



CEE

YEAR 12, ISSUE 9  
OCTOBER 2025

# LEGAL MATTERS

IN-DEPTH ANALYSIS OF THE NEWS AND NEWSMAKERS THAT SHAPE  
EUROPE'S EMERGING LEGAL MARKETS



Guest Editorial: Consolidation, Enforcement, and Evolution: The Balkan IP Legal Sector in 2025 ■ Across the Wire: Deals And Cases  
New Homes and Friends: On the Move ■ The Buzz ■ The Debrief: October 2025 ■ The Corner Office: Outsider at the Helm ■ Curbing Food Inflation  
Market Spotlight: Poland ■ Poland's EU Tech Rulebook: From Prep to Practice ■ Poland's Real Estate: In a League of Its Own in CEE  
Market Snapshot: Poland ■ Inside Insight: Maciej Czajkowski of MediaMarkt Polska ■ Know Your Lawyer: Jakub Celinski of Dentons  
Market Spotlight: Moldova ■ A Makeover of Moldova's Justice ■ EU's EUR 1.9 Billion Boost for Moldova ■ Market Snapshot: Moldova  
■ Know Your Lawyer: Oleg Efrim of Efrim Rosca Asociatii ■ Experts Review: Competition

# TABLE OF CONTENTS

<b>3</b>	<b>Guest Editorial: Consolidation, Enforcement, and Evolution: The Balkan IP Legal Sector in 2025</b>
<b>6</b>	<b>Across the Wire: Deals And Cases</b>
<b>11</b>	<b>New Homes and Friends: On the Move</b>
<b>14</b>	<b>The Buzz</b>
14	Turkiye's Missing Megaprojects: A Buzz Interview with Ali Can Goren of Balcioglu Selcuk Eymirlioglu Ardiyok Keki Attorney Partnership
15	Energy Shaping Lives in North Macedonia: A Buzz Interview with Igor Aleksandrovski of Apostolska Aleksandrovski & Partners
16	Curbing Illegal Construction in Serbia: A Buzz Interview with Nemanja Injac of Injac Attorneys
17	Speeding Up Slovenia: A Buzz Interview with Lovro Jurgec of Fatur Menard
<b>18</b>	<b>The Debrief: October 2025</b>
<b>23</b>	<b>The Corner Office: Outsider at the Helm</b>
<b>26</b>	<b>Curbing Food Inflation</b>
<b>28</b>	<b>Market Spotlight: Poland</b>
<b>30</b>	<b>Poland's EU Tech Rulebook: From Prep to Practice</b>
<b>33</b>	<b>Poland's Real Estate: In a League of Its Own in CEE</b>
<b>36</b>	<b>Market Snapshot: Poland</b>
36	Poland: Key Takeaways from the EU Data Act for Businesses
37	Introduction of Chinese Car Brands to the Polish Market – Legal Aspects of Type-Approval, Product Liability, and Distribution Network Development
39	Poland: Under Pressure – Cybersecurity Stage in Poland
<b>40</b>	<b>Inside Insight: Maciej Czajkowski of MediaMarkt Polska</b>
<b>42</b>	<b>Know Your Lawyer: Jakub Celinski of Dentons</b>
<b>44</b>	<b>Market Spotlight: Moldova</b>
<b>46</b>	<b>A Makeover of Moldova's Justice</b>
<b>48</b>	<b>EU's EUR 1.9 Billion Boost for Moldova</b>
<b>50</b>	<b>Market Snapshot: Moldova</b>
50	From Local to Global – How the Country's TMT Market Aligns with EU Standards
51	New Momentum for the Country's Energy Transition – Renewable Energy Auctions Set the Stage for Storage Integration
<b>52</b>	<b>Know Your Lawyer: Oleg Efrim of Efrim Rosca Asociatii</b>
<b>54</b>	<b>Experts Review: Competition</b>
55	Slovenia: Cartel Settlements – Practical Insights
56	Hungary: Strengthening the Formal Concept of "Concentrations"
57	Czech Republic: Competition Regime Overhaul on the Horizon
58	Kosovo: Merger Control Notification Obligations
59	Serbia: From a Reactive to a Proactive Competition Authority
60	Bulgaria: A Busy Autumn Ahead in Terms of Competition Law
61	Croatia: Labor Market and Competition Law
62	Poland: Crack Downs on Managers for Anticompetitive Agreements and Consumer Law Infringements
63	<b>Greece: The Hellenic Competition Commission Prohibited a Transaction for the First Time</b>
64	Moldova: Merger Control Overhaul – Part of the Path to EU Convergence
65	Albania: Tightening Competition Legal Framework Focus on "Killer Acquisitions" and EU Alignment
66	Ukraine: What the New FDI Screening Law Means for Investors
67	Romania: Amendments to Competition Law and New FDI Screening Guidelines
68	Turkiye: Inside the TCA's Conditional Approval of the Tofas-Stellantis Deal

## Greece: The Hellenic Competition Commission Prohibited a Transaction for the First Time

By Spyros G. Alexandris, Partner, and Yanis Nassiaras, Junior Associate, Bahas, Gramatidis & Partners



This year is marked by the first Hellenic Competition Commission's (HCC) prohibitive decision for an acquisition to be concluded. More precisely, the market concerned was the Greek private high-level education market and the parties were the two most prominent market share holders of that market: a) the company under the trade name Alphabet Education S.A. (Alphabet) and b) the company under the trade name Scholes Delta Voreiou Ellados Anonymi Etaireia (Delta).

In particular, the transaction, notified on September 17, 2024, concerned Alphabet's – a major player in the Greek private education sector, operating through entities such as IEK AKMI (vocational training institute) and Mitropolitiko Kollegio – acquisition of the exclusive control of Delta, which operates under the brand IEK Delta 360 and offers similar services in vocational training and lifelong learning. Both parties were active in providing their services in the geographic markets of Athens, Thessaloniki, and Volos (with the latter overlapping with Larissa).

Following an in-depth investigation under Article 8 of the *Greek Free Competition Act (Law 3959/2011)*, the HCC concluded that such concentration would significantly impede effective competition. The HCC identified several factors supporting this conclusion:

**High combined market shares:** The new entity would hold a very high aggregated market share in the relevant markets, creating a dominant or even super-dominant position.

**Elimination of a close competitor:** Delta was Alphabet's closest competitor across all competitive factors, and its elimination would remove significant competitive pressure.

**Barriers to entry:** The parties enjoy well-established reputations, strong brand recognition, and significant marketing expenditure, which constitute high barriers to entry and expansion for other competitors.



**Risk of price increases and quality reduction:** The transaction would allow the new entity to increase tuition fees and potentially lower service quality, to the detriment of consumers.

**Insufficient public sector constraint:** Public vocational schools were deemed unable to exert sufficient competitive pressure to counterbalance the new entity's market power.

During the proceedings, Alphabet offered commitments to address HCC's concerns. These included behavioral remedies (pricing and non-pricing commitments) of two years' duration for the Athens and Thessaloniki geographic markets, as well as a structural remedy involving the divestiture of Delta's branch in Volos.

However, the HCC held that the proposed commitments were insufficient. Behavioral remedies were deemed incapable of removing the structural competition concerns created by the transaction. The divestiture of the Volos branch, while potentially useful, was not considered adequate to restore competition in the more critical Athens and Thessaloniki markets.

As a result, the HCC, though its decision no. 887/2025, decided to prohibit the transaction, citing the creation of a dominant or super-dominant position that would lead to a significant impediment to effective competition (SIEC test). The decision reflects HCC's strict approach toward concentrations that risk creating quasi-monopolistic structures in local markets of essential services.

The case underscores the HCC's vigilance in preventing excessive market concentration in education – a sector with direct implications for consumer welfare and access to quality services. It also demonstrates that remedies must be comprehensive, effective, and enforceable to be acceptable. Structural solutions are generally preferred over behavioral measures, especially where the concentration would eliminate the strongest competitor and create a market leader with very high market shares. ●