

WORKPLACE INVESTIGATIONS – QUARTERLY REVIEW – EDITION 4

In this Quarterly Review we highlight how significant case law developments and proposed new laws are shifting the landscape for workplace investigations globally. Key topics include the proposed restriction in the UK on using confidentiality provisions in settlement agreements to prevent employees disclosing details of discrimination and harassment allegations; the UK FCA's new approach to non-financial misconduct ("**NFM**"); new anti-bullying rules in Poland; and case law from Italy and Spain on the use of electronic communications and social media in investigations.

We also apply an investigative lens to updates on diversity, equity and inclusion ("**DEI**") developments from the Trump administration in the US and highlight learnings from our recent Perspectives Series webinar on workplace investigations in APAC, (including the impact of the new data protection regime in China).

We share suggested action points in light of relevant developments and insights on trends and best practice.

KEY ISSUES

- 1 DEI updates from the US through an investigative lens
- 2 Restrictions on confidentiality provisions in UK settlement agreements
- 3 New anti-bullying legislation in Poland
- 4 Case law on electronic communications and social media in Italy and Spain

5 UK FCA's updated NFM Regime

6 UK: New obligation to take reasonable steps to prevent fraud

7 Insights from the APAC Perspectives Webinar

EXECUTIVE SUMMARY

Americas

- **US ("DEI"):** The Department of Justice ("DOJ") has been issuing investigative demands to entities receiving federal funds, seeking information about their DEI programs.
- There is an increased need, when dealing with workplace disputes, to account for both the risk of "reverse discrimination" claims and the risk of more traditional anti-discrimination claims.

Europe

- **UK (Proposed legislative changes and case law developments):** Expected legislative changes affecting the use of NDAs/ confidentiality provisions in settlement agreements may increase the need to conduct and conclude investigations to resolve allegations of discrimination and harassment.
- It is anticipated that a new body will be created (the Corporate Reporting Authority) with the power to investigate and sanction individual directors for serious failures of their reporting duties.
- Recent case law confirms that disclosures made to external investigators can attract protection under whistleblowing legislation.
- **Italy and Spain (case law on electronic communications and social media):** In Italy, the Supreme Employment Court has held that employers cannot access former employees' emails without prior union agreement or labour inspectorate authorisation, which will impact the ability to investigate matters concerning former employees.
- In Spain, courts are increasingly permitting the use of social media content as evidence in internal investigations, but not in all circumstances.
- **Poland (new regulations on workplace mobbing (bullying)):** New regulations on workplace mobbing (bullying) are expected in late 2025/ early 2026, which is likely to lead to an increase in the already high number of complaints, internal investigations and litigation related to mobbing in Poland.

Sector Focus (UK Regulated Businesses)

- **NFM:** The FCA has published its much-anticipated approach to NFM, which will impact how firms address allegations of bullying, harassment and discrimination.
- **SMCR:** The FCA's SMCR consultation paper includes draft guidance on how fitness and propriety is to be dealt with, including what may need to be included in a regulatory reference if an employee leaves the firm before an investigation into potential misconduct is concluded.

Q&A: New obligation to take reasonable steps to prevent fraud in the UK

- Our experts consider the new duty and answer questions on how this will impact the approach to investigations where there may be a suspicion of fraud against a third party.

APAC: Insights from the APAC Perspectives Webinar on Workplace Investigations

- An overview of developments and trends in workplace investigations in China, Japan, Australia and Singapore as highlighted in our APAC Perspectives webinar.
- China's new data protection regime demands informed, voluntary consent for mobile and laptop device access and data extraction.
- In Japan, discrimination and harassment complaints are on the increase and we share our thoughts on the particular sensitivities to be managed.

FULL REVIEW

Americas

US DEI

In July 2025, the U.S. Attorney General [issued guidance](#) on the legality of programs involving "discriminatory" practices, including DEI programs, under federal anti-discrimination laws. The guidance suggests that the administration considers *any* difference in treatment based on protected characteristics - favourable or otherwise - to be discriminatory. It cautions against the use of "facially neutral" criteria (i.e. those that do not appear to discriminate on their face, such as "cultural competence" or "lived experience") as "proxies" for race, sex, or other protected traits with respect to workplace policies, where such criteria are intended to advantage or disadvantage individuals on the basis of those traits. The guidance also makes clear that federal fund recipients may be liable for knowingly supporting "discriminatory" programs operated by subcontractors, grantees, and other third parties.

We have previously written about the DOJ's Civil Rights Fraud Initiative (the "**Initiative**"), which seeks to use the False Claims Act to investigate and prosecute federal contractors and government fund recipients for alleged civil rights violations (see article [here](#)). The Initiative builds on the Trump administration's [earlier Executive Orders](#) against DEI, which require federal contractors and grant recipients to certify, under penalty of False Claims Act liability, that they are not operating "unlawful" programs "promot[ing]" DEI. The DOJ is also encouraging whistleblowers to report any known "discriminatory practices" by federal funding recipients, and to file private actions against recipients on behalf of the government (contemplated by the False Claims Act, these are known as "qui tam" suits).

In furtherance of this Initiative, the DOJ recently started issuing Civil Investigative Demands ("**CIDs**") to federal contractors and grant recipients seeking information about their DEI programs. A CID is an investigatory tool the DOJ uses to gather information before bringing formal legal action. It is unclear at this time which entities have received CIDs. However, the DOJ's "strategic enforcement plan," as described in [Executive Order 14173](#), suggests that the DOJ will target entities such as publicly traded corporations, large nonprofit organizations and associations, foundations with assets over US\$500 million, state and local bar and medical associations, and institutions of higher education with endowments exceeding US\$1 billion.

Together, these anti-DEI policies increase the risk of "reverse discrimination" lawsuits and whistleblower actions against employers, and the likelihood of government scrutiny particularly for entities contracting with the federal government. However, it is important to remember that federal anti-discrimination laws - including Title VII of the Civil Rights Act, the Americans with Disabilities Act, and the Pregnant Workers Fairness Act of 2022 - remain enforceable and continue to prohibit discrimination based on protected characteristics. Additionally, claims filed by employees (not by the government) remain the bulk of the country's discrimination law enforcement.

This means that internal reviews of an organisation's DEI approach need to be carefully conducted. Employers should remain vigilant, continuously monitor for updates, and ensure they have robust compliance measures in place. Federal fund recipients should conduct a review of third-party contracts and grant agreements and establish protocols to monitor and ensure third-party compliance with relevant laws and regulations. Finally, employers should be prepared to demonstrate compliance with *all* applicable anti-discrimination laws in connection with their workplace and programmatic initiatives.

Europe

UK: Confidentiality Agreements and NDA Reforms

As part of the Employment Rights Bill currently progressing through parliament, the UK Government is proposing that NDAs, including confidentiality provisions in settlement agreements, will be void if they prevent disclosures of allegations of harassment, discrimination or victimisation/ retaliation including details of an employer's response to such allegations. [See our fuller briefing here.](#)

While, under the proposals, NDAs may still be used in limited circumstances (to be defined in secondary legislation), strict criteria have been proposed, including allowing workers to withdraw consent to the use of an otherwise banned NDA and to remain free to speak with trusted individuals.

These reforms are expected to reshape how employers approach dispute resolution and investigations into discrimination, harassment and victimisation allegations in the UK. Employers may be less willing to settle claims without the guarantee of confidentiality, which may lead to the need for investigations into the underlying allegations which could otherwise have been avoided. Further, employers should consider investigating allegations before or even after settlement to assess their exposure risk and be able to respond in the event confidentiality clauses become void and details of the allegations become public or more widely known.

UK: Employment Appeal Tribunal (EAT) confirms that disclosures made to external investigators can be protected under legislation protecting whistleblowers.

In ***Chase v Northern Housing Consortium Ltd and another [2025]*** the EAT confirmed that a worker who makes a protected disclosure to a third-party investigator can be treated as making that protected disclosure to their employer under legislation protecting whistleblowers on the basis that it has been made in accordance with a procedure whose use by that worker is authorised by the employer.

The EAT clarified that an investigation procedure, such as one carried out by external counsel, can be treated as being one pursuant to which an

employee is authorised to raise new complaints even if the purpose of the investigation procedure is (as is commonly the case) to look into existing complaints. However, in order for a worker to have a successful whistleblowing claim it will still be necessary to demonstrate that a protected disclosure to an external investigator caused a detriment (e.g. disciplinary action or dismissal).

Below we consider some practical ramifications for employers' workplace investigations and whistleblowing frameworks:

- **Consider limiting those who will have access to the full external investigation report:** This may reduce the risk of there being a chain of causation between an alleged protected disclosure and any subsequent detriment.
- **Train managers and update policies:** Managers should be aware that even if a worker raises disclosures to an external investigator the worker is still protected from resulting detriment and policies should be updated accordingly.
- **Review any whistleblowing processes:** Consider the extent to which disclosures raised with external investigators should be treated in the same way as complaints under the firm's whistleblowing procedures (this is particularly relevant for regulated firms). For example, if there is a policy approach of monitoring the future treatment of a worker who made an internal complaint, consider doing the same for one who spoke to external investigators.

UK: Audit Reform and Corporate Governance Bill

The King's Speech, on 17 July 2024, signalled a renewed commitment to further audit and corporate governance reform, with the announcement of the Audit Reform and Corporate Governance bill. The bill is expected to include the creation of a new statutory regulator - the Corporate Reporting Authority ("**CRA**"). A consultation is expected in the autumn and the draft bill is expected to include new powers for the CRA to investigate and sanction individual directors for serious failures of their reporting duties. This marks a significant shift from the current regime and it is clear the UK Government wishes to encourage directors to take their responsibilities more seriously and to engage actively with risk management, audit processes, and reporting.

Italy: Recent case law developments in internal investigations

In August 2025, the Supreme Employment Court held that employers are prohibited from accessing the emails of former employees without first obtaining union agreement or authorisation from the labour inspectorate and providing prior notice to the individuals concerned. This notice must specify the possibility, scope, and method of any access controls. This decision makes workplace investigations more complicated and time consuming in Italy and highlights the importance of forward planning.

Spain: Updates on use of social media evidence in internal investigations

Recent case law reveals a growing trend towards the use of content obtained from social media as admissible evidence in workplace investigations, particularly in relation to employees on temporary incapacity leave. Judicial authority is increasingly drawing a significant distinction between temporary incapacity arising from mental health conditions (where in a recent case it was found that travel related posts on TikTok are not necessarily incompatible with leave for anxiety or depression) and that resulting from physical ailments (where social media

images of an employee engaging in sporting activities was found to be an abuse of trust by the employee).

Poland: Labour Code Changes - mobbing

In August 2025, consultations concluded on the first draft of amendments to the Labour Code provisions concerning workplace mobbing (bullying), with new regulations expected by late 2025 or early 2026. Key changes include a clearer and broader definition of mobbing, stronger sanctions and simpler claims procedures for victims and new employer obligations such as adopting anti-mobbing policies. Employers may be exempt from liability if they can prove they took effective preventive and follow-up measures.

It is expected that the new regulations will lead to an increase in the already high number of complaints, internal investigations and litigation related to mobbing in Poland.

Sector Focus – Financial Services (UK Developments)

UK: NFM Rules and Guidance and proposed changes to SMCR Regime

On 2 July 2025, the FCA published its long-awaited approach to NFM in the financial services sector. This included introducing new NFM rules ("**NFM Rules**"), applying from 1 September 2026, aligning non-banking firms with the standards already expected of banks. The FCA also published a fresh consultation on proposed guidance for the application of NFM rules in determining a breach of the Conduct Rules and application of the Fit and Proper test. See our fuller briefing [here](#).

In addition to the NFM developments, on 14 July the FCA published a consultation on proposed revisions to the Senior Managers and Certification Regime ("**SMCR**"). One of the areas considered in the FCA's SMCR consultation is draft guidance on regulatory references where employees have left part way through an investigation.

Clarifications in the NFM Rules and proposed guidance

The FCA has expanded the scope of the Code of Conduct Sourcebook ("**COCON**") to clarify that for non-banks the NFM Rules cover serious instances of bullying, harassment and violence and similar behaviour towards a colleague (i.e. fellow employees and employees of group companies and contractors).

The FCA's draft NFM guidance seeks to draw a clear distinction between conduct within and outside of the regulatory perimeter. The draft NFM guidance includes detailed examples to help firms determine whether conduct is within scope for COCON (e.g., misconduct at firm-organised events or when representing the firm) or falls outside (e.g., private life conduct with no work connection). However, even where conduct is outside COCON, it may still be relevant to fitness and propriety assessments under FIT and require investigation (including, for example, cases of domestic violence to the extent that there is a risk of repetition in the workplace or otherwise the extent that the misconduct demonstrates a willingness to disregard ethical or legal obligations or exploit the vulnerabilities of others).

Triggers and Thresholds for Investigations

Firms should review and document the triggers for investigations and Conduct Rule breach determinations, ensuring that decisions not to classify NFM as a COCON breach are reasoned and referenced to the guidance.

The draft NFM guidance clarifies that, in relation to FIT assessments, firms are not generally required to monitor employees' private lives, including social media, proactively. However, if a firm becomes aware of allegations that, if true, would call into question an individual's fitness and propriety, it must consider what reasonable steps it can take to investigate (the nature of the allegations and the firm's resources being relevant factors). This may be challenging; it is unclear from the current draft NFM guidance whether firms would be expected to act upon rumours or merely formal findings or official allegation. A firm must balance data protection and privacy obligations alongside this regulatory expectation. Formal grievances and whistleblowing complaints are likely to be "good reason" to investigate, but informal reports, rumours and speculation will be harder to judge.

Firms will need to consider what a reasonable investigation entails; the draft guidance suggesting that it may be reasonable to ask for an explanation from the member of staff whose fitness and propriety is being assessed. What reasonable steps will look like also remains to be seen, and this may be a point clarified in the final guidance.

Regulatory references

The FCA's SMCR Review Consultation Paper includes draft guidance on what may need to be included in a regulatory reference if an employee leaves the firm before an investigation into potential misconduct is concluded. The draft guidance states that the firm should actively consider whether to include the details of the suspected misconduct in a reference taking into account:

- whether the suspected misconduct would be material enough to disclose if it were true;
- whether the firm has good enough grounds for its belief for it reasonably to consider that it would be relevant to the new employer's assessment of whether the employee is fit and proper;
- whether including it would be consistent with fairness (i.e., does it have reasonable grounds for believing that the misconduct has taken place or that the information is true); and
- the extent to which including the information is otherwise permissible under privacy, employment and other provisions of relevant law.

This draft guidance is broadly in line with process currently being adopted by many financial institutions. However, there are a lot of subjective concepts in the draft guidance and we await the final guidance to see if clarification is provided. In any event, cases will always be fact specific (and depend on regulatory relationships/ expectations on a particular firm).

Practical Steps

As a result of the FCA's updated approach to NFM and the draft guidance on regulatory references and investigations referred to above, firms should take steps to:

- review and prepare to update investigation protocols to ensure alignment with the expanded NFM Rules and draft NFM guidance, including clear documentation of decision-making and rationale;
- train HR, compliance, and legal teams on the new regulatory standards, the distinction between COCON and FIT, and the need for consistency in investigations and reporting;
- clarify internal definitions and thresholds for NFM, ensuring global consistency while respecting local legal requirements;

- coordinate cross-border investigations with local counsel to address jurisdictional differences and data privacy considerations;
- prepare for regulatory reference disclosures by maintaining appropriate records of investigations, including those with inconclusive outcomes;
- engage senior management and boards in oversight of NFM, including regular review of investigation outcomes and cultural indicators;
- communicate changes and expectations to staff, including the duty to self-report or report colleagues' conduct where appropriate; and
- keep the position under review, awaiting final guidance from the FCA in both cases.

New Obligation to take reasonable steps to prevent fraud

Q&A with Matthew Lee, a Senior Associate in Clifford Chance's regulatory investigations team.

What is the new offence?

The new Failure to Prevent Fraud offence is a corporate criminal offence. Under this regime, which came into force in the UK on 1 September 2025, large organisations can be held criminally liable if they fail to prevent fraud committed by their 'associates', a term that includes employees, agents, subsidiaries, and potentially suppliers or subcontractors acting on the company's behalf. Further details, including the "large organisation" thresholds, can be found in our briefing [here](#).

The only defence is for the organisation to show it had reasonable fraud prevention procedures in place, or that it was reasonable not to have such procedures in the circumstances.

For further details, see our practical guide to fraud prevention procedures [here](#).

What is the relevance of internal procedures?

The cornerstone of many organisations' compliance efforts will be performing an organisation wide fraud risk assessment. As part of this, government guidance emphasises the need for effective whistleblowing processes within an organisation. Robust internal investigation, disciplinary and reporting procedures should also be in place to address situations where employees are suspected of committing fraud.

What impact could the new offence have on workplace investigations?

Employers need to be mindful that, when conducting workplace investigations into allegations of external-facing fraud committed by employees (i.e. fraud other than where the employer is a victim) then there is a risk that the employer could also be criminally liable for failing to prevent any fraud that is found to have been committed.

For such an investigation, it will be important that clear and appropriately drawn terms of reference are set at its outset, so that all relevant internal stakeholders understand its scope and objectives.

If the investigation identifies that fraudulent acts have been committed, then the employer will likely need to assess how this conduct has occurred against the backdrop of its existing fraud prevention procedures. Clearly delineating and defining these processes will be important, particularly given that any non-privileged work-product created could be used as evidence in any future prosecution of the company if it is alleged that it

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Matthew Lee, Regulatory Investigations Team

failed to have reasonable fraud prevention procedures in place to prevent the fraud. Internal or external legal advice should therefore be sought at an early stage of any such matters and companies are advised to use experienced investigators to navigate these concerns.

What else should employers be considering?

More generally, updates will likely be required to an organisation's policies and procedures and employee handbooks to specially address fraud related risks. Internal facing employee communications may need to be prepared, making clear the commitment of senior management to preventing fraud within the organisation, and anti-fraud training will need to be delivered to employees (particularly those in high-risk roles), with processes in place to monitor completion of it.

APAC

Insights from the APAC Perspective Webinar

On Thursday 4 September, the Clifford Chance APAC Perspectives webinar brought together employment law specialists from our various offices in Singapore, Hong Kong, Australia, Japan, and China to discuss the latest trends, legal developments, and practical challenges in workplace investigations across the region. The entire webinar can be watched [here](#).

A few key takeaways from the webinar include:

- **Australia:** In the case of *Magar v Khan*, decided on 1 August 2025, Ms Magar was awarded AU\$305,000, inclusive of the highest ever award of general damages in Australia for sexual harassment. The respondent fast-food franchise was found to have failed to safeguard Ms Magar's anonymity, shared a video of her complaint without consent, and neglected to explain which allegations were substantiated or what remedial steps would follow. It appears that for Australian employers, confidentiality protocols and clear, empathetic communication are no longer optional but are becoming an essential requirement to limit an employer's liability.
- **China:** In China, a strengthened data protection regime has substantive impact on how workplace investigations should be conducted. Under the Personal Information Protection Law ("PIPL"), Data Security Law, and Cybersecurity Law, employers must process employee personal information in a lawful, necessary, and transparent manner. When conducting internal investigations, such as inspecting a personal device under a Bring Your Own Device (BYOD) policy or imaging a company-issued laptop, informed and voluntary consent is required. Consent must be obtained freely, without coercion, and employees should not be penalized for refusing to provide it where personal information, among others, is involved. Employers are advised to review and update data protection and BYOD policies and to take advice where an investigation requires the review of laptops, mobile phones or other devices (personal or company issued). Where cross-border data transfers are involved, investigations may become more complex and external counsel can help ensure compliance with Chinese data export requirements.
- **Singapore:** The misuse of confidential information is often a matter subject to workplace investigations and employment disputes. In the case of *Hayate Partners Pte Ltd v Rajan Sunil Kumar [2025]* a senior employee downloaded sensitive fund-management data onto his personal device but deleted it before any third-party access. He argued his contract only prohibited "misuse, disclosure or retention" and

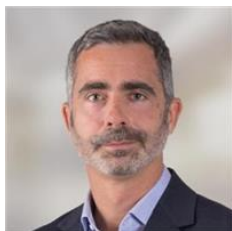
therefore he was not in breach of his confidentiality obligations. The High Court found against the employee on this point finding that a narrowly drafted contractual clause (prohibiting only "misuse, disclosure or retention") does not prevent equitable liability for unauthorised downloading. However, this decision underlines the need to draft confidentiality obligations to cover all forms of unauthorised data copying or downloading and employers are advised to review their confidentiality provisions in employment contracts to ensure they are sufficiently comprehensive.

- **Japan:** Employers are facing a significant uptick in reports of harassment, discrimination and other workplace concerns. This trend reflects both heightened employee awareness of their rights and recent legislative reforms. Japanese unique workplace culture often places emphasise on harmony and respect for hierarchy, which can sometimes discourage employees from reporting issues openly. Therefore, if investigations are not handled sensitively, there is a risk of undermining trust or even exacerbating the problem. For these reasons, in certain circumstances it can be helpful to use external counsel to conduct the investigation.

The entire webinar can be watched [here](#).

Our people would be happy to discuss any of these developments. Our workplace investigations and culture review hub can be found [here](#).

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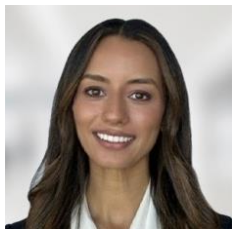


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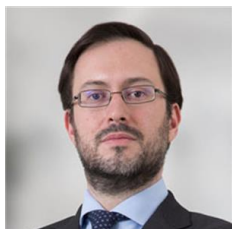
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