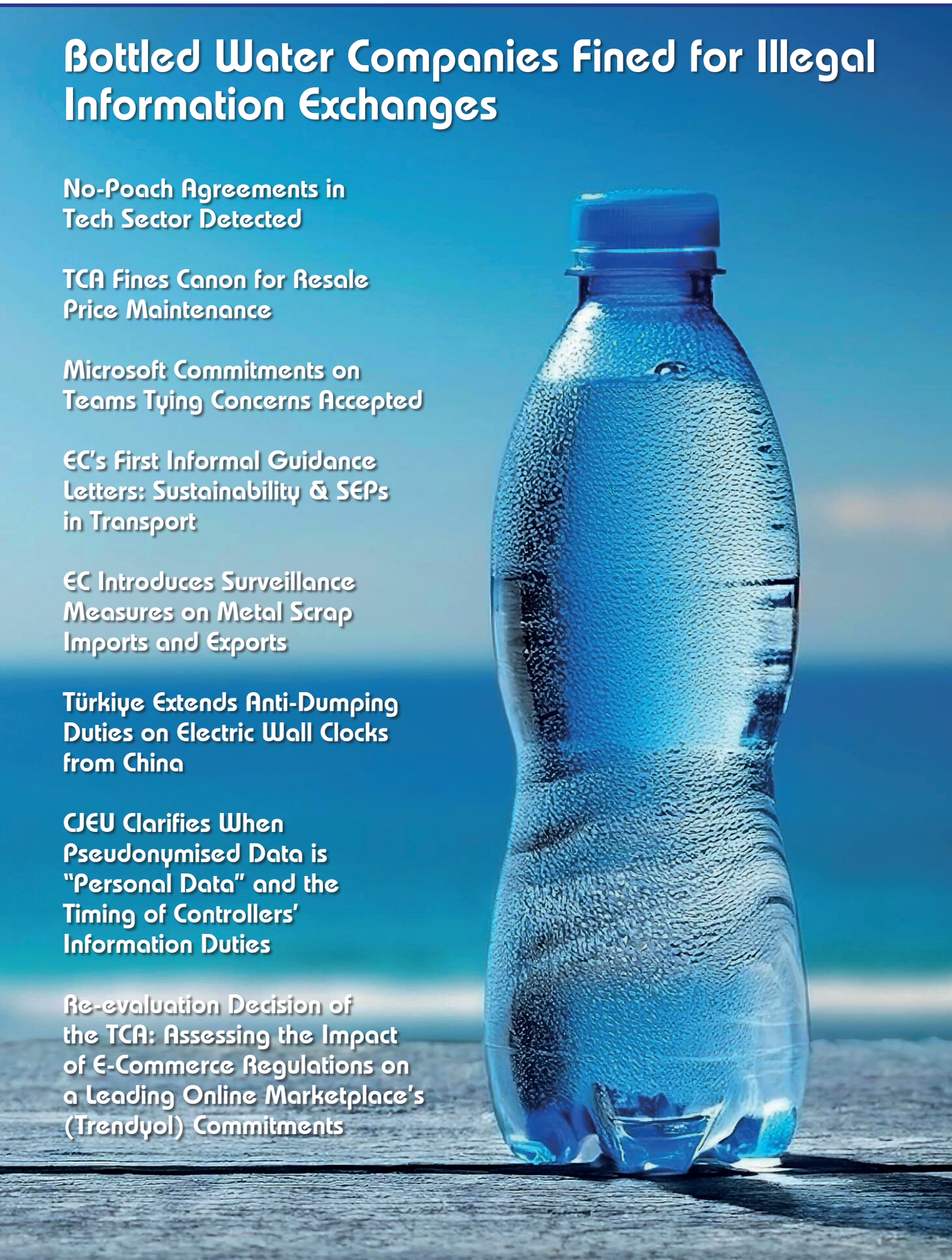
ACTECON

Bottled Water Companies Fined for Illegal Information Exchanges



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Dear Reader,

This third-quarter edition captures active enforcement across competition, trade, and data protection both in Türkiye and other jurisdictions.

In Türkiye, competition enforcement was marked by scale and scope. Bottled-water producers were sanctioned for future-pricing information exchanges. Procedurally, the Turkish Competition Authority ("TCA") penalised Novonesis for incomplete or misleading responses to information requests. Vertical exclusivity in broadcasting was unwound through commitments, restoring access for rival producers and channels. Labour-market scrutiny continued with no-poach findings and fines in the tech sector. The TCA also imposed penalties for resale price maintenance (Canon) and pressed on with digital-platform compliance in local search design.

Beyond Türkiye, the the European Union's ("EU") competition landscape featured prominent digital and procedural developments. The European Commission ("EC") accepted Microsoft's commitments to unbundle Teams and bolster interoperability and data portability, while sanctioning Google in Adtech alongside conflict-of-interest remedies across the ad stack. Procedural discipline remained front-and-centre with fines for incomplete replies in the synthetic-turf probe. On the mergers front, Prosus/Naspers' move on Just Eat was cleared with commitments to preserve rivalry, and Brussels warned Vivendi over alleged gun-jumping in Lagardère. Courts narrowed the scope for EU dawn-raids absent "sufficiently serious" indications, and the Commission issued its first informal guidance letters on collaborative sustainability and Standard Essential Patents ("SEP") licensing in transport.

Trade policy also moved briskly. The EC imposed definitive anti-dumping duties on hot-rolled flat steel from Egypt, Japan, and Vietnam, while launching surveillance on metal-scrap flows as part of the Steel and Metal Action Plan. Türkiye extended anti-dumping duties on electric wall clocks and imposed definitive measures on granite from Egypt. Multilaterally, a WTO panel recommended the EU adjust certain biodiesel countervailing duties.

In data protection, the Court of Justice of the European Union ("CJEU") clarified that personal opinions are personal data and that identifiability must be assessed from the controller's perspective at the time of collection, triggering notice obligations even before onward transfers. The Turkish Personal Data Protection Authority ("KVKK") cautioned against accessing relatives' numbers in debt collection. The European Data Protection Board ("EDPB")/The European Data Protection Supervizor ("EDPS") sought safeguards around proposed General Data Protection Regulation ("GDPR") record-keeping relief for larger firms.

"In the Focus" we revisit Trendyol's obligations after legislative changes separated private-label activities. While algorithmic-bias concerns were deemed moot under the new set-up, the TCA maintained data-use constraints - underscoring that structural fixes do not eliminate the need for robust data-governance remedies.

Finally, in "FROM ACTECON" we share milestones from our practice and community: a strategic Legal Engineering partnership with Legora; thought-leadership at the LEAR Competition Festival in Rome and the International Bar Association's ("IBA") annual conference in Florence; sustained mentorship via Association of Corporate Counsel ("ACC") Türkiye; and training the next generation through European Law Students Association's ("ELSA") Summer Law School.

We hope these highlights help you prioritise compliance actions, plan for procurement and M&A timelines, and sharpen governance around data and AI. As always, we welcome your questions and look forward to working with you on the matters that shape your markets.

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:

Bottled Water Companies Fined for Illegal Information Exchanges

On 11 September 2025, the TCA imposed administrative fines on Erikli Su ve Meşrubat Sanayi ve Ticaret A.Ş. ("Erikli Su") and Pınar Su ve İçecek Sanayi ve Ticaret A.Ş. ("Pınar Su") for engaging in information exchanges in violation of the Turkish Competition Law.

According to the reasoned decision, internal correspondence revealed contacts between representatives or distributors of Pınar Su and Erikli Su. Certain Pınar Su internal communications contained information assessed to have been obtained through direct contact with Erikli Su, and one direct exchange between the two undertakings was also identified. The TCA determined that these communications concerned the parties' current and future pricing strategies, and that actual price increases broadly aligned with the dates referenced in the correspondence.

On this basis, the TCA concluded that the undertakings shared competitively sensitive information — directly or indirectly via their exclusive distribution networks - in a way that reduced strategic uncertainty in the market. Because the information related to future pricing, the conduct was found restrictive by object under Article 4 of the Competition Law, without the need to show actual effects.

The TCA's decision underscores that sharing competitively sensitive, future pricing information—whether directly or via exclusive distributors—constitutes a by-object infringement under Article 4, so no effects analysis is required. Firms should tighten compliance by banning cross-competitor price contacts, policing distributor communications, and documenting clean-team/aggregated data protocols. The fines (Erikli Su: TRY 21,106,469.63 (≈ EUR 437,419.84), and Pınar Su: TRY 4,877,401.33 (≈ EUR 101,081.43) highlight the real financial exposure for treating "market research" as a cover for coordination.

High Cost of Incomplete and False Information: Novonesis A/S and Affiliates Penalised by TCA

On 1 September, the TCA fined Novonesis A/S and several of its affiliates for providing incomplete, false, or misleading information in the context of an ongoing investigation under Article 6 of the Competition Law.

TThe Board concluded that Novonesis A/S had failed to comply fully with formal information requests and submitted responses that were either incomplete or contradictory. In particular, the company had not provided contracts predating its merger with CHR Hansen, omitted details regarding affiliates engaged in enzyme sales in Türkiye, and failed to submit full agreements with certain enzyme customers.

Pursuant to Articles 14, 16, and 17 of the Turkish Competition Law, the TCA imposed an administrative monetary fine equal to 0.1% of the company's 2024 turnover, as well as a proportional administrative fine accruing until the requested information was duly submitted.

Broadcasting Probe into Long-Term Reciprocity and Exclusivity Concluded with Commitments

The TCA concluded its investigation into OGM Prodüksiyon ve Medya Hizmetleri A.Ş. ("OGM") and Startv Medya Hizmetleri A.Ş. ("STAR TV") concerning a production and broadcasting agreement that exceeded five years and contained reciprocal exclusivity clauses. By decision dated 28 August 2025, the TCA terminated the case by accepting commitments.

Commitments accepted

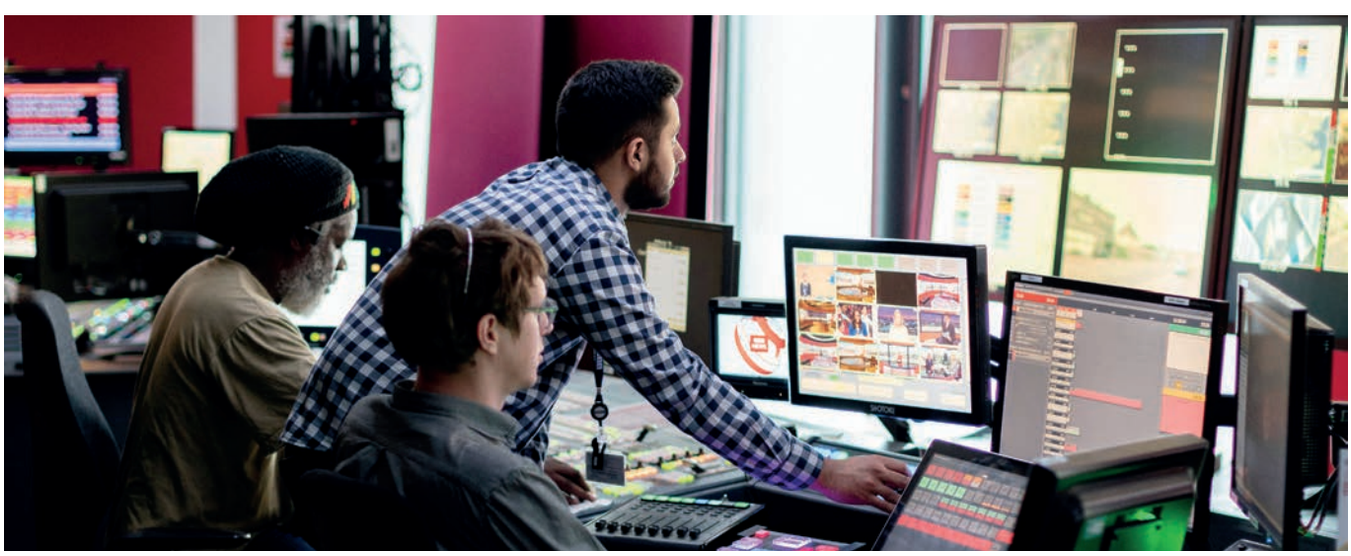
• The exclusivity provisions in the Exclusive Production and Broadcasting Cooperation Agreement dated 11 February 2022 between OGM and STAR TV will be terminated.

• OGM will be free to produce content for channels or platforms other than STAR TV; likewise, STAR TV will be free to enter into agreements for prime-time TV series with producers other than OGM.

Finding that these commitments adequately addressed the competition concerns identified, the TCA ended the investigation.

The outcome signals the TCA's heightened scrutiny of long-term, reciprocal exclusivity in broadcasting. When exclusivity risks foreclosing rival access—especially for prime-time content—early, tailored commitments can resolve concerns without a merit finding. Broadcasters and producers should review multi-year arrangements to ensure they preserve inter-brand choice and access across both production and broadcasting markets.

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.



No-Poach Agreements in Tech Sector Detected

On 13 August 2025, the TCA penalised eight technology companies for entering into no-poach agreements in the labour market. Competition law enforcement in labour markets is relatively new in Türkiye and internationally, and the TCA considered this as a mitigating factor in its assessment.

WThe investigation covered 20 IT and telecom firms, including Turkcell, Ericsson, Etiya, Netaş, Innova, and others. Evidence showed that certain undertakings maintained "blacklists" of firms from which they would not hire, entered into informal agreements not to recruit each other's employees, and applied mutual approval systems for employee transfers.

The Board concluded that such practices restrict competition in the labour markets by limiting employee mobility and preventing workers from accessing better job opportunities. The Board found that several bilateral no-poach agreements - such as those between Etiya and PIA, Kafein and Innova, and Turkcell and Ericsson - constituted infringements of Article 4 of the Competition Law. In contrast, certain other arrangements were treated as ancillary restraints, while some were dismissed due to the absence of mutual intent between the parties.

Finally, the Board acknowledged that competition law enforcement in labour markets is relatively new in Türkiye and internationally, treating this as a mitigating factor in its assessment, and the eight technology companies involved in no-poach agreements were fined TRY 91,697,701.37 (EUR 1.9 million), with the amounts determined based on the duration of the infringement.

TCA Fines Canon for Resale Price Maintenance

On 4 August 2025, the TCA decided that Canon Eurasia Görüntüleme ve Ofis Sistemleri AŞ ("Canon") violated Article 4 of the Turkish Competition by engaging in resale price maintenance.

During the investigation initiated on 18 May 2022, on-site inspections conducted at Canon and its distributors revealed that resellers who had sold below Canon's determined price levels had been warned, instructed to increase their prices to the designated levels, and subjected to penalties if they failed to comply.

Canon's defences that (i) it operated an open distribution system, (ii) the evidence consisted merely of personal correspondence, and (iii) the standard of proof had not been met were rejected. The TCA emphasised that, in cases of resale price maintenance, there is no need to establish additional elements such as pressure or incentives.

Consequently, the TCA decided, by a majority vote, that Canon had violated Article 4 of the Competition Law and imposed an administrative fine of TRY 38,300,958.83 (EUR 792,000).

Google Fined for Violating Local Search Design Obligations through Sponsored Business Ads

In July 2025, the TCA imposed a daily administrative monetary fine of approximately TRY 355 million (approx. EUR 10 million) on the economic entity comprising Alphabet Inc., Google Ireland Limited, Google LLC, Google International LLC, and Google Reklamcılık ve Pazarlama Ltd. Şti. ("Google") for non-compliance with previously imposed local search design obligations.

The penalty follows the TCA's 2021 decision, which found that Google held a dominant position in the general search services market and gave to its own local search service (Local Unit) and accommodation comparison service (Google Hotel Ads) preferred positioning and visibility over its competitors. The original decision concluded that Google had violated Article 6 of the Competition Law and imposed an administrative fine of approximately TRY 296 million (approx. EUR 33.9 million).

To restore effective competition, Google was required to implement a new design that did not disadvantage competing services and to comply with related obligations, including avoiding the unfavourable positioning of competing local search and accommodation comparison services in its general search results.

While Google submitted various compliance proposals to address the TCA's concerns, examinations conducted during the ongoing compliance process revealed that Google had implemented a new design called 'Business Ads.' Despite being presented with a 'paid sponsored ad' label, this design was found to be functionally like the previously criticised anti-competitive structures.

Based on these findings, the TCA imposed a daily fine at a rate of five per ten thousand of Google's 2024 gross revenue for the period the design remained in use, resulting in a total fine of approximately TRY 355 million (approx. EUR 10 million).

TCA Publishes Details of Long-Awaited Precedent on Labour Markets: 16 Undertakings Fined

The TCA imposed administrative fines totalling over TRY 118 million (approx. EUR 4.6 million) on 16 companies on 2 August 2023 following an investigation into anti-competitive agreements in the labour market. The reasoned decision for the relevant ruling was published on 10 July 2025.

The investigation, initiated following a confidential application, found that companies across various sectors had been engaged in 'gentlemen's agreements' that restricted competition in labour markets. Among the penalised companies, LC Waikiki, a global clothing retailer, received the highest fine of approximately TRY 59.5 million (approx. EUR 2.2 million), followed by Türk Telekom, a Türkiye-based global internet and IP services provider, with approximately TRY 41 million (approx. EUR 1.6 million), and TAB Gıda, a leading Turkish QSR group, with approximately TRY 7.3 million (approx. EUR 284.300). Other fined companies included Hepsiburada, one of Türkiye's leading e-commerce platforms, with approximately TRY 4.8 million (approx. EUR 186.9) and Vodafone with approximately TRY 5.3 million (approx. EUR 112.200).

The TCA found that the companies had entered into no-poaching agreements preventing the hiring of each other's employees, thereby restricting mobility, and suppressing wages. The TCA emphasised that such conduct constitutes a form of buying cartel equivalent to market sharing. In the reasoned decision, it was determined that the basis of the penalised undertakings' practices restricting competition in the labour market were gentlemen's agreements aimed at preventing the transfer of employees. In this context, the TCA stated that companies created blacklists to avoid targeting each other's employees, shared these lists with their human resources teams and external recruitment consultants they hired, and established direct or indirect communication and understandings to prevent employee transitions. It was emphasized that such practices were evaluated as violations of Article 4 of the Competition Law on the grounds that they restricted employee mobility in the labour market and led to wage suppression.

This decision underscores that undertakings operating in different sectors and markets can still be considered competitors under competition rules in the context of labour markets. Accordingly, this landmark decision, long-awaited by practitioners and scholars, will provide guidance on the necessary steps that undertakings should take about labour market practices.

Microsoft Commitments on Teams Tying Concerns Accepted

The EC concluded its investigation into Microsoft's collaboration platform Teams and accepted commitments designed to address competition concerns arising from the tying of Teams with the Office 365 and Microsoft 365 productivity suites (including Word, Excel, PowerPoint, and Outlook).

Key commitments

• Unbundled suites at a reduced price: Microsoft will offer versions of Office 365 and Microsoft 365 without Teams at a lower price.

• Switching option for existing customers: Customers with long-term licences will be able to switch to suites that do not include Teams.

• Interoperability assurances: Microsoft will ensure interoperability for key functionalities between competing communication/collaboration tools and designated Microsoft products.

• Data portability: Customers will be able to export their Teams data to facilitate migration to alternative solutions.

These commitments will remain in force for seven years, except for the interoperability and data-portability obligations, which will apply for ten years.

The case demonstrates continued EC scrutiny of bundling/tying in digital productivity ecosystems. By mandating unbundling, interoperability, and data portability, the commitments aim to lower switching costs and reduce foreclosure risks for rival tools, while giving enterprise customers greater choice over their collaboration stack.

Suppliers should review product bundles and technical interfaces to ensure neutral access and contestable routes to market.

EC Imposes Fine for Incomplete Information in the Synthetic Turf Sector Investigation

On 8 September 2025 the EC imposed administrative fines on Eurofield SAS ("Eurofield") and Unanime Sport SAS ("Unanime"), the ultimate parent of Eurofield at the time of the infringement, a total of around EUR 172,000 for providing an incomplete reply to a request for information issued in the context of the Commission's investigation in the synthetic turf sector.

In June 2023, the EC sent request for information to Eurofield in the context of its investigation in the synthetic turf sector. After assessing Eurofield's reply, and after comparing it with documents collected in the context of unannounced inspections, the Commission had indications that the reply was incomplete. It therefore issued, in October 2023, a subsequent request for information to the company. Eurofield again replied in an incomplete manner.

In November 2024, the EC informed the parties that it had opened an investigation into the suspected procedural breach related to the incomplete reply. From then, the parties agreed to cooperate with the EC in this investigation, by acknowledging their liability for the infringement and accepting to pay a fine.

In this context, the parties submitted the documents identified as having been omitted as well as supplementary information that the EC had not identified as missing.

Based on the infringement committed by Eurofield, the EC has concluded that a fine corresponding to 0.3% of the parties' combined total turnover would be both proportionate and deterrent. At the same time, the Commission has decided to reward the parties for their proactive cooperation once they were made aware of the investigation into their suspected procedural breach. It has therefore decided to reduce the fine by 30%, resulting in a fine totalling around EUR 172,000.

The case highlights the EC's strict approach toward procedural compliance in antitrust investigations. Even though the parties ultimately cooperated and received a fine reduction, the decision underscores that incomplete or delayed responses to information requests may lead to financial penalties, reinforcing the EC's expectation of full transparency and diligence during its inquiries.

Google Adtech Case - Raising Questions on Platform Integration

On 5 September 2025, the EC imposed administrative fines totalling approximately EUR 2.95 billion on Google for breaching the EU antitrust rules by distorting competition in the advertising technology industry ("Adtech").

According to the EC, Google breached the EU antitrust rules by favouring its own online display advertising technology services to the detriment of competing providers of advertising technology services, advertisers, and online publishers.

The EC's investigation found that Google is dominant: (i) in the market for publisher ad servers with its service "DFP;" and (ii) in the market for programmatic ad buying tools for the open web with its services "Google Ads" and "DV360". Both markets are European Economic Area-wide.

In particular, the Commission found that, between at least 2014 and today, Google abused such dominant positions in breach of Article 102 of the TFEU by:

• Favouring its own ad exchange AdX in the ad selection process run by its dominant publisher ad server DFP by, for example, informing AdX in advance of the value of the best bid from competitors which it had to beat to win the auction, and

• Favouring its ad exchange AdX in the way its ad buying tools Google Ads and DV360 place bids on ad exchanges. For example, Google Ads was avoiding competing ad exchanges and mainly placing bids on AdX, thus making it the most attractive ad exchange.

The EC ordered Google to bring these self-preferencing practices to an end, and to implement measures to cease its inherent conflicts of interest along the Adtech supply chain.

While the EC found that Google's integrated structure and data advantages created conflicts of interest, the case also raises questions about how to balance market efficiency, innovation, and competition enforcement in complex, data-driven ecosystems. Google's forthcoming compliance measures and any potential appeal will be critical in determining how far regulators can intervene in vertically integrated digital business models without discouraging technological integration and platform development.

EC Conditionally Greenlights Naspers' Just Eat Takeover

On 11 August 2025, the EC has conditionally approved Naspers' acquisition of Just Eat Takeaway.com ("JET") via its investment arm Prosus. The green light comes with strict commitments to preserve competition in Europe's fast-growing food delivery market.

JET and Delivery Hero, in which Prosus already holds a 27.4% minority stake, both operate food delivery platforms across Austria, Bulgaria, Italy, Poland, and Spain. Regulators feared the deal would weaken JET's incentive to compete with Delivery Hero, creating a risk of reduced rivalry, tacit coordination, and potentially higher prices across the European Economic Area.

The Remedies. To address these concerns, Naspers pledged to slash its Delivery Hero stake to a very low level within 12 months and agreed not to interfere in Delivery Hero's governance or increase its shareholding again. Prosus will lose its status as Delivery Hero's largest shareholder. An independent trustee, under EC's oversight, will monitor compliance.

Outcome. With these remedies, the Commission concluded that Delivery Hero remains a fully independent competitor, safeguarding consumer choice, and fair pricing in the EEA's food delivery market.

The transaction, notified on 20 June 2025, was cleared in Phase I review, extended to 35 working days due to commitments. This approval follows closely on the Commission's EUR 329 million fine against Delivery Hero and Glovo for cartel activity in June, underscoring the regulator's watchful stance on the sector.

Brussels Warns Vivendi: EU Merger Rules May Have Been Breached in Lagardère Deal

On 18 July 2025, the EC issued a Statement of Objections to Vivendi, alleging that the company prematurely implemented its acquisition of Lagardère in breach of EU merger rules. The concerns focus on violations of the notification requirement, the standstill obligation, and the conditions attached to the 2023 clearance decision.

Vivendi notified the deal on 24 October 2022. The Commission launched an in-depth probe the following month, concerned about reduced competition in publishing and magazine markets. On 9 June 2023, Brussels conditionally approved the transaction, requiring Vivendi to divest its publishing house Editis and celebrity magazine Gala before completion. Approval of suitable buyers came only later: 31 October for Editis and 8 November 2023 for Gala.

Alleged Breaches. According to the Commission, Vivendi nonetheless exercised decisive influence over Lagardère well before these approvals. Evidence suggests Vivendi intervened in editorial lines and staff decisions at Paris Match and Journal du Dimanche, as well as in programming and recruitment at radio station Europe 1. These actions, the Commission argues, show premature control contrary to EU rules designed to safeguard competition until remedies are in place.

Next Steps. The Statement of Objections does not determine guilt but gives Vivendi the chance to defend itself. If confirmed, infringements could lead to fines of up to 10% of Vivendi's global turnover. No legal deadline applies, and the case's duration will depend on its complexity and the company's defence rights.

The case underscores the Commission's increasing enforcement focus on procedural compliance under the EU Merger Regulation. Particularly, businesses must maintain strict separation and prevent even micro-level interference with a target until final approval is secured.

When Public-Interest Meets Merger Control: Lessons from BBVA–Sabadell Case

BBVA's offer for Banco Sabadell has lapsed after investors tendered only ~25.5% on 16 October 2025, drawing a line under a 17-month saga that intensified debate over Spain's merger toolbox and EU limits on national intervention.

What National Authority for Markets and Competition ("CNMC") cleared. On 30 April 2025, Spain's CNMC approved the deal with a three-year commitments package to protect retail access and payments competition: maintaining branch presence in underserved areas, safeguarding Small and medium-sized enterprises ("SME") lending conditions, creating a "vulnerable customer" basic account, and ensuring access to Sabadell's existing at the market ("ATM") arrangements.

What the Government added. On 24 June 2025, the Council of Ministers authorised the transaction but required BBVA and Sabadell to remain separate legal entities with independent assets and decision-making over lending, HR, and branches for at least three years (extendable). The Economy Ministry had also run an unprecedented public consultation on the bid.

EU reaction and litigation. On 17 July 2025, the European Commission opened infringement proceedings against Spain (letter of formal notice), questioning whether Madrid's approach conflicts with the Banking Union framework and the free movement of capital. BBVA separately appealed the Council's conditions to Spain's Supreme Court on 15 July.

Conclusion. Even though the transaction failed, the legal questions live on. This case confirms a durable "dual-filter" in Spain: competition remedies at CNMC level plus potential public-interest conditions from government (integration standstills, branch, and employment safeguards). Expect an explicit security lens (financial stability, continuity of critical payment infrastructure, and territorial access to banking) to feature more heavily in national conditions, while Brussels polices the outer boundary via Banking Union competences and capital-movement rules. Bidders in sensitive sectors should plan early for political engagement, credible protections for customers and employees, and timelines that allow for both EU scrutiny and domestic public-interest overlays.

EC's First Informal Guidance Letters: Sustainability & SEPs in Transport

On 9 July 2025, the EC issued its first-ever informal guidance letters under the revised 2022 Notice on Informal Guidance, signalling a pragmatic willingness to give written comfort on novel or unresolved antitrust questions when they matter for EU policy goals.

What the letters cover. Both letters sit in the transport ecosystem: (i) a ports-sector sustainability agreement to accelerate the shift to battery-electric container-handling equipment via joint purchasing and minimum technical specs; and (ii) an Automotive Licensing Negotiation Group to conduct collective negotiations for licences to use standard-essential patents needed for connected-car technologies. The Commission explains why, with strict safeguards (open/voluntary participation, limits on sensitive information, and independent decision-making), these collaborations can proceed without infringing Article 101 TFEU.

Why it matters. Companies now have recent EU-level examples of how to structure joint purchasing/licensing and standardisation-adjacent cooperation to pursue decarbonisation and innovation while staying onside competition rules—unlocking potential benefits like lower transaction costs, faster diffusion of interoperable tech, and accelerated emissions cuts in logistics and mobility.

Context. The Commission had flagged that, post-modernisation, it would reserve informal guidance for questions lacking clear answers in case law or guidance; these two letters (both dated 9 July 2025) are the first practical applications of that promise. Non-confidential versions are now available in the Commission's competition case register.

Michelin Convinces General Court to Narrow Scope of EU Raids

On 9 July 2025, the General Court of the European Union ("General Court") partially annulled the Commission's decision to raid Michelin, ruling that it did not have 'sufficiently serious' evidence to justify investigating some of its suspicions regarding alleged violations in the tyre sector.

The Court's decision represents a significant procedural victory for Michelin, as it successfully challenged the scope of the Commission's investigative powers in what appears to be an ongoing investigation into potential anticompetitive practices in the tyre industry.

The ruling highlights the importance of the 'sufficiently serious' evidence standard that the Commission must meet when conducting dawn raids and other investigative measures under EU competition law. The General Court's finding that this threshold was not met for certain aspects of the investigation suggests that the Commission may have overreached in its initial assessment of the evidence available.

The judgment stems from dawn raids conducted in 2023 targeting Michelin and other tyre manufacturers suspected of cartel activity. The General Court concluded that the Commission lacked sufficiently serious indications for part of the alleged infringement period, rendering the inspection decision partially invalid and preventing the use of evidence collected for that period. Neither the General Court nor the Commission disclosed the specific period affected. The Commission maintained that its decision was proportionate for the main period and that inspections at other premises remain valid. Both parties may appeal the ruling before the Court of Justice of the European Union.

Commission Fines Alchem for Participating in Pharmaceutical Cartel

The EC imposed a fine of EUR 489,000 on Alchem International Pvt. Ltd. and its subsidiary Alchem International (H.K.) Limited (together "Alchem") on 4 July 2025 for having breached EU antitrust rules through participation in a pharmaceutical cartel that lasted over 12 years.

The Commission found that Alchem had coordinated to fix minimum sales prices of N-Butylbromide Scopolamine/ Hyoscine ("SNBB"), a key pharmaceutical ingredient used in Buscopan and its generics and participated in quota allocation arrangements. The company also had exchanged commercially sensitive information with other cartel participants.

The investigation revealed a single and continuous infringement in the European Economic Area from 1 November 2005 to 12 February 2018, marking the first cartel fine by the Commission involving an active pharmaceutical ingredient.

Unlike six other companies that settled with the Commission in October 2023 and were fined EUR 13.4 million, Alchem did not participate in the settlement and was instead pursued under the standard cartel procedure, following a Statement of Objections issued in June 2024.

The EUR 489,000 fine was calculated under the Commission's 2006 Guidelines on fines, considering the value of SNBB sales, the nature and complexity of the infringements, its geographic scope, and duration. Alchem received no reduction under leniency or settlement programmes due to its lack of cooperation.

EC Imposes Anti-Dumping Duties on Hot-Rolled Flat Steel from Egypt, Japan, and Vietnam

On 26 September 2026, the EC imposed definitive anti-dumping duties on imports of certain hot-rolled flat products of iron, non-alloy or other-alloy steel originating in Egypt, Japan, and Vietnam. The measures follow an investigation concluding that dumped imports caused injury to the EU industry.

The duties will apply for five years at the following rates: Egypt: 11.7%, Japan: 6.9%–30% (depending on the exporter), and Vietnam: 12.1%.

Imports from India were also examined. The EC found no evidence of dumping by Indian exporters; therefore, no duties were imposed on imports from India.

The decision reflects the EC's continued readiness to deploy trade-defence instruments where evidence shows injury from dumped steel products. EU importers should reassess landed-cost models, review supplier terms, and consider customs valuation and origin planning. Exporters in the targeted countries may evaluate options such as interim reviews or new exporter reviews where applicable, while Indian suppliers maintain their current market access absent duties.

WTO Panel Recommends EU Modify Countervailing Duties on Imports of Biodiesel from Indonesia

On 22 August 2025, the World Trade Organisation Panel ("WTO Panel") recommended that the European Commission bring its measures into conformity with its obligations under the Agreement on Subsidies and Countervailing Measures ("SCM Agreement") following a complaint by Indonesia regarding EU countervailing duties on imports of biodiesel from Indonesia.

The WTO Panel found that the European Commission had acted inconsistently with the SCM Agreement by determining that the Indonesian government had provided countervailable subsidies to biodiesel producers through crude palm oil provision via export taxes. The Panel also concluded that the European Commission had acted inconsistently by determining that these measures had constituted income or price support to the biodiesel industry.

Additionally, the WTO Panel determined that the European Commission had acted inconsistently with the SCM Agreement by failing to properly examine the effect of Indonesian imports on EU domestic prices, not considering the existence of significant price undercutting for the product as a whole, improperly finding significant price depression, inadequately assessing factors affecting the domestic industry, and incorrectly concluding that there was a threat of material injury to EU biodiesel producers.

However, the WTO Panel rejected some of Indonesia's claims. The European Commission's determination that Indonesia's Oil Palm Plantation Fund payments to biodiesel producers constituted countervailable subsidies was found consistent with WTO rules. Additionally, the WTO Panel found no inconsistency when the European Commission had declined a price undertaking offer from Indonesian exporter Wilmar while accepting a price undertaking from Argentine exporters. The WTO Panel concluded that the inconsistent measures had nullified or impaired benefits accruing to Indonesia under the SCM Agreement.

EC Imposes Definitive Anti-Dumping Duties on Decor Paper Imports from China

The EC imposed definitive anti-dumping duties on imports of decor paper from China through the Commission Implementing Regulation 2025/1717 of 5 August 2025.

Following a complaint by four EU producers in May 2024, the Commission initiated an anti-dumping investigation in June 2024. Provisional duties were imposed in February 2025 within the scope of the investigation.

The Commission determined that the imports from China had caused material injury to the domestic industry in the European Union and rejected arguments that the low market share of imports from China had broken the causal link to the injury. It highlighted that the market share of imports from China had increased by over 500% during the period of injury determination.

Accordingly, the Commission decided to impose anti-dumping duties ranging from 26.4% to 26.9% against the imports of decor paper from China.

Commission Introduces Surveillance Measures on Metal Scrap Imports and Exports

On 23 July 2025, the Commission activated a customs surveillance system to monitor the import and export of metal waste and scrap into and out of the EU, covering ferrous waste and scrap (including steel), aluminium, and copper.

The Commission announced the implementation of the surveillance system as part of its Steel and Metal Action Plan (SMAP), adopted on 19 March 2025. The measure aims to address the decline in metal scrap availability for recycling within the EU, which has been exacerbated by 'scrap leakage' to third countries. The Commission noted that the introduction of a 50% tariff by the United States on steel and aluminium products may further worsen this issue by increasing incentives to export scrap abroad.

The surveillance system will provide the Commission with structured, detailed information on metal scrap trade flows to enable targeted trade measures, ensure sufficient supply, and prevent scarcity. The Commission stated it will use import and export data to assess if any further action is necessary by the end of the third quarter of 2025. Import and export statistics will be available and updated monthly, providing timely and transparent information on metal scrap trade flows.

Türkiye Extends Anti-Dumping Duties on Electric Wall Clocks from China

The Turkish Ministry of Trade concluded its expiry review investigation concerning imports of electric wall clocks from China and decided to maintain the existing anti-dumping measures.

On 22 July 2025, the Turkish Ministry of Trade announced through Communiqué No. 2025/16 that it had completed its expiry review investigation into electric wall clocks originating in China. The review investigation was initiated in May 2024 to assess whether the termination of the existing measures would likely lead to the continuation or recurrence of dumping and injury.

The Turkish Ministry of Trade determined that terminating the anti-dumping measure would likely lead to continuation or recurrence of dumping and injury to the domestic industry. Following evaluation by the Committee for Assessment of Unfair Competition in Imports, it was decided to maintain the existing 23% anti-dumping duty rate on imports of electric wall clocks from China. The extended measures will remain in effect for five years from the date of entry into force and may be subject to further expiry review before termination.

Türkiye Imposes Definitive Anti-Dumping Duties on Granite Imports from Egypt

On 19 July 2025, the Turkish Ministry of Trade concluded its anti-dumping investigation concerning granite imports originating in Egypt and imposed definitive anti-dumping measures.

The Turkish Ministry of Trade announced through Communiqué No. 2025/17 that it had completed its investigation into granite products originating in the Arab Republic of Egypt. The investigation, which was initiated in August 2024, established that dumped granite imports from Egypt had caused material injury to the domestic industry.

The Turkish Ministry of Trade determined that granite imports from Egypt had been sold at dumped prices, causing injury to Turkish producers. Following evaluation by the Committee for Assessment of Unfair Competition in Imports and approval by the Minister of Trade, definitive anti-dumping duties were imposed on granite imports from Egypt at rates ranging from 55% to 66%. The measures will remain in effect for five years from the date of entry into force and may be subject to expiry review before termination.

CJEU Clarifies When Pseudonymised Data Is "Personal Data" and the Timing of Controllers' Information Duties

The CJEU issued its judgment in C-413/23 P (EDPS v SRB) concerning pseudonymised data transferred to third parties. The case arose from an appeal by the EDPS against a General Court ruling that had annulled a 2020 EDPS decision. The original EDPS decision found that the Single Resolution Board (SRB) breached Regulation (EU) 2018/1725 by sharing creditors' and shareholders' comments relating to the resolution of an insolvent Spanish bank with Deloitte without informing the affected individuals.

Key holdings

• Opinions are personal data: The CJEU held that an individual's opinions or views - being expressions of that person's thinking - are inherently linked to the author and therefore constitute personal data.

• Pseudonymisation is context-dependent: Pseudonymised data do not automatically constitute personal data for every recipient; depending on the circumstances, pseudonymisation may prevent parties other than the controller from identifying the data subject.

• Controller-centric, time-of-collection test: The identifiable nature of a data subject must be assessed considering the processing circumstances and from the controller's perspective at the time of data collection.

• Information duties attach before transfer: The controller's obligation to inform is part of the legal relationship with the data subject and applies prior to any transfer to third parties, regardless of whether the recipient, post-pseudonymisation, could identify individuals.

The judgment reinforces that (i) personal opinions = personal data, and (ii) the status of pseudonymised data is recipient- and context-dependent, yet controllers must assess identifiability at collection and discharge information duties before onward disclosures. Practically, controllers should treat pseudonymised submissions as personal data for notice and transparency purposes, ensure records reflect the controller-centric assessment, and embed clear pre-transfer information and governance obligations in their data-sharing workflows.

Board Issues Public Announcement Regarding Debt Collection Agencies' Access to Relatives' Phone Numbers

On 20 August 2025, the Turkish Personal Data Protection Board ("Board") issued a public announcement regarding creditor representatives accessing phone numbers of relatives of indebted individuals to share debt information.

The announcement highlights that creditor representatives' practice of accessing the personal data of debtors' relatives and sharing debt information with them constitutes a violation of the Personal Data Protection Law ("Law").

According to the Board's assessment, obtaining phone numbers of debtors' relatives and transferring debt information to these individuals constitutes unlawful processing in terms of both data processing and data transfer.

In particular, conducting these practices without the explicit consent of the relevant individuals and for purposes other than fulfilling legal obligations constitutes a violation of the Law.

The Board emphasised that creditor representatives must refrain from such practices and act in accordance with personal data protection principles. Necessary administrative penalties will be applied when violations are detected. Furthermore, the announcement serves as a reminder to all stakeholders in the debt collection sector of their obligations under the Law and the importance of respecting individuals' privacy rights.

Finally, the Board underscores that debt collection activities must be conducted within the framework of applicable legal provisions and without violating personal data protection principles.

Re-evaluation Decision of the TCA: Assessing the Impact of E-Commerce Regulations on a Leading Online Marketplace's (Trendyol) Commitments

By Can Sarıçiçek, Özlem Başıböyük Coşkun, Nadide Akdağ and Ata Yanılmaz

DSM Grup Danışmanlık İletişim ve Satış Ticaret A.Ş. ("Trendyol"), a leading the multi-category online marketplace in Türkiye, came under scrutiny in by the Turkish Competition Authority for favouring its private-label ("PL") products through data exploitation and algorithmic manipulation. Following the TCA's 2021 investigation, Trendyol was required to ensure fair competition and prevent self-preferencing practices.

Subsequent amendments to Türkiye's Electronic Commerce Law compelled Trendyol to separate PL product sales from its marketplace, by launching a distinct platform, "TrendyolMilla," exclusively for its PL brands. Considering these regulatory developments, Trendyol petitioned the TCA to reconsider the obligations imposed under the 2023 Final Decision, arguing that the legislative changes rendered some of these requirements obsolete.

In this article we investigate the details of the TCA's Re-evaluation Decision of 2024, which provides a nuanced assessment of whether Trendyol's regulatory obligations remain relevant under the new legal and operational framework. While the TCA accepted that concerns regarding algorithmic favouritism were no longer applicable due to the complete removal of PL products from Trendyol's marketplace, it upheld obligations related to data usage, recognizing that access to third-party seller data remains a competitive risk. This article also examines the implications of regulatory adaptations, and the broader impact on the e-commerce ecosystem in Türkiye.

Background of the Trendyol case on algorithmic manipulations

Back in 2021, the Turkish Competition Authority ("TCA") launched an investigation into Trendyol, examining potential anti-competitive practices through algorithm manipulation and third-party seller data usage.[1] The investigation stemmed from concerns about Trendyol's conduct in the multi-category online marketplaces market.

The investigation's background traces back to Trendyol's business evolution. Founded in 2009 as an online retailer, the company expanded its operations in October 2017 by introducing marketplace services, becoming a hybrid platform that operated both as a seller and an intermediary service provider. Through its PL business model, Trendyol developed several PL brands including TrendyolMilla, TrendyolMan, TrendyolKids, TrendyolModest, TrendyolShoes, and Nottis by Trendyol.

Through on-site inspections and analysis of internal communications from August 2017 to September 2021, the TCA identified systematic practices favouring Trendyol's PL products.[2] The investigation revealed a "torpil adjustment" system that amplified the visibility of Trendyol's PL brands by applying higher multiplication coefficients to their product scores in the ranking algorithm. The company also manipulated follower counts, with its PL brands receiving a five-fold multiplication of actual follower numbers, while competitor brands received a three-fold increase.[3]

Upon examination of Trendyol's data practices, the TCA identified additional concerns. Internal documents showed that the company had developed econometric models for sales forecasts using competitor brands' sales data and product sales information.[4] Third-party sellers reported instances where Trendyol monitored their best-selling items, including designs and colours, subsequently producing similar products under its PL's at lower prices. This practice allowed Trendyol to leverage its position as a marketplace operator to gain advantages for its PL operations.

Based on these findings, the TCA imposed interim measures on Trendyol.[5] These measures required Trendyol to stop algorithm and coding interventions that advantaged its PL products, prohibited the sharing and use of marketplace data for products under its economic integrity, and required implementation of technical and organizational measures for compliance monitoring.

The TCA concluded its investigation with its decision dated 26.07.2023 and numbered 23-33/633-213 (the "Final Decision"), determining that Trendyol (i) holds a dominant position in the market for multi-category online marketplaces, and (ii) has abused its dominant position through two main practices: manipulating its algorithms to favour its own products over competitors, and improperly utilizing data collected from third-party sellers on its platform for its own advantage.[6]

Trendyol's commitments

The TCA imposed an administrative fine of TRY 61,342,847.73 (approximately EUR 5.8 million) and established various obligations on Trendyol to address the identified violations through the Final Decision.[7] These obligations included preventing algorithmic or manual interventions that could unfairly favour Trendyol's PL products over competitors on its own marketplace,[8] such as ensuring equal application of ranking and scoring algorithms, restricting access to PL category data in the primary product table, order table, and category tree for the data science search team, and prohibiting any manual adjustments to the algorithm for the benefit of PL products, preventing the misuse of data obtained from third-party sellers for the benefit of Trendyol's PL operations by establishing separate teams for PL activities, implementing internal policies to avoid self-preferencing and sharing these policies with relevant teams. The decision obliged Trendyol to retain all parametric and structural changes to the algorithm models used for product ranking and brand filtering, along with all codes related to or affecting these algorithms, in a versioned and verifiable manner for a period of 3 years.

The Impact of the New Electronic Commerce Law on Trendyol's Business Model

Following the TCA's investigation, Türkiye's e-commerce regulatory landscape underwent significant changes. The rapid growth of the e-commerce sector, increasing number of market players, and expanding market shares necessitated adapting the regulatory framework to these changes. Several amendments were enacted to Law No. 6563 on the Regulation of Electronic Commerce ("Electronic Commerce Law") through Law No. 7416 and a new regulation was published in2022 concerning electronic commerce intermediary service providers (ETAHSs) and electronic commerce service providers (ETHSs).

The amended Electronic Commerce Law introduced specific restrictions on ETAHSs, particularly affecting large platforms like Trendyol. Under Article 2 of the Electronic Commerce Law, ETAHSs are prohibited from selling their own branded products or products for which they hold trademark rights on their marketplace platforms. This provision directly targeted the hybrid business model that had allowed Trendyol to sell its PL products alongside third-party sellers on its platform.

Specifically, additional Article 2(1)(a) of the Electronic Commerce Law imposes an obligation on ETAHSs to refrain from offering products bearing their own brands or brands for which they hold trademark rights on their e-commerce marketplaces, and

from intermediating the sale of such products. This requirement aims to prevent anti-competitive effects arising from ETAHSs leveraging their market position, their influence over consumers and ETHSs, and data obtained through their intermediary activities to expand into ETHSs' activities.

Trendyol, identified as one of the leading multi-category marketplaces in the TCA's "E-Marketplace Platforms Sector Inquiry Final Report"[9], operates as both an ETAHS under the Electronic Commerce Law and an ETHS through its PL brands. The Electronic Commerce Law mandated compliance with these new requirements by January 1, 2024. In response, Trendyol implemented substantial changes to its operational structure. By December 2023, the company launched a separate mobile application and website called "TrendyolMilla" to house its PL brands. As of January 1, 2024, Trendyol completely ceased selling its PL products on the Trendyol marketplace platform, transitioning these sales exclusively to the TrendyolMilla platform.

Trendyol's Request for Re-evaluation of Obligations Following E-Commerce Law Changes

To reflect these changes, Trendyol submitted a series of requests to the TCA, arguing that the obligations imposed on the company by the Final Decision, have become inapplicable due to significant legislative changes and operational adjustments.

Trendyol mainly focused on the cessation of PL product sales on its marketplace. It also argued that as of January 1, 2024, when Trendyol removed its PL products from its marketplace operations pursuant to the amended Electronic Commerce Law, certain obligations imposed by the TCA have become void. For example, with the absence of PL products on the platform, the possibility of algorithmic favouritism — where algorithms might prioritise PL products — is no longer an issue.[10]

Trendyol also addressed specific obligations related to algorithmic neutrality. These obligations required Trendyol to log algorithmic parameters, monitor algorithm performance, and ensure that algorithms treat all sellers equally. Trendyol contended that these measures have become moot, since the algorithms lack the capability to create competitive advantages for the company's PL brands without PL products.[11]

Additionally, Trendyol challenged the data-sharing obligations imposed by the TCA. Trendyol explained that its PL products are now sold exclusively through a separate platform, the TrendyolMilla, rather than its hybrid marketplace. Trendyol argued that this operational separation significantly reduces the potential for data-related self-preferencing concerns. Trendyol argued that these obligations have now become inapplicable under the new operational structure.[12]

TCA's Assessments of Trendyol's requests to reconsider obligations

TCA assessed whether the obligations previously imposed on Trendyol had become moot, through an examination separately in terms of algorithmic intervention concerns and data-related concerns in its Re-evaluation Decision.

Algorithmic Intervention Concerns

In the Re-evaluation Decision, it is noted that concerns regarding algorithmic intervention were directly tied to Trendyol's use of PL products within its marketplace. These concerns included practices such as manipulating product rankings, artificially inflating follower counts, and prioritizing Trendyol's PL products in brand filtering screens. The TCA had previously concluded that these practices provided Trendyol with an unfair advantage, disadvantaging third-party sellers on the platform and disrupting competitive balance.

The transition of PL products from Trendyol's marketplace to the TrendyolMilla as of January 1t, 2024 removed them from the algorithms' scope, making it impossible for them to engage in self-preference. The TCA assessed that there is no longer a subject for the algorithms to favour, and their previously identified role in self-preferencing has become irrelevant under current conditions without PL products on the platform, in line with Trendyol's arguments.[13]

Despite this approach, the TCA highlighted that the obligations were not entirely moot but rather conditional upon Trendyol's operational structure. Should PL products return to the marketplace in the future, the risk of algorithmic favouritism could re-emerge. In such a scenario, algorithms might once again be leveraged to gain unfair advantages, which would necessitate reinstating these regulatory measures.[14]

In short, the algorithmic obligations are currently inapplicable because the removal of PL products from Trendyol's marketplace has eliminated the structural basis for algorithmic favouritism. However, their applicability remains contingent on future developments, ensuring that the regulatory framework remains proactive and responsive to changes in Trendyol's business practices.

Data-Related Concerns

The TCA focused on whether Trendyol's obligations regarding data usage had become moot following its operational restructuring. These concerns derived from Trendyol's ability to leverage data from third-party sellers to gain a competitive edge for its PL products. Despite Trendyol's separation of its PL operations from the marketplace, with PL products now being sold through TrendyolMilla, the Board concluded that the competitive risks associated with data misuse persist.[15]

It was emphasized that Trendyol's marketplace still collects large amount and range of data which are commercially valuable, such as customer preferences, best-selling products, detailed sales performance metrics, and advertising activity.[16] Such data gives Trendyol a significant strategic advantage, as it allows the company to better position its PL products in terms of design, marketing, and pricing.[17] As such, the TCA determined that the structural separation does not establish a sufficient barrier to prevent data misuse. To address these risks, the TCA upheld the obligations it had previously imposed on Trendyol regarding data collection, usage, and separation.[18]

The TCA also rejected Trendyol's argument that the structural separation between its marketplace and PL operations fully resolved the data-related concerns, stating that the mere operational separation of platforms does not address the underlying issue of access to and potential misuse of data.[19] Trendyol's ability to collect third-party seller data through its marketplace remains unchanged, and this data can still be leveraged to support its PL operations in TrendyolMilla.[20] Consequently, the TCA determined that the obligations regarding data usage shall remain in force as it safeguards against potential data misuse.

Conclusion

The TCA's decision regarding the requirements imposed on Trendyol illustrates how regulatory frameworks adapt to changes in the e-commerce landscape. While the TCA determined that algorithmic manipulation concerns became moot after Trendyol's separation of PL products to a different platform, it maintained that data-related competition concerns persist despite the structural separation. The Re-evaluation Decision reflects the TCA's nuanced approach in evaluating how different types of competitive concerns may be affected by changes in business models and regulatory requirements. By maintaining data-related obligations while lifting algorithm-related requirements, the Re-evaluation Decision acknowledges that certain competitive concerns can be resolved through structural separation, while others may require continued oversight even after such separation.

[1] TCA's decision dated 23.09.2021 and numbered 21-44/650-M.

[2] For reference to the scope of on-site inspections, please see the TCA's decision dated 26.07.2023 and numbered 23-33/633-213 and (from here on referred to as the "Final Decision"), para. 52-74, available at: https://www.rekabet.gov.tr/Karar?kararId=a8e30f1f-5daf-4015-99bb-21b10c838dcc.

[3] The Final Decision, para. 224, 641.

[4] The Final Decision, para. 271.

[5] TCA's decision dated 30.09.2021 and numbered 21-46/669-334

[6] The Final Decision, para. 789.

[7] Can Saricicek, Özlem Başıböyük Coşkun, Ayşe Sıla Koç, Berkay Ünlüsoy, Nadide Akdag, The Turkish Competition Authority concludes that a leading online marketplace manipulated algorithms and used third-party sellers' data to favour its own private label brands and retail operations (Trendyol), 26 July 2023, e-Competitions July 2023, Art. N° 122370.

[8] The Final Decision, para. 789.

[9] Turkish version of the report (published on April 14, 2022) is available at: https://www.rekabet.gov.tr/Dosya/sektor-raporlari/e-pazaryeri-si-raporu-pdf-20220425105139595-pdf

[10] TCA's decision dated 11.07.2024 and numbered 24-29/689-M (from here on referred to as the "Re-evaluation Decision", para. 16.

[11] Ibid.

[12] ibid.

[13] The Re-evaluation Decision, para 26

[14] The Re-evaluation Decision, para 26.

[15] The Re-evaluation Decision, para. 34.

[16] The Re-evaluation Decision, para. 31.

[17] ibid.

[18] The Re-evaluation Decision, para. 34.

[19] The Re-evaluation Decision, para. 31-32.

[20] The Re-evaluation Decision, para. 33.

ACTECON's Commitment to Mentorship

The ACC Türkiye In-House Counsel Mentorship Program provides a powerful platform that advances the professional development of in-house lawyers and deepens mentor–mentee relationships.

At ACTECON, we are proud to have been part of this meaningful initiative from the very beginning, helping to foster knowledge and experience sharing within the community.

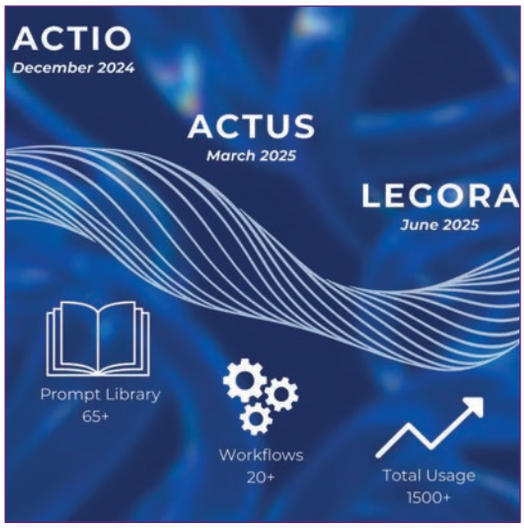
Many thanks to the ACC Europe – Association of Corporate Counsel team and to Müge Bulat Çetinkaya for organizing this important event that brought the program's stakeholders together.

Legal Engineering in Action: ACTECON × Legora

At ACTECON, innovation is not just a value, it is part of our DNA. Over the past years, we have been investing in the future of legal practice through internal initiatives like ACTIO, which explored AI-driven legal research, and ACTUS, our in-house system for analysing Turkish Competition Authority decisions. Today, we are proud to announce a new milestone in this journey: our strategic partnership with Legora, the leading collaborative AI platform for the legal industry.

With this partnership, we are not simply adopting an innovative technology. We are building on what we have already created internally and taking it to the next level. By establishing a dedicated Legal Engineering team, we are embedding AI at the very heart of our practice, transforming automation and knowledge systems into tangible value for our clients.

This is just the beginning. Together with Legora, we aim to set new standards for efficiency, collaboration, and client service in competition law and beyond.



ACTECON at the 5th edition of the LEAR Competition Festival in Rome!

Lear Competition Festival (LCF) once again brought together leading minds in competition law for inspiring discussions. Rome never loses its charm, even on grey days.

We were proud to be part of it, not just as sponsors, but also by leading the conversation. Our panel, "Key Red Flags Before You Merge: Avoiding Gun-Jumping," brought together amazing voices — Saskia King, Alessandro Di Giò, Franco Castelli, Bahadir Balki and Hanna Stakheyeva for a dynamic and insightful discussion.

The networking sessions and gala dinner were once again among the highlights, reflecting the unique spirit of connection and collaboration that makes LCF so special. Hats off to the organisation team for crafting experiences in venues that remind us why Rome is such an extraordinary host city.

Many thanks to Paolo Buccirossi, Silvia Caporale, Benedetta Ausili and to the entire Lear - Economic Consultancy team for the seamless organisation and for making this year's festival another remarkable success.

Here is to many more years of learning, sharing, and connecting. Arrivederci Rome!

FROM ACTECON

ACTECON at the IBA's 29th Annual Competition Conference

We were delighted to join the IBA's 29th Annual Competition Conference in magical Florence last week, supporting this year as headline social events sponsor.

From digital markets and interoperability to merger control, sustainability, and collective actions, the panels offered inspiring discussions on the future of competition law.

It was a real pleasure to reconnect with familiar faces and meet many new ones in the community. A big thank you to the International Bar Association and all participants. Until next time!

Merger Control in Focus: ACTECON × ELSA Summer Law School

On 20 August, Senior Associate Ayberk Kurt delivered a session at ELSA's Summer Law School, sharing practical insights on Türkiye's merger control framework and recent landmark decisions of the Turkish Competition Authority with law students from diverse jurisdictions.

Marking our 16th year of collaboration with ELSA (the European Law Students' Association), we are grateful for the opportunity and proud to support this valuable platform. We look forward to many more years of learning with—and contributing to—the next generation of legal leaders.

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.