




BEFORE THE
COMPETITION COMMISSION OF PAKISTAN

FIRST PHASE REVIEW

IN THE MATTER CONCERNING THE ACQUISITION OF % SHARES OF M/S.
BASF PAKISTAN (PRIVATE) LIMITED BY M/S. KEMYION CHEMICAL
SOLUTIONS TRADING FZCO FROM M/S. BASF SE

CASE: 1599/Merger-CCP/2026




Ms. Bushra Naz Malik
Member

ORDER

1. The Competition Commission of Pakistan (the "Commission") received a pre-merger application (the "Application") from M/s. Kemyion Chemical Solutions Trading FZCO (the "Acquirer") seeking approval for the acquisition of % shareholding of M/s. BASF Pakistan (Private) Limited (the "Target"), from M/s. BASF SE (the "Seller"), pursuant to the terms of Share Purchase Agreement dated 18th November, 2025 (the "Agreement").
2. The Application was filed under Section 11 of the Competition Act, 2010 (the "Act") read with Regulation 6 of the Competition (Merger Control) Regulations, 2016 (the "Merger Regulations").

Merger Parties

Acquirer

3. M/s. Kemyion Chemical Solutions Trading FZCO is a private limited company newly incorporated under the Laws of UAE on 06th November, 2025. The company is authorized to carry on the business of trading in acids and alkalis, basic industrial chemicals, construction chemicals, insecticides, petrochemicals, plastic and nylon raw materials. The Acquirer does not generate any revenue in Pakistan, nor does it have any subsidiaries or assets in Pakistan.

Target

4. M/s. BASF Pakistan (Private) Limited is a private limited company incorporated on 06th October, 2016 under the laws of Pakistan. It is a wholly owned subsidiary of M/s. BASF SE, the seller in the subject transaction, and is involved in the business of indenting and merchandising various chemical products including but not limited to colorants, catalysts, solvents, oxo alcohols, process chemicals, etc.

Seller

M/s. BASF SE is a German multinational public listed company incorporated on 14th January, 2008. It is the parent company of BASF group which is engaged in the business of the production of chemicals including but not limited to petrochemicals, performance materials, monomers, dispersion and resins catalyst, and agricultural chemicals, etc. Other than the Target, the Seller does not have any other subsidiaries or assets in Pakistan.



[Handwritten signature]

Transaction

6. As outlined in the Application and pursuant to the Agreement, the Acquirer, either directly or through its nominee, shall acquire a total of _____ ordinary shares of the Target, representing its entire issued and paid-up share capital. Consequently, upon completion of the proposed acquisition, the Acquirer shall obtain _____ % controlling interest in the Target.
7. The aggregate consideration for the proposed acquisition amounts to EUR _____ (approximately equivalent to PKR _____) (the "Transaction").¹

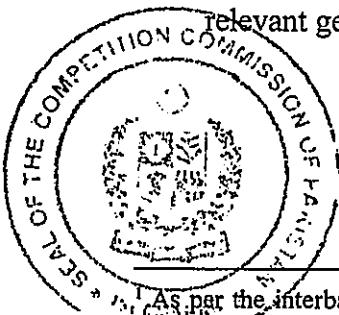
Phase-I Competition Assessment

Procedural Review

8. Based on the Application, the Commission conducted a Phase-I competition assessment of the Application, in accordance with Section 11 of the Act and Merger Regulations to determine whether the Transaction is likely to result in substantial lessening of competition or the creation or strengthening of a dominant position in the relevant market.

Relevant Market

9. The Target is primarily engaged in the business of indenting and merchandising various chemical products including but not limited to colorants, catalysts, solvents, oxo alcohols, and process chemicals, etc.
10. Furthermore, the Acquirer is authorized to carry on the business of trading in acids and alkalis, basic industrial chemicals, construction chemicals, insecticides, petrochemicals, plastic and nylon raw materials but currently it is not operational.
11. Taking the above into account, the relevant product market in this case has been identified as "**Trade of chemicals, including specialty and industrial chemicals**" while the relevant geographic market is "**Pakistan**".



¹ As per the interbank exchange rates on 18 November 2025, the EUR to PKR rate was approximately: PKR 325.47 per EUR

<https://www.exchangerates.org.uk/EUR-PKR-exchange-rate-history.htm>

Market Share

12. Based on the Target's total revenue of PKR _____ for the financial year 2024 and the total chemical imports into Pakistan amounting to PKR _____ million during FY 2023–24, as reported in Chapter 8 of the Economic Survey of Pakistan 2024–25 published by the Finance Division, Government of Pakistan, the Target's estimated market share is approximately %.

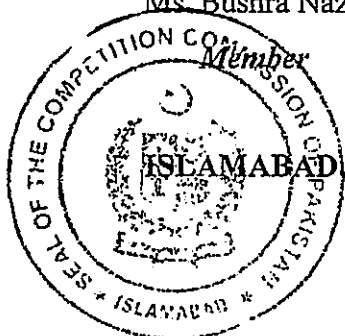
Competition Analysis

13. Once the proposed acquisition has been completed, the combined market shares of the merger parties will remain unchanged and insignificant.
14. Therefore, the Transaction does not create entry barriers or significantly enhance the market power of the Merger Parties and it is not likely to substantially lessen competition in the relevant market of Pakistan by creating or strengthening a dominant position.

Determination

15. The Commission concludes that the proposed Transaction does not create or strengthen a dominant position in the relevant market, as defined under Section 2(1)(e) read with Section 11 of the Act and the Merger Regulations. The Proposed Transaction is hereby authorized under Section 31(1)(d)(i) of the Act.
16. Without prejudice, it is hereby clarified that the present assessment is strictly limited to the review of the Transaction under Section 11 of the Competition Act, 2010.
17. Notwithstanding the above, matters which may fall outside the scope of the Commission's purview, remain subject to applicable laws, judicial orders and the oversight of relevant regulatory bodies.
18. It is so ordered.

Ms. Bushra Naz Malik



JUNE 18, 2026.