

The Paris office of Hogan Lovells is pleased to provide this English language edition of our monthly e-newsletter, which offers a legal and regulatory update covering France and Europe for May 2023.	Contact
Please note that French legal concepts are translated into English for information only and not as legal advice. The concepts expressed in English may not exactly reflect or correspond to similar concepts existing under the laws of the jurisdictions of the readers.	Sophie Giono Hogan Lovells (Paris) LLP
If you would like to consult this newsletter from past months, please click <u>here</u> .	17, Avenue Matignon
Please send an e-mail to <u>communicationparis@hoganlovells.com</u> if you wish to subscribe to this publication. For additional information, please speak to your usual contact.	CS 60021 75008 Paris Tél. : +33 1 53 67 47 47 Fax : +33 1 53 67 47 48

Hoganlovells.com

• Audio-visual

France – Bill of Law No. 545 on the reform of French public audiovisual services and audiovisual sovereignty of 21 April 2023

In a <u>press release</u> dated 2 May 2023, the French Senate announced the <u>Bill of Law No. 545</u> aimed at reforming the organization and sovereignty of the French public audiovisual sector, submitted on 21 April 2023 by Senator Laurent Lafon, Chairman of the Senate's Committee on Culture, Education and Communication.

This proposal is strongly inspired by the reform project initially put forward by the former French Minister of Culture in 2020, similarly designed to assist the troubled audiovisual sector.

The main feature of this Bill of Law is the creation of a new holding company, called "*France Médias*", which would oversee all the French public broadcasters mentioned under Article 2: France Télévisions, Radio France, France Médias Monde and National Audiovisual Institute (INA). This France Médias company would have a Chairman appointed by the Board of Directors rather than by the ARCOM.

The text is in line with the desire to help the audiovisual sector tackle the development of platforms and social networks, in order to fight "asymmetries of competition" in the sector. Among the proposals made, Article 12 calls for the 5-year period during which a channel may not be sold following its broadcasting authorization to be reduced to 2 years.

This holding company could see the light of day on 1 January 2024 if the Assemblée nationale were to adopt the proposed text.

The text is scheduled for public debate on first reading in the Senate on June 12 or 13.

Authored by Iris Accary and Claire Borgel

• Commercial

France – Decree n° 2023-417 of May 31, 2023 relating to the technical terms and conditions for terminating contracts electronically, allowing termination in 3 clicks

<u>Article L215-1-1 of the French Consumer Code</u> now stipulates that when a contract has been concluded electronically between a consumer and a professional (or if the professional offers the consumer the possibility of concluding such a contract electronically), the contract can be terminated in the same way. In this case, the trader must provide the consumer with a free online facility for notifying and taking the necessary steps to terminate the contract.

This provision came into force with the publication of its implementing decree in the JORF: <u>decree no. 2023-417 of May 31, 2023 relating</u> to the technical modalities for terminating contracts electronically, in force since June 1, 2023.

This decree lays down the rules governing access to and use of the electronic contract cancellation function. It requires professionals who conclude contracts electronically to provide consumers with a function that enables them to terminate a contract directly and quickly, with just a few clicks. This functionality must provide information on cancellation conditions, such as notice periods, as well as the consequences of cancellation.

The decree lays down specific requirements for the "just a few clicks" contract cancellation function. Firstly, professionals must clearly indicate the possibility of cancelling the contract by providing an accessible button entitled "Cancel your contract" or similar wording.

Next, they must ask consumers to provide their personal details, which may or may not be pre-filled.

Finally, the cancellation confirmation step is carried out via a button entitled "Notification of cancellation" or similar wording, such as "Confirm cancellation".

Authored by Daghan Ozturk and Malak Hegazi

France - Enactment of the law aimed at regulating commercial influence

Law no. 2023-451 of June 9, 2023 aimed at regulating commercial influence and fighting the abuses of influencers on social networks was enacted on June 9, 2023, and published in the "Journal Officiel" of June 10, 2023.

The main provisions of this law are as follows:

- The activity of commercial influence by electronic means is defined by Article 1 of the law as the mobilization by individuals or legal entities of their notoriety among their audience, for consideration, in order to communicate to the public, by electronic means, content designed to promote, directly or indirectly, goods, services or any cause whatsoever.
- The law of June 9, 2023, introduces information obligations for commercial influencers, aimed at ensuring greater transparency in their communications. In particular, any promotion of goods or services by commercial influencers will have to be explicitly accompanied by the words "Advertising" or "Commercial collaboration" in a clear, readable and identifiable manner on the image or video, whatever the format, and throughout the entire publication. Penalties for non-compliance will be those applicable to misleading commercial practices, i.e. two years' imprisonment and a fine of 300,000 euros. Images included in content communicated by commercial influencers will also have to be accompanied by the words "edited images" when they have been processed to modify the silhouette or appearance of the face, or by the words "virtual images" when the face or silhouette represented in the image has been produced by artificial intelligence. Failure to clearly and legibly affix these indications to the image or video will be punishable by one year's imprisonment and a fine of 4,500 euros.
- The law of June 9, 2023, prohibits commercial influencers from directly or indirectly promoting certain types of goods and services. This prohibition concerns in particular plastic surgery, certain financial products and services (such as financial contracts, or services based on digital assets, unless the commercial influencer is registered or approved with the French "Autorité des marchés financiers" as a digital service provider), as well as gambling (unless the platform on which this promotion is carried out offers the technical possibility of excluding minors from the content audience, and this technical mechanism is effectively activated by the latter). Once again, the basic penalty for violating these prohibitions will be two years' imprisonment and a fine of 300,000 euros, which may be accompanied by a permanent or temporary ban from the activity in which the offence was committed or the activity of commercial influence. The law provides as an alternative to the basic penalty for the application of specific penalties in the event of violation of certain prohibitions (for example, violation of the prohibition on promoting gambling is punishable by a fine of 100,000 euros).
- The powers of the "Direction Générale de la Concurrence, de la Consommation et de la Répression des Fraudes" (DGCCRF) in terms of injunctions against professionals have also been generally reinforced by this law. The DGCCRF will be able to impose a daily penalty up to €3,000 on any injunction to put an end to a breach falling within their investigative powers, which it will also be empowered to liquidate up to a limit of €300,000. This injunction is publicized. If the professional fails to comply with this publicity measure, the DGCCRF is now able to issue a formal notice to publish the decision, subject to a daily penalty of 150 euros from the date of notification of the formal notice, until actual publication. This daily penalty can also be liquidated by the DGCCRF, up to a limit of 50,000 euros.
- Commercial influencers operating outside the EU will be required to appoint a legal or natural person to act as their legal representative in the EU. The aim is to ensure the compliance of contracts entered into by commercial influencers for the purpose of influencing the French public. The designated person will be responsible for responding to requests from the relevant administrative or judicial authorities to ensure compliance with the law. In addition, said commercial influencers will be required to take out civil liability insurance with an insurer established in the EU to cover the financial consequences of their professional civil liability if they target (even incidentally) a public established in France as part of their commercial influencing activity.

- Finally, the law of June 9, 2023, establishes a regime to regulate content disseminated by commercial influencers. The obligations of online platforms (e.g. YouTube, TikTok) are strengthened, in line with the Digital Services Act (DSA), in order to make digital platforms more accountable and fight the dissemination of illicit content. In particular, platforms will be required to:
 - Set up mechanisms enabling anyone to report the presence of illicit elements on their platform, including with regard to the law of June 9, 2023;
 - Implement all the necessary measures to ensure that notifications submitted by trusted flaggers are processed as a matter of priority under the conditions laid down by the DSA;
 - Take the necessary measures to respond as quickly as possible to an injunction to act, including against content that is illegal under the law of June 9, 2023, issued by any competent national judicial or administrative authority.

Authored by Floriane Cadio de Kermainguy and Nathan Ponthieu

• Corporate

France – Order n° 2023-393 May 24, 2023 reforming the rules governing mergers, demergers, partial contributions of assets and crossborder transactions by commercial companies

France – Decree n° 2023-430 of June 2, 2023 reforming the rules governing mergers, demergers, partial contributions of assets and cross-border transactions by commercial companies

Based on Article 13 of Law no. 2023-171 of March 9, 2023 on various provisions for adapting to European Union law in the fields of the economy, health, labor, transport and agriculture (DDADUE), the Order of May 24, 2023, and as detailed in the report to the President published alongside, this Order no. 2023-393:

- transposes Directive (EU) 2019/2121 of November 27, 2019 amending Directive (EU) 2017/1132 as regards cross-border conversions, mergers and divisions, and
- simplifies operations carried out in France.

More specifically, this text provides for:

- the modification of existing provisions relating to cross-border mergers, notably those concerning the control procedure by the competent authority (*C. com., art. L. 236-42*) or those introduced for the benefit of minority shareholders (*C. com., art. L. 236-42*) or those introduced for the benefit of minority shareholders (*C. com., art. L. 236-42*) and *L. 236-35, L. 236-36, L. 236-39* Right of information and consultation) and creditors whose claims arose prior to the proposed cross-border transaction (*C. com., art. L. 236-26, L. 236-29 and L. 236-30* Right of objection);
- the creation of new provisions under Chapter VI of Title III of Book II of the French Commercial Code, to introduce cross-border demergers and conversions; and

- reforms of provisions relating to domestic operations, with regard to those applicable to cross-border operations, where justified in the interests of harmonization, simplification, modernization or consistency. In particular :
 - harmonization for all domestic and cross-border transactions of the requirement to annex the merger plan to the RCS (*C. com., art. L. 236-6*);
 - the extension of the valuation elements that must appear in the merger auditors' report (as an alternative to the method used to determine the exchange ratio, the methods used to determine the envisaged cash balance, plus the case where different methods are used in the merging companies (*C. com., art. L. 236-10*);
 - the introduction of the partial demerger, enabling shares received as consideration for the contribution to be allocated directly to the shareholders of the transferring company. The <u>ANSA</u> notes in this regard that "this mechanism had not previously been enshrined at national level, forcing practitioners to proceed in two successive stages, i.e. a partial asset contribution followed, for example, by a distribution in kind by the contributing company to its shareholders. The Ordinance of May 24, 2023 enshrines this practice by giving it a legal basis in the French Commercial Code (*art. L. 236-27 modified by Ordinance no. 2023-393, art. 5*).
 - harmonization of the majority required to decide on a cross-border transaction (between 2/3 and 90%), without this being set at more than 90% in the articles of association for SARLs and SASs (see *C. com., art. L. 236-38*).

Published a few days later, decree no. 2023-430 completes the above mentioned ordinance with several clarifications:

- elements required for commercial companies to apply the procedure for mergers, demergers, partial contributions of assets and partial demergers (*C. com., art. R. 123-56, R. 123-69 and R. 123-74-1 modified by D. n° 2023-430, art. 1; D. n° 2023-430, art. 3*) and to cross-border transactions between European Union member states (*C. com., art. R 236-20, R 236-35, R 236-37 and R 236-39 created by D. n° 2023-430, art. 7*);
- content of projects for these operations (*C. com., art. R. 236-1 to R. 236-14 modified by D. n° 2023-430, art. 4; art. R. 236-21, R. 236-36, R. 236-38 and R. 236-40 created by D. n° 2023-430, art. 7*), the notice sent to stakeholders (*C. com., art. R. 236-3 modified by D. n° 2023-430, art. 4; art. R. 236-22 created by D. n° 2023-430, art. 7*) and the management report (*C. com, art. R. 236-24 created by D. n° 2023-430, art. 7*), as well as the deadlines and procedures for publication of these documents, i.e. at least one month before the date of the general meeting called to approve the transaction or, where applicable, for simplified mergers, at least thirty days before the transaction takes effect (*C. com. art. R. 236-22 and R. 236-24 created by D. n° 2023-430, art. 7*);
- procedure for withdrawing partners or shareholders, in particular deadlines (10 days from the date of the merger decision) and appeal procedures (*C. com., art. L. 236-40, art. R. 236-26 to R. 236-28 created by D. n° 2023-430, art. 7*);
- procedures for contesting exchange parity (C. com., art. R. 236-28 created by D. n° 2023-430, art. 7);

- procedures for obtaining an advance certificate from the clerk of the commercial court (*C. com., art. R. 236-30 created by D. no. 2023-430, art. 7*), who is responsible for carrying out the legality control prior to the cross-border transaction within three months (extendable under certain conditions) of receipt of the copy of the minutes of the shareholders' meeting (note that the deadline for legality control of the completion of the cross-border merger is 15 days) (*C. com., art. R. 236-31 and R. 236-32 created by D. n° 2023-430, art. 7*);
- terms and conditions for creditor objections, which may be lodged within three months of the last publication or public availability of the draft terms of cross-border merger on the website of each of the companies (*C. com., art. R. 236-34 created by D. n° 2023-430, art. 7*);
- procedures for carrying out partial demergers, this practice being enshrined in the section on partial contributions of assets (*C. com., art. L. 236-27 and R. 236-19 created by D. no. 2023-430, art. 6*).

This new legal framework applies to cross-border capital company transactions filed with the commercial court clerk's office on or after July 1, 2023.

In practical terms, for cross-border transactions to be carried out in 2023, it is therefore necessary to finalize current projects (legal documentation, required signatures and formalities for filing with the clerk's office) by June 30, 2023 at the latest, in order to benefit from the previous regime. As an exception, companies in liquidation, which have begun distributing assets among their shareholders, companies undergoing resolution proceedings and undertakings for collective investment in transferable securities (UCITS) and alternative investment funds (AIF), are not eligible to the provisions of the Directive (*C. com., art. L. 236-32*).

Authored by Louis-Nicolas Ricard

• Employment

France - Decree no. 2023-408 of May 26, 2023 relating to the experiment allowing the conclusion of professionalization contracts combining actions to validate acquired experience

This decree defines the terms and conditions of professionalization contracts concluded in order to validate acquired experience on an experimental basis until February 28, 2026. Professionalization contracts must form part of career paths planned by projects designed to promote access to certification and professional integration in sectors experiencing recruitment difficulties. Projects will be selected following a national call for projects, and only 5,000 individual career paths may be selected for the duration of the experiment. They may concern people over 25 who are not job-seekers, and the duration of professionalization actions will be 36 months.

France - Law no. 2023-380 of May 19, 2023 relating to the 2024 Olympic and Paralympic Games and bearing various other provisions

Article 25 of this law creates a temporary derogation from Sunday rest for shops, in view of the exceptional crowds expected. Taking into account the needs of the public, the representative of the State in the French "département" may authorize a retail establishment providing goods or services to derogate from the Sunday-rest rule laid down in article L. 3132-3 of the Labor Code, for a period between June 15, 2024 and September 30, 2024. However, authorization will only be granted after receiving the opinions of some groups such as the town council, the chamber of commerce and industry, and the chamber of trades and crafts.... This derogation will only apply in the absence of any other applicable derogation (e.g.: business located in an international tourist zone that already benefits from a derogation to Sunday rest).

Authored by Baptiste Camus & Oussama El Hassani

• Finance

France – Reform on security interests (update)

Pursuant to the provisions of <u>decree n° 2023-369 of 11 May 2023</u>, the publication regime of security over moveable assets previously mentioned in our French legal and regulatory update dated December 2021 has been mainly amended as follows:

- with respect to the registration of conventional pledges over company's shares, the competent registrar is the one in whose jurisdiction the company whose shares are pledged is registered;

- it is no longer compulsory on the registration form to indicate the category to which the collateral belongs; and

- the rules applying to security interests published prior to 1 January 2023 are clarified.

Authored by Charlotte Bonsch

• Insurance

France – ACPR: review by the ACPR of automated systems for monitoring AML/CFT transactions set up by the financial institutions

The Autorité de Contrôle Prudentiel et de Résolution (« ACPR ») has published in April 2023, a report on the automated monitoring systems of transaction in connection to anti-money laundering and combatting the financing of terrorism ("AML/CFT") put in place by the financial institutions subject to its control.

This thematic review is based on the consultation of a panel of 36 groups and entities my means of the sending of a questionnaire and a collection of scenarios integrated into the monitoring tools in order to assess the control measures and resources put in place by these institutions as part of the implementation of their obligations regarding the monitoring of transactions.

The results of the ACPR's review show a widespread use of IT tools dedicated to the automated monitoring of transactions, although there is a significant use of human resources to monito transactions, which also leads to a large number of suspicious transactions reports. The report also notes that some entities are using artificial intelligence to process the information submitted to them, making it possible to monitor transactions more efficiently.

Nevertheless, the ACPR noted that the way in which alerts resulting from the monitoring systems put in place are handled differs between the financial institution consulted and that three types of alert processing channels are mainly set up: (i) processing by specialized teams, (ii) processing where the first level of processing is carried out by operational staff, and (iii) reverse processing where the first level of processing is carried out by the compliances teams.

The ACPR also points out areas for improvement in the automated monitoring systems put in place, particularly with regard to the consideration of transactions requiring specific vigilance for certain risks (*e.g.*, crypto-assets), the monitoring of certain customers who have been subject to unfavorable information (*e.g.*, suspicious transaction reports or requests from the authorities) or the comparison of peer groups (*e.g.*, customers with similar characteristics).

As a follow-up to the publication of this report, the development of guidelines on this subject is being considered.

Source: ACPR review of automated systems for monitoring AML/CFT transactions

European Union: adoption of the Retail Investment Package by the European Commission

On 24 May 2023, the European Commission has published its legislative proposal on the European Union's retail investment strategy. This legislative package consists of a directive aimed at revising the rules set out in various directives governing the distribution of financial products, particularly with regard to the protection of retail investors.

The European Commission intends to encourage retail investors to participate in the EU capital markets and to this end, the legislative proposal sets out a number of measured in order to, *inter alia*, improve the information provided to retail investors on investment products and services; make costs more transparent and comparable; further address potential conflicts of interests that may arise in the distribution of investment products; protect retail investors from misleading commercial practices; or maintain high standards of professional qualification for financial advisers.

The Retail Investment Package aims to standardize and remedy the potential confusion for retail investors resulting from the multiple sources of legislation (*e.g.*, UCITS Directive, IDD directive, MiFiD Directive) that have been enacted in recent years.

Source: European Commission proposal to protect EU retail investors and empower them to act in an informed manner

Authored by Ghina Farah, Mohamed Boukesra, Ryan-Landry Yohou

• Intellectual Property

European Union – The Unified Patent Court (UPC) began operations on 1 June 2023

The Unified Patent Court (UPC) <u>came into operation</u> on 1 June 2023, with the first-instance court judges taking their oaths before the Paris Court of Appeal on the same day.

So far, 48 judges have already been appointed, and the official languages to be used in proceedings and decisions will be French, English and German, to reflect as closely as possible the division of judging bodies within the European Union.

During its meeting on 8 May 2023, the UPC Presidium <u>decided</u> that as of 1 June 2023, actions pending before the Central Division relating to patents in section A (Human Necessities) of the International Patent Classification (IPC) will be assigned to the Paris Section, while those relating to patents in section C (Chemistry, Metallurgy) will be assigned to the Munich Section.

As for the competence initially attributed to the United Kingdom, it appears that Milan has been attributed the 3rd seat of the UPC Central Division, although the details of this new competence have not yet been defined.

European Union – Provisional political agreement of the European Parliament and Council to strengthen the protection of European craft and industrial products in the EU and worldwide

The European Parliament and Council have reached a <u>provisional political agreement</u> on the <u>13 April 2022 new Regulation Proposal</u> aiming at protecting intellectual property with regard to craft and industrial products based on the originality and authenticity of the traditional skills of their regions of origin.

This includes products such as glass, textiles, cutlery, musical instruments and porcelain. This Regulation will provide these products with a European recognition and protection system linking their origin and reputation on the one hand, to their quality on the other.

The protection of craft and industrial products and their know-how will be granted throughout the European Union and on the Internet. The aim is to bring the protection of traditional craft and industrial products into line with the protection of geographical indications.

In particular, the new Regulation intends to facilitate the registration procedures for geographical indications relating to craft and industrial products through a simplified two-stage procedure, before the competent national authorities and ultimately before the EUIPO for approval.

European Union – Recommendation (EU) 2023/1018 of 4 May 2023 on combating online piracy of sporting and other live events

On 4 May 2023, the European Commission adopted a <u>Recommendation (EU) 2023/1018</u> on combating online piracy of sports and other live events, such as concerts and theatre performances.

This Recommendation calls on Member States, as well as rights holders and intermediary service providers, to take the necessary and appropriate measures to combat the unauthorized retransmission of sporting events and other performances.

This initiative fits in with the fight against online piracy, and seeks to strengthen competitiveness in the relevant sectors across the European Union.

The Recommendation targets three main lines of action: the rapid and effective handling of notifications relating to illegal broadcasts of live content, the use of blocking injunctions adapted to this type of content, and raising consumer awareness regarding the online piracy issue and the existence of legal broadcasting offers. To this end, it invites event organizers in particular to increase the availability and attractiveness of their commercial offers within the European Union.

European Union – Amendments to the proposed Regulation on Artificial Intelligence (AI Act) voted by Members of the European Parliament on 11 May 2023

On 11 May 2023, the European Internal Market and Civil Liberties Committees adopted a joint position on the Artificial Intelligence Regulation (AI Act) proposed in April 2021 by the European Commission.

The initial text is aimed at providing safeguards and a uniform legal framework for the use and marketing of AIs in the European Union, depending on the level of risk they pose.

The amendments introduced by the MEPs are designed to support innovation in the field of AI, while at the same time protecting its users. On the intellectual property side, AI generative models (such as ChatGPT) will have to meet enhanced transparency requirements, by publishing summaries of the copyrighted data used to train the algorithms (Article 28b).

This draft negotiation agreement will have to be approved by the whole Parliament mid-June.

Authored by Iris Accary and Claire Borgel

• Litigation

France – Reintroduction of the obligation to make a preliminary attempt at amicable dispute resolution for "small" civil disputes

A <u>French decree dated 11 May 2023</u> reintroduces Article 750-1 of the French Code of Civil Procedure which requires prior recourse to an amicable dispute resolution procedure for certain "small" disputes before French judicial tribunals, such as disputes concerning a sum not exceeding 5,000 Euros. The Article also provides for exemptions from this obligation.

As mentioned in a previous update from our firm (<u>see here</u>), this article was cancelled by the French Administrative Supreme Court (*Conseil d'Etat*) in September 2022 because its previous version did not sufficiently specify the conditions for establishing the unavailability of judicial conciliators. This has now been rectified.

These provisions apply to proceedings initiated starting from 1st October 2023.

Authored by Charles-Henri Caron, Alexis de Kouchkovsky et Céline Giannetti

• Public Law

France – Public procurement - Electronic transmission of the backup copy

French order no. <u>ECOM2308848A</u> of April 14, 2023 amending appendix 6 of the French Public Procurement Code, published in the OJFR of 22 April 2023, modifies articles 2-I and 4 of the order of March 22, 2019 setting the procedures for making available consultation documents and the backup copy, which constitutes this appendix, in order to introduce a new method for the transmission of backup copies of candidatures and bids.

Thus, the candidate or bidder may now send a backup copy within the deadline for submission of candidatures or bids, either (i) as before, on paper or on a physical electronic medium, or (ii) by electronic means when authorized by the purchaser or the granding authority in the consultation documents. The backup copy is sent electronically, using tools and devices that comply with the requirements of appendix 8 of the French Public Procurement Code relating to the minimum requirements for electronic means of communication used in public procurement.

Furthermore, article 2 of the above-mentioned order of 2023 also adapts the procedures for submitting a backup copy electronically to the French overseas territories and collectivities.

France – Clarification on information and data exchanges between public authorities facilitating administrative procedures for the general public

Two decrees dated 11 May 2023, published in the OJFR of 13 May 2023, aim to organize and facilitate the exchange of information and data between public authorities in the context of administrative procedures, and consequently amend the regulatory part of the Code of relations between the public and the administration.

The aim of decree no. <u>2023-361</u> is to organize the exchange of information and data between public authorities when these latter are necessary to process declarations or requests submitted by the public, to inform individuals of their entitlement to a benefit or advantage, and to allocate such benefits or advantages where appropriate.

Decree no. <u>2023-362</u> sets the list of public authorities responsible for making certain types of information or data concerning individuals, companies or non-profit organizations available to other public authorities. The aim of this list is to provide a better understanding of the information exchange systems set up between public authorities, enabling each citizen to become more familiar with them.

Authored by Bruno Cantier, Astrid Layrisse and Nazrin Huseynova

Disclaimer

This publication is for information only. It is not intended to create, and receipt of it does not constitute, a lawyer-client relationship.

So that we can send you this email and other marketing material we believe may interest you, we keep your email address and other information supplied by you on a database. The database is accessible by all Hogan Lovells' offices, which includes offices both inside and outside the European Economic Area (EEA). The level of protection for personal data outside the EEA may not be as comprehensive as within the EEA. To stop receiving email communications from us please click here.

The word "partner" is used to refer to a member of Hogan Lovells International LLP or a partner of Hogan Lovells US LLP, or an employee or consultant with equivalent standing and qualifications, and to a partner, member, employee or consultant in any of their affiliated businesses who has equivalent standing. Where case studies are included, results achieved do not guarantee similar outcomes for other clients.

© Hogan Lovells 2023. All rights reserved. Attorney advertising.