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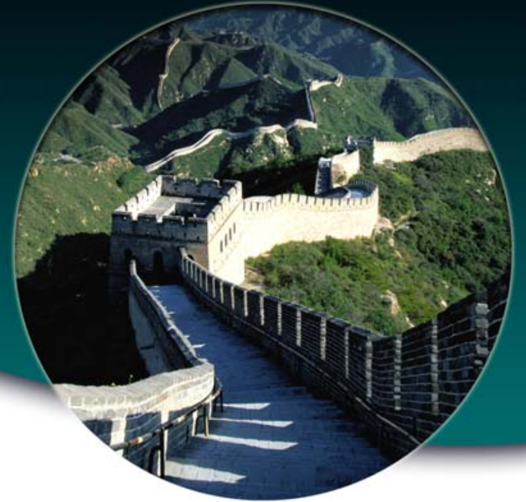

CHINA UPDATE 2009

Squire, Sanders & Dempsey L.L.P.

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MOFCOM Issues New Conditional Approvals Under AML Merger Review

Key Points:

- ***MOFCOM continues to employ behavioral and structural remedies***
- ***Decisions lack specificity, which may impact the ability to seek administrative or judicial review, but more details in decisions arrive with every new case***
- ***MOFCOM seeking views of industry associations, competitors and customers***
- ***MOFCOM demonstrating willingness to assert extraterritorial jurisdiction by conditioning transactions on offshore divestments and conditions imposed on offshore entities***

China's Ministry of Commerce (MOFCOM) has demonstrated a willingness to use its authority to impose conditions on transactions and to prohibit mergers that are considered inappropriate, and will impose behavioral as well as structural remedies when necessary. Some decisions lack specificity, but more detailed decisions have been released as MOFCOM builds its experience in merger review.

Recent cases include:

- **GM/Delphi:** In the proposed purchase of Delphi by GM, GM notified MOFCOM on August 18, 2009 and MOFCOM published its decision on September 28, 2009. MOFCOM imposed conditions and identified potential negative impacts on China's automotive and automotive parts markets including a requirement that Delphi and its affiliates continue to supply China-based carmakers without discrimination; that GM not seek to acquire from Delphi confidential commercial information about China's market; that Delphi and its affiliates coordinate with clients changing suppliers; that GM continue to comply with multi-sourcing and nondiscrimination principles when purchasing automotive parts; and that GM and Delphi regularly submit reports to MOFCOM about their compliance with the conditions. See MOFCOM Announcement No. (2009) 76, issued on September 28, 2009 (In re Merger Review of GM/Delphi Acquisition).

- **Pfizer/Wyeth:** In Pfizer's proposed acquisition of Wyeth, notification to MOFCOM was submitted on June 9, 2009, and MOFCOM commenced its review on June 15, 2009. Further review was commenced on July 15, 2009, and MOFCOM rendered a decision to approve with conditions the transaction on September 29, 2009. MOFCOM's decision maintains that the transaction would have an adverse effect on competition in the market for the vaccine for mycoplasma pneumonia in swine in China, and MOFCOM requires Pfizer to commit to

divesting from several types of animal health vaccines, pharmaceuticals and medicinal feed additives. Within six months of the decision, divestment of Pfizer's mycoplasma pneumonia of swine vaccine business in China is required, including both tangible and intangible assets to ensure viability and competitiveness; the purchaser of the divested assets must be independent of the parties and meet the prequalification standards set by MOFCOM. If Pfizer is unable to find a buyer within six months, MOFCOM may appoint a trustee to dispose of the business with no reserve price, and during the divestment period a transitional manager must be appointed to run the business. MOFCOM further ruled that for a period of three years from completion of the divestment, Pfizer must provide reasonable technical support to the purchaser. See MOFCOM Announcement No. (2009) 77, issued on September 29, 2009 (Decision on Conditional Approval of Pfizer/Wyeth Acquisition).

- **Panasonic/Sanyo:** On October 31, 2009 MOFCOM approved the Panasonic/Sanyo merger with conditions. In December 2008 Panasonic and Sanyo agreed that Panasonic would acquire a majority stake in Sanyo through a tender offer for approximately US$9 billion. Merger notification was filed with MOFCOM in January 2009, and the filing was deemed complete on May 4, 2009. In June MOFCOM initiated a second-phase investigation for 90 days. As allowed under the Antimonopoly Law (AML), MOFCOM further extended its investigation for an additional 60-day period.

  MOFCOM consulted with various government agencies, industrial associations and chambers of commerce, and conducted interviews with competitors and downstream customers. MOFCOM also conducted onsite inspections. It concluded that the proposed merger would result in combined market shares of 61.6 percent for rechargeable coin-shape lithium batteries, 46.3 percent for nickel-metal hydride batteries and 77 percent for nickel-metal hydride batteries through Panasonic EV Energy Co., Ltd. (PEVE), an offshore joint venture between Panasonic and Toyota. MOFCOM concluded that the proposed acquisition would adversely affect competition in these three product markets and conditioned approval on certain divestures including (1) the transfer by Sanyo of its rechargeable coin-shaped lithium battery operations to a third party; (2) the transfer by Sanyo of its nickel-metal hydride battery operations in Japan to a

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third party and the reorganization of Sanyo's factory in Suzhou to an original equipment manufacturer (OEM) supplier of the third party in Japan with respect to Sub C and D batteries, or the transfer of Panasonic's comparable operations in China to a third party; and (3) transfer by Panasonic of its nickel-metal hydride battery operations to a third party, and the reduction of Panasonic's ownership interest in the PEVE joint venture from 40 percent to 19.5 percent, waiver of its rights to vote in shareholder meetings or to appoint directors and the discontinuance of the use of the name "Panasonic" in the PEVE joint venture name. MOFCOM further ruled that it would continue to review and examine the parties' progress in complying with its conditions.

MOFCOM's decision in the Panasonic/Sanyo matter reflects a greater desire to assert extraterritorial jurisdiction over offshore transactions. In prior cases, MOFCOM focused on mainland operations including, for example, a condition in the Pfizer/Wyeth deal for the parties to divest certain mainland animal vaccine business and restrictions in the InBev/Anheuser-Busch transaction to bar the parties from increasing their investments in China-based breweries. In the Panasonic/Sanyo transaction, MOFCOM has moved into new territory and is, in effect, ordering the parties to modify their operations outside China and imposing conditions effecting an offshore-based joint venture.

– *James M. Zimmerman*

New Changes to Noncompete Compensation Standards in Local Rules

Key Points:

- ***No national set level of noncompete compensation***
- ***New noncompete compensation standards for Beijing and Shenzhen***

Noncompete clauses are commonly used in labor contracts and confidentiality agreements to protect business secrets and employers' intellectual property rights. Article 23 of China's Labor Contract Law provides that for an employee with confidentiality obligations, the employer and the employee may stipulate noncompetition clauses in the labor contract or in the confidentiality agreement and come to an agreement that, when the labor contract is dissolved or terminated, the employee shall be given economic compensation within the noncompetition period. However, the Labor Contract Law did not set a national standard for economic compensation, and this uncertainty leaves much room when negotiating the amount of compensation.

According to Squire Sanders' research in some major cities and provinces in China, there are local rules and regulations that set definite compensation levels for noncompete obligations. Beijing and Shenzhen have promulgated newly amended standards for noncompete compensation in the summer of 2009.

With respect to Beijing and disputes concerning noncompete compensation, if no exact compensation amount is included in the labor contract or confidentiality agreement, the non-compete term shall not be invalid. The parties may consult with each other to reach an agreement. In the event that the meeting fails, the employer shall pay 20 percent to 60 percent of the annual salary of the most recent year. That amount is defined in a document entitled the "Minutes of Meeting of Beijing Labor and Social Security Bureau and People's High Court of Beijing regarding Issues of Application of Law in Labor Dispute Cases." That joint meeting was held in July 2009 to clarify issues concerning labor contract disputes.

With respect to Shenzhen, the Standing Committee of the People's Congress of Shenzhen promulgated the amended "Regulation on Protection of Technology Secrets of Enterprises in Shenzhen Special Economic Zone" on May 21, 2009, which provides that compensation shall be calculated on a monthly basis and shall be no less than 50 percent of the average monthly salary of the most recent 12 months. The previous standard was calculated on a yearly basis and required no less than two-thirds of the annual salary of the most recent year.

Tianjin has no current rule, but the prior rule was 50 percent of salary during employment. According to the "Regulation on Protection of Technology Secrets of Enterprises in Zhuhai Special Economic Zone," the minimum compensation in Zhuhai was no less than 50 percent of the annual salary of the most recent year. In addition "Regulations on Labor Contracts of Jiangsu Province" set the minimum compensation in Jiangsu Province at no less than one-third of the annual salary of the most recent year.

As the compensation level varies in different cities and provinces, strict compliance with relevant local minimum compensation requirements is recommended. In the event that no local minimum standard is set, the practice in other cities might be a good reference. An average compensation standard might be a better and safer choice.

– *Chen (Edison) Junkang*

New Measures Regarding Tax Treaty Benefits for Nonresidents

Key Points:

- ***Recent tax circulars from the State Administration of Taxation clarify requirements for nonresidents wishing to enjoy tax benefits under China's tax treaties***
- ***Nonresidents should consult with tax counselors and competent tax authorities when seeking tax treaty benefits***

To strengthen tax revenue and protect China's tax base, over the past year China's State Administration of Taxation (SAT) has promulgated a series of tax circulars with respect to the tax obligations of nonresidents. Recently, the SAT issued "Administrative Measures on Tax Treaty Treatment of Nonresidents" (the Measures) to clarify the procedures and documentation requirements for nonresidents wishing to enjoy tax benefits under China's tax treaties. The Measures went into effect on October 1, 2009.

According to the Measures, it is mandatory for a nonresident either to apply for an approval or to file a record for treaty benefits with the competent tax authority, depending on the nature of the treaty benefits requested. Specifically, when claiming tax treaty benefits (i.e., a reduced tax rate or exemption) with respect to dividends, interest, royalties and capital gains, the nonresident must obtain a formal approval from the competent tax authority. When claiming treaty benefits in connection with permanent establishments and business profits, dependent personal services or independent personal services, the nonresident is required to file a record with the competent tax authority. Application of the treaty benefits without the prescribed approval or recording will result in the denial of treaty benefits and penalties.

The Measures require substantial and extensive documentation for the approval or recording of treaty benefits. These requirements impose compliance and administrative burdens on nonresidents, resulting in increased tax risk. Nonresidents should consult with tax counselors and the relevant tax authority about the details when they plan to seek tax treaty benefits.

– *Daniel Yao*

Collection of Employee Fingerprint Data for Attendance Purposes Raises Privacy Concerns

Key Points:

- ***When fingerprint data is collected merely for attendance recording purposes, the privacy risk will likely exceed the benefits***
- ***Before installing biometric devices, employers must assess whether they***

are able to comply with data protection principles

Many companies have adopted advanced technologies in the workplace that have brought remarkable changes to practices and routines, but these changes also bring new concerns and potential legal problems.

For example, there is a growing trend of replacing the traditional time clock and basic electronic access cards with security systems that collect and store personal biometric data. These include fingerprint scanners, facial recognition systems and devices capable of identifying an individual's voice or iris. When collecting this kind of data, companies must be careful to comply with China's Personal Data (Privacy) Ordinance (PDPO).

A recent investigative report published by the Privacy Commissioner for Personal Data (the Commissioner) found that collecting an employee's fingerprint to record attendance at work breached the PDPO. The complaint was brought by an employee of a furniture installation company. On the first day he reported for duty the company collected and recorded his fingerprint. The complaint alleged that the company had not informed him that it would collect his fingerprint when he accepted the employment offer.

The company had adopted a fingerprint recognition system (the System) to record staff attendance. The company's explanation was that the use of the time clock could not prevent staff from punching time cards for one another, so it decided to use the System.

The company had collected the fingerprints of approximately 400 employees, and none had refused to cooperate. Apart from the System, no alternative for recording attendance was provided to the employees. The System only recorded the minimum data necessary to identify the staff member and record the time. After it was recorded, the fingerprint was converted into numerical codes that were then encrypted and recorded. Only the time records could be downloaded when the System was connected to the server. There was no output port, and the Company could not directly access or transfer fingerprint records from the System.

Although the company said that all staff had given their consent and provided fingerprints willingly, the Commissioner disagreed. The reasons were that, first, there was a disparity in bargaining power between the company and its employees, raising a presumption of undue influence. Second, the staff had not been given a choice about providing fingerprint data or offered an alternative. And third, the company had not presented a clear, balanced explanation enabling employees to make an informed decision.

The Commissioner also found that the System could ascertain the identity of staff from the fingerprint. Therefore, the fingerprint data collected satisfied the definition of personal data under the PDPO. The Commissioner commented that given its uniqueness and unchangeable nature, fingerprint data is sensitive personal data requiring extra care.

Data Protection Principle (DPP) 1 provides that personal data shall not be collected unless the data is collected for a lawful purpose directly related to a function or activity of the data user and the collection is necessary for or directly related to that purpose. DPP 2 provides that personal data shall be collected by means that are lawful and fair in the circumstances of the case.

These principles were tested, and the Commissioner found the steps taken were unnecessary and excessive. Consequently, a warning letter was issued, and the Commissioner ordered the company to stop collecting staffers' fingerprints and destroy all existing fingerprint data immediately. As remedial action, the company has stopped collecting fingerprints, deleted existing data, installed a less intrusive password-based system and voluntarily destroyed all fingerprint data.

There may be cases in which similar systems or devices are appropriate – for instance, in jewelry shops that need to restrict access to certain areas for security reasons. Even so, the employer should explain the reasons for collecting this data and the issues relating to personal data privacy. Staff would still have to give genuine, informed and unambiguous consent before providing their fingerprints and should do so in line with a clear procedure. In all cases, the employee's decision should be respected.

However, given that fingerprints and other biometric data are unique, there may be additional concerns, such as the risk of identity theft. Before deciding to install these devices, employers should carefully assess whether they are able to comply with data protection principles. In particular, they should note the limitation principle set out in the PDPO, which states that personal data must be collected for a lawful purpose directly related to a function or activity of the data user. Any data requested should be necessary but not excessive.

Employers should carefully assess whether the advantages of collecting fingerprint data exceed the disadvantages. The following, though not an exhaustive list, are some relevant factors for consideration:

1. The number of employees affected;
2. The period of retention of staff fingerprint data;
3. The scope and extensiveness of the collection of fingerprint data (e.g., whether only applicable to high-security areas);

4. The intended use of the data collected;
5. The impact of the collection of fingerprint data on the employer-employee relationship;
6. Whether current security measures are adequate to protect staff's fingerprint data from loss or theft; and
7. The extent of harm caused to staff in the event of data loss or improper handling.

Even if the collection can be legitimately justified, employers should implement sufficient privacy protective measures against potential loss of or unauthorized access to fingerprint data. When fingerprint data is collected merely for attendance recording purposes, the privacy risk will likely exceed the benefits. To act prudently, employers should consider less intrusive options.

According to the Privacy Commissioner, systems that do not collect personal data such as fingerprints are not within the jurisdiction of the PDPO or the Commissioner. One example is a fingerprint recognition system that converts certain features of the fingerprint into a unique value and stores it in a smart card held by the employee. For verification, the employee puts his finger and the smart card on the recognition system. In this way, the employer has not collected employees' fingerprint data or the value, and therefore has not collected any personal data as defined in the PDPO.

– Deborah Y. Cheng

Practitioner's Checklist: Environmental Planning and Strategies for Foreign Investors

Key Points:

- ***Foreign investors acquiring China-based companies must scrutinize the target's permits and licenses to determine if compliance with environmental regulations is a sham***
- ***Investors should not view China as having relaxed environmental standards***

Environmental issues are playing a more important role in investments in which production equipment is part of the assets either contributed by the China-based party to a foreign-invested enterprise (FIE) or purchased by the FIE. Many foreign investors quickly realize two unfortunate facts when investigating potential China-based partners or acquisition targets: (1) production equipment fails to meet basic pollution control standards and (2) factory sites are significantly contaminated after years of production without regard to environmental standards. As a prerequisite, a foreign party should conduct a thorough due diligence of technical capabilities and regulatory compliance of a targeted

China-based company. Permits and licenses should be scrutinized to determine if compliance is genuine, given that many China-based companies have enjoyed a cozy relationship with local environmental authorities that may vouch for compliance today but, in the future, may find themselves under the scrutiny of environmental investigations. A close review of applications may indicate whether the China-based party procured its permits through corrupt means including misrepresentation or selective disclosure of factual information.

Foreign investors confronted with acquisitions involving environmental problems may opt to structure the investment so as to include an upgrade of the targeted facilities' environmental technology; otherwise, the investor must proceed with the understanding that the equipment may be outmoded and potentially in violation of the law, or decide to invest elsewhere. A thorough technical due diligence, conducted in advance, should reveal the technology improvements that are needed. The foreign party should also include the necessary indemnification language in its agreements to insulate itself from any liability that may arise as a result of activities prior to the acquisition date. An independent environmental assessment report may be used as a reference point for any environmental liability. After an FIE operation is under way, foreign investors should establish and monitor a compliance program that takes into consideration China's current laws and regulatory system, as well as international standards. Leaving compliance issues in the hands of the China-based partner may be a mistake without first implementing the proper controls to ensure that practices conform with corporate and international standards.

In light of the Ministry of Environmental Protection's (MEP) increased enforcement efforts, it would be a mistake for foreign investors to view China as having relaxed environmental standards, even if past practices reflect an intent to skirt the environmental laws. China faces many challenges in its strategy for sustainable development, and foreign investors have the opportunity to be part of the solution. A checklist of environmental strategies for foreign investors includes the following steps:

- Conduct a thorough due diligence review of the technical capabilities and regulatory compliance of local partners, contractors, distributors, manufacturers, etc.;
- Conduct a thorough due diligence of any property-related or equipment-related acquisition or business arrangement;
- Conduct environmental site assessments using qualified environmental consultants, and review and verify existing permits and licenses;

- Evaluate the need for technological improvements, negotiate contractual protections and establish an active post-investment compliance monitoring program;
- Review compliance and practices for products subject to China's Restriction of Hazardous Substances (RoHS) and Waste Electrical and Electronic Equipment (WEEE) regulations;
- Establish a compliance team to regularly review, report on and audit an environmental compliance program; and
- Monitor changes in the law and policy, and monitor the MEP enforcement efforts.

– James M. Zimmerman

Perspectives on PRC Anticorruption and US Foreign Corrupt Practices Act Compliance

An interview with Amy Sommers[1]

Q. There's been a lot in the press about how US authorities are ramping up enforcement of the Foreign Corrupt Practices Act (FCPA). For foreign businesses with China operations, isn't there also the risk of being investigated by China's authorities for possible corruption?

Sommers: Yes, there is, despite the common perception that there's comparatively little risk of investigation by China's authorities for corruption-related reasons, as opposed to being investigated by the US Department of Justice (DOJ), the primary FCPA enforcement agency in the United States. Various factors reinforce this perception – the sheer geographic scale of China, the multiple layers of regulators with authority over corruption issues and the widespread prevalence of the problem. Yet we've also seen that China's regulators can launch – and perhaps even more critically, announce – investigations that create reputational and other risks for the targets. Recent examples include the allegations of bribery against Rio Tinto and the arrest of four of its executives in July in connection with the setting of iron ore prices. And in 2007, the police detained 22 people in a bribery investigation involving several large foreign companies such as McDonald's, McKinsey and Whirlpool. I never saw a follow-up report in either the Chinese or Western media about what happened, but an executive at one of the companies told me that nothing came of it. Even so, the *New York Times* article is up on the Internet, and the case is mentioned often – not so great for the companies named.

Q. What sorts of business activity by foreign companies in China appear to be the riskiest in terms of bribery and corruption?

Sommers: There are several types, broadly speaking: activities in connection with (1) regulatory

[1] Amy Sommers is a partner in the Squire Sanders Shanghai office.

approvals, (2) sales to state-owned entities and (3) dealing with administrative actions.

Notwithstanding China's trade liberalization following its accession to the World Trade Organization (WTO), foreign investment in various sectors remains subject to scrutiny and approval. Real estate is an obvious example. Morgan Stanley disclosed to the US Securities and Exchange Commission (SEC) earlier this year that one of its employees may have engaged in behavior that violates the FCPA; news reports indicated that the individual involved was an executive responsible for Morgan Stanley's real estate investments in China.

The classic FCPA fact pattern involves payment of kickbacks to purchasing decision-makers in state-owned enterprises to ensure issuance of a purchase order. Given the prevalence of state ownership in business enterprises, it's not surprising that this is a frequent source of compliance risk.

Finally, when an agency launches an audit or seeks to impose a penalty for noncompliant behavior – usually having nothing to do with corrupt payments – there's a risk that businesspeople in the target company will seek to resolve the matter by making an improper payment. This can happen with the State Administration of Industry of Commerce, Customs and other agencies where officials have considerable discretion on how and whether to apply administrative regulations.

Q. What tends to trigger PRC authorities to investigate charges of bribery and corruption – whistleblowers? Government audits?

Sommers: The three top sources are whistleblower reports from inside the company (typically a disgruntled current or former employee), reports by competitors and government audits. A government audit can arise from a probe into a wholly unrelated activity if an agency learns of potentially corrupt behavior in the course of its investigation.

Q. How would you describe interactions with regulators and government agencies in China's major cities vs. undeveloped regions?

Sommers: Generally speaking, the level of professionalism of government personnel in China's major cities is impressively high, particularly in parts of the bureaucracy that interact with foreign investors. I've heard disturbing stories to the effect that government agencies deal with domestic parties most of the time, even in a major metropolis like Shanghai. In terms of an urban vs. rural divide, yes, considerable differences are still there. A foreign-invested company that is a major employer and taxpayer in a region can garner a certain cachet with officials; on the other hand, its dependence on regulatory approvals can make it vulnerable to pressure from extortionist officials.

Q. China's press talks about "commercial bribery," but this isn't a term one hears in the FCPA context. What does it mean?

Sommers: "Commercial bribery" refers to payments being made or received in connection with purely commercial behavior (i.e., in connection with purchases and sales of goods and services). The PRC definition of what constitutes an "official," for purposes of assessing bribery, is narrower than the DOJ's interpretation. This means that behavior that would violate the FCPA because it involves kickbacks for sales to state-owned enterprises might qualify in China as commercial, rather than official, bribery. Either way, it's subject to punishment – but with different legal provisions and processes.

Q. One commentator suggests that anticorruption charges brought by China's authorities are, at least in part, politically motivated. What is your view of this point?

Sommers: I would characterize the situation this way – frequently, a decision by China's authorities on *whether* to launch an investigation or make public accusations of improper conduct may be strongly influenced by policy or strategic considerations. That said, however, I've not come across too many instances where there wasn't at least some basis for the underlying allegations. Improper behavior is real, and it's out there. Whether officials wish to know and act on it is a matter of some discretion. If a company enjoys a reputation as a solid citizen, regulators may be inclined to give it the benefit of the doubt and assume the alleged wrongdoing is being conducted by a renegade employee.

Q. To your knowledge, have settled FCPA actions (e.g., *Faro*) also spawned local anticorruption investigations by China's regulators?

Sommers: The only FCPA action I'm aware of in which settlement with the DOJ prompted an investigation is Control Components, Inc. When that case was resolved this summer, the DOJ announced the names of China-based state-owned companies whose employees were alleged to have received kickbacks from Control Components in connection with purchases of service control valves used in the oil and gas industry. The regulator in China responsible for oversight of the government's ownership interest in state-owned enterprises, the State-owned Assets Supervision and Administration Commission (SASAC), formed an investigative group to look into the allegations, but to date no formal findings have been publicly announced.

Q. What are three things a foreign-invested business in China can do to limit its risk of noncompliance with FCPA and PRC anticorruption rules?

Sommers: The top one is to commit to making "clean" business part of your company culture, and then use that commitment as a selling (or defensive) point in your China operations. Johnson & Johnson and GE are two outstanding success stories in this regard. I'm not saying it's easy, but one reason Johnson & Johnson is so successful at projecting its compliance commitment today is because its commitment dates to 1943, when it adopted "Our Credo."

Second, train and retrain employees, but go beyond robotically citing provisions of FCPA and PRC criminal law. Instead, speak with employees about the company's values, understand their feedback about what is going on in the market and convey your commitment to a compliance culture – even if it sometimes means losing an opportunity or incurring a cost.

Third, beware of being too focused on results in your instructions to, and assessments of, China-based team members – because in China, if you give an employee a goal (e.g., "Deliver an approval for this deal by X date"), he or she will do everything possible to reach it, even though how it's reached might not comply with company policy and relevant laws. In other words, be both results- and process-oriented.

Past Events

On October 27 Squire Sanders partner **Song Zhu** participated in an intellectual property panel discussion presented by The International Committee of the Association of Corporate Counsel, San Francisco Bay Chapter. The panel answered the big questions on protection and enforcement of intellectual property rights in China, such as whether it is cost-effective and worthwhile for US-based companies to register their intellectual property in China and how effective intellectual property protection is in China.

On November 11 **David M. Spooner,** of counsel in the Squire Sanders Washington DC office, presented at the Tire Tech Forum portion of the Asian Essen Tire Show. Mr. Spooner discussed the recent imposition of safeguard tariffs by the United States on imports of tires from China. He addressed the basic law and facts, the political backdrop to the case and options for reducing or eliminating the tariffs. Readers can access his PowerPoint presentation online.

On November 17 Squire Sanders national partner **Rainer Burkardt** participated in a European Union Chamber of Commerce in China (EUCCC) seminar titled **Bribery and Corruption in China**. The seminar targeted legal practitioners as well as risk and finance managers from all industries who face challenges in ensuring compliance with business policies and local and extraterritorial legislations.

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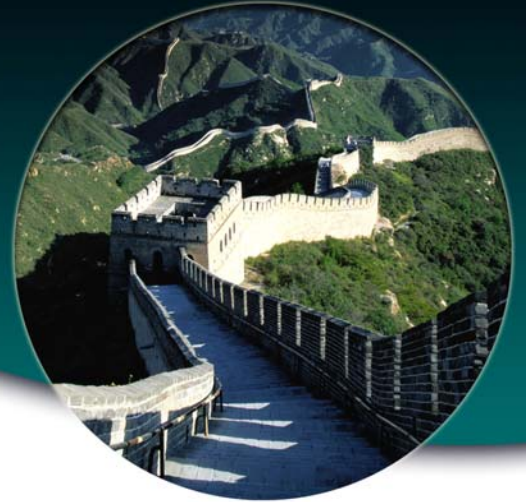

CHINA UPDATE

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This newsletter provides free information on the influence of certain aspects of the Chinese legal environment and does not constitute legal advice.

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