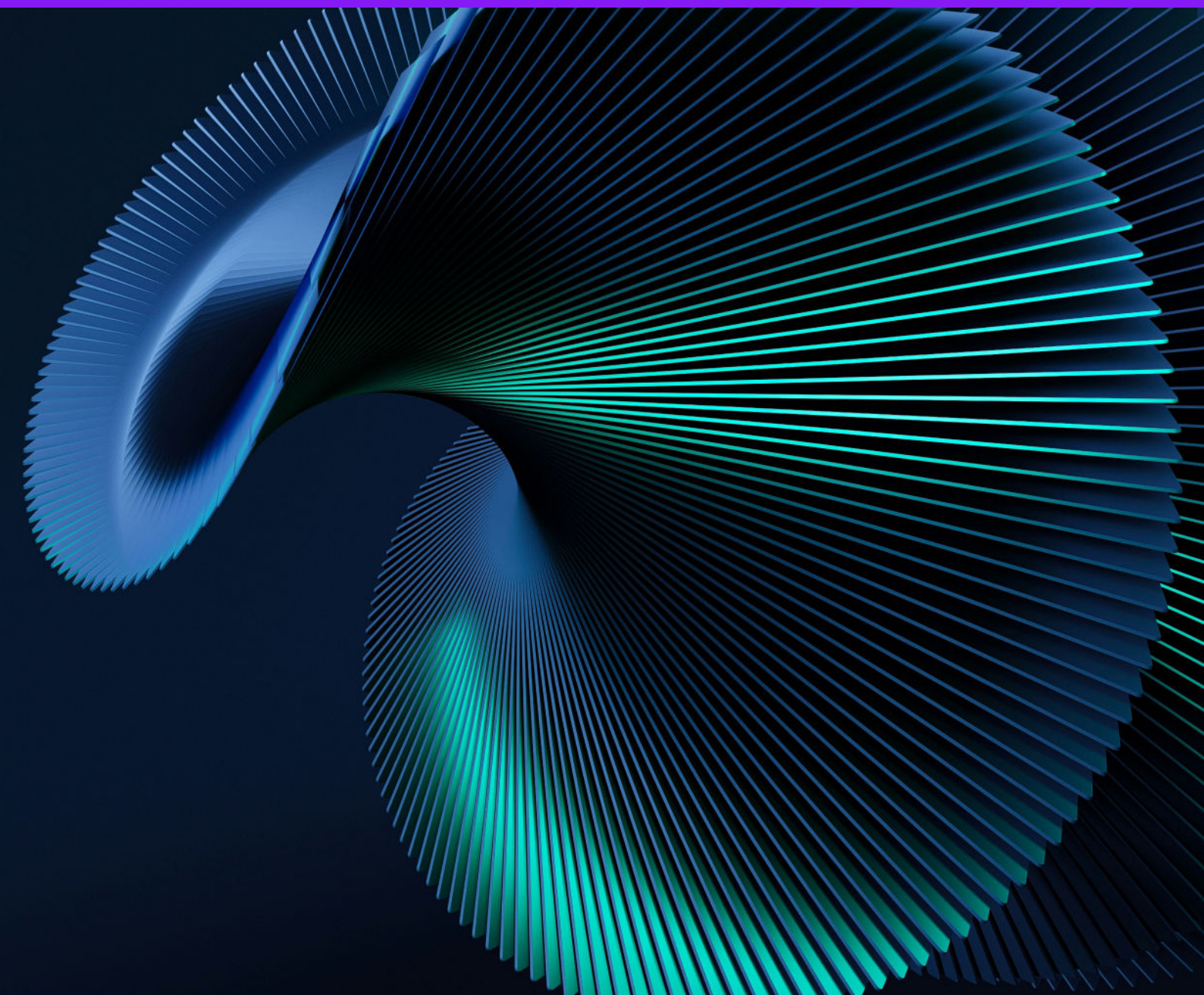
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Two-Minute Recap

Competition Law Matters **in Türkiye**

2026 October



TCB Opens Adkoturk Investigation and Imposes Interim Measures in the Instant Noodle Market

The Turkish Competition Board ("**TCB**") has initiated an investigation into Adkoturk, producer of Indomie and Supermie instant noodles, over allegations that it sought to exclude competitors and restricted its dealers' resale prices and sales activities.

The preliminary findings indicated that Adkoturk may have offered retailers free products, delisting budgets, visibility support, and similar advantages to encourage the removal of competing products or the reallocation of shelf space. The TCB considered that these practices could cause serious and potentially irreparable harm.

Pending its final decision, the TCB prohibited Adkoturk from providing such advantages to retail outlets. No infringement has yet been established. The case is notable because the TCB intervened before completing the investigation, indicating that trade-spend and visibility arrangements may attract immediate scrutiny where they restrict rivals' access to shelves. This approach is consistent with the TCB's practice in the Coca-Cola, Unilever and Haribo cases, where arrangements affecting in-store visibility and the proportion of shelf space allocated to suppliers' products were also closely scrutinised. Taken together, these cases show that shelf allocation has become a recurring enforcement focus where commercial incentives may limit rivals' access to retail outlets.

TCB Accepts New EssilorLuxottica Commitments and Publishes Renewed Abuse Decision

The TCB announced that it had concluded its investigation into EssilorLuxottica after accepting commitments addressing the company's relationship with Atasun, its affiliated optical retailer. Accordingly, EssilorLuxottica must not offer Atasun different discounts or preferential campaign conditions for branded sunglasses and optical frames or share competitor data collected through its lens-cutting machines with Atasun.

Further commitments address potential exclusivity in ophthalmic lenses. Purchase obligations under agreements combining lenses and lens-cutting machines will be limited to 18 months. New agreements will expressly confirm that opticians are not required to purchase exclusively from EssilorLuxottica, and discounts for contact-lens purchases will not be included in new ophthalmic-lens agreements.

TCB Opens Investigation into Alleged Collusion in Public Catering Tenders

The TCB has opened an investigation into ten companies providing collective catering services over allegations that they coordinated their conduct in tenders organised by public institutions. The investigation will examine whether the companies acted jointly rather than

determining their bids independently, thereby causing public loss.

No infringement has yet been established. That said, taken together with the MDF and Koruma Klor decisions, the investigation reflects the TCB's continued scrutiny of bidding conduct in public procurement and indicates that practices capable of affecting tender outcomes and public expenditure remain an enforcement priority.

TCB Fines MDF and Particleboard Producers for Collusive Bidding in Timber Auctions

The TCB has announced the conclusion of its investigation into seven MDF and particleboard producers concerning timber-sale tenders organised by the General Directorate of Forestry.

The TCB found that the companies coordinated their conduct instead of determining their bids independently. Six producers had settled, while the ordinary procedure continued for Yıldız Entegre.

The total fines amount to approximately TRY 1.33 billion (approx. EUR 24 million). The outcome highlights the exposure arising from coordination in public auctions, including where undertakings participate as purchasers rather than suppliers. Read together with the recently published Koruma Klor decision concerning coordination in public procurement and the newly opened investigation into catering tenders, the case indicates that the TCB is maintaining close scrutiny of bidding conduct across both public procurement and public asset sales.

TCB Publishes Reasoned MediaMarkt Decision in Hub-and-Spoke Cartel Case

The TCB has published its reasoned decision dated 2 April 2026, finding that MediaMarkt participated in a hub-and-spoke cartel concerning the retail prices of Fakir and De'Longhi products. The TCB concluded that supplier Fakir acted as the hub through which information was exchanged between MediaMarkt, Teknosa and Vatan.

The findings were based on communications in which retailers raised concerns about competitors' low prices or planned price changes and expected Fakir to intervene. Considering these communications together with subsequent price movements, the TCB concluded that MediaMarkt was aware of and participated in the coordination. The other three parties had previously settled.

MediaMarkt was fined TRY 330.3 million (approx. EUR 6 million). Applying the current penalty framework as the more favourable regime, the TCB granted a 70% reduction because the products concerned represented a limited share of MediaMarkt's turnover. The decision clarifies how retailer-supplier communications and subsequent pricing conduct may establish participation in a hub-and-spoke arrangement.

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

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www.gentemizer.com