April, 2022　No.46

This issue covers the following topics:

Malaysia

REASONS DISCOVERED POST-DISMISSAL OF EMPLOYEES CANNOT BE RELIED UPON TO JUSTIFY THE DISMISSAL OF AN EMPLOYEE

マレーシアの雇用法上、従業員の解雇には正当な理由が必要とされており、法律上何が正当な理由に該当するか明文の規定はないものの、一般的には従業員の不正行為や業績不振などがその一例として挙げられる。本稿では、かかる正当な理由は解雇時点で判明しているものに限られ、解雇後に判明した事由は正当な理由にはなり得ないことを判示した裁判例について紹介する。

Notwithstanding any termination by notice clause contained in the employment contract of an employee which gives right to an employer to terminate such employment contract by written notice, the strict position under Malaysian law is that an employer is required to show "***just cause or excuse***" before terminating an employee's contract of employment – Typically misconduct or poor performance will amount to "***just cause or excuse***". All employees in Malaysia (regardless of their wage and designation) can bring an unfair dismissal claim against the employer under section 20 of the Industrial Relations Act 1967 ("**IRA 1967**") within 60 days of their dismissal if they believe that they have been dismissed without just cause or excuse.

In the case of *Maritime Intelligence Sdn Bhd v. Tan Ah Gek [2021] 10 CLJ 663* ("**Maritime Case**"), the Federal Court decided on October 22nd, 2021 that an employer cannot rely on reason that arose or becomes apparent after the dismissal of an employee to justify the termination of employment of such employee. This means that for example, if an employee is dismissed for poor performance, and through further investigation after his dismissal, the employer discovers that the employee had falsely claimed for overtime payments when he did not in fact work overtime, the employer cannot use the false claims for overtime payments as a reason to justify his dismissal.

Brief Facts of Maritime Case

Maritime Intelligence Sdn. Bhd. ("**MISB**") had dismissed Tan Ah Gek ("**Tan AG**") from employment after a domestic inquiry was held because of alleged misconduct including undermining the authority of MISB's director and unethical and unprofessional behavior. The Industrial Court found MISB had failed to substantiate the allegations made against Tan AG and held that the dismissal was without "***just cause or excuse***".

In MIBS's pleadings to the Industrial Court, MISB raised for the first time that the dismissal was justified in their

view, because Tan AG was never qualified for her position from the outset because her post-graduate degree was not issued by an accredited university. This new ground was rejected by the Industrial Court because it was not specified in the show cause letter issued by MISB to Tan AG and it was not stated as a ground of dismissal in the notice of termination issued to Tan AG.

MISB later made an application for judicial review at the High Court, which was dismissed. MISB then appealed to the Court of Appeal, which was also dismissed, albeit for different reasons. MISB eventually appealed to the Federal Court, and the Federal Court had to consider the following question: "*Whether the Industrial Court has the right to enquire into reasons subsequently put up by the employer via pleading to justify the dismissal, even if such reasons were not given at the time of the dismissal*".

Federal Court's Findings

The Federal Court dismissed MISB's appeal and ruled that MISB cannot rely on reasons discovered post dismissal to justify the dismissal of Tan AG. In coming to its decision, the Federal Court interpreted sections 20(1) and 20(3) of the IRA 1967, wherein it was stipulated that:

Section 20(1) – "*Where a workman, irrespective of whether he is a member of a trade union of workmen or otherwise, considers that he has been dismissed without just cause or excuse by his employer, he may make representations in writing to the Director General to be reinstated in his former employment; the representations may be filed at the office of the Director General nearest to the place of employment from which the workman was dismissed*"

Section 20(3) – "*Upon receiving the notification of the Director General under subsection (2), the Minister may, if he thinks fit, refer the representations to the Court for an award.*"

As underlined above, a dismissed employee is entitled to lodge a representation in writing to the Director General of the Industrial Relations Department for unfair dismissal if in the employee's view, the termination of employment is without justified reasons. In relation to this, the Federal Court's views are as follows:

1. Its interpretation of section 20(1) of IRA 1967 is that any representations by a dismissed employee that he has been unfairly dismissed must made at the time of the dismissal, i.e. when the dismissed employee subjectively considers that he has been dismissed without just cause or excuse.

2. The Industrial Court is bound to hear the dismissed employee's representations, which are made at the time of his dismissal, and as such, the focus of the Industrial Court's enquiry must be premised on matters and events that occurred at the time of the dismissal. In assessing the fairness of a dismissal, the Industrial Court is confined to the reasons, factors or events operating in the mind of the employer at the time of dismissal, resulting in the representation.

3. The very specific wording of section 20 of the IRA 1967 does not allow the Industrial Court to embark on a far ranging survey to ascertain whether given matters which the employer has discovered subsequently and not put forward to the employee, it is justified in dismissing the employee.

4. The phrase 'just cause or excuse' in section 20(1) of the IRA 1967 confines the Industrial Court's enquiry into the employer's state of mind to matters that were considered at the time, or that preceded the decision to dismiss.

5. In cases where the employer does not give the employee any reasons for the dismissal, the Industrial Court will embark on its own inquiry, and the employer will be allowed to adduce evidence to explain why the dismissal was with just cause or excuse, provided that any such justifications provided by the employer must have been evident and operational at the time of the dismissal.

Conclusion

Due to the Maritime Case, employers should be diligent and carefully conduct their domestic inquiry for any intended dismissal of employees. The employer should as much as possible, establish clear reasons for dismissal

of its employees before issuing a notice of termination to the employee as it will be difficult for it to later rely on reasons discovered after the dismissal to justify the termination.

[Author]

Aizad Bin Abul Khair (Nagashima Ohno & Tsunematsu Singapore LLP)
aizad_khair@noandt.com

Aizad Bin Abul Khair is a Malaysian and UK qualified attorney in the Singapore office. His areas of practice include mergers and acquisitions, equity capital markets, joint ventures and general corporate matters. Aizad has extensive experience working in Malaysian related matters and this includes sale and acquisition of private companies and businesses, listing and other equity capital raising on the Malaysian Stock Exchange, take-overs and corporate restructuring.

Singapore

SINGAPORE HIGH COURT GRANTS PROPRIETARY AND WORLDWIDE MAREVA INJUNCTIONS AGAINST "PERSONS UNKNOWN" FOR STOLEN CRYPTOCURRENCY ASSETS

シンガポール高等裁判所は、暗号通貨を盗取されたと主張する米国籍の原告が被告を特定せずに Mareva Injunction と呼ばれる資産凍結の仮処分を求めたのに対して、暗号通貨の資産性を肯定し、身元不明の被告に対しても一定の特定を行うことで仮処分命令を出すことができる旨判示した。暗号通貨の法的性質や盗取された場合に採りうる法的措置を新たに示した実務的にも意味のある裁判例であることから本稿で紹介する。

Introduction

In a judgment released on 4 March 2022, the Singapore High Court issued its first worldwide Mareva injunction (also known as a freezing injunction) against "persons unknown" for stolen cryptocurrency assets. This follows after the Singapore Court of Appeal's *obiter dicta* in 2020 examining whether cryptocurrencies could be a property and the precise nature of such right. Even though the plaintiff in *CLM v CLN* [2022] SGHC 46 is a citizen of the United States, the suit was commenced in Singapore against persons unknown as first defendants and foreign entities operating cryptocurrency exchanges in Singapore as second and third defendants. The case raised two novel points of law: (1) whether stolen cryptocurrency assets could be the subject of a proprietary injunction, and (2) whether the court had jurisdiction to grant interim orders against persons whose identities were, at the time of the commencement of the suit, unknown. Both questions were answered in the affirmative.

Summary of the Facts

The plaintiff, a United States citizen, commenced an action in the High Court to trace and recover 109.83 Bitcoin ("BTC") and 1497.54 Ethereum ("ETH"), collectively referred to as the "Stolen Cryptocurrency Assets", that were allegedly misappropriated from him by unidentified persons (referred to as the first defendants). As a portion of the Stolen Cryptocurrency Assets had been traced to digital wallets that were controlled by cryptocurrency exchanges with operations in Singapore, the entities that were incorporated in the Cayman Islands and Seychelles were named as second and third defendants. It was made clear that the exchanges were considered innocent third parties and the plaintiff did not make substantive claims against them other than for disclosure of information and documents collected by the exchanges for the relevant accounts through which some of the Stolen Cryptocurrency Assets were moved, and transaction details of these accounts.

The plaintiff alleged that on 7 January 2021, upon enlisting an acquaintance's assistance in accessing a safe in his apartment in Mexico, the safe combination was revealed to six of his acquaintances. At 8pm the next day, the plaintiff discovered that his BTC and ETH in his Exodus and BRD wallets had been withdrawn without his knowledge or consent. He believes that the recovery seeds for his cryptocurrency wallets were stolen from his safe and used to transfer the Stolen Cryptocurrency Assets, worth about USD 7 million in total.

Some of the Stolen Cryptocurrency Assets were traced to certain wallet addresses controlled by the second and third defendants (cryptocurrency exchanges). The plaintiff sought a proprietary injunction as well as a worldwide Mareva injunction (worldwide freezing injunction) against the first defendants, who were persons unknown. A proprietary injunction is an interim order that can be granted by a court in support of a claim for proprietary relief, and as such fastens on a specific asset in which a plaintiff asserts proprietary interest. It prevents a defendant from dealing with that asset and its traceable proceeds. On the other hand, a Mareva injunction is granted in support of claims for personal relief. It is ambulatory and does not latch on to any specific asset. Instead, a Mareva injunction prevents the defendant from dissipating his or her assets beyond a certain value to defeat a possible judgment that may in due course be rendered against him or her.

Cryptocurrencies as a Property Right

As proprietary injunctions can only be granted in support of a proprietary relief sought in the main claim, the Court had to first be persuaded that cryptocurrencies were capable of giving rise to proprietary rights. The High Court reviewed the Court of Appeal's examination of the definition of a property right in *Quoine Pte Ltd v B2C2 Ltd* [2020]

2 SLR 20, applying the classic definition of a property right in the seminal case of *National Provincial Bank Ltd v Ainsworth* [1965] AC 1175 that it "must be definable, identifiable by third parties, capable in its nature of assumption by third parties, and have some degree of permanence or stability."

Drawing from Singapore, UK and New Zealand case law, the High Court was persuaded that cryptocurrencies satisfied the definition of a property right, being computer-readable strings of characters tied to an account which enabled its definition, which could only be controlled to the exclusion of others by private keys of the owner, thereby satisfying the second requirement that the right must be "identifiable by third parties". Under the third requirement that the right must be "capable of assumption by third parties", third parties must respect the rights of the owner in that asset, and the asset must be potentially desirable – a requirement that was satisfied by the existence of active trading markets for cryptocurrencies. The High Court also found that the blockchain technology provides a certain degree of permanence or stability for cryptocurrencies.

In sum, the High Court held that cryptocurrencies were capable of giving rise to proprietary rights, and granted a proprietary injunction for the Stolen Cryptocurrency Assets as against the first defendants on the basis that there was a serious issue to be tried and that the balance of convenience was in favor of granting the injunction.

Injunctions Against "Persons Unknown"

The ability to operate anonymously, or at least under pseudonyms, is one of the central tenets (and probably a main attraction) of cryptocurrencies. In the plaintiff's case, where the Stolen Cryptocurrency Assets that were transferred without his knowledge or consent, even though he was able to trace the movement of the BTC and ETH, he faced layers of anonymization techniques used by the perpetrators that masked their true identities. This was through the use of Virtual Private Network services that obscured the locations from which the perpetrators had accessed their accounts on the second and third defendants. Moreover, the physical addresses used to register the perpetrators' accounts on the second and third defendants were not necessarily properly verified, which made it hard to discover their identities even with the cryptocurrency exchanges' cooperation in disclosing information on those accounts.

Following UK and Malaysian precedents, the Singapore High Court held that it could grant interim orders against persons unknown, so long as they were described with sufficient certainty as to who were included and excluded. The Court found that the description of the first defendants as "any person or entity who carried out, participated in or assisted in the theft of the Plaintiff's Cryptocurrency Assets on or around 8 January 2021, save for the provision of cryptocurrency hosting or trading facilities" was sufficiently certain.

Conclusion

The Singapore High Court's decision further cements cryptocurrency's legal standing as a valuable property right that can and will receive protection under the law. Although the proprietary and Mareva injunction orders are not decisions on the merits *per se*, this is nevertheless a welcome development following the Court of Appeal's detailed commentary on the nature of cryptocurrencies and the ability of owners of such intangible assets to exercise and enforce his or her rights to the exclusion of third parties, a crucial concept under property law. This case further illustrates that cryptocurrency exchanges are limited in their ability to actually prevent the fraudulent transfer of cryptocurrency assets; they are not likely to be able to play a significant role in preventing actual dissipation of assets, and it is up to owners to be diligent with the device(s) and private keys used to operate their cryptocurrency accounts.

[Author]

Annia Hsu (Nagashima Ohno & Tsunematsu Singapore LLP)
annia_hsu@noandt.com

Annia Hsu is a Singapore and New York qualified attorney in the Singapore office of NO&T. Annia has assisted in representing and advising clients in all forms of dispute resolution including litigation in the Singapore courts, arbitration, adjudication, and mediation, and her areas of practice and experience include general commercial litigation and arbitration, shareholder disputes, mining, energy, construction and infrastructure disputes, resulting and constructive trusts, restructuring and insolvency, and probate and administration matters. She has experience in both commercial and investor-state arbitration conducted under ICSID, ICC, LCIA and SIAC rules.

Philippines

LATEST AMENDMENTS TO THE PUBLIC SERVICE ACT: DEFINING PUBLIC UTILITIES

2022 年 3 月 21 日、フィリピンの公共サービス法として知られる改正連邦法第 146 号が改正された。この改正により、公共サービスを公益事業（public utility）と重要インフラ（critical infrastructure）の二つと定義され、それ以外の公共性を有する事業に対して外資が参入できることが明確化された。外資によるフィリピンへの投資活動にとっては歓迎すべき法改正であることから本稿で紹介する。

On 21 March 2022, further amendments to Commonwealth Act No. 146[1], otherwise known as the Public Service Act, were signed into law as Republic Act No. 11659 (the "**Latest Amendments**"). By providing for a specific definition of the term "public utility", the Latest Amendments distinguish it from the concept of public services and create significant changes by opening up a number business sectors previously regarded as public utilities to full foreign ownership.

Background

The existing limitation on the foreign ownership of public utilities finds basis in the 1987 Philippine Constitution, which provides that no franchise, certificate, or any other form of authorization for the operation of a public utility shall be granted except to Philippine citizens or to corporations organized under Philippine laws and at least 60% owned by Philippine citizens. However, the Constitution did not define the term "public utility" and in the absence of any clear statutory definition of such term, the Public Service Act, which was enacted in 1936 to regulate the delivery of public services, was relied on by authorities to determine what constituted public utilities.

Looking back, Section 14 of the 1936 version of the Public Service Act used the terms "public service" and "public utility" interchangeably. However, after several laws amending and renumbering Section 14 were subsequently passed[2], references to "public utility" no longer appeared in the definition of "public service". By then, jurisprudence emerged tying the two concepts together and defined public utility as "a business or service engaged in regularly supplying the public with some commodity or service of public consequence such as electricity, gas, water, transportation, telephone or telegraph service". The Supreme Court has also repeatedly ruled that as its name indicates, the term "public utility" implies public use and service to the public, and that the principal determinative characteristic of a public utility is that of service to, or readiness to serve, an indefinite public or portion of the public which has a legal right to demand and receive its services or commodities.[3] As a consequence, businesses which qualified as public services under the Public Service Act were regarded as public utilities and were subject to the constitutional foreign ownership limitation of 40%. However, now that the Latest Amendments have defined what a public utility is, the application of such constitutional limitation will be qualified accordingly.

Highlights of the Latest Amendments

The key changes to the Public Service Act introduced by the Latest Amendments are discussed below:

I. Public utilities and critical infrastructure as new sub-classifications of public services

The Latest Amendments provide statutory definitions for public utilities and critical infrastructure, as specific classifications of public services.

a) Public utilities

The Latest Amendments added a new paragraph (d) to Section 13 of the Public Service Act, defining public utility as a public service that operates, manages or controls[4] for public use, any of the following:

---

[1] As amended by Commonwealth Act No. 454, Republic Act No. 1270, Republic Act No. 2013, and Republic Act No. 2677, etc.
[2] These include Commonwealth Act No. 454, Republic Act No. 1270, Republic Act No. 2013, and Republic Act No. 2677.
[3] G.R. No. 83551, 11 July 1989; G.R. No. 124293, 24 September 2003; G.R. No. 197611, 23 June, 2021
[4] All concessionaires, joint ventures and other similar entities that wholly operate, manage or control for public use the sectors enumerated are also public utilities

(i) distribution of electricity

(ii) transmission of electricity

(iii) water pipeline distribution systems, and wastewater pipeline systems, including sewerage pipeline systems

(iv) petroleum and petroleum products pipeline transmission systems

(v) seaports

(vi) public utility vehicles[5], except transport vehicles accredited with and operating through transport network corporations

The above list of public utilities appears to be exclusive, since the Latest Amendments provide that "no other person shall be deemed a public utility unless otherwise subsequently provided by law". Consequently, only entities engaged in the above businesses remain subject to the 40% foreign ownership constitutional limitation applicable to public utilities. However, note the discussion in Paragraph 1(c) below on the prohibition of entities controlled by or acting on behalf of the foreign government or a foreign state-owned enterprise from investing in public utilities.

b) Critical Infrastructure

Based on the Latest Amendments, critical infrastructure refers to any public service, which owns, uses, or operates physical or virtual systems and assets, that are so vital to the Republic of the Philippines such that the incapacity or destruction of such systems or assets would have a detrimental impact on national security. Such critical infrastructure includes telecommunications (except passive telecommunications tower infrastructure and components, and value-added services) and other such vital services as may be declared by the Philippine President.

The Latest Amendments provide that investments in critical infrastructure are subject to reciprocity requirements, and foreign nationals shall not be allowed to own more than 50% of the capital of entities engaged in the operation and management of critical infrastructure, when the country of such foreign national does not accord reciprocal rights to Philippine nationals. In addition, in case of interruption of services, entities engaged in the operation and management of critical infrastructure are required to (i) act on customer complaints within 10 days, or provide an action plan to be accomplished within a reasonable period, from the date the complaint was received, and (ii) file a monthly report to the appropriate regulatory agency detailing the service interruptions that occurred during the covered period, the complaints lodged before it, and the actions taken on each complaint.

Although the Latest Amendments have only identified the telecommunications sector as a "critical infrastructure" thus far, it should be noted the Philippine President has the power to add to the list of sectors that are considered as critical infrastructure through executive issuances.

c) Limitation of investment in public utilities and critical infrastructure

After the Latest Amendments take effect, an entity controlled by or acting on behalf of a foreign government or foreign state-owned enterprises are prohibited from owning capital in any public utility or critical infrastructure. Further, foreign state-owned enterprises (which already own capital in a public utility or critical infrastructure prior to the effectivity of the Latest Amendments) are prohibited from investing additional capital in such public utility or critical infrastructure. As an exception, sovereign wealth funds and independent pension funds of each state may still collectively own up to 30% of the capital of a public utility or critical infrastructure notwithstanding the above.

[5] See Section 2(k) of the Latest Amendments

II. For "public service not classified as a public utility", full foreign ownership now allowed

Given the amendments, investments in a public service not classified as a public utility, such as telecommunications, logistics, freight forwarding, shipping, air carriers and airports have been effectively liberalized and may now be up to 100% foreign owned, provided that reciprocity requirements are met for sectors which qualify as critical infrastructure (e.g., telecommunications).

The Latest Amendments expressly provide that nationality requirements shall not be imposed by the relevant administrative agencies on any public service not classified as a public utility, notwithstanding any law to the contrary. However, a public service not classified as a public utility shall still be considered a "business affected with public interest" for purposes of applying Sections 17 and 18, Article XII of the 1987 Philippine Constitution. Such constitutional clauses relate to instances when the State may temporarily take over private businesses[6], or nationalize industries.[7]

Public services shall continue to be regulated and supervised by the relevant administrative agencies under existing laws, and such agencies are required to issue rules and regulations to implement the Latest Amendments.

III. Other notable provisions

a) Amendments affecting the telecommunications business

Considering the Latest Amendments, the following points are material to the telecommunications business:

- While telecommunications is not a public utility, it is still critical infrastructure. Thus, foreign ownership of telecommunications may still be limited to 50% in the event reciprocity requirements are not satisfied, or prohibited in the event the foreign investor is an entity controlled by or acting on behalf of a foreign government or foreign state-owned enterprise; and

- Persons and companies (except micro, small and medium enterprises[8]) engaged in the telecommunications business are required to obtain and maintain certifications from an accredited certification body attesting to its compliance with relevant ISO information security standards, as may be prescribed by the Department of Information and Communications Technology. The maintenance of such certifications shall be a continuing qualification for the retention of a franchise or other authority to operate.

b) National security interest as basis to suspend or prohibit a proposed merger, acquisition or investment in a public service

In the interest of national security, the Philippine President may now suspend or prohibit a proposed merger, acquisition or investment in a public service that effectively results in the grant of direct or indirect control of such public service to a foreigner or foreign corporation. However, the Philippine President must exercise such power within 60 days from receipt of the recommendation of the relevant department or administrative agency. The National Economic Development Authority is directed to promulgate rules and regulations to implement such provisions.

c) Requirement when employing foreign nationals

Public services employing foreign nationals in industries to be determined by the Department of Labor and Employment, are required to implement an understudy/skills development program to ensure the transfer of technology/skills to Philippine nationals with the potential of succeeding the foreign national in the same

---

[6] In times of national emergency and when public interest so requires, the State may temporarily take over or direct the operation of any privately owned public utility and business affected with public interest during the emergency and under reasonable terms prescribed by it. (Section 17, Article XII of the 1987 Philippine Constitution)

[7] In the interest of national welfare or defense and upon payment of just compensation, the State may transfer to the public the ownership and operations of utilities and other private enterprises to the government. (Section 18, Article XII of the 1987 Philippine Constitution)

[8] As defined under Republic Act No. 6977, otherwise known as the Magna Carta for Micro, Small and Medium Enterprises

establishment or its subsidiary.

Conclusion

The amendments to the 86-year old Public Service Act have been long overdue. With the Latest Amendments, the Philippines has taken great leaps to open up a number of sectors to full foreign ownership, and it is anticipated that this landmark legislation will significantly change the Philippine business landscape as it creates more opportunities for foreign direct investment and increases competition.

[Author]

Patricia O. Ko (Nagashima Ohno & Tsunematsu Singapore LLP)
patricia_ko@noandt.com
Patricia O. Ko is a Philippine qualified lawyer in the Singapore office. Prior to joining NO&T, she was a Senior Associate in one of the top law firms in the Philippines. Her areas of practice include mergers and acquisitions, foreign direct investment, public-private partnership, securities, general corporate matters, immigration, trademarks, and data privacy. She is experienced in advising clients in commercial transactions involving acquisition of businesses and real estate, joint ventures, corporate restructuring, and regulatory and compliance matters.

[EDITORS' PROFILES]

Nobuo Fukui (Nagashima Ohno & Tsunematsu Singapore LLP)
nobuo_fukui@noandt.com
Nobuo Fukui is a partner at Nagashima Ohno & Tsunematsu and a representative of its Singapore Office (Nagashima Ohno & Tsunematsu Singapore LLP). He has been stationed in Singapore since 2013 and providing legal services mainly to Japanese companies and its affiliates to expand their business into south-east Asian countries.
He is a graduate of the University of Tokyo (LL.B., 2001) and Duke Law School (LL.M., 2009). He was admitted to the Japan Bar in 2003 and New York State Bar in 2010. He worked as a foreign lawyer at Widyawan & Partners (Jakarta) from 2010 to 2013, focusing on Indonesian legal practice, and he has extensive legal experience in the Indonesia related transactions.

Rashmi Grover (Nagashima Ohno & Tsunematsu Singapore LLP)
rashmi_grover@noandt.com
Rashmi Grover is an Indian and UK qualified foreign attorney in the Singapore office. Her areas of practice include mergers and acquisitions, private equity and general corporate. She has extensive experience working in the Indian markets and advising clients on corporate commercial and finance transactions including transactions involving mergers, formation of joint ventures, acquisition of stakes in companies, private equity investments, business/asset acquisition transactions, regulatory filings, debt issuances and structured lending transactions.

www.noandt.com

NAGASHIMA OHNO & TSUNEMATSU

JP Tower, 2-7-2 Marunouchi, Chiyoda-ku, Tokyo 100-7036, Japan
Tel: +81-3-6889-7000 (general) Fax: +81-3-6889-8000 (general) Email: info@noandt.com

Nagashima Ohno & Tsunematsu is the first integrated full-service law firm in Japan and one of the foremost providers of international and commercial legal services based in Tokyo. The firm's overseas network includes offices in New York, Singapore, Bangkok, Ho Chi Minh City, Hanoi and Shanghai, and collaborative relationships with prominent local law firms throughout Asia and other regions. The over 500 lawyers of the firm, including about 40 experienced attorneys from various jurisdictions outside Japan, work together in customized teams to provide clients with the expertise and experience specifically required for each client matter.

Singapore Office
(Nagashima Ohno & Tsunematsu Singapore LLP)

6 Battery Road #40-06
Singapore 049909
Tel: +65-6654-1760 (general)
Fax: +65-6654-1770 (general)
Email: info-singapore@noandt.com

Bangkok Office
(Nagashima Ohno & Tsunematsu (Thailand) Co., Ltd.)

34th Floor, Bhiraj Tower at EmQuartier
689 Sukhumvit Road, Klongton Nuea
Vadhana, Bangkok 10110, Thailand
Tel: +66-2-302-4800 (general)
Fax: +66-2-302-4899 (general)
Email: info-bangkok@noandt.com

HCMC Office
(Nagashima Ohno & Tsunematsu HCMC Branch)

Suite 1801, Saigon Tower
29 Le Duan Street, District 1
Ho Chi Minh City, Vietnam
Tel: +84-28-3521-8800 (general)
Fax: +84-28-3521-8877 (general)
Email: info-hcmc@noandt.com

Hanoi Office
(Nagashima Ohno & Tsunematsu Hanoi Branch)

Suite 10.04, CornerStone Building
16 Phan Chu Trinh, Hoan Kiem District
Ha Noi City, Vietnam
Tel: +84-24-3266-8140 (general)
Fax: +84-24-3266-8141 (general)
Email: info-hanoi@noandt.com

Shanghai Office
(Nagashima Ohno & Tsunematsu
Shanghai Representative Office)

21st Floor, One ICC, 999 Middle Huaihai Road
Xuhui District, Shanghai 200031, China
Tel: +86-21-2415-2000 (general)
Fax: +86-21-6403-5059 (general)
Email: info-shanghai@noandt.com

For more details on our global practice

If you would like the convenience of receiving future editions of the NO&T Asia Legal Review by email direct to your Inbox, please fill out our newsletter subscription form at the following link: https://www.noandt.com/en/newsletters/nl_asia_legal_review/
Should you have any questions about this newsletter, please contact us at <asia-legal-review@noandt.com>.
Please note that other information related to our firm may be also sent to the email address provided by you when subscribing to the NO&T Asia Legal Review.