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Cartels

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CONTENTS

Singapore

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Overview of the law and enforcement regime relating to cartels

Singapore's competition law regime

Enacted in 2004, the Competition Act 2004 (the "**Act**") is the principal statute governing the competition law regime in Singapore. The Act is administered and enforced by the Competition and Consumer Commission of Singapore (the "**CCCS**"), which is a quasi-judicial, statutory body established under Part 2 of the Act. Previously known as the Competition Commission of Singapore (the "**CCS**"), the CCS was renamed the CCCS when it took on the additional function of administering the Consumer Protection (Fair Trading) Act 2003 with effect from 1 April 2018. Cartel matters are decided upon by the CCCS, but the CCCS's decisions can be appealed to the Competition Appeal Board (the "**CAB**"). A decision of the CAB can subsequently be appealed to the General Division of the High Court on a point of law arising from the decision, or from any decision as to the amount of a financial penalty. Parties may also appeal decisions of the General Division of the High Court to the Court of Appeal under Section 74 of the Act.

The Section 34 Prohibition

Cartel activities are prohibited by Section 34 of the Act (the "**Section 34 Prohibition**"), which provides that:

> "*…agreements between undertakings, decisions by associations of undertakings or concerted practices which have as their object or effect the prevention, restriction or distortion of competition within Singapore are prohibited…*"

Section 34(2) of the Act provides examples of the types of arrangements that may fall within the ambit of this Prohibition. Specifically, Section 34(2) of the Act states that agreements, decisions or concerted practices may have the object or effect of preventing, restricting or distorting competition within Singapore if they:

- directly or indirectly fix purchase or selling prices or any other trading conditions;
- limit or control production, markets, technical development or investment;
- share markets or sources of supply;
- apply dissimilar conditions to equivalent transactions with other trading parties, thereby placing them at a competitive disadvantage; or
- make the conclusion of contracts subject to acceptance by the other parties of supplementary obligations that, by their nature or according to commercial usage, have no connection with the subject of the contracts.

Third Schedule to the Act

Section 35 of the Act provides for excluded agreements that are specified in the Third Schedule to the Act. For example, the Minister for Trade and Industry (the "**Minister**")

may exclude a particular agreement or any agreement of a particular description if he is satisfied that there are exceptional and compelling reasons of public policy as to why the Section 34 Prohibition ought not to apply (paragraph 4 of the Third Schedule to the Act).

Other specific activities and industries excluded from the application of the Section 34 Prohibition are specified in paragraphs 5, 6 and 7 of the Third Schedule to the Act, and include the supply of piped potable water, the supply of bus services, and cargo terminal operations, amongst others.

The Section 34 Prohibition does not apply to vertical agreements unless the Minister otherwise specifies by order (paragraph 8 of the Third Schedule to the Act). To date, the Minister has not specified any vertical agreement to which the Section 34 Prohibition will apply.

Additionally, the Section 34 Prohibition does not apply to arrangements that give rise to net economic benefit (an exclusion that is provided for in paragraph 9 of the Third Schedule to the Act). In order to qualify for the exclusion, it must be shown that the arrangement:

- contributes to improving production or distribution, or promoting technical or economic progress;
- does not impose on the undertakings concerned restrictions that are not indispensable to the attainment of those objectives; and
- does not afford the undertakings concerned with the possibility of eliminating competition in respect of a substantial part of the goods or services in question.

Block Exemption Orders

Section 36 of the Act empowers the Minister to make an order, following the recommendation of the CCCS, to exempt certain categories of agreements from the Section 34 Prohibition.

The Competition (Block Exemption for Liner Shipping Agreement) Order is the only Block Exemption Order ("**BEO**") that has been granted in Singapore since the introduction of competition law. It initially took effect on 1 January 2006 for a period of five years, and its extension until 2015 was granted by the Minister on 16 December 2010. It was then subsequently extended by the Minister for a further period of five years. The BEO would have expired on 31 December 2020 but for an extension by the Minister granted on 26 August 2020, which extended the BEO for one additional year until 31 December 2021. Upon the recommendation of the CCCS and pursuant to the Competition (Block Exemption for Liner Shipping Agreements) (Amendment) Order 2021, the BEO has been extended for another three years, from 1 January 2022 to 31 December 2024, in respect of vessel-sharing agreements for liner shipping services and price discussion agreements for feeder services.

CCCS's Guidelines

Pursuant to Section 61 of the Act, the CCCS has published guidelines that outline how the CCCS administers and enforces the provisions under the Act.

Of relevance to cartel enforcement are the CCCS Guidelines on the Section 34 Prohibition, which have recently been amended (the "**Section 34 Guidelines**"), the CCCS Guidelines on Lenient Treatment for Undertakings Coming Forward with Information on Cartel Activity 2016 (the "**Leniency Guidelines 2016**") and the CCCS Practice Statement on the Fast Track Procedure for Section 34 and Section 47 Cases (the "**Fast Track Practice Statement**"). The Section 34 Guidelines, Leniency Guidelines 2016 and Fast Track Practice Statement apply to all cases for which the CCCS has not issued a provisional infringement decision ("**PID**") before 1 December 2016.

Overview of investigative powers in Singapore

The investigative powers of the CCCS are set out in the Act, specifically:

- Section 62 of the Act provides that the CCCS may conduct an investigation if "*there are reasonable grounds for suspecting that…the Section 34 prohibition has been infringed by any agreement*". Any investigation will be carried out by either the CCCS or a duly appointed inspector (Section 62(2) of the Act).
- Section 63 of the Act provides that the CCCS has the power to require the production of specified documents or specified information.
- Section 64 of the Act provides that the CCCS has the power to enter premises without a warrant.
- Section 65 of the Act provides that the CCCS has the power to enter and search premises with a warrant.

The CCCS's powers of investigation are described in detail in the CCCS Guidelines on the Powers of Investigation in Competition Cases 2016.

Overview of cartel enforcement activity during the last 12 months

On 17 November 2022, the CCCS issued an infringement decision ("**ID**") against four companies, namely CNL Logistics Solutions Pte. Ltd., Gilmon Transportation & Warehousing Pte. Ltd., Penanshin (PSA KD) Pte. Ltd. and Mac-Nels (KD) Terminal Pte. Ltd. The companies were found to have engaged in price fixing conduct by imposing in a coordinated manner an additional charge for warehousing services at Keppel Distripark, hence contravening Section 34 of the Act. A combined total penalty of S$2,799,138 was imposed on the companies.

Key issues in relation to enforcement policy

The revised version of the Section 34 Guidelines was released on 31 December 2021, and has taken effect from 1 February 2022.

The Section 34 Guidelines clarify the CCCS's analytical framework and considerations in relation to the Section 34 Prohibition, as well as its stance towards vertical agreements. The Guidelines noted that the fact that undertakings are in a vertical relationship and/or have a vertical agreement does not, however, preclude the finding of a horizontal concerted practice that has as its object or effect the prevention, restriction or distortion of competition within Singapore. In particular, while dual distribution agreements may generally be considered vertical agreements, a horizontal concerted practice is likely to be found in agreements of a hub-and-spoke nature.

On 28 December 2021, the CCCS also released the Business Collaboration Guidance Note (the "**Guidance Note**"), which supplements the Section 34 Guidelines. It clarifies the CCCS's position on the common types of business collaborations and provides guidance on how the CCCS will assess such collaborations in view of the Section 34 Prohibition. The seven common types of business collaborations covered in the Guidance Note are:

- information sharing – exchange of both price and non-price information amongst businesses;
- joint production – collaboration to jointly produce a product, share production capacity or subcontract production;
- joint commercialisation – collaboration in the selling, tendering, distribution or promotion of a product;

- joint purchasing – collaboration to jointly purchase from one or more suppliers;
- joint research & development ("**R&D**") – collaboration on R&D activities, such as joint investment;
- standards development – setting of industry or technical standards; and
- standard terms and conditions in contracts – usage of terms shared amongst competitors establishing conditions of sale and purchase of goods and services between them and their customers.

In particular, the Guidance Note sets out factors and conditions, such as the nature and extent of the collaborations, and indicative market shares, under which competition concerns are less likely to arise from the collaborations.

The CCCS released the Fast Track Practice Statement and the leniency regime, i.e., the Leniency Guidelines 2016, on 1 November 2016.

The Leniency Guidelines 2016 provide greater clarity on the CCCS's leniency programme, including the requirements for leniency, how a leniency marker or conditional immunity/leniency is secured, perfected and/or withdrawn, and the disclosure and use of information obtained from the leniency applicant by the CCCS. It also introduces new express requirements for leniency applications.

The Fast Track Practice Statement introduces a fast-track procedure for infringements of the Section 34 Prohibition to incentivise parties under investigation to cooperate with the CCCS. The purpose of introducing the fast-track procedure is to assist the CCCS in more effectively and efficiently enforcing the Act.

Key issues in relation to investigation and decision-making procedures

In deciding whether to launch a formal investigation, the CCCS takes into account its strategic priorities and the merits of the case. The CCCS prioritises its enforcement efforts based on the following:

- potential impact of the conduct on the economy and society (e.g., the significance of the industry in the Singapore economy, whether the infringement has a great impact on business costs in Singapore, how large a consumer base the industry has, how much the infringement will add to costs of living);
- severity of the conduct (e.g., hard-core price-fixing, serious abuse of dominance, mergers that substantially lessen competition);
- importance of deterring similar conduct (e.g., whether other companies will follow suit and engage in the same conduct if it is left unchecked);
- resource considerations (e.g., how many cases the CCCS is handling, how resource-intensive the case is relative to the expected benefits); and
- risk of over-intervention (e.g., when action by the CCCS may inadvertently deter innovation and entrepreneurship).

There is no prescribed timeframe for the conclusion of the CCCS's cartel investigations. The timeframe for an investigation depends largely on the nature and complexity of each case.

Leniency/amnesty regime

The CCCS's leniency programme is described in detail in the Leniency Guidelines 2016. Leniency applications may be made orally or in writing to the CCCS.

If a party provides sufficient information to the CCCS to establish the existence of cartel activity before the CCCS has opened an investigation, that party may benefit from full

immunity from financial penalties ("**full immunity**"). To earn full immunity, the leniency applicant must also ensure that it:

- provides the CCCS with all the information, documents and evidence available to it regarding the cartel activity;
- grants an appropriate waiver of confidentiality to the CCCS in respect of other jurisdictions and regulatory authorities that have been notified of the conduct and/or from whom leniency has been sought;
- unconditionally admits liability to the conduct for which leniency is sought;
- maintains continuous and complete cooperation throughout the investigation and until the conclusion of any action by the CCCS arising as a result of the investigation;
- refrains from further participation in the cartel activity from the time of disclosure of the cartel activity to the CCCS (except as may be directed by the CCCS);
- must not have been the one to initiate the cartel; and
- must not have taken any steps to coerce another undertaking to take part in the cartel activity.

After the CCCS has commenced an investigation, the first party that provides information to the CCCS about the cartel that is sufficient for it to issue an ID can benefit from lenient treatment by way of a reduction of up to 100 per cent in the level of the financial penalties. Subsequent leniency applicants may benefit from a reduction in financial penalties of up to 50 per cent.

The CCCS provides a marker system for leniency applications. If the leniency applicant is unable to immediately submit sufficient evidence to allow the CCCS to establish the existence of the cartel activity, the leniency applicant will be given a limited time to gather sufficient information and evidence in order to perfect the marker. If the leniency applicant fails to perfect the marker within the given time, the next leniency applicant in the marker queue will be permitted to perfect its marker to obtain full immunity or a 100 per cent reduction in financial penalties. Once the marker has been perfected, the other leniency applicants in the marker queue will be informed that they no longer qualify for full immunity or a 100 per cent reduction in financial penalties.

The CCCS also operates a "Leniency Plus system". A party cooperating with the CCCS in relation to a cartel in one market (Cartel A) may also be involved in a completely separate cartel activity in another market (Cartel B). Under the Leniency Plus system, if the party was to provide information in respect of Cartel B, it may not only stand to benefit from lenient treatment in respect of Cartel B, but may benefit from further reduction in penalties in respect of Cartel A.

Administrative settlement of cases

The fast-track procedure provides an avenue for parties to admit liability for infringements of the Act (and comply with various other conditions) in return for a reduction in the amount of financial penalty to be imposed. It exists in parallel to the CCCS's leniency programme and is distinct from voluntary commitments offered to the CCCS, in that the latter does not involve any admission of liabilities by the parties under investigation or finding of infringement under the Act.

The fast-track procedure can be initiated by the CCCS prior to or after a PID but not after an ID has been issued. The CCCS envisages that, in general, the fast-track procedure will be initiated prior to a PID being issued. Parties under investigation can proactively indicate to the CCCS their willingness to engage in a fast-track procedure discussion. However, the CCCS has discretion in determining whether a case is suitable for the fast-track procedure.

The Fast Track Practice Statement sets out the fast-track procedure. The fast-track procedure consists of the following stages: initiation; discussion; agreement; and acceptance. The fast-track procedure was first successfully utilised by two parties in a case of bid-rigging of maintenance services for swimming pools in an ID issued on 14 December 2020. Notably, the parties under investigation signed fast-track agreements with the CCCS after investigations began. In essence, parties who sign these agreements admit their liability and involvement in the infringement, agree to cooperate throughout the CCCS's investigation and confirm that they will not make extensive written representations or request to inspect documents and evidence. Therefore, in accordance with the Fast Track Practice Statement, the parties had their financial penalties reduced by 10 per cent, in addition to the leniency discounts also granted to both parties. This is the first ID where the fast-track procedure was applied by the CCCS.

Third-party complaints

Third parties may lodge complaints with the CCCS if they believe that there has been a breach of the Section 34 Prohibition.

The CCCS will check at the onset that the complaint falls within its scope of powers under the Act. If the subject matter of the complaint is under the CCCS's purview, the CCCS may ask the complainant to provide further information. If the complaint cannot be substantiated, the matter will be closed. The CCCS will inform the complainant of its decision to not take any action in relation to a complaint.

If the complaint can be substantiated with relevant information, the CCCS will evaluate and assess whether the subject matter of the complaint is likely to have an appreciable adverse effect on competition. The CCCS may launch an investigation if there are reasonable grounds for suspecting that competition law has been breached.

Civil penalties and sanctions

The CCCS, under Section 69 of the Act, can make such directions as it considers appropriate to bring an infringement to an end or to remedy, mitigate or eliminate any adverse effect of the infringement. While Section 69 of the Act provides general discretion to the CCCS in making directions to bring an infringement to an end or to remedy, mitigate or eliminate any adverse effect of the infringement, it provides specific examples of the directions that the CCCS may make, including:

- requiring parties to the agreement to modify or terminate the agreement;
- payment to the CCCS of such financial penalty in respect of the infringement as the CCCS may determine (where it determines that the infringement has been committed intentionally or negligently), such financial penalty not exceeding 10 per cent of such turnover of the business of the undertaking in Singapore for each year of infringement for such period, up to a maximum of three years;
- to enter such legally enforceable agreements designed to prevent or lessen the anti-competitive effects that have arisen as may be specified by the CCCS;
- to dispose of such operations, assets or shares of such undertaking in such manner as may be specified by the CCCS; and
- to provide a performance bond, guarantee or other form of security on such terms and conditions as the CCCS may determine.

As stated in the CCCS Guidelines on the Appropriate Amount of Penalty in Competition Cases (the "**Penalty Guidelines**"), the CCCS adopts the following six-step approach when determining the amount of financial penalty to impose:

- calculation of the base penalty having regard to the seriousness of the infringement (expressed as a percentage rate) and the turnover of the business of the undertaking in Singapore for the relevant products and relevant geographic markets affected by the infringement in the undertaking's last business year;
- adjustment for the duration of the infringement;
- adjustment for other relevant factors, e.g., deterrent value;
- adjustment for aggravating or mitigating factors;
- adjustment if the statutory maximum penalty is exceeded; and
- adjustment for immunity, leniency reductions and/or fast-track procedure discounts.

The Penalty Guidelines were recently amended to clarify the list of mitigating factors in the calculation of financial penalties in the event of an infringement of the Section 34 Prohibition. In particular, it is a mitigating factor where the undertaking (a) provides evidence that its involvement in the infringement was substantially limited, and (b) demonstrates that, during the period in which it was party to the infringement, it actually avoided applying the anti-competitive agreement by adopting competitive conduct in the market.

The CCCS has imposed financial penalties on the parties involved in cartel activities in every ID published to date, save for the parties who have enjoyed immunity under the leniency programme.

Section 69(4) of the Act provides that the maximum amount of financial penalty imposed may not exceed 10 per cent of the turnover of the business of the undertaking in Singapore for each year of infringement, up to a maximum of three years. There are no minimum penalties (in absolute terms) stipulated in the Act.

Right of appeal against civil liability and penalties

Parties to an agreement or persons whose conduct in respect of which the CCCS has made a decision as to the infringement of the Section 34 Prohibition may appeal against (or with respect to) that decision, the imposition or amount of any financial penalty, or any directions issued by the CCCS, to the CAB. An appellant would be required to prove its case on a balance of probabilities to succeed in its appeal. Appeals are made by lodging a notice of appeal, in accordance with the Competition (Appeals) Regulations, within two months from the date of issue of the CCCS's ID.

The CAB is an independent body established under Section 72 of the Act. It currently comprises 12 members including lawyers, economists, accountants, academics and other business people. An appeal must be heard by any committee of the CAB consisting of not less than three members. The CAB's powers and procedures are set out primarily in Section 73 of the Act and the Competition (Appeals) Regulations. It has broad powers to make directions it thinks fit to determine the just, expeditious and economic conduct of the appeal proceedings.

Including appeals in merger and abuse dominance cases, as of January 2023, the CAB has received 19 appeals, and issued its appeal decisions in 16 of these appeals. Two appeals were withdrawn by the appellants and one appeal is currently in progress.

A decision of the CAB can subsequently be appealed to the General Division of the High Court on a point of law arising from the decision, or on the amount of a financial penalty (Section 74(1) of the Act). Appeals are brought by way of originating application, and the procedure governing the appeal is set out in Order 20 of the Rules of Court 2021. Parties may also appeal decisions of the General Division of the High Court to the Court of Appeal under Section 74(4) of the Act. Such right of appeal is the same right that exists in the case

of decisions made by the General Division of the High Court in the exercise of its original civil jurisdiction. There is no further right of appeal from the Court of Appeal. There have been no appeals against the decisions of the CAB to date.

Criminal sanctions

No criminal sanctions may be imposed on individuals in respect of cartel conduct or competition law violations in Singapore.

However, criminal liability can arise where a person:

- refuses to provide information pursuant to a requirement on him or her to do so;
- destroys or falsifies documents;
- provides false or misleading information; or
- obstructs an officer of the CCCS in the discharge of his or her duties.

Offences are punishable by a prison sentence not exceeding 12 months, a fine not exceeding S$10,000, or both. There have been no such criminal sanctions imposed in Singapore to date.

Cooperation with other antitrust agencies

As provided under the Third Schedule to the Act, certain activities and industry sectors in Singapore are carved out from the Act. These activities and industry sectors are regulated by robust sector-specific competition rules, which are enforced by sectoral regulators.

As stated in the CCCS Guidelines on the Major Competition Provisions (which were recently revised to make consequential amendments reflecting changes made to other guidelines), the CCCS will work with the relevant sectoral regulator on cross-sectoral competition matters to determine which regulator is best placed to handle the case in accordance with the legal powers given to each regulator. The lead will be taken by the agency that is best placed in terms of the ability to investigate the alleged anti-competitive conduct and impose any necessary remedies.

Please refer to the section on cross-border issues below for cooperation between CCCS and foreign competition authorities.

Cross-border issues

Section 88 of the Act provides for cooperation between the CCCS and foreign competition bodies. The CCCS inked its first memorandum of cooperation with the Japan Fair Trade Commission (the "**JFTC**") on 22 June 2017.

The agreement provides for extensive cooperation between the two competition authorities as it allows for the authorities to notify each other of potential infringements of the other party's competition laws. It also allows for the exchange of information and coordination on enforcement of cases, such as cartel investigations, that are of mutual interest. Both competition authorities can request that the other competition authority initiate enforcement activities. For example, if the CCCS uncovers cartel activities undertaken in Japan that affect Singapore, the CCCS can request that the JFTC initiate investigations.

In addition to the above, the CCCS announced, on 30 August 2018, that it had entered into a memorandum of understanding with Indonesia's Commission for the Supervision of Business Competition to facilitate cooperation on competition enforcement. On 17 September 2019, the CCCS signed a memorandum of understanding with the Competition Bureau Canada. This is the first cooperation agreement between the CCCS and an overseas enforcement agency in respect of both competition and consumer protection laws.

Following this, the CCCS also signed a memorandum of understanding with the Philippine Competition Commission and the State Administration for Market Regulation of The People's Republic of China on 29 November 2021 and 29 December 2021, respectively.

Besides these five memoranda, it should be noted that many of Singapore's Free Trade Agreements include chapters on competition and provide for cooperation on competition matters. The CCCS is also a founding member in the International Competition Network's Framework on Competition Agency Procedures (joined on 16 May 2019), which is a non-binding multilateral framework promoting procedural fairness and transparency amongst competition agencies. More recently, Singapore was also involved in the 54th ASEAN Economic Ministers Meeting in September 2022, where negotiations for the ASEAN Framework Agreement on Competition ("**AFAC**") were launched. The AFAC serves as a formal cooperation agreement that would facilitate cross-border cooperation and coordination on competition policy and law matters amongst the ASEAN member states.

Further, the CCCS already cooperates with foreign competition authorities on cartel investigations through its leniency programme. Leniency applicants are required to grant a waiver of confidentiality to the CCCS in respect of any jurisdiction where the leniency applicant has also applied for leniency, as a condition to benefit from total immunity from financial penalties.

Developments in private enforcement of antitrust laws

Section 86 of the Act provides that any person who suffers loss or damage directly as a result of an infringement (including, *inter alia*, of the Section 34 Prohibition) shall have a right of action for relief in civil proceedings. The Act does not allow claimants to claim for double or treble damages.

This right is predicated on an infringement finding by the CCCS and may only be brought within two years following the expiry of any applicable appeal periods. Third parties do not have standing to bring such claims in other circumstances, or to lodge an appeal with the CAB.

To date, there have been no follow-on claims brought to court in respect of a violation of the Section 34 Prohibition.

Reform proposals

There are currently no public reform proposals.

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Chong Kin is the Managing Director of the Corporate & Finance Department at Drew & Napier LLC and he co-heads the Competition Law & Regulatory Practice.

Chong Kin has played a key role in the development of sectoral competition regulation in Singapore, in particular, in the telecommunications, media and postal industries. Since 1999, he routinely advises the sectoral competition regulators on liberalisation, market access, licensing, competition regulation, merger reviews and enforcement issues, including successfully defending the regulators in various Ministerial appeals.

He continues to advise both regulators and industry on competition matters under various sectoral competition codes and is widely acknowledged by peers, clients and rivals as a leading competition lawyer in Singapore.

Asialaw notes that "[Chong Kin] is a very technically proficient and commercially savvy lawyer. He is also very entrenched in the competition space, giving him unique insights into policy direction and interpretation".

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Corinne has also assisted multinational and local companies in setting up competition law compliance and audit structures, dawn raid and whistle-blowing programmes and conducting audit checks for companies in a wide range of industries in Singapore and other jurisdictions in the ASEAN region. Corinne has also assisted in the drafting of sectoral competition codes and guidelines and has advised regulators and industry on sectoral competition codes in the telecommunications, media, energy, aviation, transport and financial services sectors.

Corinne has been recognised by *The Legal 500 Asia Pacific* as a Leading Individual for Antitrust and Competition, Best Lawyers (Competition/Antitrust Law) and *Who's Who Legal* as one of Singapore's foremost competition practitioners under the age of 45.

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