Identomat

COMPLIANCE GUIDE

eCommerce & Marketplaces Compliance in Armenia

COUNTRY Armenia

INDUSTRY eCommerce & Marketplaces

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KEY REGULATORS Competition and Consumer Protection Commission · State Revenue Committee

Key takeaways

- No licence is needed to sell goods online in Armenia, and online shops and marketplaces are not covered by the anti-money laundering (AML) law, so there is no legal duty to run identity checks on every buyer.
- Marketplaces must keep business and private sellers apart: a person selling goods as a business through a platform must be registered as an individual entrepreneur and issue electronic receipts, and private sales must sit in a separate section. A draft Law on Electronic Commerce (in public consultation until 17 November 2026, not yet law) would also make platforms check every seller's details against official registers before the seller can list.
- Since 1 July 2026, online buyers can cancel most purchases within 14 days without giving a reason (up to 12 months longer if they were not told about this right), and sellers must refund within 14 days.
- Since 1 August 2025, platforms must tell buyers whether each offer comes from a trader, explain how search results are ranked and how reviews are checked; fake reviews are banned. The consumer authority can fine up to 5% of the previous year's revenue.
- From 1 January 2027, platform operators registered with the tax authority must report each month the sales made through them to consumers in other Eurasian Economic Union (EAEU) countries, including every seller's taxpayer number. Selling alcohol, energy drinks or tobacco to under-18s is banned online and offline, but the law sets no online age-check method.

Armenia is open to online retail and marketplaces without sector licensing. Obligations come from consumer, trade, tax and personal data law rather than from financial-crime rules, and many of the online-specific consumer rules took effect in 2025 and 2026.

The principal authorities are the Competition and Consumer Protection Commission, which is the central body for consumer interests, and the State Revenue Committee, which administers tax registration, electronic receipts and, from 2027, platform reporting.

The biggest practical obstacle for a new marketplace is seller onboarding: confirming that business sellers are registered taxpayers, separating private sellers, and capturing the seller data that monthly tax reports will require from January 2027.

CONTENTS

1 Who regulates this sector
2 Licensing and authorisation
3 Identity framework (AML rules do not apply)
4 Identity verification and onboarding
5 Digital channels: what's different
6 Data protection and biometrics
7 Sector-specific obligations
8 Risk indicators and red flags
9 Enforcement and penalties
10 Recent changes and what to watch
11 What this means for identity verification
- Sources

1 Who regulates this sector

Authority	Remit for eCommerce	Level	Official site
Competition and Consumer Protection Commission	Central body for consumer interests; unfair commercial practices, price display rules, fines	National	competition.am
State Revenue Committee	Tax registration, electronic receipts, VAT on cross-border online sales, platform reports from 2027	National	src.am
Personal Data Protection Agency of the Ministry of Justice	Authorised body for personal data, acting independently; mandatory prior notification of biometric processing	National	moj.gov.am
Central Bank of Armenia	Licensing of payment and settlement organisations; Financial Monitoring Center (Armenia's financial intelligence unit) for AML reporting entities	National	cba.am
Market Surveillance Inspection Body	Safety of non-food products on the market; hallmarking of precious metals	National	Statute, Prime Minister Decision 732-L

Ministry of Economy	Consumer safety mechanisms; trade and services policy	National	Statute, Prime Minister Decision 658-L, pt 23
State Register of Legal Entities Agency (Ministry of Justice)	Registration of companies and individual entrepreneurs; company search, extracts, beneficial owner declarations	National	e-register.am
Information Systems Regulatory Commission	Autonomous regulator for information systems and cybersecurity, including the national electronic identification layer; proposed supervisor of platform duties	National	Law on the Information Systems Regulatory Body, art. 2
Municipalities	Permits and local duties for selling alcohol and tobacco; local inspections under the Law on Trade and Services (art. 17)	Local	Municipal

The Commission carried the name Competition Protection Commission until amendments in force from 1 August 2025 made it the central body for consumer interests. A draft Law on Electronic Commerce would give supervision of platform-specific duties to the Information Systems Regulatory Commission.

2 Licensing and authorisation

Armenian law sets no licence specific to online shops or marketplaces; electronic communication is a permitted form of retail trade (Law on Trade and Services, art. 9(2)). An "electronic trading platform" is software, including a website or app, through which consumers conclude contracts electronically (art. 2(1)(35)). Authorisation questions arise from what is sold and how money moves:

Sellers as taxpayers

Individuals may sell goods through a platform as a business only if registered as an individual entrepreneur and issuing electronic settlement documents (Law on Trade and Services, art. 15.1(4)).

Alcohol and tobacco

Selling alcoholic drinks or tobacco products needs, in the cases the law provides, a municipal sale permission, charged as a quarterly local duty scaled to the floor area of the premises (Law on Local Duties and Fees, arts. 9(1)(9), 12(1)(9); Tobacco Law, art. 5(6)(1)). Selling without it is fined AMD 100,000 to 200,000 (Code of Administrative Offences, art. 169.16(1)).

Payments

Accepting payments from payers as a business in order to pay them on to a payee is a payment service (Law on Payment and Settlement Systems, art. 17(1)©), which requires a Central Bank licence (art. 19(4)). Licensed payment organisations may not carry on trading activity (art. 19(3)).

Non-resident EAEU platforms

A platform operator from another EAEU state selling goods to Armenian consumers registers with the tax authority (Tax Code, art. 288(9.2)) and accounts for value added tax (VAT) itself (art. 70(2)(5)).

3 Identity framework (AML rules do not apply)

The Law on Combating Money Laundering and Terrorism Financing lists its reporting entities exhaustively (art. 3(1)(4)). Online retailers and marketplaces are not on the list, so they have no statutory customer due diligence, suspicious transaction reporting or record-keeping duties under that law. Two edges matter:

- **Precious metals and stones.** Dealers in precious metals and precious stones are reporting entities, but their reporting and due diligence duties apply only to cash transactions of AMD 5 million or more (arts. 6(4)(5), 16(3)).
- **Payment flows.** Persons carrying out money transfers are financial institutions under the law (art. 3(1)(4)(d)). A marketplace that itself collects buyers' payments for sellers, rather than using a bank or licensed provider, provides a licensed payment service (Law on Payment and Settlement Systems, arts. 17(1)©, 19) and enters both regimes.

Outside those cases, identity obligations come from trade, consumer and tax law and from age limits for restricted goods (section 4).

4 Identity verification and onboarding

Sellers

Because article 15.1(4) of the Law on Trade and Services limits business selling by individuals to registered individual entrepreneurs and requires a separate section for private sales, a marketplace must establish at onboarding whether a seller acts as a business and, if so, confirm its registration and taxpayer identification number (TIN).

Consumer law reinforces this. When a product is offered on a platform, the buyer must be told whether the offer comes from a trader or from another person, based on the seller's declaration to the platform (Law on Consumer Rights Protection, art. 37.2(3)(5)). From 1 January 2027, platforms registered with the tax authority must also report, for each sale to consumers in other EAEU states, the supplier's name and TIN (Government Decision 1462-N of 8 October 2026, annex, pt 2(4)).

Buyers and age-restricted goods

No law requires identity verification of ordinary online buyers. Age limits apply by product: selling or supplying by any other means alcohol and energy drinks to persons under 18 is prohibited (Law on Trade and Services, art. 9(16.1)), as is selling or supplying tobacco products, their accessories, substitutes and imitations to under-18s (Tobacco Law, art. 5(1)). Where the seller doubts a buyer's age, the Tobacco Law allows it to ask for an identity document and refuse the sale if none is shown. Neither law sets a remote age-verification method. Article 9(16.2) of the Law on Trade and Services also bans selling alcohol and energy drinks "through automatic self-service devices and other technical means" (art. 2(1)(32) defines the device as electronic equipment trading without staff involvement); whether a website or app is "other technical means" is unsettled.

Electronic signature and strong identification

Where a distance contract uses strong identification or an electronic signature equivalent to a handwritten one, the technical and legal requirements must meet standards set by the Government (Law on Consumer Rights Protection, art. 24.1(2)); as of November 2026 no such standards have been published. A document protected by an electronic digital signature has the same legal effect as one signed by hand once the signature is verified (Law on Electronic Document and Electronic Digital Signature, art. 4); the signature certificate on the national ID card is valid for the card's validity (art. 14). Only ID cards issued before 15 February 2023 carry a chip usable for login and signing with a card reader; holders of chipless cards use Mobile ID (the "YesEm" mobile ID SIM), issued at mobile operators' service centres.

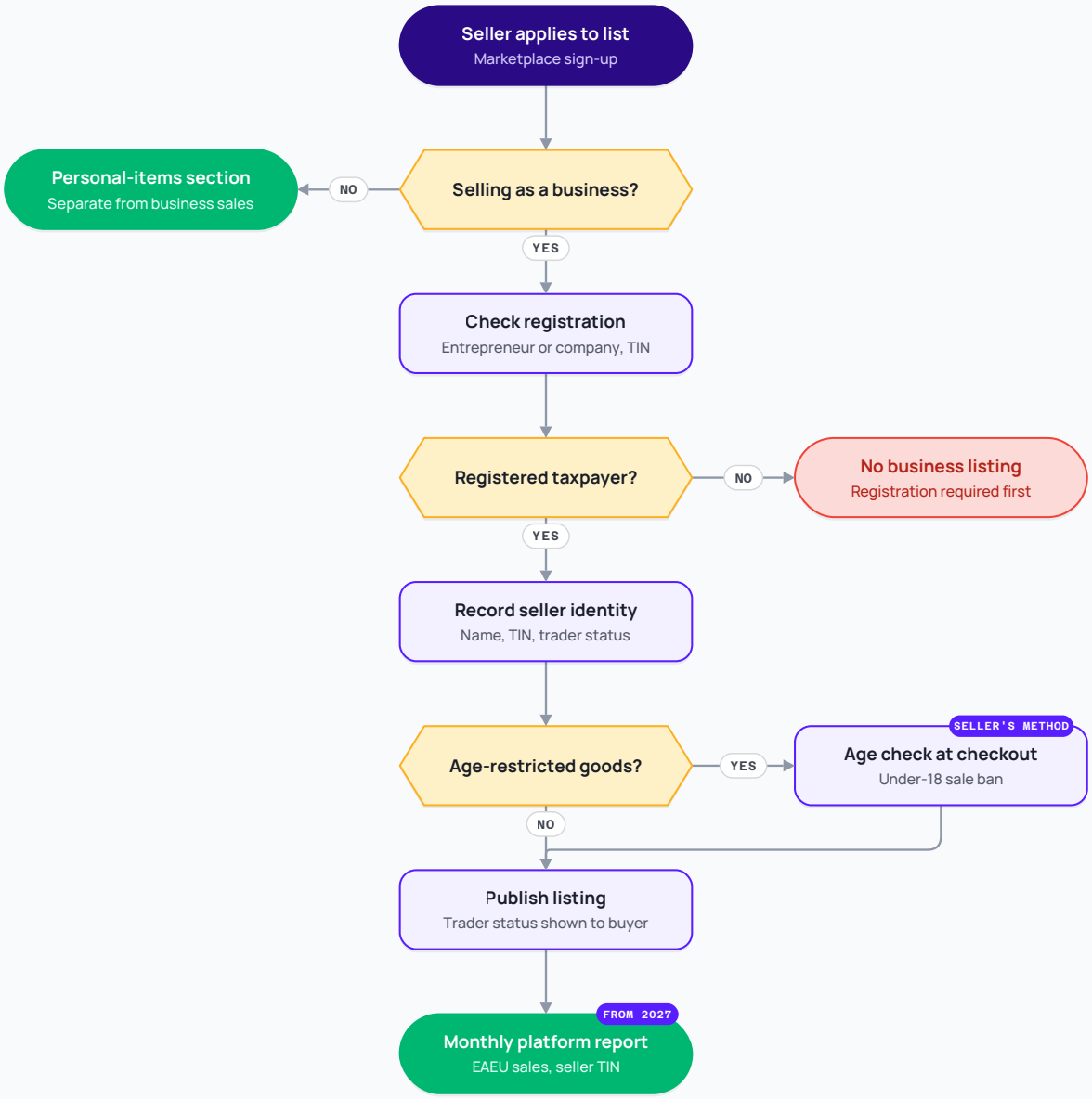


Figure 1. Marketplace seller onboarding and listing in Armenia.

5 Digital channels: what's different

Bottom line: most Armenian eCommerce rules are written for the online channel (distance-contract rights, platform information and transparency duties, seller registration on platforms), while age limits for restricted goods are channel-neutral and set no online verification method.

Requirement	In person / shop	Online / remote	Difference

Licence to sell	None for general retail	None for online shops or platforms	Same
Pre-contract information	Art. 10.2 list, before contract	Art. 10.2 list plus platform data (art. 10.1), durable medium, order-button rule (art. 24.3)	Differs
Right to withdraw	Return or exchange of unused non-food goods within 14 days (art. 23; Civil Code, art. 517)	Same right, plus withdrawal without reason within 14 days for most goods and services; up to 12 more months if not informed (arts. 24.4, 24.5)	Differs
Who may sell as a business	General trade rules	Individuals only as registered entrepreneurs; private-sales section (art. 15.1(4))	Differs
Ranking and reviews	General unfair-practice ban	Disclose trader status, ranking parameters and review checks; fake reviews banned (art. 37.2)	Differs
Age limits for alcohol, energy drinks, tobacco	Under-18 sale ban	Same ban, applies to "any other means" of supply; no method set	Same
Fiscal receipts	Cash register rules	Electronic cash register may be used for orders taken through a website or app (Tax Code, art. 380.1)	Differs
Biometric data	Consent and prior notification	Consent and prior notification	Same

Distance contracts: a new chapter since July 2026

Chapter II.1 of the Law on Consumer Rights Protection, added by law HO-178-N and in force since 1 July 2026, governs distance contracts. For goods, the 14-day withdrawal period runs from receipt and extends by up to 12 months if the consumer was not informed. The seller refunds within 14 days by the original payment method; the consumer returns the goods within 14 days and bears at most the return cost and any loss in value from misuse, and not even the return cost if the seller failed to inform them of the right (arts. 24.4 to 24.8). Delivery is due within 30 days unless agreed otherwise (art. 24.10). This sits on top of the general 14-day right to return or exchange unused non-food goods of proper quality (art. 23; Civil Code, art. 517), which applies in every channel; the goods excluded from that right,

such as personalised, perishable or unsealed hygiene items, are also excluded from withdrawal (art. 24.9(1)(4)).

Platform transparency since August 2025

Law HO-206-N, in force since 1 August 2025, requires platforms to say whether an offer comes from a trader, give the main ranking parameters and explain how reviews are checked (art. 37.2(3)). Hidden paid placement, unverified "verified review" claims and fake reviews or view counts are always misleading (art. 37.2(4)).

Order button and durable medium

The order button must make clear that ordering creates an obligation to pay (art. 24.3(3)); the seller confirms the contract on a durable medium by delivery (art. 24.3(6)), and the buyer must be able to store and reproduce it (Law on Trade and Services, art. 15.1(3)).

6 Data protection and biometrics

Four provisions of the Law on Protection of Personal Data shape onboarding design:

- **Children.** For a data subject under 16, consent to processing is given by the legal representative (art. 9(9)).
- **Biometrics.** Biometric data may be processed only with the data subject's consent, unless a law provides otherwise and its aim can be met only by that processing (art. 13). Notifying the Agency before processing biometric or special-category data is mandatory (art. 23(3)); the notice states the purpose, legal basis, data, data subjects and security measures (art. 23(4)).
- **Form of consent.** Consent is given in writing, or electronically certified with an electronic digital signature; oral consent counts only through reliable actions that clearly show it (art. 9(7)), and the controller must prove consent was obtained (art. 9(8)). A tick-box alone may not meet this standard for a selfie-based age or identity check, so the consent step needs to be designed and recorded with care.
- **Retention.** Data processed on the basis of consent is kept only as long as objectively necessary for the purpose, or for the period set in the consent (art. 9(2)).

The authorised body is the Personal Data Protection Agency of the Ministry of Justice (Government Decision 734-N of 2 July 2015), which acts independently (art. 24(2)).

7 Sector-specific obligations

Platform tax reporting from January 2027

Tax Code article 76.1, added by law HO-83-N `Adopted, effective 1 Jan 2027`, requires platform operators registered with the tax authority under article 288 to report by the 20th of each month the supplies made through them to non-business individuals in other EAEU states, plus returns. Government Decision 1462-N of 8 October 2026 sets the content: operator and platform details, transport documents, each supplier's name and TIN, and a commodity code of at least six digits. Filing is electronic only.

Information every platform must show

Platforms must show seller contact details, contract terms, the full price with taxes and delivery, payment methods, error correction, return rights and dispute procedures (Law on Consumer Rights Protection, art. 10.1), plus the article 10.2 list, including any personalised pricing; the seller bears the burden of proof (art. 10.2(3)). Product name, selling price and unit price must be shown, with delivery priced separately (Law on Trade and Services, art. 9.7).

Proposed: seller verification under a Law on Electronic Commerce

A draft Law on Electronic Commerce from the Ministry of High-Tech Industry and Artificial Intelligence is in public consultation from 2 to 17 November 2026 `Proposed, comments close 17 Nov 2026`. As drafted, a seller could list only after giving the platform its name, contact details, business or private status, TIN (private sellers of personal property exempt), bank details where the platform handles payments and a self-certification of product compliance (draft art. 4(1)). The platform would cross-check these against official registers, request documents for gaps and block listing until they are fixed (art. 4(2), (3)), and keep the data for one year after the relationship ends (art. 4(4)). Supervision would sit with the Information Systems Regulatory Commission (arts. 2(20), 19). Entry into force would be six months after publication, with six more months for existing platforms (art. 20).

8 Risk indicators and red flags

SELLER AND PLATFORM INTEGRITY INDICATORS

- **Hidden traders**: repeat sellers using the personal-items section to avoid registration.
- **Unregistered business sellers**: no entrepreneur registration or electronic receipts.
- **Mismatched tax identity**: seller TIN or name not matching the registered taxpayer.
- **Fake reviews and views**: ratings from accounts with no purchase history, or inflated view counts.
- **Undisclosed paid ranking**: promoted listings shown as organic results.
- **Age-restricted listings**: alcohol, energy drinks or tobacco without an age gate or sale permission.
- **Large cash jewellery sales**: cash of AMD 5 million or more for precious metals or stones.

9 Enforcement and penalties

The Competition and Consumer Protection Commission assesses whether conduct infringes consumer interests, including unfair commercial practices under the consumer law and breaches of the price display rules (Law on Protection of Economic Competition and Consumer Interests, art. 26.1). It may issue a warning or impose a fine (art. 92). Penalties are calculated as follows (art. 93):

Breach	Penalty	Basis
Infringement of consumer interests	Up to 5% of the previous year's revenue	Art. 93(7.1), calculated under the Commission's methodology
Failure to stop or remedy a breach, or meet conditions, set by a Commission decision	Up to AMD 5,000,000	Art. 93(12)

Firm active less than 12 months in the prior year	Percentage applied to revenue of up to 12 months before the breach	Art. 93(13)

The Commission's fine methodology (Decision 566-N, in force 23 August 2025) starts consumer-interest fines at 2.5% of the revenue concerned, scaled for duration, and price-display fines at AMD 1,000,000 (pts 21, 29). Paying 75% of a Commission fine within two months of the decision taking effect discharges the obligation (art. 100(1)).

Sales of restricted goods to minors are administrative offences under the Code of Administrative Offences, with fines set as multiples of a calculation base of AMD 1,000 (Law on Minimum Monthly Wage, art. 3): selling alcohol or energy drinks to under-18s carries a fine on the seller of AMD 50,000 (art. 158(17)), and selling tobacco products or substitutes to under-18s a fine of AMD 80,000 to 100,000 (art. 173.1(2)).

10 Recent changes and what to watch

- **2 to 17 November 2026**: `Proposed, comments close 17 Nov 2026` draft Law on Electronic Commerce in public consultation, with mandatory seller data collection and register cross-checks before listing.
- **2 to 17 November 2026**: `Proposed, comments close 17 Nov 2026` draft Law on Electronic Identification and Trust Services, which would set assurance levels for electronic identification schemes, introduce an Armenian digital identity wallet and replace the Law on Electronic Document and Electronic Digital Signature.
- **1 January 2027**: `Adopted, effective 1 Jan 2027` monthly platform reports to the tax authority on sales to consumers in other EAEU states (Tax Code art. 76.1; Government Decision 1462-N).
- **1 July 2026**: `In force` new distance-contract chapter in the consumer law (14-day withdrawal, 14-day refunds, order-button and durable-medium rules) and expanded pre-contract information duties (law HO-178-N).
- **1 January 2026**: `In force` unit-price display extended to smaller businesses (law HO-207-N, art. 11(2)).
- **1 August 2025**: `In force` platform transparency and fake-review ban (HO-206-N); platform definition and price display rules (HO-207-N); Commission consumer remit and 5% fines (HO-205-N), with its fine methodology from 23 August 2025.

11 What this means for identity verification

- **Verify sellers, not buyers.** Confirm business sellers' registration and TIN, record their trader declaration, and keep private sellers in a separate section; collect these fields before the first sale, as 2027 tax reports need them.
- **Prepare for register checks.** The draft Law on Electronic Commerce would require cross-checking seller data against official registers before listing.
- **Choose a proportionate age check.** Under-18 bans apply online with no prescribed method; any document or biometric check must respect data minimisation and retention limits.
- **Plan for biometrics.** Face match or liveness needs consent in the form article 9(7) requires and mandatory prior notification to the Personal Data Protection Agency of the Ministry of Justice.
- **Watch identity standards.** Government standards for strong identification in distance contracts are not yet published, and the draft electronic identification law would add assurance levels; ID-card signatures carry handwritten-signature effect, but only cards issued before 15 February 2023 have a usable chip; others rely on Mobile ID.

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How Identomat helps

Identomat runs identity verification, screening and monitoring for regulated businesses on one platform, with workflows you configure for each market. For the requirements in this guide, that means:

- KYB onboarding for marketplace sellers, checking company or entrepreneur registration and taxpayer details before the first sale.
- KYC onboarding with ID document capture and verification for individual sellers, including NFC reading of chip documents.
- Age verification at checkout for alcohol, energy drinks and tobacco products, configurable to the level of assurance a seller chooses.
- Biometric liveness and face match with consent capture, plus an audit trail for each check.
- No-code workflow builder to route business sellers, private sellers and age-restricted listings through different checks.

Request a meeting

DISCLAIMER

This article is intended for informational purposes only and does not constitute legal advice. It is a compilation of information from various sources and reflects the information available as of the last updated date indicated above. Laws, regulations, and regulatory guidance may change, so readers should consult qualified legal professionals for advice specific to their circumstances.

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