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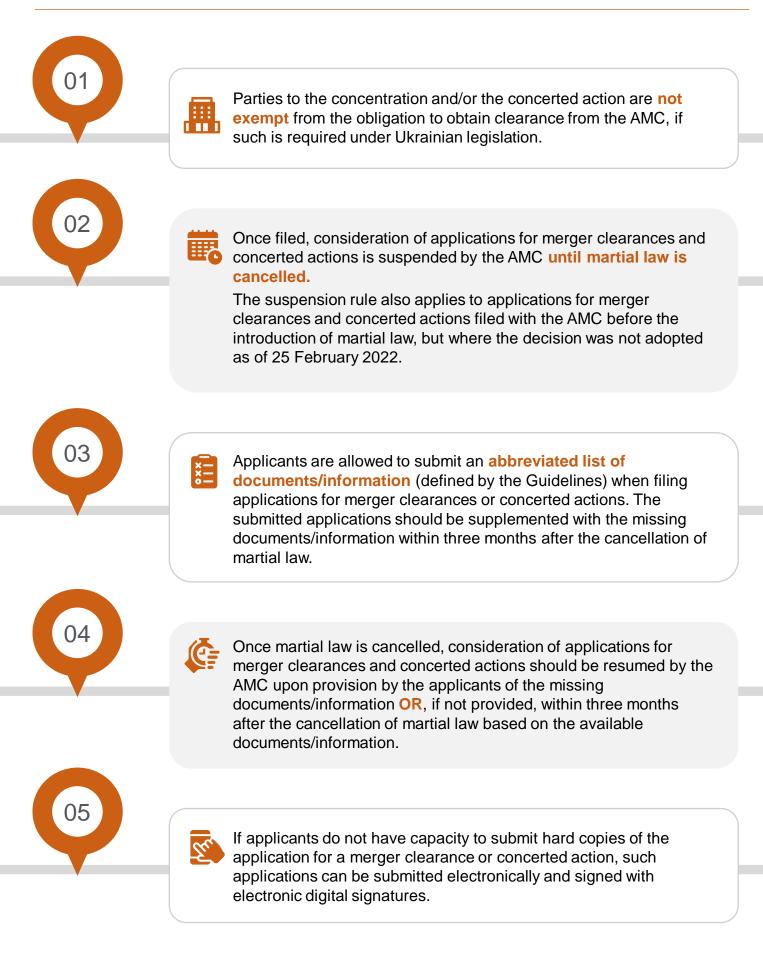
Merger and concerted action controls in Ukraine during martial law

Due to the introduction of martial law in Ukraine on 24 February 2022, the operations of the Antimonopoly Committee of Ukraine (AMC) have been adjusted or suspended in a number of ways. As a result, on 30 March 2022 the AMC adopted Guidelines on the filing and consideration of applications for merger clearances and concerted actions during martial law (Guidelines).

To remind, Ukrainian competition legislation has exterritorial effect, meaning that concentrations finalised outside Ukraine may require approval from the AMC, if the financial thresholds provided under Ukrainian law are exceeded.

Below we provide important highlights from the Guidelines with respect to merger and concerted action controls during martial law in Ukraine. Please note that martial law has been introduced in Ukraine until 25 April 2022 but may be further extended.

Guidelines on the filing and consideration of applications for merger clearances and concerted actions during martial law (1)



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Guidelines on the filing and consideration of applications for merger clearances and concerted actions during martial law (2)



aggression against Ukraine are the UBO(s) of one of the participants to the concentration **OR** if the AMC has reasonable suspicions that the concentration's purpose is a withdrawal of assets/shares to circumvent sanctions, **the maximum amount of fine** prescribed by law (up to 5% of the group's turnover for the previous year) shall apply for the finalisation of a concentration **without** obtaining AMC clearance.

For more information, please contact:



Galyna Zagorodniuk Partner, Head of Competition & State Aid, Co-head of Corporate and M&A Kyiv, Ukraine

+380 67 466 3255 galyna.zagorodniuk@kinstellar.com



Yulia Eismont Senior Associate Kyiv, Ukraine

+380 50 339 5445 yulia.eismont@kinstellar.com



Anna Vizniak Associate Kyiv, Ukraine

+380 50 201 6838 anna.vizniak@kinstellar.com



Danylo Rudyk Associate Kyiv, Ukraine

+380 67 218 5745 danylo.rudyk@kinstellar.com

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