Rajah & Tann Asia

Lawyers who know Asia

Regional Competition Bites Q2 2026

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Contents

Overview

Dear Friends,

In the second quarter of 2026, competition and consumer protection regulators across Southeast Asia remained active in merger control, cartels, digital markets, e-commerce and sector reform. For businesses, the key message is practical: filing deadlines, tender conduct, online sales practices and platform rules are now core compliance risks, not back-office legal issues. Whilst businesses are aware of this, not all appreciate the importance of having competition issues front and centre as deals are struck, cooperations are entered into and market intelligence is gathered.

This edition highlights the developments most likely to affect companies operating, investing or selling across Southeast Asia.

Merger control

Merger control remains a regional priority. In **Singapore**, the Competition and Consumer Commission of Singapore ("**CCS**") cleared transactions in electric vehicle ("**EV**") charging, pharmaceutical products and semiconductor foundry services, while continuing to review marina berth and airline cooperation matters. CCS also revised its merger procedure guidelines, including a 25-working-day streamlined assessment for low-risk cases. In **Indonesia**, the Indonesia Competition Commission ("**ICC**") continued to fine companies for late merger notifications, including cross-border transactions. In the **Philippines**, the Philippine Competition Commission ("**PCC**") revised its schedule of administrative fines. In **Vietnam**, the National Competition Commission ("**NCC**") fined companies for failing to notify a share acquisition.

Anti-competitive agreements and consumer protection

Authorities also remained active on cartel, bid-rigging and unfair conduct issues. In **Indonesia**, ICC dismissed one tender conspiracy case but saw another bid-rigging decision upheld in court. In **Malaysia**, the Malaysia Competition Commission ("**MyCC**") issued a proposed decision over alleged bid-rigging in a food supply tender. In Thailand, the Trade Competition Commission of Thailand ("**TCCT**") dismissed complaints involving a parcel-collection agency arrangement and a chicken product distributorship.

Consumer protection enforcement is increasingly focused on online conduct. In **Singapore**, CCS took action against three online retailers for false urgency tactics and misleading claims. In Vietnam, NCC sanctioned misleading customer information and scrutinised e-commerce platform fees.

Legislation and policy

Legislative and policy reform has also accelerated. **Singapore** passed amendments to strengthen the Infocomm Media Development Authority's media-sector competition and consumer protection powers, and CCS issued revised fast track procedure guidelines for competition investigations. **Indonesia's** ICC advocated for the enactment of a dedicated Digital Market Law to address growing competition concerns involving digital platforms. Indonesia also overhauled its e-commerce regulations, significantly extending the compliance obligations of e-commerce platforms. **Malaysia** tabled major amendments to its competition framework. The **Philippines** deepened energy-sector cooperation, **Thailand** joined talks to upgrade the ASEAN-Republic of Korea Free Trade Agreement, and **Vietnam** introduced revised competition sanctions.

Compliance reminder

Businesses should review merger filing processes, tender and competitor-contact controls, digital platform practices, e-commerce pricing and promotions, and consumer-facing claims. These areas are drawing active scrutiny and can create exposure even where conduct is operational rather than strategic.

Our regional team stands ready to assist with risk assessments, filings, investigations and practical compliance measures. Please contact the Rajah & Tann Asia Competition & Antitrust Team if you would like to discuss how these developments may affect your business.

The Rajah & Tann Asia Competition & Antitrust and Trade Team
Contact No: 65-6232 0111
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Indonesia

In Indonesia, businesses should expect close scrutiny of tender conduct, merger filing deadlines and e-commerce platform governance.

ICC continued to enforce late notification rules against domestic and foreign transactions and to push digital market reform. Courts also continued to support ICC decisions where bid-rigging was proven.

Consumer protection reform is also underway, with a collaborative, empirical research-based approach to forthcoming amendments to Indonesia's consumer protection law.

Finally, Indonesia has also recently overhauled its e-commerce regulations to significantly extend the compliance obligations of e-commerce platforms, beyond meeting their own regulatory requirements, to requiring more active oversight of merchant activities, among other matters. On this, platforms should review merchant oversight, pricing, ranking, product information, traceability and AI-related controls.

1. ICC Enforcement Against Anti-Competitive Agreements

Anti-competitive agreements – enforcement

ICC dismissed one alleged tender conspiracy for a natural gas transmission pipeline project. At the same time, ICC's decision finding a tender conspiracy for two packages for the maintenance of *Motoren-und Turbinen-Union* ("**MTU**") main engines in the Directorate General of Customs and Excise of Indonesia for 2024 has been upheld in court, reflecting the consistency in approach between the courts and ICC, which is of importance given the different views seemingly adopted in other countries. The contrast shows that documentary similarities alone may be insufficient, but proven tender coordination remains a serious enforcement risk.

ICC acquits respondents - tender conspiracy in natural gas transmission pipeline project

On 19 May 2026, ICC found that five respondents had not been proven to have violated Article 22 of the Indonesian Competition Law ("**ICL**") in the Cirebon-Semarang Phase II natural gas transmission pipeline tender. The case involved PT Timas Suplindo, PT Pratiwi Putri Sulung, PT Pembangunan Perumahan (Persero), PT Nindya Karya, and the Selection Working Group within the Ministry of Energy and Mineral Resources for 2024. Investigators had alleged conspiracy. ICC treated similarities in technical documents, repeated addenda to tender documents, disruptions and failures in the procurement system, and receipt of price bid documents outside the electronic system as insufficient to prove a tender conspiracy, emphasising that similarities in documents alone, absent irregularities, are insufficient without evidence of substantive communication, coordination or a joint arrangement.

ICC decision upheld - tender conspiracy in two packages for maintenance of MTU main engines

On 25 May 2026, the Central Jakarta Commercial Court upheld ICC's decision against PT Dieselindo Utama Nusa ("**Dieselindo**") and PT Rolls Royce Solutions Indonesia ("**RRI**") in a case concerning two tender packages for MTU main engine maintenance. ICC had found a conspiracy in the conduct of both tenders, and that RRI, as principal, had provided exclusive support and facilitated Dieselindo's participation and success in the tenders in a manner that restricted competition and gave it an undue advantage over other bidders. ICC concluded that both respondents had violated Article 22 of the ICL and imposed aggregate fines of IDR2.5 billion. The Commercial Court subsequently upheld ICC's decision.

2. ICC Takes Action Against Late Merger Notifications

Merger control – enforcement

ICC continued to pursue late merger notifications, including foreign-to-foreign deals with an Indonesian nexus. Delays were not lengthy and even a three-day delay was deemed a violation. Using an external adviser who provides inaccurate guidance does not aid the offending business. Businesses must build Indonesian filing checks into transaction timetables early and ensure the right experts are sought to guide them.

Acquisition of Intage Holdings, Inc.

On 18 May 2026, ICC fined Docomo, Inc. ("**Docomo**"), a major telecommunications operator in Japan, IDR2 billion for notifying its 51% acquisition of Intage Holdings, Inc., which is a Japanese holding company with business affiliates in Indonesia, six working days late. Docomo attributed the delay to the complexity of the cross-border transaction and the breadth of its operations and argued that it had shown good faith. ICC imposed the fine despite Docomo's cooperation and argument that the delay had no anti-competitive effect.

Acquisition of PT Centra Multi Suryanesia Aset

On 2 June 2026, ICC fined PT ITM Bhinneka Power ("**Bhinneka**"), a company engaged in renewable energy and electricity support services in Indonesia, IDR1 billion for notifying its 65% acquisition of PT Centra Multi Suryanesia Aset three working days late. The company acknowledged the delay and cooperated in the proceedings.

Acquisition of PT Coates Hire Indonesia

On 17 June 2026, ICC opened a preliminary examination into Mitsubishi Corporation's alleged 11-working-day delay in notifying its 99.99% acquisition of PT Coates Hire Indonesia. The complete notification documents were received by ICC 11 working days late, according to ICC. Mitsubishi Corporation attributed the delay to an error by its former legal advisers, and not negligence on its part. The case will proceed under the expedited examination procedure, following Mitsubishi Corporation's request for the same, and its cooperation during the proceedings and prior compliance record.

3. ICC Advocates for Competition Law and Policy Reform, and Domestic and International Cooperation

Policy – competition law and reform

ICC has ramped up its efforts across the key pillars of competition law and policy development, and domestic and international cooperation, particularly in relation to the digital economy. Through its various moves, ICC has established itself as a strong advocate for competition law and policy reform, the strengthening of inter-agency cooperation, and the international exchange of best practices, ideas, and key information and technology.

Competition law and policy

On 22 April 2026, ICC sought support from former President Joko Widodo for amendments to the ICL and stronger institutional powers.

On 26 May 2026, ICC advocated a Digital Market Law to address growing competition concerns arising from algorithm use, artificial intelligence ("**AI**"), and data dominance by digital platforms. ICC noted that since 2020, the digital and e-commerce sector has accounted for approximately 4.03% of its enforcement cases, making it the third-largest sector, and highlighted the IDR202.5 billion fine imposed on Google in early 2025 for abuse of dominance. The key areas of focus extend over algorithmic transparency, AI, data dominance, self-preferencing, discriminatory access, predatory pricing and other platform conduct. Businesses using digital platforms should expect closer scrutiny of algorithms, pricing and access terms.

On 23 June 2026, ICC stated that sector rules for bottled drinking water should reflect competition law principles. High concentration is not unlawful by itself, but conduct such as coordination, restrictive vertical arrangements or discrimination may draw scrutiny.

Domestic and international cooperation

On 27 April 2026, ICC and the Attorney General's Office reported IDR43.9 billion in recoveries from 11 historic ICC decisions.

On 29 April 2026, ICC and the Japan Fair Trade Commission discussed digital enforcement, including data-based market power, algorithmic collusion and possible AI tools for bid-rigging detection.

4. Indonesia Overhauls its E-Commerce Regulations - from Platform Compliance to Platform Gatekeeping

Legislation – e-commerce

On 8 June 2026, Regulation No. 19 of 2026 on e-commerce replaced Regulation No. 31 of 2023. The new rules span competition, consumer protection, business licensing, customs and AI governance.

The regulation expands platform obligations beyond their own compliance. Platforms must oversee merchant activities, pricing practices, consumer-facing information and product traceability. Ride-hailing and online travel applications are expressly within scope where they facilitate e-commerce.

E-commerce businesses should review pricing, promotions, ranking, merchant controls, product traceability and AI or algorithmic tools. Non-compliance can lead to serious consequences, including platform blocking and licence revocation. For more information, please refer to our June 2026 Legal Update titled "An Overhaul in Indonesian E-Commerce Regulations: From Platform Compliance to Platform Gatekeeping".

5. Collaborative Empirical Research for Proposed Amendments to Consumer Protection Law

Legislation – consumer protection

Indonesia is also considering amendments to Law No. 8 of 1999 on consumer protection ("**CPL**"). The review aims to update the CPL for digital, cross-border and modern consumer issues.

On 10 March 2026, the Regional Representative Council began empirical research for a CPL amendment bill. Issues under review include vulnerable consumers, addictive products, online dispute resolution, cross-agency coordination and control of standard clauses.

Businesses selling into Indonesia should monitor the bill, particularly if they use standard terms or digital sales channels.

Malaysia

In Malaysia, businesses should watch three areas: bid-rigging enforcement, greater use of data by MyCC, and the proposed overhaul of the Competition Act 2010 and Competition Commission Act 2010. The reforms would strengthen MyCC's tools and broaden competition compliance expectations.

1. Proposed Decision Against Bid-Rigging Cartel Relating to Food Supply Tender

Anti-competitive agreements – horizontal

On 16 June 2026, MyCC issued a proposed decision against six enterprises for alleged bid-rigging in a National Anti-Drugs Agency food supply tender worth RM5.7 million.

MyCC's provisional finding is that the enterprises exchanged information and facilitated the tender for raw, fresh and dry food, potentially infringing section 4 of the Competition Act 2010. The proposed decision is not a final finding, and the enterprises may make written and oral representations.

The case is a reminder that tender information exchange and facilitation can attract scrutiny, especially in food, agriculture and public procurement.

2. MyCC Signs MOU with DOSM to Strengthen Data Sharing, Economic Analysis and Capacity Building

Policy – data sharing

On 18 June 2026, MyCC and the Department of Statistics Malaysia ("**DOSM**") signed a Memorandum of Understanding ("**MOU**") to strengthen cooperation on data sharing, economic analysis and capacity building. The collaboration signifies the Malaysian Government's commitment to adopting a more data-led approach to competition enforcement.

The MOU covers four main areas: data sharing, capacity building, joint monitoring and economic analysis.

1. **Data sharing**: MyCC and DOSM will share administrative and economic data and combine statistical and competition expertise.
2. **Capacity building**: The agencies will develop skills through training, exchanges and knowledge-sharing initiatives.
3. **Joint monitoring**: The agencies will monitor strategic sectors and policies to support fair competition.
4. **Economic analysis**: The agencies will strengthen analysis of market structures, supply chains and price movements.

For businesses, better data access may mean more targeted market monitoring and investigations. Compliance frameworks should be refreshed before issues arise.

3. Malaysia Competition Law: MyCC's Enforcement Overhaul

Legislation - competition law

The Competition (Amendment) Bill 2026 and the Competition Commission (Amendment) Bill 2026 were tabled on 23 June 2026 and passed by the *Dewan Rakyat* on 6 July 2026. They are scheduled for the *Dewan Negara* sitting from 20 July 2026 to 4 August 2026.

The Bills would materially expand Malaysia's competition framework, strengthen MyCC's investigative and enforcement powers, and introduce a settlement procedure, a right of appeal to the Malaysia High Court and whistleblower protection mechanisms. The settlement procedure in particular will provide a welcome reprieve to businesses that inadvertently get caught in a violation.

Businesses operating in or connected to Malaysia should prepare now, even though the Bills still require passage through the *Dewan Negara*. For more information, please refer to our July 2026 Legal Update titled "Malaysia Competition Law: MyCC's Enforcement Overhaul".

Philippines

In the Philippines, PCC focused on higher penalties through revisions to administrative fines under Memorandum Circular No. 26-002 and deeper energy-sector cooperation with the Independent Electricity Market Operator of the Philippines ("**IEMOP**") to jointly monitor the wholesale electricity spot market. Businesses should pay close attention to merger notification discipline, accurate submissions and conduct in power markets.

1. PCC Memorandum Circular No. 26-002: Revised Schedule of Administrative Fines under the Philippine Competition Act

Legislation – competition law

PCC issued Memorandum Circular No. 26-002, dated 16 April 2026 ("**Circular**"), revising administrative fines under the Philippine Competition Act ("**PCA**"), the 2017 PCC Rules of Procedure and the Merger Rules.

1. Fines for anti-competitive agreements and abuse of dominant position were increased from PHP 110 million to up to PHP 125 million for a first offence; and from PHP 110-275 million to PHP 125–310 million for subsequent offences;
2. Procedural penalties were also adjusted, including for failure to notify, misleading information, obstruction, reprisal, discrimination and improper disclosure of confidential information; and
3. Fines relating to merger notification delays and prohibited mergers were revised.

The revised fines took effect from 4 June 2026.

Companies operating in or entering the Philippines should check merger timelines, filing accuracy and cooperation protocols for PCC proceedings.

2. PCC-ERC Policy Dialogue on Competition in the Renewable Energy Sector

Policy – renewable energy

On 17 March 2026, PCC and the Energy Regulatory Commission discussed PCC's competition impact assessment of the Green Energy Auction Program. Key issues included determining green energy auction reserve price methodology, per-grid auction design and transparency in price caps and pre-bid conferences.

Energy-sector stakeholders should monitor auction design and pricing methodology because future changes may affect participation, project viability and pricing strategy.

3. PCC-IEMOP MOA on Joint Oversight of the Electric Power Sector

Policy – electric power industry

On 9 June 2026, PCC and IEMOP signed a Memorandum of Agreement to promote fair competition in the electric power industry. This establishes a framework for cooperation, data sharing, and capacity building, under which IEMOP will provide market reports and data to PCC, while PCC will provide technical guidance to help identify potential competition issues.

Power-sector participants should expect more coordinated monitoring of anti-competitive conduct and agreements.

Singapore

In Singapore, CCS remained active across merger review, airline cooperation, consumer protection and competition procedure. Businesses should note shorter merger review routes for low-risk deals, revised fast track guidance for investigations, and closer scrutiny of online sales practices.

CCS cleared transactions in EV charging, pharmaceutical assets and semiconductor foundry services, and continued reviewing marina berth and airline cooperation matters.

On consumer protection, CCS acted against online retailers using misleading website features known as dark patterns, including fake visitor counts, fabricated countdown timers and false discount claims.

1. CCS Addresses Concerns on Proposed Purchase of Assets of Marina at Keppel Bay in the Supply of Marina Berths

Merger – horizontal

After a Phase 1 review, CCS identified potential competition concerns in the proposed acquisition by ONE15 Marina KB Pte. Ltd. of the property and assets at Marina at Keppel Bay from Keppel Bay Pte Ltd.

CCS's concern is that the parties may be close competitors in premium marina berths and may hold significant shares post-transaction. CCS is considering whether the transaction could increase prices or reduce service quality.

The matter is still pending review and may proceed to an in-depth Phase 2 review.

2. CCS Conditionally Clears Acquisition Involving EV Charging Companies

Merger – horizontal

CCS conditionally approved SP Mobility Pte. Ltd.'s ("**SPM**") proposed acquisition of Strides YTL Pte. Ltd. after accepting commitments addressing competition concerns.

The parties are charging point operators which own and operate EV charging networks and provide services relating to the supply of EV charging points. To address competition concerns relating to the parties' supply of EV charging points located in Housing Development Board ("**HDB**") carparks within the East region of Singapore, SPM offered the following commitments for those East HDB charging points:

1. EV charging prices will not exceed pre-transaction levels, except for permitted pass-through costs or factors beyond SPM's control.
2. Discounts and rebates will not discriminate against drivers solely because they charge in the East region.

CCS considered the commitments to be sufficient. The decision shows that targeted commitments can address localised overlaps in infrastructure markets.

3. CCS Clears Proposed Acquisition of Pharmaceutical Assets

Merger – horizontal

CCS cleared Zuellig Pharma Holdings Pte. Limited's ("**Zuellig**") proposed acquisition of certain assets from Eli Lilly relating to *Cialis* (*Tadalafil*) for human use in Singapore. *Cialis* is used to treat erectile dysfunction.

CCS found no substantial lessening of competition because *Cialis* is not a must-have product for distributors and Zuellig could not preferentially promote it over other erectile dysfunction medications it distributes.

4. CCS Clears GlobalFoundries Acquisition in Semiconductor Foundry Services

Merger – horizontal

CCS cleared GlobalFoundries Singapore Pte. Ltd.'s acquisition of Advanced Micro Foundry Pte. Ltd ("**AMF**"). The deal adds AMF's silicon photonics manufacturing capabilities, which support high-speed data applications including AI data centres and quantum computing.

CCS found no substantial lessening of competition in the supply of foundry services for pluggable transceivers in Singapore. It noted that the parties were not closest competitors, several other suppliers remained viable and the combined market share was low.

5. Consultation on Proposed Cooperation between Singapore Airlines Limited and Vietnam Airlines JSC

Anti-comptitive agreements – airline cooperation

CCS conducted a public consultation from 8 April to 22 April 2026 on the proposed commercial cooperation between Singapore Airlines Limited and Vietnam Airlines JSC. The cooperation would cover services between Singapore and Vietnam, including scheduling, pricing, sales, marketing and related commercial areas.

The parties submitted that low-cost carrier competition, low entry barriers and expected consumer and economic benefits would address competition concerns.

CCS is assessing whether the cooperation would infringe section 34 of the Competition Act 2004.

6. Revised Guidelines on Merger Procedures

Merger – guidelines

The revised CCS Guidelines on Merger Procedures ("**Merger Procedure Guidelines**") took effect on 1 May 2026 and apply to merger notification and investigation procedures.

The key amendments are practical for deal teams and include the following:

1. A streamlined track can reduce Phase 1 review for mergers that are unlikely to present competition concerns from 30 working days to 25 working days;
2. Information burdens for merger parties and third parties when submitting information to CCS are reduced; and
3. Merger parties should receive earlier clarity on whether CCS is likely to clear a merger.

For more information, please see our full Legal Update here.

7. Revised Guidelines on Fast Track Procedure for Resolution of Investigations into Competition Infringements

Anti-competitive conduct – guidelines

The revised CCS Guidelines on the Fast Track Procedure ("**Revised FTP Guidelines**") and related consequential amendments to the CCS Guidelines on the Major Provisions and CCS Guidelines on Directions and Remedies took effect on 1 July 2026.

The Revised FTP Guidelines are intended to resolve section 34 or section 47 investigations more efficiently. Key changes include:

1. A fast track discount of up to 30% (up from 10%, making it more palatable);
2. Clearer guidance on submissions in response to proposed infringement decisions; and
3. Revocation of the fast track discount if a business appeals, including against an agreed financial penalty.

For businesses, the procedure may reduce management time, costs and uncertainty where early resolution is appropriate.

For more information, please see our full Legal Update here.

8. Bill Passed in Parliament to Address Market Competition Issues in the Media Sector

Legislation – media sector

The Info-communications Media Development Authority (Amendment) Bill was passed in Parliament on 7 May 2026. It strengthens the Infocomm Media Development Authority's ("**IMDA**") competition and consumer protection powers in the media sector and aligns the media framework more closely with the telecommunications framework.

The key business-facing changes are:

1. **Broader ownership and control oversight**: Prior approval will be required for transactions resulting in acquisition of 30% or more equity interests or voting power in a regulated person, effective control, or takeover of the media business as a going concern.
2. **More timely intervention**: IMDA will have broader direction powers to address unfair market conduct and protect consumers.
3. **Lower burden for immaterial transactions**: Certain immaterial transactions may be treated more simply, reducing regulatory burden while preserving oversight.

For more information, please see our full Legal Update here.

9. Online Retailers Found to be Conducting Dark Patterns

Consumer protection – unfair practices

CCS found that Seager Inc. (which operates Boarding Gate), Origin Sleep and Light In The Box used misleading website features (commonly known as dark patterns) to influence consumers' purchasing decisions. All three gave undertakings, stopped the practices and committed to avoid unfair trade practices.

The practices include:

1. Fake visitor counts and unsupported cart activity claims;
2. Fabricated countdown timers and false urgency messages; and
3. Scarcity labels and false discount claims used for promotional effect.

Notably, one retailer claimed that its website design was based on a template purchased from an overseas vendor. CCS stated that businesses cannot avoid responsibility by relying on third-party website templates. This is important for regional retailers using common platform tools across markets.

With the rising prevalence of dark patterns, consumer protection authorities have demonstrated increased vigilance against such online practices. Businesses should ensure online claims, urgency messages, discount displays and stock indicators are accurate and supported by evidence.

Thailand

In Thailand, TCCT continued to review and resolve unfair trade practice complaints, including disputes in parcel-collection agency and chicken product distribution arrangements. The decisions are useful reminders that evidence, authority to act and actual business harm matter in section 57 complaints.

TCCT also participated in talks to upgrade the ASEAN-Republic of Korea Free Trade Agreement ("**AKFTA**"), reflecting continued regional cooperation on competition and consumer protection.

1. TCCT Dismisses Complaint of Unfair Penalties in Parcel-Collection Agency Arrangement

Anti-competitive conduct – unfair trade practices

TCCT dismissed a complaint alleging unfair deductions in a parcel-collection agency arrangement. It found no prohibited conduct under section 50 or section 57 of the Trade Competition Act B.E. 2560 ("**TCA**") as there were legitimate explanations for the alleged unfair deductions.

Three complainants had entered into parcel-collection agency agreements with the respondent company to act as partners operating shop-front parcel drop-off points for the general public. The complainants alleged that after they entered the parcels' dimensions and weight into the respondent's system, the respondent altered that data to record larger figures, automatically deducting a penalty and the difference in shipping charges, and then reverted the data to the originally entered figures without refunding the penalty or the deducted difference.

TCCT found that the first complainant's deductions arose from weighing-system inaccuracies that were corrected and refunded. The other complainants withdrew or did not provide further evidence, so the complaints did not proceed.

2. TCCT Dismisses Complaint of Unfair Termination of Chicken Product Distributorship

Anti-competitive conduct – unfair trade practices

TCCT dismissed a complaint over alleged unfair termination of a chicken product distributorship. It found no unfair use of superior bargaining power or unjustified refusal to deal under section 57(2) of the TCA.

The complainant operated a distributorship for chicken products, holding a customer account with the respondent under a distributorship licence. The complainant received a termination notice signed by "Mr. W," a sales operations manager, prompted by alleged consumer complaints. However, the respondent contended that Mr. W had acted on his own initiative and personal decision, without authority or any mandate to terminate the contract. Following negotiations, Mr. W allowed the complainant to continue trading, without notifying the respondent.

TCCT resolved that, because the termination notice was signed by Mr. W without authority and he was not a party to the contract, the notice had no legal effect to end the contract. As the respondent continued to supply goods and the complainant could carry on her business, no damage arose – a necessary element of section 57. Accordingly, the complaint was found to be without merit.

3. TCCT Participates in Negotiations to Upgrade the ASEAN-Republic of Korea Free Trade Agreement

Policy – international cooperation

TCCT joined negotiations to upgrade the AKFTA, with a focus on benefits for Thai businesses and consumers.

From 8 to 10 June 2026, TCCT participated in the first AKFTA Upgrade Negotiation Meeting under the Competition and Consumer Protection Working Group. The meeting marked a crucial starting point in negotiations, and participants openly exchanged views and perspectives on key issues, reflecting a shared commitment to promoting fair and transparent competition, and laying a solid foundation for further negotiations.

For businesses, the negotiations may support more consistent competition and consumer protection standards across ASEAN-Korea trade.

Vietnam

In Vietnam, businesses should watch three developments: tougher competition sanctions, active enforcement against merger notification and misleading information failures, and closer scrutiny of e-commerce platform fees. Digital platforms and transaction teams are most directly affected.

1. Vietnam Strengthens Competition and Consumer Protection Enforcement

Legislation – competition and consumer protection

Vietnam introduced reforms affecting competition and consumer protection compliance.

1. Decree No. 102/2026/ND-CP, effective 20 May 2026, revises penalties for competition violations. For failures to notify economic concentrations, merger notification failures and gun-jumping violations, fines may reach VND2 billion, subject to a 5% turnover cap in the relevant market during the financial year immediately preceding the year in which the violation was committed. The Decree also enables electronic enforcement. Note too that warnings will effectively no longer be provided.
2. Resolution No. 66.18/2026/NQ-CP, effective from 1 July 2026 to 1 March 2027, streamlines exemption procedures for prohibited anti-competitive agreements by allowing online submissions and removing fees. Draft consumer protection amendments would also strengthen consumer data rights and decentralise dispute resolution.

The reforms are intended to increase deterrence while reducing some procedural and compliance burdens.

Businesses should check merger notification processes, exemption procedures and consumer data handling.

2. NCC Enforcement Actions Against Failure to Notify Merger and Misleading Product Information

Merger control – consumer protection – enforcement

NCC issued enforcement decisions on merger notification and misleading information. It sanctioned BAF Vietnam Agriculture JSC ("**BAF**") and Thanh Xuan Clean Agriculture Development JSC ("**Thanh Xuan**") for failing to notify BAF's acquisition of 99.99% of Thanh Xuan's shares. Separately, NCC imposed VND 200 million fines on Carlsberg Beer Vietnam ("**Carlsberg**") and Shopee for providing misleading information to customers.

The companies cooperated with investigations and complied with the decisions. Shopee and Carlsberg were also required to correct misleading information on their websites and social media platforms publicly.

These decisions show that NCC is prepared to act on both transaction filings and consumer-facing claims. Transaction teams and marketing teams should treat both as competition compliance issues.

3. NCC Scrutiny of E-Commerce Platform Fee Policies and Regulatory Developments

Consumer protection – e-commerce

NCC is scrutinising e-commerce platform fee policies, including fee increases by Shopee and TikTok Shop. NCC also asked Shopee to review its "Maintain Visibility" programme, under which a fee would be charged and allocated to sellers' advertising accounts; Shopee voluntarily postponed implementation.

Separately, the Minister of Industry and Trade discussed implementing regulations for the Law on E-Commerce, controls on counterfeit goods and digital trade fraud, and support for Vietnamese-owned platforms and logistics.

Platform operators should expect continued oversight of fee structures, data governance and digital trade practices, particularly where changes affect sellers or consumers.

Our Achievements

Practice Accolades

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

Global Competition Review 100 (GCR100) 2026

Elite Law Firms

Assegaf Hamzah & Partners
Christopher & Lee Ong
C&G Law
Rajah & Tann Singapore
Rajah & Tann (Thailand)

Chambers Asia Pacific 2026 – Competition/Antitrust

Band 1

Assegaf Hamzah & Partners
Christopher & Lee Ong
Rajah & Tann Singapore

The Legal 500 Asia Pacific 2025 – Antitrust and Competition

Tier 1

Assegaf Hamzah & Partners
Christopher & Lee Ong
C&G Law
Rajah & Tann Singapore

asialaw 2025

Assegaf Hamzah & Partners: **Outstanding**

Rajah & Tann Singapore: **Outstanding**

Christopher & Lee Ong: **Highly Recommended**

C&G Law: **Highly Recommended**

ALB Indonesia Law Awards 2023

Assegaf Hamzah & Partners: **Winner** (Antitrust and Competition Law Firm of the Year)

In-house Community Firm of the Year 2024

C&G Law: **Winner**

Christopher & Lee Ong: **Honourable Mentions**

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)
Jane Guan (Band 2)

The Legal 500 Asia Pacific 2025 – Antitrust and Competition

Indonesia:
Rikrik Rizkiyana (Hall of Fame)
Farid Nasution (Leading Lawyer)
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)

Lexology Index: Thought Leaders – Competition 2025

Indonesia:
HMBC Rikrik Rizkiyana

Singapore:
Kala Anandarajah
Tanya Tang (Competition Economist)

Best Lawyers 2026

Singapore: **Kala Anandarajah**

asialaw Awards 2024-25

Singapore:

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

asialaw 2025 – Competition / Antitrust

Singapore: **Kala Anandarajah** (Elite Practitioner)
Joshua Seet (Notable Practitioner)

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

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

GCR Women in Antitrust 2025

Indonesia: **Anastasia Pritahayu**
Malaysia: **Yon See Ting** (since 2021)
Philippines: **Norma Margarita B. Patacsil**
Singapore: **Kala Anandarajah** (since 2021), **Tanya Tang**

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