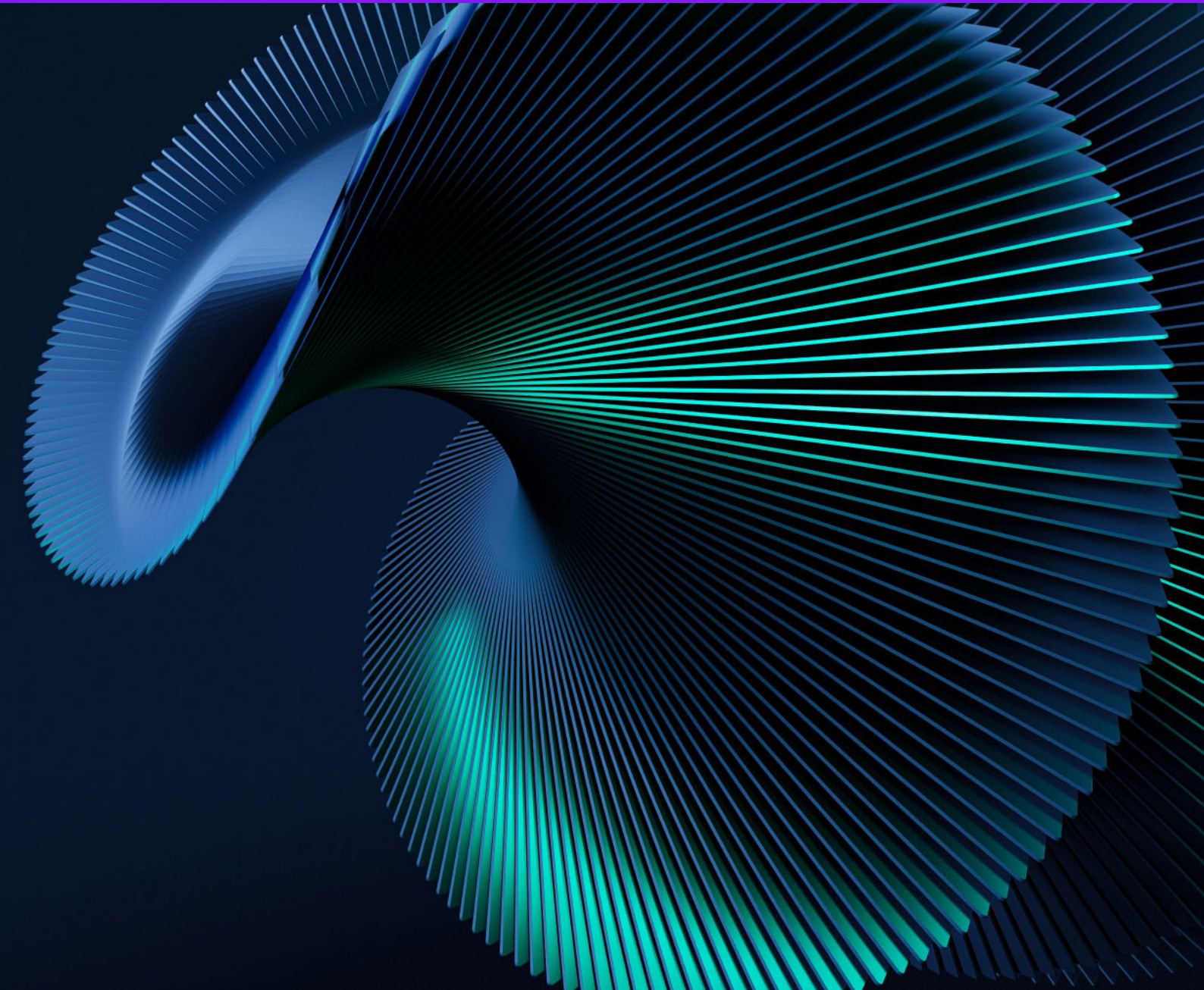


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## Two-Minute Recap

# Competition Law Matters in Türkiye

2026 April



## A Tax Angle in Ad Tech: Google Under Investigation

The Turkish Competition Board (“**TCB**”) has launched an investigation into *Google* over its online advertising services, examining whether its billing practices towards advertisers and advertising agencies amount to an abuse of dominance.

The probe focuses on Google’s dual invoicing structure, under which certain customers are billed via *Google Ireland Limited* while others are invoiced through its Turkish entity, leading to different tax obligations. In particular, customers invoiced through Ireland may be subject to withholding tax under Turkish law, whereas those invoiced domestically are not.

The TCB will assess whether this distinction results in unequal cost burdens among similarly situated undertakings and whether it constitutes discriminatory treatment that may distort competition. The investigation will also examine the criteria used by *Google* to classify its customers and whether such classification is objective and consistently applied.

## AI Under the Microscope Through Sector Inquiry

The Turkish Competition Authority (“**TCA**”) has initiated a comprehensive sector inquiry into the artificial intelligence (“**AI**”) ecosystem, reflecting the growing recognition of AI as a transformative force reshaping competition dynamic across markets.

The inquiry will focus on the multi-layered AI value chain -from infrastructure to model

development and applications, with particular emphasis on access to key inputs such as data, computing power, and technical expertise. The TCA will assess how early access to these inputs may enable certain undertakings to strengthen their market positions through vertical integration.

The review will also examine the competitive implications of general-purpose AI models, including risks related to market entry barriers, ecosystem lock-in and restricted access to critical inputs. In addition, the TCA will analyse the integration of AI into large digital platforms, particularly in relation to potential exclusionary practices such as self-preferencing, tying and access restrictions. The findings of the inquiry are expected to inform future policy development and enforcement tools.

## TCB Concludes Investigation in Hybrid Seed Markets

The TCB has concluded its investigation into undertakings active in the hybrid industrial gherkin seed and hybrid fruit and vegetable seed markets, finding that several companies engaged in anticompetitive conduct.

During the investigation, a significant number of undertakings opted for the settlement procedure, admitting to engaging in exchanges of competitively sensitive information and, in certain cases, coordinating sales prices. The TCB accepted these settlements and granted fine reductions, bringing a substantial part of the case to a close through procedural efficiency tools.

As for the remaining parties, the TCB established that they had participated in information exchange practices restricting competition and imposed administrative fines accordingly.

## **Hybrid Enforcement in Pharma: Orzaks Case Concluded with Settlement and Commitments**

The TCB has concluded its investigation into *Orzaks* through a combination of settlement and commitment procedures. The case concerned allegations that *Orzaks* restricted pharmacies' online sales and engaged in practices potentially excluding competitors.

Under the settlement procedure, *Orzaks* admitted to restricting online sales by pharmacies, leading to the imposition of an administrative fine. In parallel, the TCB accepted a set of commitments addressing broader exclusionary concerns, including purchasing obligations, bundling practices, and discount schemes. The accepted commitments aim to ensure greater freedom for pharmacies in product selection and shelf allocation, while limiting practices that could foreclose competitors.

## **From Insurers to Hospitals: Broad Healthcare Probe**

The TCB has launched a broad investigation into undertakings active in the health insurance ecosystem, including insurers such as *Allianz Sigorta* and *Anadolu Sigorta*, as well as private healthcare providers and service platforms.

The probe will examine allegations of price fixing, market sharing and exchanges of sensitive information among insurers, alongside potential exclusionary agreements between insurers and healthcare providers. The investigation reflects the TCA's growing focus on complex, multi-sided markets and the competitive dynamics of the healthcare sector.

## **TCB Launches Investigation into Dabur International's Turkish Subsidiaries**

The TCB has launched an investigation into Hobi Kozmetik and RA Pazarlama both subsidiaries of Dabur International Limited, over allegations that they determined the resale prices of their buyers.

According to the preliminary findings, the allegations concern interventions against sellers offering lower prices, allegedly requiring them to increase their resale prices. The file also includes claims that sellers complying with the company's indicated prices were granted certain advantages, while those selling below these prices faced supply restrictions. If confirmed, the allegations would indicate that retailers were prevented from freely setting their own resale prices, potentially keeping retail prices above competitive levels.

**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.

**For more information, you can contact us.**



**Bulut Girgin**  
Partner  
bgirgin@gentemizer.com



**Mustafa Polat**  
Senior Associate  
mpolat@gentemizer.com



**Semanur Avcı**  
Associate  
savci@gentemizer.com



**Şevval İlke Özçelebi**  
Legal Trainee  
siozcelebi@gentemizer.com