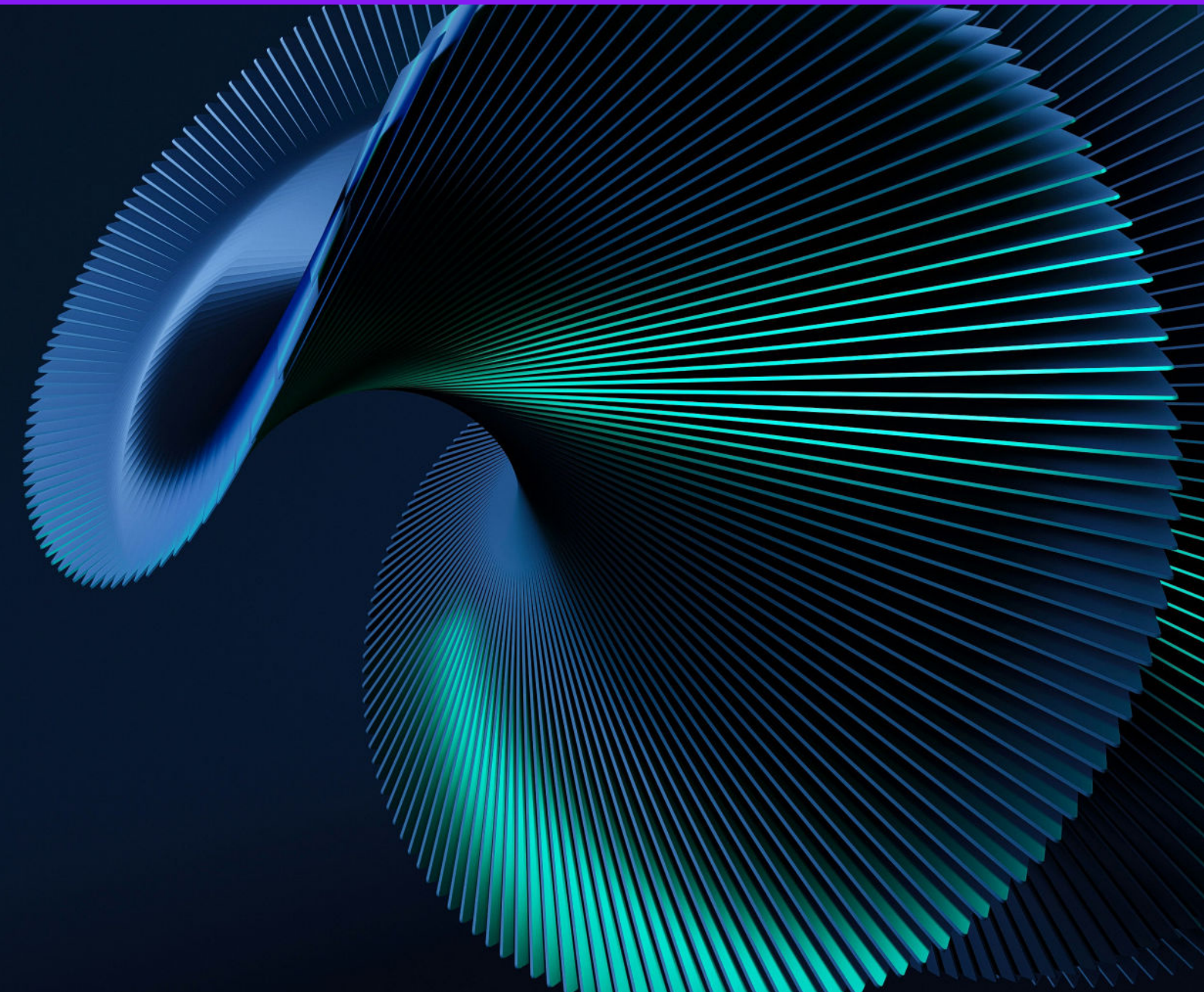


GENTEMIZER

Two-Minute Recap

Competition Law Matters in Türkiye

2025 September



White Meat Producers are Fined for Sharing Competitively Sensitive Information

The Competition Board (“**TCB**”) assessed whether undertakings in the white meat sector engaged in strategic information sharing that could affect competition. Similar infringements had previously been identified in 2009 and 2019, with corresponding penalties imposed. Following the latest investigation, administrative fines totaling approximately TRY 3.7 billion (approx. EUR 76 million) were imposed. Eight undertakings were fined for sharing competitively sensitive information, while five undertakings accepted the infringement under a settlement, received %25 reduced administrative fines. Behavioral remedies were also imposed, requiring undertakings to discontinue future-dated price lists and promptly communicate price changes to buyers.

Uber Gains Sole Control of Trendyol GO with TCA’s Approval

In May, the TCB approved Uber’s acquisition of an 85% shares in Trendyol GO. With the reasoned decision published in September, the TCB concluded that the transaction does not significantly lessen competition, nor does it create or strengthen a dominant position within the meaning of Article 7 of Law No. 4054 on the Protection of Competition (“**Law no 4054**”). As a result, Uber assumes sole control over Trendyol GO, while Trendyol retains a 15% minority shareholding in the company.

Investigation Launched into Spotify in the Online Music Streaming Market

The TCB has decided to open an investigation into Spotify in the online music streaming market to determine whether the platform discriminates among rights holders in playlist inclusion, ranking, and recommendation algorithms, and whether it engages in predatory pricing that disadvantages competitors or rights holders in Turkey.

OGM and STAR TV Probe Concluded via Commitments

The investigation concerning the long-term exclusivity clauses in the production and broadcasting agreement between OGM and STAR TV has been concluded via commitments. Under these commitments, the exclusivity clauses in the agreement will be terminated. OGM is now free to produce content for channels and platforms beyond STAR TV, while STAR TV can enter into prime-time series agreements with producers other than OGM. The TCB deemed the commitments sufficient to address the identified competition concerns, feasible to implement promptly, and effective, thereby closing the investigation.

Investigation Launched in Meal Card Market

The TCB has initiated an investigation into Edenred, Multinet, Pluxee, and Set Corporate Services, active in the corporate meal card market, over alleged violations of Article 4 of

Law no. 4054. The preliminary investigation indicated sufficient grounds to examine practices such as collusive behavior in tenders, customer allocation, and exchange of competitively sensitive information. The TCB decided to open a formal investigation to determine whether these practices restrict competition.

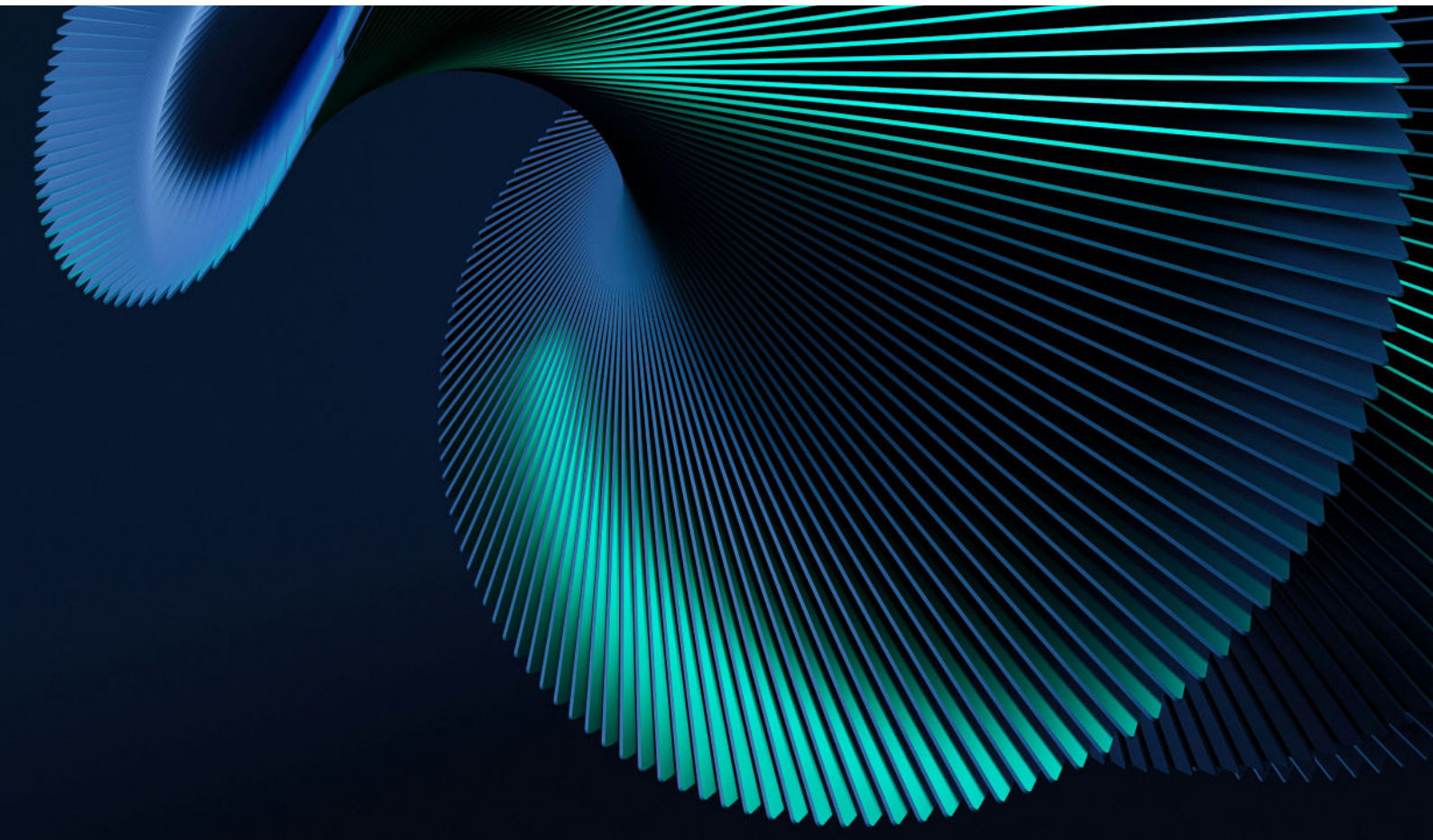
Investigation Launched in the Dairy Market

The TCA has launched an investigation into 38 companies in the dairy sector for allegedly pressuring raw milk producers through “milk-for-feed” practices, potentially violating Article 4 of Law no. 4054. The decision includes interim measures preventing coercion on quantity or brand, ensuring compliance with contractual provisions, and requiring detailed reporting

of milk and feed transactions until the final decision. Dairy producers will also be informed about these interim measures to ensure market transparency.

Labour Market Investigation in Shipbuilding Sector

The TCA has expanded its scrutiny of labour markets with a new investigation into the shipbuilding sector. The case targets 33 companies, two trade associations, and a consultancy firm, examining allegations of wage-fixing, no-poaching agreements, and facilitating practices supporting such arrangements. These practices may fix the cost of labour and restrict worker mobility, potentially infringing Article 4 of Law No. 4054.



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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