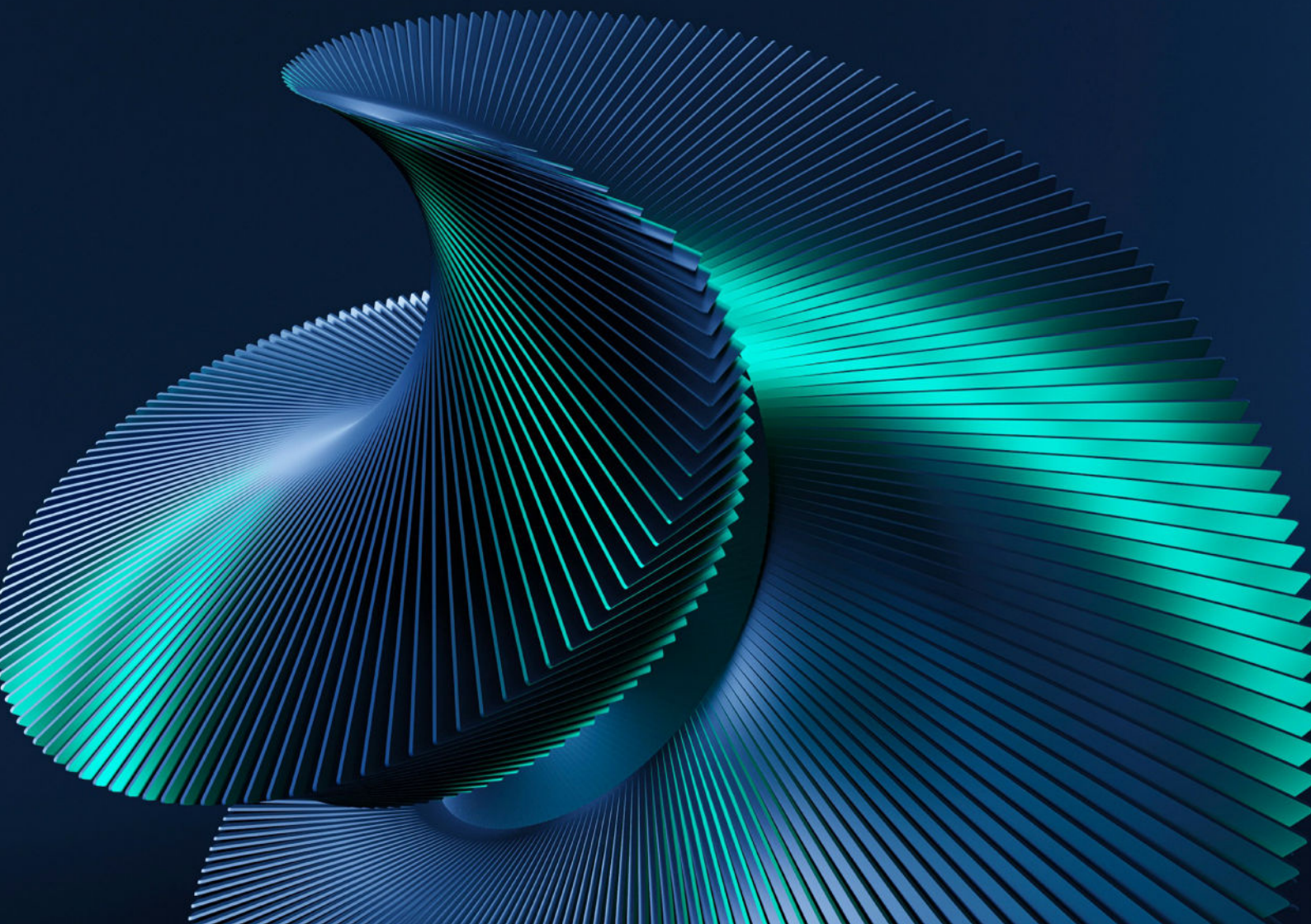


GENTEMIZER

Two-Minute Recap

Competition Law Matters Around the Globe

2025 September



CMA Issues Guidance on Competition in Labour Markets

In September 2025, the UK Competition and Markets Authority (“**CMA**”) published a practical guide entitled *Competing for Talent*, focusing on how competition law applies in labour markets. The guide stresses that businesses not only compete for customers but also for workers, and therefore practices such as no-poaching agreements, wage-fixing, and the exchange of competitively sensitive information between employers may amount to unlawful cartel conduct. The CMA highlights that these restrictions can reduce employee mobility, depress wages, and limit business growth. The guidance provides illustrative examples, clarifies the distinction between legitimate collective bargaining and anti-competitive coordination, and outlines the severe sanctions companies and individuals may face for infringements.

Sanofi Faces EC Raids on Vaccine Disparagement Claims

Sanofi has become the focus of unannounced European Commission (“**EC**”) inspections over potential anticompetitive disparagement in the seasonal flu vaccine sector. The EC is investigating whether the company engaged in exclusionary practices that undermine competitors. Sanofi confirmed the inspections in France and Germany on 29 September 2025 and stated it will fully cooperate, asserting compliance with applicable rules. The investigation follows precedent in the pharmaceutical sector: in October 2024, Teva was fined EUR 462.6 million partly for a coordinated campaign to disparage a rival multiple sclerosis treatment, highlighting the significant financial and reputational risks of such conduct.

Italy Fines Oil Majors for Fuel Price-Fixing Cartel

The Italian Competition Authority (“**AGCM**”) has levied fines totalling EUR 936.7 million on six major oil companies — Eni, Esso, Ip, Q8, Saras and Tamoil — for operating a fuel price-fixing cartel. Prompted by a whistleblower complaint, the investigation revealed that between January 2020 and June 2023, the companies coordinated to fix the value of the “bio component” factored into fuel prices. The AGCM found that this coordination, supported by direct and indirect information exchanges as well as industry disclosures, resulted in parallel price increases across the market, constituting a clear breach of competition law.

EC Fines Eurofield for Incomplete Responses

The European Commission has fined Eurofield SAS and its former parent, Unanime Sport SAS, EUR 172,000 for providing an incomplete response to a formal information request during an antitrust investigation in the synthetic turf sector. This decision is noteworthy as it is the first time the Commission has imposed a sanction solely based on procedural misconduct—i.e., failing to fully comply with an information request—rather than for substantive antitrust conduct. The case underscores that transparency and completeness in regulatory submissions are treated as core compliance obligations under EU competition law.

Germany Considers Call-In Powers for Below-Threshold Deals

Bundeskartellamt President Andreas Mundt indicated that Germany may introduce a call-in power system to better capture so-called “killer acquisitions” that currently evade merger control.

While Germany already requires notification for transactions exceeding EUR 400 million in value, recent court rulings have curtailed the scope of this threshold, raising concerns that problematic acquisitions could slip through. Speaking at a conference in New York, Mundt stressed that relying solely on the transaction value test may no longer provide sufficient oversight, and legislative amendments could be on the horizon.

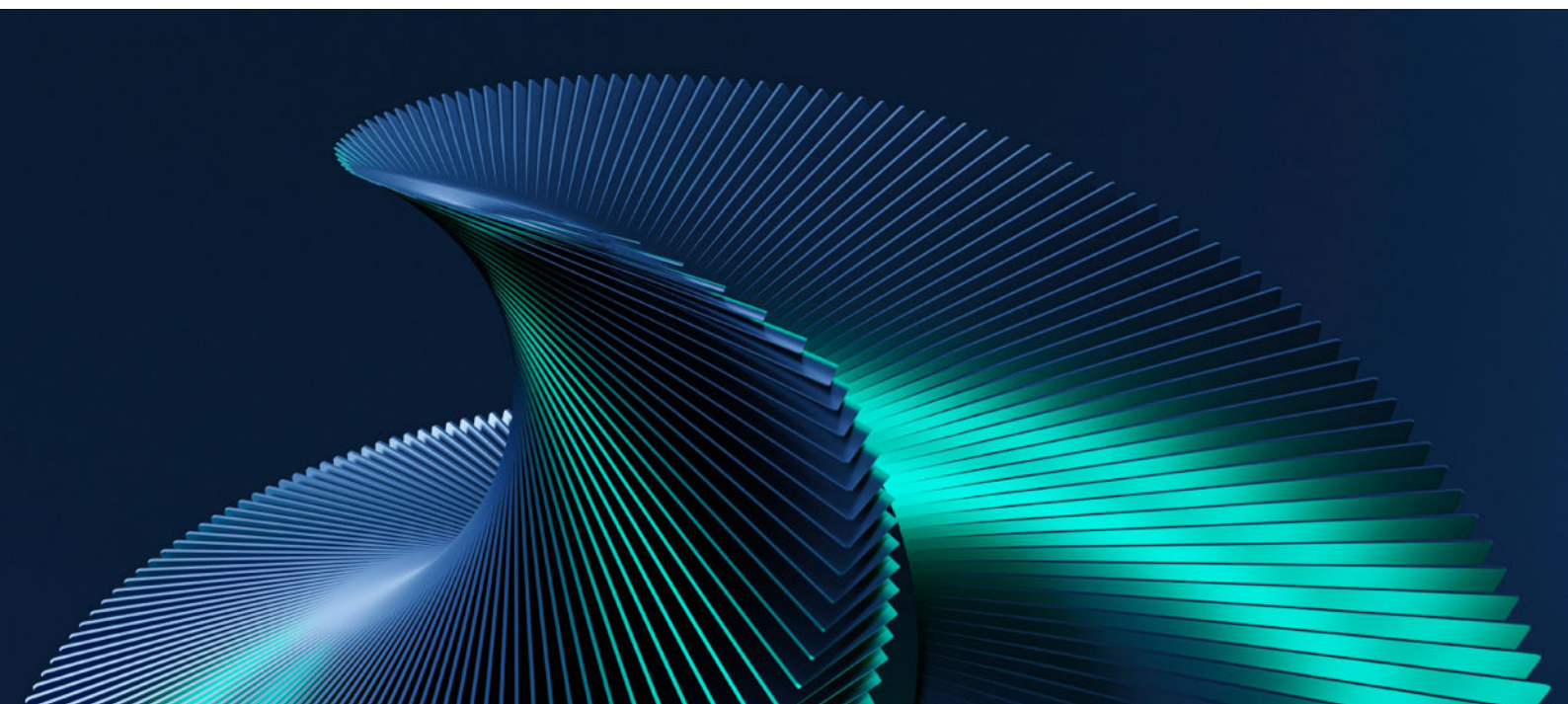
Austria Fines Securitas for Cartel Conduct

The Austrian Cartel Court has fined Securitas EUR 540,000 following an application by the Federal Competition Authority (“**AFCA**”). The case concerned collusion in the personnel security services market, where Securitas engaged in price-fixing, price coordination, and information exchange with a competitor in three private tenders between August 2019 and December 2022. Securitas admitted the infringement and cooperated with the AFCA outside the leniency programme, which contributed to a reduced

penalty. The decision highlights that under Austrian competition law, fines of up to 10% of turnover may be imposed, with the level determined by the seriousness, duration, and circumstances of the infringement.

JFTC Fines Harley-Davidson for Imposing Sales Targets on Dealers

The Japan Fair Trade Commission (“**JFTC**”) has fined Harley-Davidson’s Japanese subsidiary approx. USD 1.44 million and issued a cease-and-desist order for breaching the Antimonopoly Act. Since January 2023, the company had imposed unilateral monthly and quarterly sales targets on dealers, suggesting that failure to comply could jeopardize contract renewals. The JFTC found this amounted to abuse of a superior bargaining position. In addition to the fine, Harley-Davidson must halt these practices, distribute compliance guidelines, provide regular staff training and third-party audits, and report on compliance measures to the regulator for three years.



GenTemizer is a Turkish law firm based in Istanbul, Türkiye. We advise various businesses in relation to their investments, M&A, competition law/antitrust, project financing and construction projects as well as on operational and dispute resolution matters in the context of the Turkish regulatory framework. We have also advised investors in relation to government sponsored privatisation projects.

We are listed in *Legal 500*, *IFLR1000* and *Chambers and Partners* as one of the leading law firms in Türkiye. Each of our partners have also been recognised as one of the leading lawyers in Türkiye. We understand and can meet the demanding requirements and innovative, responsive thinking required for an investment transaction in Türkiye.

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