



Saudi Competition Authority issues 2024 Activities Report

The Saudi General Authority for Competition (GAC) has released its 2024 Annual Activity Report. The report underscores a year of intensified enforcement, legislative initiatives, and accelerated digital transformation, reflecting the GAC's evolving role in fostering a competitive and transparent market in alignment with Saudi Vision 2030.

The GAC opened 459 investigations in 2024 and referred 35 matters to the Sanctions Committee. Most investigations were initiated in the wholesale and retail sectors. Settlement continues to feature prominently. Out of the 35 cases progressed to the Sanctions Committee settlement requests were submitted in 34 cases. 22 cases were settled, showing that cooperative engagement of the GAC in enforcement cases may be beneficial. Still, given the high number of investigations initiated, businesses with strong market positions and significant exposure in Saudi Arabia should take procurations. An analysis of the GAC's enforcement practice shows that the authority particularly scrutinizes vertical arrangements, as well as exclusivity and resale price maintenance (RPM) clauses. Businesses should review their contracts with exposure to Saudi Arabia for compliance with local standards and ensure that Saudi staff and business partners are aware and observe requirements of Saudi competition law.

Merger control continues to be a primary concern of the GAC. The GAC conducted reviewed 317 economic concentrations, approving 202 and issuing 105 non-jurisdiction decisions. As of year's end, only ten filings remain pending. Notably, the GAC has in 2024 increasingly scrutinized transactions on issues such as vertical integration and foreclosure risks, particularly in strategic sectors such as

Infrastructure—both physical and digital, healthcare, and digital services.

The Authority also reinforced its policy advisory role through market studies in digital markets, construction, real estate, and agro-fish supply chains. Though non-binding, these studies often signal enforcement priorities. Companies using AI-driven pricing tools or digital platforms should take particular note as these areas have been subject to closer monitoring by the GAC.

The report also addressed legislative reforms, some of which came to fruition in early 2025. The GAC assessed reforms with three priorities: recalibrating merger notification thresholds to capture significant transactions currently outside the regime, enhancing procedural safeguards with clearer timelines, evidence access and formalized settlement procedures, and expanding the scope of per se violations to include vertical restraints such as RPM clauses in sectors where competitive harm is presumed. The amendments of the thresholds were implemented in 2025 when the GAC issued the 5th version of their Merger Guidelines in April 2025. These introduced a requirement that the target of an acquisition 'contributes' to the parties meeting the Saudi revenue threshold element. Other reforms are still pending.

In parallel, the GAC continued its efforts to promote voluntary compliance. It launched 17 compliance programs in 2024 and certified 9 companies that completed them successfully. These initiatives, combined with capacity-building sessions for businesses and legal advisers, are aimed increase awareness of competition law in the Kingdom and provide transparency.

The GAC's digital transformation has significantly enhanced its enforcement capabilities. It achieved a digital maturity score of 82% (up from 49% in 2022), successfully resolved 100% of cases within specified deadlines, and attained an 88% customer satisfaction rate. These advancements have been felt in practice in

reduction of average review times of merger filings in 2024.

Overall, the GAC's 2024 activities demonstrate the consolidation of Saudi Arabia's competition regime into a more assertive and internationally aligned framework. Ongoing reforms to the Competition Law, Executive Regulations, and Merger Guidelines coupled with the increased use of market studies, stricter enforcement, and enhanced procedural tools, signify a more robust and comprehensive approach to competition oversight.

A decorative orange arc is located in the bottom left corner of the page, partially overlapping a light green circular shape.



IKRAM OUDIDDA

Associate

ikram.oudidda@bremerlf.com

Ikram is an associate of the region law firm BREMER and part of the firm's Antitrust & Merger Control team. She represents PE firms and corporates in antitrust investigations and advises them on merger control review in Morocco and handles merger control filings under the COMESA and ECOWAS merger control regimes. She works in English, French, and Arabic languages.



NICOLAS BREMER

Partner

nicolas.bremer@bremerlf.com

Nicolas is a partner and attorney with the regional law firm BREMER where he heads the firm's Antitrust & Merger Control team. He oversees the firm's Riyadh and Cairo representations and has extensive experience in advising international and domestic clients on merger control and antitrust matters as well as broader regulatory M&A matters in Saudi Arabia, the UAE, Egypt and the wider Near and Middle East. He works in English, Arabic and German languages.