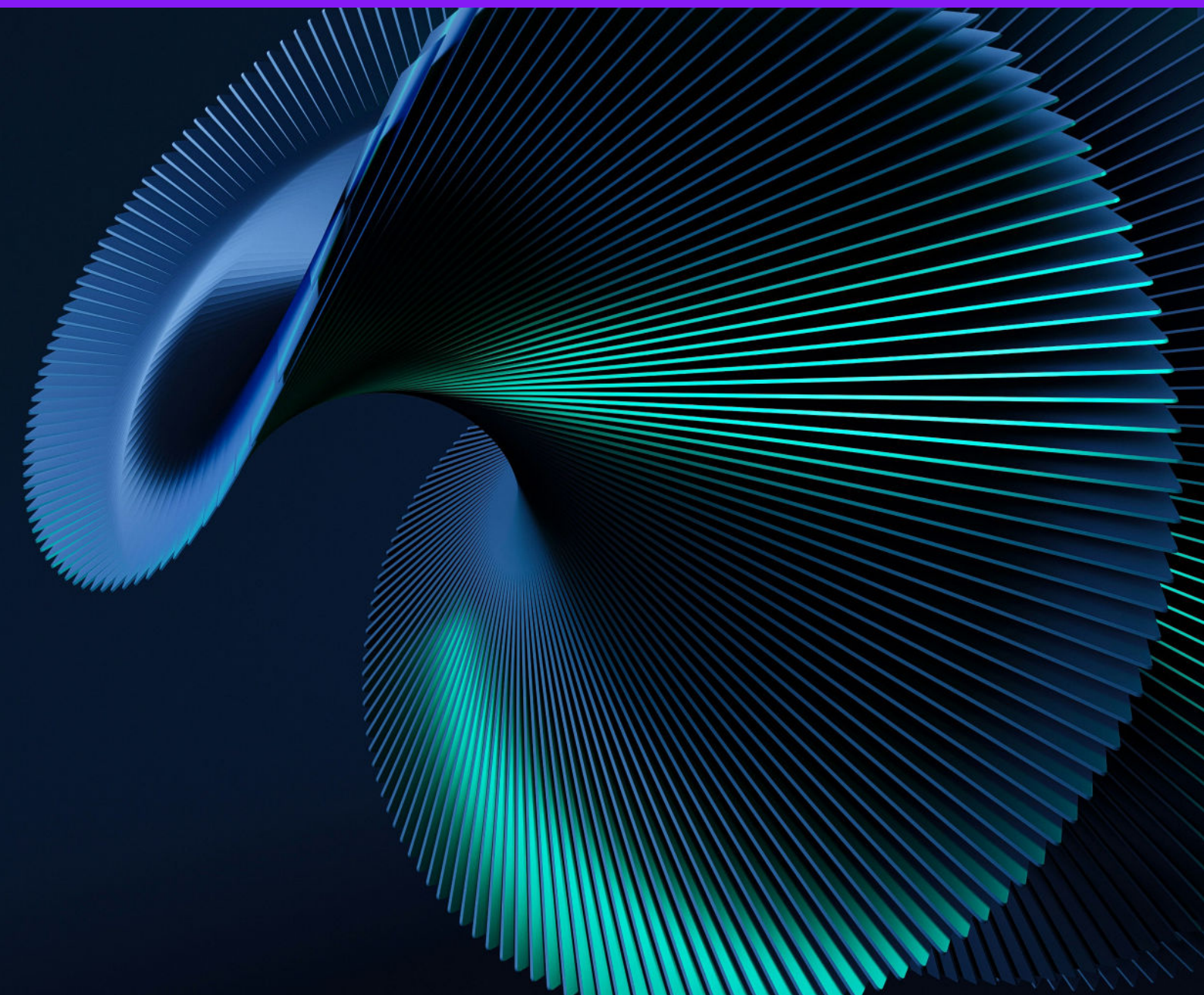
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Two-Minute Recap

Competition Law Matters **in Türkiye**

2026 September



TCB Publishes Settlement Decisions in Hub-and-Spoke Price Coordination Case

The Turkish Competition Board ("**TCB**") has published four settlement decisions concerning a hub-and-spoke cartel involving plant-based drinks supplier Nilky and competing retailers BİM, Migros and Şok. The TCB found that Nilky acted as the hub by facilitating the indirect exchange of future retail prices and the timing of price increases between the three retailers.

The findings were based on communications showing efforts to align the retailers' price increases, together with subsequent pricing movements. The TCB concluded that BİM, Migros and Şok were aware of the coordination and used information concerning competitors' future pricing in determining their own conduct. It therefore characterised the arrangement as a hub-and-spoke cartel aimed at fixing retail prices.

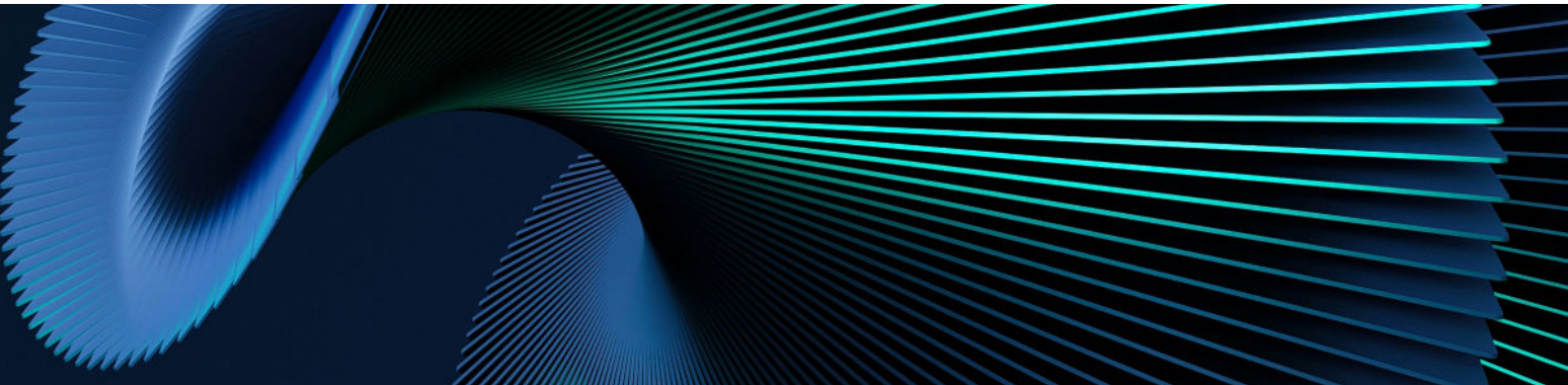
All four parties settled the investigation and received the maximum 25% settlement reduction. The resulting fines were approximately EUR 94,300 for Nilky, approx. EUR 1.27 million for BİM, approx. EUR 0.91 million) for Migros and approx. EUR 0.75 million for Şok. The TCB also applied recidivism as an aggravating factor to BİM, Migros and Şok, while taking the limited share of Nilky sales in each retailer's overall turnover into account as a mitigating factor.

TCB Publishes Reasoned Decision on Etsy's Logistics Integration Commitments

The TCB has published its reasoned decision concerning Etsy's logistics integration arrangements in Türkiye. The case examined whether giving full API integration only to ShipEntegra could disadvantage competing logistics intermediaries and restrict competition. The TCB identified concerns around unequal access to Etsy's technical infrastructure, while stopping short of a definitive dominance or infringement finding.

To address these concerns, Etsy committed to run a selection process for eligible logistics providers and ensure that at least two providers can participate in its preferred-partner programme, subject to contractual and security requirements. Etsy will also inform sellers that they remain free to use providers outside the programme. The commitments will remain in force for five years. The TCB accepted them and decided not to open an investigation against Etsy. It also found no basis to investigate ShipEntegra for an anticompetitive agreement.

The decision shows that the TCB may treat access to a digital platform's technical integration as a competitive parameter where unequal access can affect rivalry in an adjacent market.



TCB Publishes Renewed Google Shopping Decision Following Court Annulment

The TCB has published the reasoned version of its 21 May 2026 decision adopted following the annulment of its 2020 Google Shopping decision. The TCB again found Google dominant in general search and online shopping comparison services and concluded that Google infringed Article 6 by placing rival shopping-comparison services at a competitive disadvantage while favouring its own Shopping Unit. The decision also reinstates behavioural obligations concerning the treatment of rival comparison services in search results and the presentation of the Shopping Unit.

The main new element concerns the fine. A recalculation under the current penalty framework and Google's later turnover produced a significantly higher amount, but the TCB held that the renewed decision could not place Google in a worse position than under the annulled 2020 decision. It therefore maintained the original fine of approx. EUR 1.86 million rather than imposing the recalculated approx. EUR 28.67 million amount.

TCB Publishes Reasoned Decision on AXA and DenizBank Bancassurance Agreement

The TCB has published its reasoned decision concerning the non-life insurance distribution agreement between AXA Sigorta, DenizBank and Deniz Finansal Kiralama. The TCB found that the agreement fell within Article 4 due to its exclusivity and non-compete provisions and could not receive negative clearance. However, it could benefit from the vertical block exemption, subject to a revision of the employee no-solicitation clause.

The clause prevented the parties from soliciting each other's employees for 12 months after termination. The TCB considered the duration acceptable but found the scope too broad because it applied to all employees. Referring to its Labour Markets Guidelines, the TCB required the restriction to be limited to employees who are key to the implementation of the bancassurance arrangement. With that amendment, the restriction was considered proportionate and the agreement eligible for block exemption.

TCB Launches Investigation into Alleged No-Poach Arrangements Among Automotive Suppliers

The TCB has launched an investigation into 37 companies active in the automotive supply industry, together with the Automotive Suppliers Association of Türkiye (TAYSAD) and the Automotive Suppliers Specialised Organised Industrial Zone (TOSB). Companies under investigation include Assan Hanil, Autoliv, Denso, Farplas, Tırsan, Toyota Boshoku and Toyotetsu.

According to the public announcement, the companies may have entered into gentlemen's agreements, through meetings and other communication channels, not to hire one another's employees. Such arrangements may have made it harder for employees leaving one supplier to receive offers from others in the industry, potentially pushing them to move to other sectors rather than to a competitor where their experience would be valued. The TCB will also examine whether the companies exchanged information on wages and other working conditions.

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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