



# Global Investigations Guide: Eurasia

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## Introduction

It is with the utmost pleasure that we, as members of Hogan Lovells' team of investigation and compliance practitioners in Russia, CIS and Eurasia, announce the release of the first edition of the *Eurasian Investigations Guide*.

This *Guide* represents the outcome of the work of leading practitioners of key post-Soviet jurisdictions in Eurasia and provides general responses to the topical issues related to internal corporate investigations. The intention of the *Guide* is to offer an insight to the major components of the legal investigative activity in such spheres as anti-corruption, bribery, anti-money laundering and compliance from the perspective of leading experts from across the region.

A special word of thanks goes to Daria Pavelieva, Bella Mikheeva and Alexandra Dmitrieva who undertook the important task of co-ordinating the work of the experts contributing to the *Guide*, as well as to harmonise style and language throughout the entire volume.

Hogan Lovells' *Eurasian Investigations Guide* is not intended to provide legal advice nor should it replace the advice of counsel. Its aim is to deliver a brief but meaningful assessment of investigative activity and assist in navigating the complexities surrounding these issues.

We hope that the *Eurasian Investigations Guide* will be favourably received by practitioners. We thank you for your interest in this publication.

Best regards



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## Cross-border investigation

The usual and well-known challenges of a cross-border investigations, such as language barriers, different cultural and language issues, often contradicting each other local laws, data privacy provisions, compliance issues and enforcement practices, create multiple sets of problems and sensitivities for practitioners faced with the task of conducting it effectively. In Eurasian jurisdictions, there are further unique regional challenges.

Globally and regionally, cross-border investigations tend to be on the rise while businesses everywhere face increased regulatory pressure multiplied by the COVID – 19 pandemic and geopolitical issues. From the start of an investigation, to its completion it is crucial to be aware of the important issues and avoid unrepairable mistakes.

Hogan Lovells *Eurasian Investigations Guide* aims to provide assistance by offering a general overview and best practices of investigations in Eurasia, to help orient those leading or involved with such investigations throughout their life cycle – from the start to its, hopefully, successful completion.

### Start of a cross border investigation

Following the assessment as to what exactly has triggered the investigation, usually a whistle-blower's complaint, an external claim, an internal finding, a media publication or a regulatory action, jurisdictional analysis has to be conducted to assess which jurisdictions are likely to be involved in the investigation. It could be that the issue in question is or is likely to be subject to investigation by authorities in a number of jurisdictions influencing how exactly one could structure the investigation.

Right resourcing from the start of the investigation is everything. Often, local in-house legal team has to be supported by outside counsel or other external resources. Given the need to hire the best experts on white collar crime or compliance, it would be recommended to build and maintain beforehand a network of experts in the key jurisdictions, available in crisis situations when time is of the essence, such as dawn raids or investigations carried out by law enforcement authorities.

Understanding the extent to which one may investigate in the respective jurisdiction is equally important, given the existing legislation on classified information, including state secrets, commercial secrets, personal information and its transfer abroad, the breach of which could sometimes trigger criminal liability.

Further, it must be carefully assessed whether early disclosures to local law enforcement agencies are necessary or would be helpful from a strategic standpoint. In most Eurasian jurisdictions, however, such disclosures are uncommon and may create more problems than they solve. In cross-border cases, where many authorities may be involved, there could be a strategic advantage to disclosing information in a certain order. One has to determine as well whether to make disclosures to third parties, including, shareholders, insurance companies, local authorities and other stakeholders.

From the start it is paramount to get the right advice to make sure the investigation progresses in the right direction.



## Investigation

The immediate objective of the investigation has to do with the objective to “stop the bleed”: to ensure that any potentially on-going criminal or unlawful conduct is stopped. This often includes suspension of certain questionable business operations such as payments or goods deliveries, monitoring certain payment and goods streams or putting certain individuals at least under close monitoring or even their temporal suspension pending the outcome of the investigation in case there are serious reasons to believe that their actions could generate further risks to a company.

Preservation of all information potentially relevant to the investigation, with such measures as issuing a data hold, suspending auto-delete functions and immediately imaging data carriers, is equally important from the start, especially in the context of the investigations involving and FCPA or UK BA elements.

Given the privilege issues related to the need to protect the information, it is normally recommended, especially in the context of the investigation in Eurasian jurisdictions where legal privilege protection faces multiple challenges, as the information could be confiscated and reviewed by the authorities in some jurisdictions, to have external counsel (often with the status of an “advocate”) to take the lead in the investigation. This includes generation and storage of sensitive work product.

Observing requirements to classified information, such as data privacy as well as state and commercial secrets is equally important as Eurasian jurisdictions often are quite formalistic in this respect, requiring, for example, express written consents of employees to process their personal information, and imposing stringent liability for breaches. Given the potential legal exposure and complexities, it is strongly recommended that expert data privacy counsel be part of any cross-border investigation team in all phases.

An important issue has to do with the “export” of data to other countries in a cross-border investigation, which should not be taken for granted. This can be particularly problematic if such countries, such as the US, do not have an equivalent level of data privacy protection to the respective Eurasian jurisdictions, which regulation is close to that of the EU. This could require additional protective measures like reducing data amounts or redacting personal information before any data transfer.

Interviews often also raise various legal issues. Each jurisdiction has its own rules and best practices in this regard. If an interviewee is not properly instructed or the interview is otherwise not done correctly, it could lead to evidence being inadmissible in the subsequent legal proceedings.



## The end of the investigation

Importantly, the end of the investigation poses the question of whether detailed investigation report should be produced. This is mostly linked to the question of privilege. Even if outside counsel produces a report, it may have only limited protection if it enters into the custody of the company. In the cross-border context, certain authorities may view the waiver of privilege and production of a report as necessary to demonstrate good will and cooperation. There may be then be all sorts of pressures to produce the investigation report, which raises the issue of the form and scope of its release, if any.

Remediation measures addressing weak points identified during the investigation is its most natural result. In some jurisdictions it is important to assess whether the company could face liability and its amount. Remediation can include, for example, sanctioning employees, including termination, targeting legal and organisational weaknesses, assessing internal policies and procedures, including internal investigation protocols, updating companies' records, conducting mandatory compliance and other training, etc. Respective limitation periods have to be noted and observed to make sure, for example, that certain disciplinary measures could be implemented.

For companies operating in multiple jurisdictions, it may be necessary to conform worldwide internal guidelines to the higher legal standard in the home jurisdiction, even though a lower standard may be permissible in local jurisdictions.

Recovery of damages is another important step against the parties liable for misconduct to compensate some of the company's losses, which could be significant, either through civil or criminal proceedings.

## Conclusion

The existing regulatory field is getting more and more complex, and sometimes is compared to a minefield. Numerous issues have to be kept in mind and observed when conducting a cross-border investigation, especially in such a diverse region as Eurasia. Issues can arise at every stage in the life cycle of an investigation. Trying to build an effective investigative activity necessitates careful assessment of critical cultural, legal, organisational and business differences and gaps, and understanding the respective methodology. This is what this *Guide* attempts to accomplish addressing, at least initially, the "blossoming complexity" of the Eurasian investigatory landscape.



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Heading the Russian / CIS IWCF (Investigations White Collar & Fraud) practice of the firm, Alexei offers clients the benefit of over 23 years' experience as an accomplished litigator, investigator and compliance specialist.

Alexei handles complex litigation, compliance and investigation matters. He is a recognised authority on cross-border asset recovery and contentious insolvency litigation. Alexei handled numerous multijurisdictional and internal investigations, including matters involving allegations of bribery and corruption under the Russian Criminal Code, FCPA, the UK Bribery Act and other anti-bribery laws. He advised on the set up and management of various compliance systems to leading Russian and international companies. Alexei defended top foreign clients in various regulatory investigations carried out by Russian authorities.







## Editors



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Heading the Russian Dispute Resolution practice of the firm, Alexei offers clients the benefit of over 20 years' experience as an accomplished litigator and advisor. Alexei has built a strong portfolio of winning complex cases in both commercial and general courts in Russia and in international arbitrations. He is a recognized authority on Russian and international fraud and asset tracing litigation.



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## Guide questions

1. What are the laws relating to anti-corruption, bribery, and money laundering in your country?
2. Do the following persons or bodies have the right to be informed, or is the company obliged to inform the following persons/bodies, about an internal investigation before it is commenced? Do they have the right to participate in the investigation (e.g., in interviews)?
  - a. Employee representative bodies, such as a works council or union.
  - b. Data protection officer or data privacy authority.
  - c. Other local authorities.

What are the consequences of non-compliance?

3. Do employees have a duty to support the investigation, for instance by participating in interviews? Is there anything a company can do to require employees to support an investigation (e.g., advance consents)? Can companies impose disciplinary measures if an employee refuses to cooperate?
4. Can any labor law deadlines or statute of limitations be triggered, or any rights to sanction employees be waived, by investigative actions? How can this be avoided?
5. Are there relevant data privacy laws, state secret laws, or blocking statutes in your country that have to be taken into account before:
  - a. Conducting interviews?
  - b. Reviewing emails?
  - c. Collecting (electronic) documents and/or other information?
  - d. Analyzing accounting and/or other mere business databases?
6. Do any specific procedures need to be considered in case a whistle-blower report sets off an internal investigation (e.g., for whistle-blower protection)?
7. Before conducting employee interviews in your country, must the interviewee:
  - a. Receive written instructions?
  - b. Be informed that he/she must not make statements that would mean any kind of self-incrimination?
  - c. Be informed that the lawyer attending the interview is the lawyer for the company and not the lawyer for the interviewee (so-called Upjohn warning)?
  - d. Be informed that they have the right to have their lawyer attend?
  - e. Be informed that they have the right to have a representative from the works council (or other employee representative body) attend?
  - f. Be informed that data may be transferred across borders (in particular to the United States of America)?
  - g. Sign a data privacy waiver?



- h. Be informed that the information gathered might be passed on to third parties, including local or foreign authorities?
    - i. Be informed that written notes will be taken?
- 8. Are document-hold notices or document-retention notices allowed in your country? Are there any specific rules that need to be followed (point in time, form, sender, addressees)?
- 9. Can attorney-client privilege (legal advice privilege) be claimed over findings of the internal investigation? What steps may be taken to ensure privilege is maintained?
- 10. Can attorney-client privilege also apply to in-house counsel in your country?
- 11. Are any early notifications required when starting an investigation?
  - a. To insurance companies (D&O insurance, etc.) to avoid losing insurance coverage.
  - b. To business partners (e.g., banks and creditors).
  - c. To shareholders.
  - d. To authorities.
- 12. Are there any other immediate measures that have to be taken in your country, or would be expected by the authorities once an investigation starts, e.g., any particular immediate reaction to the alleged conduct?
- 13. Is there a duty to self-report the discovered misconduct to prosecuting authorities?
- 14. If local prosecuting authorities become aware of an internal investigation, would they interfere in it or ask for specific steps to be followed?
- 15. Please describe the legal prerequisites for search warrants or dawn raids on companies in your country. If the prerequisites are not fulfilled, can the evidence gathered still be used against the company?
- 16. Would voluntary self-disclosure or cooperation with state authorities help avoid or mitigate liability? What are the requirements to obtain the cooperation credit?
- 17. Are deals, non-prosecution agreements, or deferred prosecution agreements available and common for corporations in your jurisdiction?
- 18. What types of penalties (e.g., fines, imprisonment, disgorgement, or debarment) could companies, directors, officers, or employees face for misconduct of (other) individuals of the company?
- 19. Can penalties for companies, their directors, officers, or employees be reduced or suspended if the company can demonstrate an efficient compliance system? Does this only apply in cases where efficient compliance systems have been implemented prior to the alleged misconduct?
- 20. Please briefly describe any investigation trends in your country (e.g., recent case law, upcoming legislative changes, or special public attention on certain topics).



# Turkmenistan

Contributed by Centil Law Firm

	Corporate liability	Public bribery	Commercial bribery	Extraterritorial applicability of criminal laws	Adequate procedures defense
Yes		✓	✓	✓	
No	✗				✗

## 1. What are the laws relating to anti-corruption, bribery, and money laundering in your country?

- Criminal Code (*Уголовный кодекс*).
- Criminal Procedural Code (*Уголовно-процессуальный кодекс*).
- Anti-Corruption Law (No. 35-V *Закон о противодействии коррупции*).
- Law on Combating Money Laundering, Terrorism Financing, and the Financing of the Proliferation of Weapons of Mass Destruction (No. 261-V *Закон о противодействии легализации доходов, полученных преступным путем, финансированию терроризма и финансированию распространения оружия массового уничтожения*).
- Law on Currency Regulation and Currency Control in Foreign Economic Activities (No. 230-IV *Закон о валютном регулировании и валютном контроле во внешнеэкономических отношениях*).

## 2. Do the following persons or bodies have the right to be informed, or is the company obliged to inform the following persons/bodies, about an internal investigation before it is commenced? Do they have the right to participate in the investigation (e.g., in interviews)?

- Employee representative bodies, such as a works council or union.
- Data protection officer or data privacy authority.
- Other local authorities.

## What are the consequences of non-compliance?

Turkmen laws do not provide for internal investigation procedure. There are no provisions allowing persons/bodies to be informed about an internal investigation.

However, under the general rules of the Labor Code (*Трудовой кодекс*) and Law on Trade Unions, their Rights and Guarantees (Law No. 443-IV *О профессиональных союзах, их правах и гарантиях деятельности*), the employees' representative body is entitled to represent and protect the rights and interests of its members as well as to control the employees' compliance with labor regulations.

If internal documents of the trade union or of the company provide for labor unions to have a right to be informed about an internal investigation and participate in interviews, such rights will be enforceable.

## 3. Do employees have a duty to support the investigation, for instance by participating in interviews? Is there anything a company can do to require employees to support an investigation (e.g., advance consents)? Can companies impose disciplinary measures if an employee refuses to cooperate?

Generally, in case of an internal investigation, such duty is not required under the laws of Turkmenistan. However, if internal regulations, collective agreements, or internal orders provide that employees have a duty to support the investigation, the relevant employee shall comply with such a duty.

In case employees have a duty to cooperate, and refuse to do so, the employer has a right to impose the following disciplinary measures: a warning or a reprimand.







**4. Can any labor law deadlines or statute of limitations be triggered, or any rights to sanction employees be waived, by investigative actions? How can this be avoided?**

Under Turkmen labor law (Article 166 of the Labor Code), disciplinary sanctions may be imposed upon employees within:

- a. one month after the misconduct is identified; and/or
- b. six months after the misconduct occurred (or two years if the misconduct is identified as a result of an audit or inspection).

**5. Are there relevant data privacy laws, state secret laws, or blocking statutes in your country that have to be taken into account before:**

- a. Conducting interviews?
- b. Reviewing emails?
- c. Collecting (electronic) documents and/or other information?
- d. Analyzing accounting and/or other mere business databases?

We would advise to consider the following regulations before conducting any activity above:

- Law on Privacy Information and its Protection (Law No. 519-V *Об информации о личной жизни и ее защите*).

In accordance with the Law on Privacy Information and its Protection when investigations are held by the government authorities, there is no need to obtain the consent from a person in order to collect and use his/her personal information.

- Law on Regulation of the Internet and Development of Provision of Internet Services in Turkmenistan (Law No. 159-V *О правовом регулировании развития сети Интернет и оказания интернет-услуг в Туркменистане*).

Internet providers, operators of websites, and online services have an obligation to cooperate with government authorities during the investigative process and provide full assistance to such authorities. In addition,

internet providers and operators have a duty of non-disclosure of any information related to the investigation.

- Law on the Protection of State Secrets (Law No. 84-I *О защите государственных секретов*).

Information qualified as state secret may be disclosed only in accordance with special procedures established by the Cabinet of Ministers of Turkmenistan.

- Law on Commercial Secrets (Law No. 53-II *О коммерческой тайне*).

Officials of state authorities who conduct the investigative process have the right to request and receive the relevant company's information which is qualified as commercial secret. The state officials have a duty of non-disclosure of such information to third parties that are not authorized to receive such information.

- Labor Code.

In the course of the investigative process, all constitutional and other rights of employees ought to be respected, regardless of the alleged type of crime they are accused of.

**6. Do any specific procedures need to be considered in case a whistle-blower report sets off an internal investigation (e.g., for whistle-blower protection)?**

Procedures for conducting an internal investigation are not provided under the laws of Turkmenistan. Therefore, there are no legal requirements to be considered in case a whistle-blower report sets off an internal investigation unless such procedure is provided in internal regulations of the relevant company.

**7. Before conducting employee interviews in your country, must the interviewee:**

- a. Receive written instructions?
- b. Be informed that he/she must not make statements that would mean any kind of self-incrimination?
- c. Be informed that the lawyer attending the interview is the lawyer for the company and not the lawyer for the interviewee (so-called Upjohn warning)?



- d. Be informed that they have the right to have their lawyer attend?
- e. Be informed that they have the right to have a representative from the works council (or other employee representative body) attend?
- f. Be informed that data may be transferred across borders (in particular to the United States of America)?
- g. Sign a data privacy waiver?
- h. Be informed that the information gathered might be passed on to third parties, including local or foreign authorities?
- i. Be informed that written notes will be taken?

There are no well-defined rules under Turkmen laws. However, we would advise to follow the steps defined above since they are considered best practice.

#### 8. Are document-hold notices or document-retention notices allowed in your country? Are there any specific rules that need to be followed (point in time, form, sender, addressees)?

Document-hold notices or document-retention notices are not prohibited; however they are not required under Turkmen laws. There are no specific requirements regarding such notices.

#### 9. Can attorney-client privilege (legal advice privilege) be claimed over findings of the internal investigation? What steps may be taken to ensure privilege is maintained?

Under the Law on Advocacy and Legal Profession (Law No. 105-IV *Закон об адвокатуре и адвокатской деятельности*), any information received from the client by the advocate (i.e., a lawyer who obtained a status of “advocate”) while providing legal advice is covered by attorney-client privilege, which is known as “advocate secrecy”.

However, if information received from the client relates to national, state, or public security, such information may not be protected under attorney-client privilege.

#### 10. Can attorney-client privilege also apply to in-house counsel in your country?

Attorney-client privilege applies to advocates only and is not applicable to in-house counsel or other lawyers who are not advocates. Advocates are not allowed to be employed, but act on the basis of the Agreement for Legal Assistance.

#### 11. Are any early notifications required when starting an investigation?

- a. To insurance companies (D&O insurance, etc.) to avoid losing insurance coverage.
- b. To business partners (e.g., banks and creditors).
- c. To shareholders.
- d. To authorities.

Provision of such notifications is not required by law. However, the obligation to notify these entities can be imposed on a company as a contractual obligation or by virtue of internal documents.

#### 12. Are there any other immediate measures that have to be taken in your country, or would be expected by the authorities once an investigation starts, e.g., any particular immediate reaction to the alleged conduct?

Not required by law.

#### 13. Is there a duty to self-report the discovered misconduct to prosecuting authorities?

The duty to self-report the discovered misconduct is imposed only on state authorities under Article 15 of the Anti-Corruption Law. There is no such duty for companies.

**14. If local prosecuting authorities become aware of an internal investigation, would they interfere in it or ask for specific steps to be followed?**

Article 7 of the Anti-Corruption Law provides that if state authorities become aware of any corruption-related crime, they should take all necessary measures in case of misconduct in a company (including intervention in the company's investigation). The laws do not provide for specific steps the local authorities may ask the company to take in such an instance. It is most likely that state authorities will begin their own investigation process.

**15. Please describe the legal prerequisites for search warrants or dawn raids on companies in your country. If the prerequisites are not fulfilled, can the evidence gathered still be used against the company?**

In accordance with Article 279 of the Criminal Procedural Code, search and seizure of items which are necessary for criminal investigations are conducted in the presence of the representative of the company. The results of conducted searches and seizures shall be recorded in a protocol issued by state authority representatives. Articles 124 and 125 of the Criminal Procedural Code provide that evidence collected in violation of the due legal process are inadmissible before the court.

**16. Would voluntary self-disclosure or cooperation with state authorities help avoid or mitigate liability? What are the requirements to obtain the cooperation credit?**

According to Article 57 of the Criminal Code voluntary self-disclosure and cooperation with state authority will mitigate liability. Generally, there are no formal requirements to obtain the cooperation credit in the public domain. However, such requirements may exist in internal protocols/regulations of state authorities which are not available to the public.

Pursuant to Article 185 of the Criminal Code, if the person who has given a bribe voluntarily discloses such misconduct, he/she can be released from criminal liability.

**17. Are deals, non-prosecution agreements, or deferred prosecution agreements available and common for corporations in your jurisdiction?**

No, they are not available. Corporations may not be held criminally liable under the laws of Turkmenistan. As a result, laws do not provide for any non-prosecution/deferred prosecution agreements for corporations.

**18. What types of penalties (e.g., fines, imprisonment, disgorgement, or debarment) could companies, directors, officers, or employees face for misconduct of (other) individuals of the company?**

Only individuals may be subjects of criminal liability in Turkmenistan. The following types of penalties could be imposed upon individuals of the company:

- Imprisonment from three to 20 years.
- Freezing of bank accounts and/or seizure of property.
- Fine in the amount of US\$744 to US\$ 17,500.
- Debarment from work position.

**19. Can penalties for companies, their directors, officers, or employees be reduced or suspended if the company can demonstrate an efficient compliance system? Does this only apply in cases where efficient compliance systems have been implemented prior to the alleged misconduct?**

Not required by law.

**20. Please briefly describe any investigation trends in your country (e.g., recent case law, upcoming legislative changes, or special public attention on certain topics).**

Due to a lack of public information relating to legislative proposals and absence of any comments on behalf of the public enforcement services, it is quite challenging to highlight any specific trends in the current situation.



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Kamilla graduated from the Moscow State Institute of International Relations (Russia) and is fluent in Russian, English, and Italian.



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