



Bribery & Corruption 2020

Seventh Edition

Contributing Editors:
Jonathan Pickworth & Jo Dimmock

GLOBAL LEGAL INSIGHTS – BRIBERY & CORRUPTION
2020, SEVENTH EDITION

Contributing Editors

Jonathan Pickworth & Jo Dimmock, White & Case LLP

Senior Editors

Caroline Oakley

Rachel Williams

Sub-editor

Andrew Schofield

Group Publisher

Rory Smith

Publisher

Jon Martin

Creative Director

Fraser Allan

We are extremely grateful for all contributions to this edition.

Special thanks are reserved for Jonathan Pickworth and Jo Dimmock for all of their assistance.

Published by Global Legal Group Ltd.

59 Tanner Street, London SE1 3PL, United Kingdom

Tel: +44 207 367 0720 / URL: www.glggroup.co.uk

Copyright © 2019

Global Legal Group Ltd. All rights reserved

No photocopying

ISBN 978-1-83918-013-2

ISSN 2052-5435

This publication is for general information purposes only. It does not purport to provide comprehensive full legal or other advice. Global Legal Group Ltd. and the contributors accept no responsibility for losses that may arise from reliance upon information contained in this publication. This publication is intended to give an indication of legal issues upon which you may need advice. Full legal advice should be taken from a qualified professional when dealing with specific situations. The information contained herein is accurate as of the date of publication.

Printed and bound by CPI Group (UK) Ltd, Croydon, CR0 4YY
November 2019

CONTENTS

Preface	Jonathan Pickworth & Jo Dimmock, <i>White & Case LLP</i>	
General chapter		
Asia-Pacific Overview	Phillip Gibson, Dennis Miralis & Rachel Le Bransky, <i>Nyman Gibson Miralis</i>	1
Country chapters		
Australia	Tobin Meagher & Richard Abraham, <i>Clayton Utz</i>	14
Belgium	Hans Van Bavel, <i>Stibbe</i>	30
Brazil	Rogério Fernando Taffarello, <i>Mattos Filho, Veiga Filho, Marrey Jr. e Quiroga Advogados</i>	37
China	Hui Xu, Sean Wu & Catherine E. Palmer, <i>Latham & Watkins</i>	48
Czech Republic	Roman Kramářík, Helena Hailichová & Tomáš Beneš, <i>JŠK, advokátní kancelář, s.r.o.</i>	66
France	Ludovic Malgrain, Grégoire Durand & Jean-Pierre Picca, <i>White & Case LLP</i>	74
Germany	Dr. Thomas Helck, <i>White & Case</i>	84
Greece	Ovvdias S. Namias & Vasileios Petropoulos, <i>Ovvdias S. Namias Law Firm</i>	92
Hong Kong	Kareena Teh & Catherine Wong, <i>LC Lawyers LLP</i>	102
India	Aditya Vikram Bhat & Shantanu Singh, <i>AZB & Partners</i>	119
Indonesia	Denny Rahmansyah & Nico Angelo Putra Mooduto, <i>SSEK Indonesian Legal Consultants</i>	130
Ireland	Megan Hooper, Imelda Higgins & Heather Mahon, <i>McCann FitzGerald</i>	138
Italy	Roberto Pisano, <i>Studio Legale Pisano</i>	148
Japan	Catherine E. Palmer & Junyeon Park, <i>Latham & Watkins</i>	159
Mexico	Carlos Chávez, Humberto Pérez-Rocha & Lisandro Herrera, <i>Galicia Abogados, S.C.</i>	170
Netherlands	Jurjan Geertsma & Madelon Stevens, <i>JahaeRaymakers</i>	181
New Zealand	Ben Upton, <i>Simpson Grierson</i>	192
Nigeria	James Okoh, Johnson Agwu & Ogechi Nwobia, <i>Fidelis Oditah & Co</i>	201
Poland	Marcin Kondracki, Adam Domański & Justyna Bartoszek, <i>Kondracki Celej Adwokaci sp. p.</i>	217
Romania	Mihai Mareş, <i>Mareş & Mareş</i>	229
Russia	Hannes Lubitzsch, <i>Noerr OOO</i>	244
Singapore	Jason Chan & Lee May Ling, <i>Allen & Gledhill LLP</i>	257
Slovenia	Uroš Čop, Katarina Mervič & Eva Rop, <i>Law firm Miro Senica and attorneys, Ltd.</i>	263
Switzerland	Marcel Meinhardt & Fadri Lenggenhager, <i>Lenz & Staehelin</i>	277
Ukraine	Dr. Svitlana Kheda, <i>Sayenko Kharenko</i>	287
UAE	Rebecca Kelly, Chris Warren-Smith & Caroline Hibberd, <i>Morgan, Lewis & Bockius LLP</i>	302
United Kingdom	Jonathan Pickworth & Jo Dimmock, <i>White & Case LLP</i>	308
USA	Douglas Jensen & Ashley Williams, <i>White & Case LLP</i>	322

PREFACE

We are pleased to present the seventh edition of *Global Legal Insights – Bribery and Corruption*. This book sets out the legal environment in relation to bribery and corruption enforcement in 28 countries and one region worldwide.

This edition sees the addition of new chapters relating to Belgium, Poland, Hong Kong and the Czech Republic, as well as an Asia-Pacific overview. In addition to addressing the legal position, the authors have sought to identify current trends in enforcement, and anticipated changes to the law and enforcement generally.

Incidents of bribery and corruption often involve conduct and actors in several different jurisdictions. As enforcement activity increases around the world, attention is being focused on particular problems companies face when they seek to resolve cross-border issues.

Coordinating with multiple government agencies can be challenging at the best of times, and can be even more difficult when dealing with bribery and corruption laws that have been amended or have just entered into force. Sometimes a settlement in one jurisdiction can trigger a further investigation in another. Stewarding a company through these sorts of crises involves not only dealing with today's challenges, but thinking about the next day, the next week, the next month, and beyond, on a global stage.

We are very grateful to each of the authors for the contributions they have made. We hope that the book provides a helpful insight into what has become one of the hottest enforcement topics of current times.

Jonathan Pickworth & Jo Dimmock
White & Case LLP
November 2019

Indonesia

Denny Rahmansyah & Nico Angelo Putra Mooduto
SSEK Indonesian Legal Consultants

Overview of the law and enforcement regime

This past year has been an exciting one for Indonesia, which held legislative and presidential elections in April. There was also a significant development in the anti-corruption sector, with the issuance of an amendment to the law on the nation's anti-corruption body, known as the Corruption Eradication Commission (*Komisi Pemberantasan Korupsi* or "KPK").

While the KPK Law amendment has received significant media attention and been the focus of protest in large cities across the country, as of this writing it has not been made public. This despite some reports that the amended law was promulgated on October 17, 2019, as Law No. 19 of 2019 (the "Amended KPK Law"). While we have not seen the Amended KPK Law, if it has in fact already been enacted, we will nevertheless attempt to address the most significant changes introduced by the amendment, based on the most recent draft bill prior to its promulgation, as well as public reports.

Apart from the Amended KPK Law, we address key developments in the Indonesian anti-corruption legal regime from the past year. We start with the general legal framework for corruption and bribery in Indonesia. It must be noted that the legal regime, aside from the Amended KPK Law, remains the same as in previous years. That said, we believe it will be helpful to provide a brief overview.

The Indonesian anti-corruption regime is primarily based on Law No. 31 of 1999 regarding Eradication of Criminal Acts of Corruption (August 16, 1999), as amended by Law No. 20 of 2001 (November 21, 2001) (together, the "Anti-Corruption Law").

The Anti-Corruption Law governs the following types of corruption crimes, namely corruption:

- that causes loss to the state's finances;
- related to bribery;
- related to gratuity;
- related to malfeasance;
- related to extortion; and
- related to conflict of interest in procurement.

As can be seen from the above, the Anti-Corruption Law adopts a broad definition of corruption, which encompasses bribery. Therefore, in the Indonesian legal context, the term "corruption" also covers bribery.

The Anti-Corruption Law also addresses the commission of corruption crimes by certain perpetrators in addition to or involving state officials, namely judges, advocates, and certain

types of contractors (those that render services related to public projects during wartime).

There are also other related crimes that are punishable under the Anti-Corruption Law, including obstruction of justice and perjury.

In addition to the Anti-Corruption Law, Law No. 11 of 1980 regarding Bribery (October 27, 1980) (the “Anti-Bribery Law”) stipulates punishment for any person who bribes a public official. It would appear that both the Anti-Corruption Law and the Anti-Bribery Law punish corruption crimes related to bribery. However, the Anti-Bribery Law provides that the law applies to bribery crimes that have not been regulated. The Anti-Bribery Law complements the Anti-Corruption Law. We are not aware of any recent cases charged under the Anti-Bribery Law.

Corruption is a special crime under Indonesian law. Perpetrators of corruption acts are brought before the Corruption Court pursuant to Law No. 46 of 2009 regarding the Corruption Court (October 29, 2009) (the “Corruption Court Law”). The Corruption Court is a special court having jurisdiction over corruption crimes in Indonesia and has an extraterritorial reach. The Corruption Court Law expressly empowers the Corruption Court to adjudicate corruption crimes committed by Indonesian citizens in overseas territories.

The Anti-Corruption Law applies not only to the party providing the illicit payment (bribe, gift, or gratification), but also to the recipient of such payment. Under the Anti-Corruption Law, any person attempting, assisting, or conspiring to commit a criminal act of corruption is subject to the same penalties as the perpetrator.

The forms of punishment under the Anti-Corruption Law can be divided into two categories, namely: (i) primary sanctions, and (ii) additional sanctions.

(i) Primary sanctions can be any of fines, imprisonment, and/or capital punishment.

Fines that can be imposed range from a minimum of IDR 50 million (approximately US\$ 3,350 using the current exchange rate of US\$ 1 = IDR 14,900) up to IDR 1 billion (approximately US\$ 67,115 using the current exchange rate).

Prison sentences that can be imposed range from one year up to life in prison.

Capital punishment may be applied if the criminal act of corruption involves funds intended for the eradication of a dangerous situation, a national disaster, riots, or an economic or monetary crisis, or for repeated criminal acts of corruption.

(ii) Additional sanctions comprise the following sanctions/penalties:

- (a) confiscation of tangible or intangible movable or immovable goods used for or obtained from criminal acts of corruption, including any company owned by the accused where a criminal act was perpetrated, and the same shall apply to goods that replace the aforementioned movable or immovable goods;
- (b) payment of compensation in a maximum amount equal to those assets obtained from the criminal acts of corruption;
- (c) whole or partial closure of the company for a maximum period of one year; or
- (d) revocation of all or certain rights, or the cancellation of all or certain profits that have been or can be given by the government to the accused.

It is important to note that both the Anti-Corruption Law and the Anti-Bribery Law only govern corruption involving government officials or causing losses to state finances. Corruption in the private sector (involving only companies or only among private individuals), which does not involve a government official or relate to state finances, is not subject to these laws. The scope of “private corruption” would fall under the ambit of the

Indonesian Criminal Code and, in practice, perpetrators would be reported as committing the crime of embezzlement or fraud.

There are essentially three law enforcement bodies tasked with combating corruption in Indonesia, namely: (i) the Police; (ii) the KPK; and (iii) the Attorney General's Office (the "AGO").

Each body is authorised to investigate criminal acts of corruption with different levels of investigative or prosecution authority.

Prior to the inception of the KPK, the Police would investigate alleged corruption crimes and the AGO would proceed with the prosecution of criminal cases in the courts.

The KPK was established pursuant to Law No. 30 of 2002 regarding the KPK (December 27, 2002), which has recently been amended as discussed above. The KPK is empowered to investigate and prosecute criminal acts of corruption that involve the state legal enforcement apparatus, state organisers, and others involved in the enforcement of the anti-corruption legal regime, including alleged corruption that may have been committed by the Police or the AGO. In short, the KPK's authority is focused on corruption committed by public officials.

Overview of enforcement activity and policy during the last year

Since its inception, the KPK has garnered most of the Indonesian public's and media's attention in the fight against corruption. The KPK is known for its sting operations, or *operasi tangkap tangan* ("OTT"), resulting in the red-handed capture of perpetrators, mostly state officials. The KPK's activities are focused on bribery crimes committed by individuals. The KPK has also more recently focused its investigations on corporations. The KPK website reported around a 44% increase in corruption investigations and prosecutions in 2018 compared to the previous year (source: <https://acch.kpk.go.id/id/statistik/tindak-pidana-korupsi>). To be precise, in 2018, the KPK investigated 199 new cases and prosecuted 151 cases, with a majority of these cases involving legislators and local regional heads. In 2018, the KPK conducted 30 OTT operations.

One high-profile case in 2018 was the prosecution of the head of the Indonesian Bank Restructuring Agency ("IBRA") for the misappropriation of funds disbursed by IBRA to collapsing banks as a result of the 1998 Asian financial crisis. The case was alleged to have caused state losses of more than IDR 4.85 trillion. The Corruption Court initially sentenced the defendant to 13 years in prison and a fine of IDR 800 million. However, in July 2019, the Supreme Court overturned the decision and acquitted the defendant of the corruption charge. The reason for the acquittal revolved around the issue of whether the defendant's action constituted a "criminal act".

Some of the higher-profile cases in 2019 involved the AGO. Another high-profile case occurred in June 2019, in which the Indonesian Corruption Court sentenced the former CEO of Pertamina, a state-owned oil and gas company, to eight years in prison and a fine of IDR 1 billion. That case involved a charge of corruption causing state losses from a business decision that was made in 2009. The business decision in question related to acquiring certain offshore assets from a company in Australia. The decision was said to have been made without due diligence and a proper risk analysis and without the approval of Pertamina's board of commissioners.

In late 2017, the KPK introduced an electronic wealth reporting system. Under Indonesian law, public officials are required to file mandatory annual wealth reports (*Laporan Harta*

Kekayaan Penyelenggara Negara or “LHKPN”) with the KPK. Public officials are required to report their wealth in their LHKPN, including movable and immovable assets. 2019 was an election year, and as a prerequisite for being inaugurated, newly elected legislators were required to file an LHKPN.

Law and policy relating to issues such as facilitation payments and hospitality

We understand that the Foreign Corrupt Practices Act (the “FCPA”) permits facilitating payments to be made to foreign officials for routine governmental actions to expedite the performance of their duties. Such payments are generally considered as not being intended to influence the outcome of the official’s action or decision, but rather to expedite an action or decision that is already a given. A facilitating payment, therefore, is an exception to the anti-bribery prohibitions in the FCPA.

In contrast, facilitating payments are not recognised under Indonesian law. Generally, there is no provision under the Anti-Corruption Law or in Indonesian law that permits facilitating payments or exempts such payments from the general prohibitions of the Anti-Corruption Law. In fact, unauthorised payment to any government official, regardless of the purpose, is very suspect and may be considered a bribe. The Anti-Corruption Law expressly provides that gifts or gratifications given to a public official shall be considered a bribe if they are related to his/her position and are contrary to his/her official duty or obligations.

The Anti-Corruption Law does not define the term “gift”. It merely provides that “gratifications” are “*gifts in a broad meaning, which includes the giving of money, goods, discounts, commissions, interest-free loans, travel tickets, lodging, travel, free medical care, and other facilities*”. Such gratification shall also encompass any gift that is accepted outside the country and given by using electronic means or otherwise. The term is thus meant to suggest any consideration of any kind, whether requested or not.

Based on the foregoing broad definition, we are of the view that a facilitating payment provided for the purpose of expediting or securing the performance of a routine governmental action by an official would constitute a gift and gratification within the meaning of the Anti-Corruption Law.

In 2015, the KPK issued *Guidelines for Gratification Control*. Separately, KPK Regulation No. 2 of 2014 regarding *Guidelines for Reporting and the Determination of Gratuity Status* (December 9, 2014) requires state officials to report the receipt of a gratification to the KPK within 30 days of its receipt. While the KPK takes a hard line on this issue, it has not, to our knowledge, exercised its authority to prosecute people who make or receive such payments. These payments are considered relatively small in amount compared to the cases subject to the KPK’s sting operations. It would appear that the KPK has much bigger fish to fry and prefers not to expend its limited resources pursuing either donors or government officials engaged in the practice of these “small” payments.

Another issue faced by companies in Indonesia is “official” requests for the payment of travel and logistical costs, or the daily allowances of government officials in the performance of their official duties. Companies will typically receive an official written request for certain payments from the government institution concerned. Companies tend to view such requests as suspect and question, rightfully so, whether such payments are allowed under the Anti-Corruption Law.

To be clear, there is no regulation which expressly provides, obliges, or allows companies to bear the travel costs and pay the daily allowances of government officials. The general rule for official travel clearly stipulates that the daily allowances of government officials are

to be provided by the relevant government ministry or state institution.

Interestingly, Indonesian law enforcement agencies appear to take a flexible approach to this issue. Law enforcement agencies understand that many government ministries and other government bodies lack the budget to accommodate official travel. Acknowledging the limits of the government's fiscal capability, law enforcement agencies accept, as a matter of unwritten policy, that the private sector may be asked to bear some or all of the costs of official travel, provided that: (i) the amount given to an official does not exceed the maximum amount stipulated by the Minister of Finance for official travel, which is regularly updated, typically on a yearly basis; and (ii) the daily allowance of the officials has not been covered by the state budget.

In our view, a private sector entity paying a government official an amount in respect of official travel to which the official is entitled by statute, but which has not been covered by the state budget, would not likely be deemed unlawful. However, there is no provision of Indonesian law with the clear intent of permitting or prohibiting the practice.

Accordingly, we have prepared a few pointers which we hope are useful for companies in handling such a situation. As the practice normally occurs through the issuance of a request, the company should ask for an official written request from the relevant government institution. The company will need to review whether the activity the government institution will perform and the amount requested are consistent with the prevailing laws and regulations. It is advisable that companies do not make such payments in cash, if possible. In any event, any cash payment should be to an official state bank account and paid through any of the officially appointed state-owned banks. Any request for payment to an individual's bank account should at all times be avoided.

We would recommend that companies consult their legal and compliance teams in every situation where payments to government officials are involved.

Key issues relating to investigation, decision-making and enforcement procedures

As noted at the outset, a significant regulatory development is the Amended KPK Law. Public reports suggest the following key amendments under the Amended KPK Law:

1. The establishment of a Supervisory Board. It appears that this Supervisory Board will have authority over the operations of the KPK.
2. Removal of the prohibition on the KPK from ceasing investigations and prosecutions. Under the Amended KPK Law, the KPK can drop cases if the investigation or prosecution is not finished within two years.
3. Wiretapping, searches and seizures require prior written approval from the Supervisory Board.
4. The Supervisory Board is authorised to prepare a code and conduct formal hearings into possible ethics violations by members of the KPK.
5. Only police can be appointed as KPK investigators.

The Amended KPK Law will likely affect how KPK investigations are carried out. As discussed above, there are three law enforcement bodies authorised to investigate and/or prosecute corruption. These three bodies have equal standing and there is no regulation on which body should initiate an investigation. Whichever body has sufficient preliminary evidence to conduct an investigation may proceed with the investigation, resulting in the potential overlap of authorities. Prior to the Amended KPK Law, the KPK had the authority to take over the investigation or prosecution of a criminal act of corruption

conducted by the Police or the AGO based on a number of specified criteria. Under the Amended KPK Law, the KPK is required to cooperate with the Police and the AGO. It is unclear how this “cooperation” might play out.

Overview of cross-border issues

The Anti-Corruption Law and the Anti-Bribery Law recognise the extraterritorial principle.

The Anti-Corruption Law stipulates that “individuals outside the territory of Indonesia” are subject to its provisions. These individuals may be held liable for corruption in the event that they provide any assistance, opportunity, infrastructure, or information for a transnational criminal act of corruption in Indonesia (such as transferring funds originating from corruption overseas) that gives rise to a corruption crime specified under the Anti-Corruption Law. The individual will be treated as a perpetrator under the Anti-Corruption Law.

The Anti-Bribery Law provides that bribery committed outside Indonesia is subject to the Anti-Bribery Law. It is important to note that the Anti-Bribery Law concerns the bribery of Indonesian government officials who have authority related to public services in Indonesia. It does not govern bribery of foreign officials.

Separately, the Supreme Court of Indonesia issued Supreme Court Regulation No. 13 of 2016 (December 29, 2016) (“SC Reg. 13/2016”), which sets out the procedures for handling criminal acts, including criminal acts of corruption, committed by corporations. SC Reg. 13/2016 does not seem to limit the “citizenship” of a corporate entity, and in fact requires the “citizenship” information of a corporate entity in the event the KPK or the AGO issues a summons to a corporation as part of an investigation (either as a witness or perpetrator). Article 10 of SC Reg. 13/2016 stipulates that a summons letter for a corporation shall at least contain:

- (a) the name of the corporation;
- (b) the corporation’s domicile;
- (c) the nationality of the corporation;
- (d) the status of the corporation in the criminal act of corruption (witness, suspect, or defendant);
- (e) the place and time of investigation; and
- (f) a summary of the criminal act of corruption that relates to the summons.

Although SC Reg. 13/2016 provides the authority to issue summonses to foreign entities, we are not aware of any incident whereby law enforcement bodies have issued such a summons. We also believe that it would be very difficult to enforce such a summons without the cooperation of the country of domicile of the entity to which the summons is addressed.

Corporate liability for bribery and corruption offences

The Anti-Corruption Law may hold corporations responsible for criminal acts of corruption. Pursuant to the Anti-Corruption Law, a corporation found guilty of an act of corruption may be required to pay a maximum fine equal to the maximum fine for an individual, plus an additional one-third on top of such fine. Individual members of management may be held liable for criminal acts of corruption committed by the corporation.

In a similar vein, SC Reg. 13/2016 stipulates that a corporation shall be represented by member(s) of its management during any investigation and subsequent court proceedings for corporate crimes, except for a corporation that is undergoing a dissolution process, which shall be represented by the liquidator.

SC Reg. 13/2016 also suggests that in deciding criminal penalties for a corporation, the Panel of Judges may assess whether the corporation:

- (a) profited or benefited from such criminal act, or whether such act was committed for the corporation's interest;
- (b) allowed such criminal act to happen; and
- (c) failed to take necessary measures to prevent and/or minimise the impact of such criminal act, and also to ensure the compliance of the corporation with the prevailing laws and regulations to avoid such criminal act from being committed.

We would note that the above provision (c) may be interpreted to mean that the Panel of Judges would likely look into the measures taken by a corporation in preventing the alleged act of corruption. However, it is not clear whether such provision provides a defence or excuse for companies that claim to have taken measures to prevent an act of corruption from occurring. The regulation does not address the forms of valid defence.

Since the enactment of SC Reg. 13/2016, law enforcement agencies have utilised the provisions of SC Reg. 13/2016 to target corporations in relation to corruption allegations. In 2018, the KPK named four state-owned corporations as corruption suspects.

Proposed reforms / The year ahead

The year 2019 was an election year and, as expected, saw a great deal of controversy. As anticipated, the Amended KPK Law received significant public attention and was itself a source of controversy. Reaction to the Amended KPK Law has been sharply divided, with the two sides seeming to have polar opposite views of what the amended law means for the fight against corruption. The only thing seemingly that can be said with any certainty is that Indonesia will have to wait and see whether the newly issued Amended KPK Law will curb corruption investigations or make them fairer.

Another key legislative reform that has been discussed for some time but has not been accomplished as of this writing is the amendment of the Indonesian Criminal Code. Previous reports suggested that there are a number of proposed amendments to provisions relating to corruption. But more recent reports seem to suggest the amendments will focus more on general offences than corruption offences. It is not clear when, or even if, the amendment to the Criminal Code will be issued.

Nevertheless, 2020 is shaping up to be an interesting year.

* * *

Acknowledgment

The authors would like to acknowledge Syarifah Reihana Fakhry, an SSEK associate, for her assistance with the research for this guide.

**Denny Rahmansyah****Tel: +62 21 5212038 / +62 21 2953 2000 /****Email: dennyrahmansyah@ssek.com**

Denny Rahmansyah joined SSEK in 2001 and has been deeply involved in numerous major transactions related to cross-border mergers and acquisitions, cross-border debt restructurings, banking and finance companies, private power and infrastructure projects.

He is also experienced in the fields of anti-corruption and compliance, real estate and property (including hotels and villas), telecommunications, foreign investment and general commercial and corporate law. Prior to joining SSEK, Denny was associated with another prominent law firm in Jakarta, where he worked mostly in acquisition and debt restructuring matters.

Denny is recognised by *Asialaw* as a leading practitioner in Indonesia for corporate law and mergers and acquisitions.

Denny received his Bachelor of Laws from the University of Indonesia in 2000, and his Master of Laws majoring in international economic and business law from the University of Groningen, the Netherlands, in 2009. In 2007, he attended the 44th Academy of American and International Law in the United States, where he studied American law from an international perspective.

Denny is a member of the Association of Indonesian Legal Consultants and the Indonesian Advocates Association (Peradi). He holds an advocate licence from Peradi, admitting him to practice throughout Indonesia.

**Nico Angelo Putra Mooduto****Tel: +62 21 5212038 / +62 21 2953 2000 / Email: nicomooduto@ssek.com**

Nico Angelo Putra Mooduto graduated from the University of Indonesia Faculty of Law in 2012. He joined SSEK in 2011 and is extensively involved in a wide range of projects, mostly in the firm's general corporate, compliance, construction, and dispute resolution practices.

SSEK Indonesian Legal Consultants

Mayapada Tower 1, 14th Floor, Jl. Jendral Sudirman Kav. 28, Jakarta 12920, Indonesia

Tel: +62 21 5212038 / +62 21 2953 2000 / Fax: +62 21 5212039 / URL: www.ssek.com

Other titles in the **Global Legal Insights** series include:

- **AI, Machine Learning & Big Data**
- **Banking Regulation**
- **Blockchain & Cryptocurrency Regulation**
- **Cartels**
- **Corporate Tax**
- **Employment & Labour Law**
- **Energy**
- **Fintech**
- **Fund Finance**
- **Initial Public Offerings**
- **International Arbitration**
- **Litigation & Dispute Resolution**
- **Merger Control**
- **Mergers & Acquisitions**
- **Pricing & Reimbursement**



Strategic partner