

**Regional
Competition
Bites Q4 2025**



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Overview

Dear Friends,

Happy New Year!

We share here our fourth quarter of 2025 updates on competition and consumer protection enforcement across Southeast Asia. You will see agencies pairing active casework with policy modernisation in digital and traditional sectors alike. Enforcement activity remained pronounced in areas such as price-fixing and procurement collusion, while consumer protection probes have increased across all sectors and safety standards. In parallel, merger control reviews and measures continue across many diverse sectors in the region. Legislative and policy initiatives focused on strengthening cross-border cooperation, refining penalties and procedures, and addressing competition and consumer risks arising from artificial intelligence ("AI"), platform governance, and the wider digital economy.

Merger control

Merger control clearances is an important area of the work that we do. A review of the cases reflects how busy the regulators are and consequently how seriously the area is taken. In **Singapore**, the Competition and Consumer Commission of Singapore ("CCS") cleared the acquisition of a healthcare business after concluding the transaction would not substantially lessen competition in the relevant markets. CCS also consulted on streamlining its Guidelines on Merger Procedure, proposing a more efficient assessment approach – having had a case of ours used as the trial was an honour. In **Vietnam**, the National Competition Commission ("VCC") issued conditional approvals in the gypsum board and loan markets. Vietnam has also proposed revising the sanctions framework for economic concentrations, reflecting a move toward more calibrated and practical enforcement. In **Indonesia**, the Indonesia Competition Commission ("KPPU") reported sustained merger notification volumes in 2025 despite changes in thresholds, and continued to enforce against procedural breaches, highlighting the risk of sanctions for late filings and entity-specific notification failures.

Anti-competitive agreements and unfair consumer practices

Activities involving cartels, collusion, vertical restrictions, abuse of dominance, and consumer-facing misconduct have seen more intense enforcement. In **Malaysia**, the Malaysia Competition Commission ("MyCC") issued proposed decisions against alleged cartels in childcare pricing and prison procurement tenders, and accepted undertakings from speedboat operators to cease coordinated fare announcements. A number of cases have gone up on appeal to the Malaysian courts. Recently, the High Court upheld an abuse of dominance decision by MyCC, clarified that prior MyCC infringement findings are not a prerequisite for private actions (which is different from the position in Singapore), and granted a stay of substantial fines in a poultry feed cartel matter. In **Indonesia**, KPPU fined companies for bid-rigging, advanced probes into alleged collusion in online loan interest rate setting, and prepared a vertical exclusion case in the air-conditioner market for hearing. The **Philippines** Competition Commission referred alleged bid-rigging in flood control projects to the Department of Justice and formalised an inter-agency coordination to bolster detection and case development in public procurement.

Regional Competition Bites

On consumer protection, in **Singapore**, CCS acted against misleading online practices, issued safety warnings after market surveillance found non-compliant children's products online, and provided guidance to improve market transparency and consumer understanding. In **Vietnam**, VCC fined companies for misleading claims aimed at diverting customers and issued directives to safeguard consumer rights on digital platforms and in media services. In **Thailand**, the Trade Competition Commission ("TCCT") sanctioned abuse of superior bargaining power in a franchise context.

Legislation and policy

Policy reform and regional cooperation progressed apace, with authorities refining tools to address digital economy issues and cross-border challenges. In **Singapore**, consultations have been conducted on harmonising the treatment of market competition issues across the telecommunication and media sectors, as well as streamlining merger and settlement procedures. In **Vietnam**, the new Law on E-Commerce has been adopted, positioning Vietnam as a regional forerunner in platform governance. In **Thailand**, TCCT advanced competition policy priorities around AI, the green economy, and global trade, and deepened inter-agency collaboration to better regulate digital platforms. TCCT has also introduced regulatory amendments to raise the threshold for determinant market dominance. In **Indonesia**, KPPU pushed legislative reform proposals to introduce pre-merger notification, leniency, search and seizure powers, and expanded market and dominance definitions. Regionally, **Cambodia** and Hong Kong signed a Memorandum of Understanding to strengthen cooperation, while the **Philippines** endorsed the ASEAN Framework Agreement on Competition and signed a Memorandum of Understanding with **Malaysia**, reinforcing cross-border enforcement, capacity-building, and sustainable competition governance.

Compliance reminder

In light of these developments, businesses really need to proactively review and strengthen their competition and consumer protection compliance frameworks, prioritising high-risk areas such as information exchanges, procurement engagement, platform and marketplace conduct, digital marketing and claims, AI-enabled tools, and merger filing protocols. Practical steps include conducting targeted audits of online practices, refreshing staff training on dos and don'ts, and validating notification triggers and timelines across relevant jurisdictions.

Our regional team stands ready to assist with rapid risk triage, merger strategy, investigations response, and programme enhancements tailored to local enforcement priorities.

The Rajah & Tann Asia Competition & Antitrust Team is committed to staying ahead of the rapid developments in competition law across the region and stands ready to assist. Please reach out to us if you wish to further discuss these developments.

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Cambodia

The year 2025 has seen the Cambodia Competition Commission ("CCC") pursue greater regional cooperation in competition policy and enforcement. In this last quarter, CCC has continued this trend by entering into a Memorandum of Understanding ("MOU") with the Hong Kong Competition Commission ("HKCC") to further implement collaboration in the area of competition law. This marks the continued development of the competition framework in Cambodia, as well as ties with regional partners.

1. Cambodia and Hong Kong Competition Authorities Sign MOU on Implementation of Competition Policy and Law

*Policy –
regional
agreements*

On 12 November 2025, CCC and HKCC signed an MOU to strengthen their partnership by establishing a framework for cooperation on competition matters.

Under the MOU, the agencies will exchange views and information on matters including: (i) major developments in competition policy and law; (ii) enforcement experiences; and (iii) studies on topical issues. The MOU also provides a framework for CCC and HKCC to engage in technical cooperation through seminars, workshops, training programmes, staff secondments and research collaborations.

CCC has indicated that, since Cambodia's Law on Competition came into force in 2021, it has looked towards jurisdictions in the region with established competition agencies and regimes, such as Hong Kong, on their work and initiatives. The MOU serves to facilitate deeper and more ambitious collaboration in this regard.

The signing of the MOU, along with a similar MOU with the Philippines Competition Commission earlier in 2025, highlights CCC's efforts at regional cooperation in competition law and policy, and its continued growth and development.

Indonesia

The Indonesia Competition Commission (Komisi Pengawas Persaingan Usaha or "KPPU") marked the end of 2025 with a review of its work and progress throughout the year, as well as setting out its areas of focus for 2026. In 2025, KPPU has demonstrated greater enforcement efforts, with a record number of decisions and quantum of fines imposed, as well as continuous activity in merger notifications and Government advocacy.

In 2026, KPPU is poised to advance legislative reform of its competition law. KPPU has submitted its proposals to the draft amendment of the law, with the formal amendment process to be undertaken by the House of Representatives ("DPR") in coordination with the Government. KPPU has also published Competition Law Textbooks and engaged in close collaboration with PROSPERA.¹ These approaches emphasise KPPU's dual role as regulator and policy advisor, contributing substantive input to ensure that the amended law remains responsive to evolving business models.

At a case-specific level, KPPU has continued its enforcement efforts. It imposed a IDR2.5 billion penalty for collusion to rig tenders in the public sector. KPPU is also progressing ongoing proceedings concerning the setting of online loan interest rates and alleged unfair competition arising from business activity impediments in the air-conditioning industry.

1. KPPU Issues Recap of 2025: A Year of Stronger Law Enforcement

Policy – competition

KPPU has issued a recap of 2025, reviewing its achievements and performance in enforcing competition law. This includes the following key areas:

Enforcement: Enforcement continued to be the centrepiece of KPPU's performance, with 13 decisions issued by the end of 2025, and fines totalling IDR698.5 billion (approximately USD45 million). These decisions were dominated by cases involving late filings of mergers and acquisitions, followed by bid-rigging and monopolisation cases. In total, the cases involved 24 businesses, eight of which were foreign business entities. Notably, KPPU imposed an all-time-high administrative sanction of IDR449 billion (approximately USD29 million) in a case concerning vertical integration and abuse of dominant position.

These figures represent a sharp increase compared to previous years. They signal KPPU's strict enforcement stance and its readiness to act swiftly against market actions that are anti-competitive or harmful to consumers, including bid-rigging in the procurement of goods and services.

Merger Notification: KPPU has been active in the area of mergers and acquisitions notification, with 115 merger notifications submitted in 2025, involving a total transaction value of IDR1,093 trillion (approximately USD70.5 billion). These mergers and acquisitions were concentrated mainly in real estate, mining, and logistics sectors.

¹ PROSPERA is the Australia-Indonesia Partnership for Economic Development, a bilateral cooperation programme funded by the Australian Government to provide policy advice and technical assistance to the Indonesian Government to support economic reform, strengthen governance, and promote sustainable, inclusive growth.

Advocacy: KPPU formulated and delivered 12 policy recommendations to the Government, including, for example, proposals on anti-dumping duties for filament yarn. It also promoted 60 corporate compliance programs, 25 of which have been formally recognised by KPPU.

Oversight: KPPU has launched initiatives to safeguard the public interest across various strategic commodities. This includes a deep-dive assessment of non-subsidised fuel shortages to ensure there are no monopolistic practices, and the monitoring of rice price increases.

Administration: KPPU officially instated 394 employees in the State Civil Apparatus in December 2025, reflecting its ongoing institutional transformation and enhancement of its enforcement capacity.

Oversight of Partnership Arrangements: Beyond competition law enforcement, KPPU is also vested with the authority to supervise the implementation of partnership arrangements between large corporations and micro, small, and medium enterprises ("MSME"). In 2025, KPPU registered four partnership cases (two in the retail sector, one in poultry farming, and one in healthcare services), and initiated one investigation case in the retail sector.

Moving forward, KPPU has indicated that it will continue supporting the Government's 8% economic growth target by regulating markets to ensure that they function as instruments of growth. KPPU has also indicated that it will continue to tackle increasingly complex competition issues, such as the digitalisation of cartel conduct and self-preferencing by digital platforms, and that it is preparing legal instruments to tackle anti-competitive behaviour in the digital sphere.

2. KPPU Advances Comprehensive Reform of Competition Law

Policy – competition law reform

KPPU is seeking to modernise Indonesia's competition law to reflect Indonesia's evolving economic landscape. Since Law No. 5 of 1999 on the Prohibition of Monopolistic Practices and Unfair Business Practices ("Law No. 5 of 1999") was enacted, Indonesia's economic landscape has evolved dramatically, including a rapid shift towards a digital ecosystem. This has resulted in a gap between the current regulation and market reality, with emerging competition risks, such as data-driven anticompetitive conduct and algorithmic discrimination, not accommodated by the current law.

Legislation reform: KPPU has underscored the urgency of amending Law No. 5 of 1999 to ensure that Indonesia's competition framework remains robust and future-proof. In its proposals, KPPU has set several key reforms, including: (i) reforming the current post-merger notification with mandatory pre-merger notification; (ii) developing a leniency program; (iii) introducing search and seizure authority; (iv) expanding the definitions of the "relevant market" or "abuse of a dominant position" to encompass data and algorithm-based dominance; (v) strengthening the evidentiary system in competition cases by recognising indirect evidence in the form of economic data and digital communications; and (vi) regulating aspects of the secretariat, staffing, and law enforcement mechanisms.

For more information on the legislation reform, please see our Legal Update on [Major Changes Ahead: Indonesian Competition Law Reform Moves Forward](#).

Competition Law Textbook: In 2025, KPPU published three landmark publications, highlighting its institutional commitment to advancing competition policy in Indonesia. First, it published *Competition in Words: A Compilation of Constructive Thoughts for Navigating Competition Policy*

in the Modern Economy. This textbook addresses the evolving challenges of globalisation, digital markets, and climate change, emphasising how competition regulations can be aligned with environmental policy to promote fair, sustainable, and resilient economic growth. Second, *Fair Competition, Prosperous Consumers, Efficient and Innovative Economy* was developed in collaboration with PROSPERA, combining legal and economic research to illustrate the benefits of competition for consumers, innovation, and national competitiveness. It highlights lessons from international practices, explores regulatory challenges in the digital era, and sets out strategies for strengthening Indonesia's competition framework as part of the Government's *Indonesia Emas 2045* vision. Third, the *Competition Law Textbook – Third Edition* provides a standardised reference for academics, law enforcers, and business actors. It lays a new foundation for adaptive enforcement and legal certainty, ensuring stakeholders share a common understanding of fair competition principles amid increasingly complex markets.

Together, these three books reflect KPPU's dual role as both regulator and thought leader, reinforcing its mission to foster a fair, inclusive, and sustainable economy.

Insight from the Third Jakarta International Competition Forum (JICF): In the *Third Jakarta International Competition Forum (JICF)*, KPPU underscored that conventional approaches to competition oversight are no longer relevant if pursued in isolation. The forum produced a strategic consensus: improving the quality of national competition requires regulatory reform, cross-agency collaboration, and optimisation of information technology. Future economic regulation must shift from rigid frameworks that act as barriers to entry toward adaptive structures that guarantee legal certainty and ease of investment. The forum also stressed the urgency of collaboration efforts and breaking down institutional silos, ensuring that sectoral policies do not distort other markets. Finally, the forum underscored the importance of information systems as a safeguard against collusion and cartel practices. Interoperability was viewed by the forum (comprising KPPU, relevant Government agencies, industry representatives, and academic experts) as a critical enabler for fair competition and innovation.

KPPU – Press Council Synergy in the Digital Market: The national press industry is facing critical challenges amid digital disruption. Recognising these challenges, KPPU and the Press Council signed an MOU to address market failures that threaten the sustainability of Indonesian journalism. This collaboration signals a firm stance against unfair practices such as non-transparent algorithms and disproportionate advertising arrangements, which undermine both media independence and the quality of public information.

This synergy attempts to align with KPPU's broader agenda of competition law reform whilst also safeguarding press freedom. By combining strict enforcement, data exchange, and policy advocacy between KPPU and the Press Council, they aim to safeguard the integrity of Indonesia's media ecosystem while continuing to promote a level playing field where innovation and resilience in journalism can thrive. In this way, the MOU reinforces that the strategic direction of law reform is one that ensures regulation evolves from rigid barriers into adaptive structures that guarantee legal certainty, fair competition, and sustainable democracy in the digital era.

3. KPPU Imposes IDR2.5 billion Penalty for Collusion to Rig Tenders

KPPU has imposed a fine of IDR2.5 billion (approximately USD161,000) on PT Dieselindo Utama Nusa ("Dieselindo") and PT Rolls-Royce Solution Indonesia ("Rolls-Royce") after finding them guilty of collusion in the MTU Engine Maintenance Tender conducted by the Directorate General of Customs and Excise for the 2024 fiscal year. The parties were found to have committed various

Anti-competitive agreements - horizontal

acts that resulted in unfair business competition, including acts of collaboration, facilitating collusion, and granting Dieselindo exclusive opportunities to secure the tender. The tenders, valued at IDR54 billion (approximately USD3.48 million) had been awarded to Dieselindo, which received support from Rolls-Royce. KPPU's investigation and the penalty imposed emphasise its commitment to enforcing competition law and tackling bid-rigging, particularly within the public sector.

4. Unfair Business Competition Case in the Sale of Air Conditioners Set to Proceed to Trial

KPPU has completed the case file compilation regarding alleged unfair business competition in the sale of AUX brand air conditioners and is ready to proceed to hearings.

The alleged violation centres on AUX Electric and AUX Exim, who unilaterally terminated a 20-year distribution partnership with PT Berkat Elektrik Sejati Tangguh ("PT BEST"). This termination, which was preceded by a series of restrictive practices, ultimately forced PT BEST out of the market for AUX air conditioners in Indonesia. Subsequently, AUX Group appointed a new exclusive distributor, PT Teknologi Cipta Harapan Semesta.

KPPU stated that it has obtained sufficient evidence of potential violations of Law No. 5 of 1999, specifically concerning restrictive business practices that harmed PT BEST. The case highlights KPPU's focus not only against horizontal anti-competitive practices such as cartels, but also vertical restraints and exclusionary conduct along the supply chain.

If proven, the parties may face fines of up to 50% of net profits or 10% of total sales in the relevant market during the infringement period.

5. KPPU Continues Probe into Alleged Online Loan Interest Rate Collusion

KPPU is continuing its probe into alleged collusion in setting online loan interest rates under Case Register No. 05/KPPU-I/2025. The follow-up hearing, held on 13 October 2025, featured testimony from a senior official of the Financial Services Authority (*Otoritas Jasa Keuangan*) regarding the determination and trends of online lending interest rates in Indonesia from 2018 to 2024.

The hearing also allowed both the Investigator and the Reported Parties to pose questions, with the Investigator focusing on the mechanisms for interest rate setting in the online lending industry, which are suspected to distort competition.

This case highlights KPPU's commitment to enforce fair competition in the digital economy, where collusion increasingly occurs through digital channels rather than physical meetings, making detection and enforcement more complicated.

Anti-competitive agreements - vertical

Anti-competitive agreements - horizontal

Malaysia

In the last quarter of 2025, the Malaysian competition enforcement sphere has been rife with activity, with the Malaysia Competition Commission ("MyCC") issuing proposed decisions on breaches of competition law and a number of decisions going before the Malaysian Courts. This demonstrates the continuing growth and development of competition law in Malaysia while signalling the increasing maturity of Malaysia's competition law regime.

Notably, MyCC has recently taken enforcement action against alleged bid-rigging cartels in public procurement, including investigations involving tenders issued by the Kluang Prison Department. MyCC has also pursued price-fixing conduct in the childcare services sector across multiple states. These actions underscore MyCC's continued focus on cartel conduct and its willingness to pursue enforcement across both traditional procurement markets and community-facing services.

Separately, the High Court has upheld MyCC's decision against Dagang Net Technologies Sdn Bhd ("Dagang Net"), an online trade facilitation service provider, for abuse of dominance, while also granting a stay on fines imposed by MyCC against four poultry feed millers for allegedly entering into anti-competitive agreements. In addition, the High Court has provided guidance on private actions against anti-competitive conduct, holding that a prior MyCC infringement decision is not a prerequisite for such private actions to be carried out. Further up the judicial hierarchy, the Federal Court has declined to grant leave to MyCC to appeal against lower Court decisions that overturned a RM86.8 million fine imposed on Grab Holdings Inc ("Grab").

Aside from the above, as part of its efforts to address competition issues in specific industries, MyCC is conducting a study on the improvement of the Umrah industry in Malaysia, seeking to improve efficiency, transparency, and competitiveness. In addition, MyCC has accepted undertakings from the Speedboat Operators Association on the Menumbok-Labuan route, reflecting its continued use of behavioural remedies to address competition concerns and promote fair competition in sector-specific markets.

1. Dagang Net – Abuse of Dominant Position Case Goes Before the High Court

MyCC's final infringement decision against Dagang Net has gone before the Malaysian Courts, and proceedings look set to continue. In February 2021, MyCC found that Dagang Net had abused its dominant position as the Government's sole service provider for online trade facilitation services under the National Single Window. MyCC determined that Dagang Net had infringed Section 10(1) of the Competition Act 2010 ("Competition Act") by imposing exclusivity clauses on software providers, limiting their ability to work with other parties and restricting overall competition within the market. MyCC imposed a financial penalty of RM10.3 million on Dagang Net for its allegedly anti-competitive conduct.

Anti-competitive conduct – abuse of dominance

In 2023, Dagang Net appealed to the Competition Appeal Tribunal ("CAT") against MyCC's infringement decision, but its appeal was dismissed. Dagang Net then made a judicial review application to the High Court, which was also dismissed on 5 December 2025. The High Court upheld the CAT's decision and confirmed the validity of MyCC's infringement decision.

Based on public news, Dagang Net has indicated that it has filed an appeal to the Court of Appeal against the decision of the High Court, marking a further step in the long-running dispute. The decision will be closely watched for guidance on what behaviour constitutes an abuse of dominant position.

2. Federal Court Quashes Bid to Appeal Against Overturning of RM86.8 million Fine Against Grab

The Malaysian Federal Court, on 14 October 2025, declined to grant MyCC leave to appeal against lower court decisions that overturned a RM86.8 million fine imposed by MyCC on Grab.

MyCC had in October 2019 issued a proposed decision against Grab for the alleged breach of Section 10 of the Competition Act. MyCC provisionally found that Grab had abused its dominant position by imposing restrictive clauses on Grab drivers, preventing them from promoting and providing advertising services for Grab's competitors. MyCC proposed to impose a RM86.8 million fine on Grab.

In 2023, the High Court quashed MyCC's proposed fine, and this decision was upheld by the Court of Appeal in March 2025. The Court of Appeal found the investigations against Grab to have been procedurally improper, justifying judicial review.

MyCC then sought leave to appeal against the Court of Appeal's decision, posing questions of law to be decided by the Apex Court. However, the Federal Court has decided that MyCC did not meet the threshold for leave to be granted for an appeal. Notwithstanding this development, which effectively quashes the proposed fine against Grab, businesses should note MyCC's enforcement efforts against anti-competitive conduct, including abuse of dominance, is expected to continue.

3. High Court Holds that MyCC Determination not Prerequisite for Private Action on Anti-Competitive Conduct

It was reported on 2 December 2025 that the High Court had held that businesses and individuals can bring a private action for losses arising from anti-competitive conduct, even without a prior infringement finding by MyCC. This decision arose from a question-of-law application in a case where commercial purchasers brought a private action against Heineken for losses suffered as a result of an alleged abuse of dominant position.

The High Court held that an infringement finding by MyCC is not a prerequisite for private action against the alleged anti-competitive conduct. Instead, it held that these are merely formal mechanisms by which MyCC communicates its regulatory conclusions. The absence of an infringement finding is not equivalent to a finding of no-infringement, as it only signifies that no regulatory conclusion has been reached. As such, plaintiffs may continue to exercise their statutory right to maintain a private action against anti-competitive conduct as provided for under Section 64(1) of the Competition Act.

This decision provides welcome clarity on the right to bring a private action under the Competition Act, in particular by clarifying the relationship between the exercise of such rights and the existence of any determination of infringement by MyCC. The High Court confirmed that the absence of a prior infringement finding by MyCC does not, in itself, preclude an affected party from pursuing a private action, thereby reinforcing the availability of standalone civil claims under the Competition

Anti-competitive conduct – abuse of dominance

Anti-competitive conduct – private action

Act. This clarification is significant for businesses as it underscores the potential exposure to private enforcement even in circumstances where regulatory proceedings have not been commenced or concluded.

4. Poultry Feed Millers – High Court Grants Stay of Fines Imposed by MyCC

In October 2025, the High Court granted four poultry feed millers' applications for a stay on fines imposed by MyCC for entering into allegedly anti-competitive agreements.

MyCC had in December 2023 imposed fines on five poultry feed millers for their alleged infringement of Section 4 of the Competition Act by colluding in a cartel to fix poultry feed prices. The fines, collectively totalling approximately RM415.5 million, were amongst the largest fines imposed by MyCC. Amongst the five companies, Leong Hup Feedmill Malaysia Sdn Bhd was subject to the highest fine amount of RM157.5 million.

The CAT had, on 6 December 2024, dismissed the applications by the poultry feed millers to stay MyCC's imposition of financial penalties, despite their pending appeal to the CAT against MyCC's final decision. The poultry feed millers then applied for judicial review of the CAT's decision to the High Court, whereby the High Court allowed their applications. The High Court quashed the CAT's decision and granted a stay of MyCC's infringement decision (including payment of the financial penalty) and all related consequential actions, proceedings, execution and enforcement.

5. MyCC Issues Proposed Decision Against Childcare Service Enterprises for Alleged Price Fixing Cartel

MyCC has, on 29 December 2025, issued a proposed decision against 31 childcare service enterprises for their alleged participation in a horizontal price fixing agreement relating to the provision of childcare services in Kelantan. MyCC provisionally found that the enterprises had infringed the Competition Act by discussing and agreeing to fix floor prices for childcare services during an association meeting and later making a public announcement on the agreement to fix floor prices.

MyCC also provisionally found that the agreement had the object of significantly preventing, restricting or distorting competition in the provision of childcare services in Kelantan. The enterprises were notified of the proposed penalties and directions, and were given the opportunity to submit their written representations and present their oral representations before MyCC. MyCC will issue its final decision after considering the representations made by these enterprises together with the evidence obtained during the investigation.

6. MyCC Issues Proposed Decision on Alleged Price Fixing Cartel in Prison Public Procurement

MyCC has, on 23 December 2025, issued a proposed decision against six enterprises for their alleged involvement in a bid rigging cartel for quotations and tenders issued by the Kluang Prison Department. The enterprises were provisionally found to have infringed the Competition Act. The affected quotations and tenders amounted to a total value of RM7.3 million.

MyCC, through its investigations, found that the enterprises had engaged in bid rigging cartel activity through the exchange of information and facilitation of tender and bid submissions by the

Anti-competitive agreements - horizontal

Anti-competitive agreements - horizontal

Anti-competitive agreements - horizontal

same party. MyCC found that such conduct amounted to anti-competitive agreements that had the object of significantly preventing, restricting or distorting competition in relation to the public procurement in the Kluang Prison Department.

7. Undertaking by the members of the Speedboat Operators Association of Menumbok

On 19 December 2025, MyCC announced that it had accepted an undertaking from the Speedboat Operators Association of Menumbok ("SOAM") and its 14 members ("Undertaking"). This Undertaking was given in response to MyCC's investigation into SOAM's announcements of boat fare increases which were displayed at the ticket counter at the Menumbok Ferry Terminal and on the Facebook page of SOAM ("Conduct"). MyCC's investigation was initiated by a direction from the Minister of Domestic Trade and Cost of Living to MyCC to investigate the matter.

Anti-competitive agreements - horizontal

MyCC, at the end of its investigation, concluded that the Conduct constituted an infringement of Section 4(2)(a) of the Competition Act. As a result, SOAM and its 14 members undertook to:

1. not take any action that has the same purpose or effect as the previous Conduct, including but not limited to collective discussions or coordination regarding fares, surcharges, rebates, discounts or any other commercial terms relating to ticket prices;
2. notify in writing all current and prospective members of SOAM of the withdrawal of the collective decision to increase the speedboat fares for the route from Menumbok to Labuan, as well as the obligations in the Undertaking; and
3. publish the Undertaking by means of a notice on SOAM's official website, social media platforms and at ticket counters within 14 days from the date of the Undertaking.

No financial penalties were imposed on SOAM or its 14 members upon acceptance of the Undertaking.

Given the above, associations and their member businesses should be wary of any announcements made and should take precautions to ensure that all announcements are in compliance with the competition laws of Malaysia.

8. Public Survey for the Study on the Improvement of the Malaysian Umrah Industry

Market study – Umrah industry

MyCC has conducted a "Study on the Improvement of the Umrah Industry in Malaysia", seeking to examine market structures, assess current industry conditions and support long-term improvements within the Umrah industry's economic market framework.

This study will focus on: (i) analysing the market structure and operational patterns of Umrah industry players; (ii) understanding the current demand and supply trends for Umrah services; and (iii) identifying critical competition and regulatory issues and challenges. Based on these findings, MyCC will propose recommendations and appropriate interventions to the Government.

MyCC has sought input from stakeholders and the public, and the insights and information provided will play a vital role in shaping policy recommendations and improvement measures to create an efficient, transparent, and competitive Umrah market.

Philippines

The last quarter of 2025 has seen the Philippines Competition Commission ("PCC") pursue heightened enforcement against anti-competitive conduct, particularly in the public infrastructure market. This increased scrutiny arose from allegations of bid-rigging in flood control projects, which have been the focus of much public attention.

On the regional front, PCC demonstrated its commitment to regional cooperation in competition law and enforcement, entering into agreements with regional partners to develop greater collaboration in promoting fair competition, facilitating regional integration, and curbing anti-competitive practices.

1. Bid Rigging in Flood Control Project – PCC Pursues Enforcement, Safeguards for Public Infrastructure

Following recent controversies on flood control projects, PCC pursued enforcement against alleged anti-competitive conduct in the procurement of flood control projects in Bulacan.

Anti-competitive agreements - horizontal

1. PCC received referrals from the Department of Public Works and Highways ("DPWH") concerning possible violations of the Philippine Competition Act and proceeded with a preliminary inquiry into possible bid-rigging and collusion among the contractors for the projects.
2. PCC has now referred to the Department of Justice ("DOJ") its initial findings that the contractors agreed to rig and manipulate the bidding process by having pre-determined winning and losing bidders. Several public officers of the projects facilitated and ensured that this bid-rigging arrangement was followed.
3. DOJ will evaluate the referral and recommend either the conduct of further case build-up or proceed with preliminary investigation.

On a related note, PCC and DPWH signed a memorandum of agreement to strengthen inter-agency coordination in promoting fair competition and integrity in public procurement and infrastructure development. This formalises cooperation in detecting and addressing anti-competitive behaviour in public works projects, including bid-rigging and abuse of dominance. It establishes mechanisms for case referrals, joint investigations, policy coordination, and capacity-building programs.

PCC's enforcement efforts and inter-agency collaboration highlights its strict stance against anti-competitive conduct and bid-rigging, particularly with respect to public works, where such conduct may have a severe impact to the public. Businesses are reminded that anti-competitive agreements such as bid-rigging may result in administrative fines as follows:

1. For the first offence, a fine of up to P110 million;
2. For the second offence, a fine of between P110 million to P275 million;
3. For the third and subsequent offences, a fine of between P165 million to P275 million.

2. Philippines Welcomes Signing of AFAC to Strengthen Regional Competition Policy

PCC affirmed its commitment to regional economic cooperation with the signing of the ASEAN Framework Agreement on Competition ("AFAC") on 23 September 2025. PCC Chairperson Michael Aguinaldo emphasised that the AFAC will strengthen Philippines' ability to engage in cross-border enforcement of competition law and improve market transparency and accountability.

The AFAC is expected to serve as a foundation for further regional integration and improved economic governance, reinforcing ASEAN's commitment to fair competition and the establishment of a level playing field for businesses across member states. It highlights the increasing cross-border nature of competition issues and the importance of being fully apprised of the applicable competition laws before venturing into the relevant overseas markets.

3. Philippines and Malaysian Competition Authorities Sign MOU on Regional Cooperation

PCC signed a memorandum of understanding ("MoU") with the Malaysia Competition Commission ("MyCC") during the MyCC Competition Summit 2025 on 30 October 2025, underscoring the importance of environmental, social, and governance (ESG) issues in merger control and affirming its commitment to regional cooperation and sustainable competition policy.

The MoU aims to strengthen cross-border cooperation, information exchange, and capacity-building in advancing regional competition governance. It reflects the agencies' commitment to curbing anti-competitive practices (such as bid-rigging) and promoting transparent, competitive markets.

The signing of the MoU highlights PCC's efforts at regional cooperation in competition governance, creating sturdier entryways for businesses looking to expand into these jurisdictions.

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*Policy –
regional
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Singapore

The Competition and Consumer Commission of Singapore ("CCS") has continued its focus on consumer protection, specifically against unfair and misleading practices and particularly in the area of online retail. CCS is also looking into updating the competition regime, conducting public consultations on proposed amendments to legislation and guidelines.

On the consumer protection front, CCS has issued warnings against misleading website features and the false use of standards and rating on online platforms, highlighting common unfair practices that may arise in online retail and marketing. CCS has also conducted a market surveillance on safety issues in baby and children's products purchased online, as well as a study on competition and consumer issues in the household appliance industry.

In the area of mergers and acquisitions, CCS has proposed changes to the competition guidelines on merger procedures and settlement procedures, seeking to introduce more streamlined and effective processes. CCS has also proposed changes to harmonise and refine the treatment of market competition issues across the telecommunication and media sectors. On merger reviews, CCS continues to review various proposed merger transactions, clearing the acquisition of a healthcare business in this quarter.

1. CCS Issues Warning on Use of False Standards and Ratings

CCS investigated and found that a mattress brand used certain logos and Trustpilot rating on its website and online platforms in a manner that was misleading to consumers. The brand displayed the logos with statements such as "Hospitality Standards", creating the false impression that these were official industry standards, though no such official standard existed. The brand also falsely displayed a 4.5-star Trustpilot rating on its online platforms.

The logos and ratings were created and first displayed by the brand's former owner, H&S Private Limited ("H&S"). When the brand was sold to the present business owner, Adcasa Pte. Ltd. ("Adcasa"), despite being aware of the logos and ratings, Adcasa did not check their veracity after acquiring the brand and continued to display them.

CCS issued warnings to H&S for initiating the conduct, and to Adcasa for continuing the conduct after acquiring the business. Adcasa has since agreed to give an undertaking to CCS to remove the misleading logos and the Trustpilot Rating.

CCS's actions highlight that the continuation of existing conduct, and not just the initiation of such conduct, will also be subject to enforcement. This serves as a timely reminder of the importance of conducting due diligence on compliance with consumer protection laws and competition laws for mergers and acquisitions. Failure to conduct proper consumer protection and competition due diligence will expose the acquirer to potential liability for existing non-compliances.

Businesses should also be aware of all marketing and consumer-facing statements and check their veracity to ensure that they are true and not misleading to consumers.

Consumer protection – unfair practices

2. CCS Takes Action Against Misleading Website Features

CCS has taken action against two retailers of consumer electronics and home appliances for various unfair trade practices. CCS found that the first retailer had automatically added unsolicited items into consumers' shopping carts, while the second retailer pressured consumers into purchases using: (i) fake countdown timers; (ii) misleading stock indicators; (iii) unsubstantiated shortage claims; and (iv) inflated discounts. The parties have since ceased the practices, rectified the website issues, and provided the relevant undertaking to not to engage in unfair trade practices.

CCS has highlighted that it is an unfair trade practice for businesses to charge for the supply of unsolicited products, or to make false or misleading claims to pressure consumers into making purchases. CCS has further provided the following guidance to businesses regarding online retail:

1. Ensure that consumers agree to the purchase of a product before checkout;
2. Provide clear disclosure of the price and nature of any add-ons;
3. Statements made about products, such as stock availability or price discounts, should be factually accurate;
4. Countdown timers should reflect genuine timelines given to consumers; and
5. Stock indicators should be genuine and reasonable.

3. CCS Warns of Safety Risks When Buying Baby/Children's Products Online

Following a market surveillance, the Consumer Product Safety Office ("CPSO") of CCS uncovered safety issues in baby cots, strollers, and children's jewellery purchased online. A majority of the sample products tested by CPSO were found to be unsafe as they did not meet applicable product safety standards under the Consumer Protection (Consumer Goods Safety Requirements) Regulations 2011.

CCS has indicated that it has since worked closely with the e-commerce platforms and online retailers to remove the non-compliant products, and that it will continue its market surveillance efforts to keep consumers safe.

Under Singapore law, suppliers of general consumer goods must ensure their products meet applicable safety standards. For children's products, this means compliance with applicable international safety standards issued by at least one of the following organisations: (i) the International Organisation for Standardisation; (ii) the International Electrotechnical Commission; (iii) the European Committee for Standardisation; or (iv) ASTM International. Failure to comply with directions to stop selling unsafe products may result in a fine not exceeding S\$10,000 and/or imprisonment not exceeding two years.

4. CCS Issues Guidance on Household Appliance Repair Services

CCS and the National Environment Agency have conducted a study into Singapore's household appliance industry to assess competition and consumer issues. The study found that the supply of household appliances is generally well-served by various market players such as manufacturers,

Consumer protection – unfair practices

Consumer protection – unfair practices

Consumer protection – unfair practices

distributors, importers and wholesalers, while the after-sales service sector is generally well-supported by repairers.

In the report, CCS provides guidance to manufacturers and retailers on the following:

1. Safeguarding consumers' ability to seek repair services from alternative repair providers by ensuring access by independent repairers to essential repair inputs;
2. Enhancing consumer understanding of warranty information, including the provision of warranty information (such as warranty duration, coverage and limitations) that is easily understood by consumers;
3. Providing reliable durability information from accredited third-party testing, such as the estimated product lifespan based on certain testing conditions, to enable informed purchase and repair decisions by consumers; and
4. Making accurate and substantiated green claims, supported by credible evidence.

5. CCS Consults on Proposed Changes to Guidelines on Merger Assessment and Settlement Procedures

Merger – assessment and settlement

As part of its periodic reviews of its guidelines on the Competition Act 2004, CCS has proposed changes to key guidelines on competition:

1. Amending CCS's Guidelines on Merger Procedure to introduce a streamlined approach to the merger assessment process; and
2. Issuing new Guidelines on the Procedure for Settlement to introduce a more effective and streamlined settlement procedure.

CCS's proposed changes are significant as they will affect two important processes under CCS's jurisdiction: (i) the merger assessment process, which determines whether businesses can move forward with proposed mergers and acquisitions; and (ii) the settlement process, which allows businesses to enter into settlement agreements with CCS in the event that they are under investigation for competition law violations.

CCS conducted a public consultation on the proposed changes from October 2025 to November 2025. For more information, please see our Legal Update on the consultation [here](#).

6. CCS Clears Acquisition of Healthcare Business

Merger – horizontal

CCCS has cleared the proposed acquisition of Econ Healthcare (Asia) Limited (now known as Econ Healthcare (Asia) Pte. Ltd.) ("Econ Healthcare") by TPG Inc. ("TPG").

TPG is an investment firm which invests in companies across a broad range of industries and geographies, including companies involved in the provision of residential nursing home services and non-residential care services in Singapore. Econ Healthcare is a private nursing home operator, operating medicare centres and nursing homes in Singapore, and also provides non-residential care services. TPG submitted that TPG and the Econ Healthcare Group overlap in the market for residential nursing home services and non-residential care services.

CCS has concluded that the transaction has not resulted in a substantial lessening of competition in relation to the supply of non-residential care services, and the supply of both subsidised and unsubsidised nursing home services in Singapore. CCS concluded that the relevant markets are likely to remain competitive in view of the low market shares of the parties, presence of viable competitors, constraints on price increases under the Ministry of Health's schemes for subsidised nursing home services, potential for competitors to switch supply of capacity from unsubsidised nursing home services, and fragmented markets comprising a mix of for-profit and non-profit suppliers.

7. Public Consultation on Amendments to Harmonise Market Competition Issues Across Telecommunication and Media Sectors

The Ministry of Digital Development and Information and Infocomm Media Development Authority ("IMDA") have issued a public consultation on the draft Info-communications Media Development Authority (Amendment) Bill ("Bill"), which proposes amendments to the Info-communications Media Development Authority Act 2016.

Following the implementation of the converged Code of Practice for Competition in the Provision of Telecommunication and Media Services 2022, the Bill seeks to further harmonise and refine the treatment of market competition issues across the telecommunication and media sectors by implementing (i) changes to the media competition framework which were previously consulted on; and (ii) further refinements for better clarity of the provisions.

The key proposed amendments include, amongst others, provisions on:

1. The threshold for acquisition transactions requiring IMDA approval;
2. The extent to which anti-competitive agreements will be rendered void;
3. The power to order structural separation;
4. The process for appeal against IMDA's decisions and directions;
5. IMDA's powers to issue directions and obtain information, particularly regarding regulated persons and owners or controllers of essential resources; and
6. IMDA's authority to approve any document not prepared by IMDA as a code of practice or standard of performance.

*Legislation –
telecommunications and
media*

Thailand

Thailand's Trade Competition Commission Office ("TCCT") marked the fourth quarter of the year by continuing efforts to better regulate the digital economy and its unique competition risks. In this regard, TCCT and the Office of Consumer Protection Board ("OCPB") strengthened collaboration to regulate digital markets and protect consumer rights. TCCT is also advancing policies to address competition and consumer protection challenges from artificial intelligence ("AI"), the green economy, and global trade, aligning with international standards. On the topic of regulation, TCCT has introduced regulatory amendments to raise the threshold for determinant market dominance.

On the enforcement front, recent actions include a decision on alleged price-fixing among ice producers, with most parties not being prosecuted due to insufficient evidence.

These initiatives reflect Thailand's commitment to fair competition and sustainable economic growth.

1. TCCT Raises Threshold for Determining Market Dominant Business Operators

TCCT has issued a Notification regarding the Rules on Being Deemed as Business Operator with Dominant Position of Market Power ("Notification"), which came into effect on 17 December 2025. The Notice amends the criteria for determining a market-dominant business operator, effectively raising the threshold.

Anti-competitive conduct – abuse of dominance

Under the Notification, a business operator is considered to hold market dominance if it meets either of the following thresholds:

1. A market share of 50% or more in a particular market and sales revenue of at least THB 1 billion in the preceding year; or
2. The top three business operators in a particular market have a combined market share of at least 75%, excluding any operator with sales revenue of less than THB 1 billion in the preceding year or a market share of less than 20%.

The previous TCCT notification applied a lower market dominance threshold of 10%. In effect, the revision of the threshold in the Notice makes it more difficult for a business to be classified as a market-dominant operator. Businesses looking to enter into relevant transactions in the market should assess their market shares against the new standards to determine any notification requirements.

2. TCCT and OCPB Join Forces to Enhance Regulation of Digital Market

On 9 December 2025, TCCT and OCPB organised a public seminar on "Digital Market: Fair Competition, Confident Shopping", to enhance oversight of digital platform businesses.

Consumer protection – digital markets

Regional Competition Bites

TCCT aims to regulate all levels of business operators in this sphere to ensure free and fair competition, with OCPB focusing on protecting consumer rights. TCCT has highlighted that fair competition is vital for long-term, sustainable consumer protection.

The agencies will focus on competition law and consumer protection policy in three key areas:

1. The role of technology in the digital economy and society;
2. The role of competition law and consumer protection law in the digital era; and
3. Cooperation between the two agencies to foster a fair and sustainable digital economy.

Businesses operating in digital markets may expect greater scrutiny on competition and consumer protection matters in this area and should keep abreast of any upcoming regulations, initiatives, or other guidance on compliance.

3. TCCT to Enhance Competition Policy to Keep Up with AI, Green Economy and Global Trade Dynamics

In October 2025, TCCT, in collaboration with the Organisation for Economic Co-operation and Development ("OECD"), held the international conference "TCCT - OECD Competition Day 2025" to advance the national competition reform agenda under the OECD - Thailand Country Programme Phase 2.

TCCT aims to advance Thailand's competition policy to address challenges from AI, the green economy, and global trade, and to align national regulations with international standards for sustainable economic development.

Key topics discussed include the current state of Thailand's markets and competition, the transition to energy sustainability, the energy and telecommunications sectors, and the use of digital technology to enhance competition regulation.

The conference is in line with TCCT's efforts to ensure that Thailand's competition framework stays up-to-date, especially regarding hot-button issues and market developments like those highlighted above.

4. Decision on Abuse of Bargaining Power in Franchise Termination

TCCT has issued a decision concerning complaints by parcel delivery franchisees operating in a franchised parcel network. The complainants operated under the franchisor's system and were supervised by a regional office responsible for territorial oversight and control of system access. Following a restructuring, an intermediary franchisee was introduced as the complainants' direct contractual counterparty, but the regional office continued to control the operational territory and IT system access.

The dispute arose after the franchisor detected parcel tracking numbers in the operating system with no status movement and imposed a THB 1,000 fine on the complainants' account. The complainants challenged the fine under the standard operating procedure ("SOP"), including by submitting a video clip showing the counting and bagging of parcels. The challenge was rejected, and a further challenge was not accepted as it was both outside the SOP timeframe and still considered insufficiently supported.

Policy – AI, green economy, global trade

Anti-competitive conduct – abuse of dominance

Regional Competition Bites

After the appeal process failed, the director of the regional office company instructed staff to suspend the complainants' access to the operating system by changing their login credentials, and the regional office then communicated that it would terminate the relationship notwithstanding that approximately eight months remained under the contract. The regional office maintained its decision, citing that the complainants' escalation of the fine dispute to the franchisor caused the regional office to be reprimanded by the franchisor. The intermediary franchisee entity was informed only after the suspension and could not reverse the action, as system and territorial control rested with the regional office.

In its findings, TCCT concluded that the franchisor (as the brand owner and franchisor) was not involved in the decision to suspend system access or terminate the relationship and therefore was not liable. TCCT found, however, that the regional office had superior bargaining power and had unilaterally refused to continue dealing with the complainants without reasonable justification by suspending system access, which in turn led to termination and material harm to the complainants. This amounted to an unfair trade practice or abuse of superior bargaining power under Section 57(2) of the Trade Competition Act, read together with TCCT's unfair trade practice guidelines.

Administrative penalties were imposed on the regional office under Section 82. In addition, the director of the regional office company who ordered the suspension and termination was held jointly liable under Section 84.

Vietnam

The last quarter of 2025 saw significant enforcement action by the National Competition Commission of Vietnam ("VCC") addressing unfair competition (resulting in administrative fines) as well as the protection of consumer interests. VCC has also issued decisions concerning conditional economic concentrations.

The E-commerce industry should also note the new regulatory framework under the recently passed E-Commerce law, which clarifies obligations for social media e-commerce and livestreamed sales, strengthens seller identification and market transparency and deals with responsibilities of foreign platforms in Vietnam.

1. VCC Cracks Down on Unfair Competition: Fines on Leading Companies

In the fourth quarter of 2025, VCC took action against unfair competition practices, including the imposition of administrative fines on Fuji Medical Vietnam Co., Ltd. And Akanwa Vietnam Co., Ltd. Both companies were fined VND 200,000,000 each for the act of providing misleading information to customers about their business, products, and services in order to attract customers of other businesses, thereby violating the provisions of the Law on Competition. The companies are required to publicly correct the misleading information to customers about the business, products, and services on their respective websites.

Consumer protection – unfair practices

Both companies actively cooperated with VCC by providing relevant information and documents. VCC's actions highlight its efforts to protect consumers against unfair practices such as the provision of misleading information. Businesses should ensure that all representations and information put forth to customers and the public, such as content on websites and online platforms, are accurate and truthful.

2. VCC Issues Decisions on Conditions for Merger Filings

Merger horizontal

VCC issued decisions on merger filings, setting out conditions that need to be complied with for conditional economic concentration in the gypsum board market and the loan market respectively, between: (i) Saint-Gobain Vietnam Limited., GS Engineering & Construction Corp., and Phu My Innovative Materials Limited Liability Company ("Case 1"); and (ii) The Siam Commercial Bank Public Company Limited; Home Credit Vietnam Company Limited; Home Credit N.V. ("Case 2").

Case 1

Conditions that participating companies need to comply with include:

1. Compliance with competition laws, especially avoiding abuse of market dominance and prohibited anti-competitive agreements;
2. Submitting an annual written report to VCC detailing total cost, average selling price per square meter, and distributor contract terms for gypsum board products;

3. Maintaining or increasing annual gypsum board export volumes after the economic concentration and reporting any planned changes in production or export plans to VCC before implementation; and
4. Providing written reports on compliance with these conditions upon request from the VCC.

Case 2

Conditions that participating companies need to comply with include:

1. Providing written reports to VCC upon request, including details on fee and interest calculation methods, lists of partner suppliers, contract terms, and sample consumer contracts with applicable fees and service conditions;
2. After the concentration, developing business plans and implementation roadmaps to ensure easier consumer access to loans;
3. Ensuring the accuracy of all submitted notification dossiers and completing all required procedures as stipulated by law; and
4. Regularly reporting on transaction outcomes and complying with all relevant laws and international commitments.

The decisions demonstrate VCC's focus on ensuring fair competition in the relevant markets in all merger filings. Parties seeking to enter into economic concentration should keep in mind that conditions may potentially be imposed, and if so, ensure compliance with any conditions set out by VCC.

3. MOIT Issues Draft Decree Amending Decree No. 75/2019/ND-CP on Legal Framework for Sanctioning Violations of Regulations on Economic Concentration

Merger – enforcement

On 2 October 2025, the Ministry of Industry and Trade ("MOIT") issued a draft decree amending and supplementing certain articles of Decree No. 75/2019/ND-CP ("Draft Decree"), which governs administrative sanctions for violations in the field of economic concentration in Vietnam. The Draft Decree aims to address the current deficiencies of Decree No. 75/2019/ND-CP:

1. Difficulty in Determining Relevant Market – Current fines are based on total revenue in the relevant market, but this is hard to define when parties do not operate in related industries.
2. Imbalance in Penalties – Failure to notify economic concentration (a procedural violation) is penalised at the same level as prohibited acts, which is disproportionate and inconsistent with international practice.
3. Excessive Fines – The current maximum fine is 5% of revenue. For large enterprises, this can amount to hundreds of billions of VND, which is impractical and burdensome.
4. No Penalty for Dishonest Information – Existing decree lacks provisions to handle fraudulent information in notification dossiers.

To deal with the deficiencies, the Draft Decree introduces:

1. Fixed fines for procedural violations, in addition to percentage-based fines:
 - VND 2 billion for enterprises with revenue over VND 3,000 billion;
 - VND 1 billion for smaller enterprises; and

2. New sanctions for fraudulent information, allowing the authorities to cancel notifications or approvals if false information changes the nature of the case.

4. VCC Enforces Consumer Rights Protection in Cyberspace and Media Industry

Consumer protection – unfair practices

To protect the interests of consumers in cyberspace due to Zalo's recent update of Terms of Service, VCC requested VNG Group Joint Stock Company ("VNG Company"), which operates the Zalo platform that collects and uses user information, to urgently implement the following actions:

1. Review the implementation of the Zalo Terms of Service to avoid situations where consumers have to agree to VNG Company collecting, storing and using consumer information, as well as ensure that the expression of consent by consumers is carried out on a voluntary, clear, substantive and non-formal basis;
2. Review all consumer contracts and ensure that they comply with the law on protection of consumer rights before implementing them in practice; and
3. Ensure that there are measures to protect consumer information and, with regard to the consumers having accepted the updated Terms of Service, avoid transfer of consumer information to third parties on a temporary basis.

In the media space, VCC noted that Vietnam Satellite Digital Television Co., Ltd. stopped providing pay TV services under the K+ brand from 1 January 2026, and this affected many consumers using the service. VCC has requested that the company take the following actions:

1. Explain the suspension of the provision of pay TV services under the K+ brand mentioned above;
2. Ensure transparency and convenience in the process of providing information and guiding consumers when making refunds; and
3. Ensure the full and accurate performance of responsibilities in providing services that are not in accordance with the registered contents, notifications, announcements, posting, advertising, introduction, conclusions and commitments as prescribed in Article 36 of the Law on Consumer Rights Protection 2023.

Consumer rights are a key pillar of VCC's enforcement efforts, and the above actions demonstrate the scope of orders that VCC may issue to address consumer rights issues that may arise.

5. New E-commerce Regulatory Framework to Come into Effect on 1 July 2026

Consumer protection – e-commerce

On 10 December 2025, the National Assembly adopted the Law on E-Commerce with overwhelming support (444 out of 446 deputies). The law, which consists of seven chapters and 41 articles, will take effect on 1 July 2026.

Key provisions under this new e-commerce law include:

1. Clearer obligations for social media e-commerce and livestreamed sales
 - Provides clear responsibilities for sellers, hosts, and platform operators.

- Social media platforms engaging in e-commerce are treated as a distinct category with tailored obligations.
- Focuses on transparency, legal accountability, and consumer protection.

2. Stronger seller identification and improved market transparency
 - Utilises the national electronic identification system (VNeID).
 - Aims to curb counterfeit goods, improve traceability, and assist tax authorities.
 - Emphasises using existing digital infrastructure to avoid unnecessary administrative burden.
3. Conditions for foreign platforms
 - Sets out requirements for appointing authorised representatives or establishing legal entities in Vietnam.
 - Establishes conditions based on platform structure and international commitments.

Implementation Roadmap

The new law will emphasise risk-based supervision, data-driven post-inspection, and clear responsibilities. The Government will issue guiding documents immediately after adoption.

The digital economy is an urgent area of focus for competition regulators around the world, and with the adoption of the Law on E-Commerce, Vietnam is poised to be a regional forerunner in e-commerce regulation. Businesses operating in the e-commerce sphere should be aware of the impending obligations and responsibilities, and review their operations to ensure early compliance.

Our Achievements

Practice Accolades

Rajah & Tann Asia has been named as a leading Competition Practice across several different jurisdictions across Southeast Asia by all of the major legal ranking journals, including but not limited to:

Global Competition Review 100 (GCR100) 2026



Elite Law Firms

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C&G Law
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Assegaf Hamzah & Partners: **Outstanding**

Rajah & Tann Singapore: **Outstanding**

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Rajah & Tann Singapore: **Honourable Mentions**

Our Achievements

Individual Accolades

The members of our Rajah & Tann Asia Competition & Antitrust and Trade Team have also been individually recognised in various legal ranking journals, including but not limited to:

Chambers Asia Pacific 2026 – Competition/Antitrust



Indonesia:
Farid Nasution (Band 1)
Rizkiyana Rikrik (Band 1)
Asep Ridwan (Band 2)
Albert Boy Situmorang (Band 3)
Vovo Iswanto (Band 3)

Singapore:
Kala Anandarajah (Band 1)
Joshua Seet (Up and Coming)

Malaysia:
Yon See Ting (Band 1)
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Asep Ridwan (Leading Lawyer)
Albert Boy Situmorang (Mentioned Lawyer)
Vovo Iswanto (Mentioned Lawyer)

Malaysia:
Yon See Ting (Hall of Fame)
Jane Guan (Next Generation Lawyer)

Philippines:
Andrea Katipunan (Mentioned Lawyer)

Singapore:
Kala Anandarajah (Leading Lawyer)
Joshua Seet (Mentioned Lawyer)
Tanya Tang (Mentioned Lawyer)

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(Competition/Antitrust Lawyer of the Year (Regional Legal Expertise))

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(Elite Practitioner)
Joshua Seet (Notable Practitioner)

Indonesia: **Rikrik Rizkiyana** (Notable Practitioner)

Malaysia: **Yon See Ting** (Distinguished Practitioner)

Lexology Index: Thought Leaders – Competition 2025



Indonesia:
HMBC Rikrik Rizkiyana

Singapore:
Kala Anandarajah
Tanya Tang (Competition Economist)

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Regional Competition Bites

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