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Competition Legal Quarters

Q3+Q4 2022

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Dentons' selection of competition law news from the EU, as well as Czech, and Slovak jurisdictions, that happened in Q3+most of Q4 of 2022. Enjoy this extended edition before the holiday break.

Top news in brief:

- Every year, the Court of Justice of the EU tends to be very active in September/October, and this year was no exception. The EU's top court delivered no less than eight noteworthy judgments or advocate general opinions consequential for M&A transactions, abuse of dominance, privacy protection and private enforcement of competition law.
- The Czech Office for the Protection of Competition (ÚOHS) faced an unprecedented chain of obstructions to its on-site inspections. It voiced both its concern about these developments as well as an offer to discount fines for firms willing to cooperate with investigations or implement compliance programs at the 2022 St. Martin's conference in Brno.
- The Slovak Antimonopoly Office (PMÚ) revisited its earlier decision fining a company €300,000 for alleged abuse of its dominant position in the waste management sector. The Council of the PMÚ quashed the first instance decision on appeal, because of "new facts" that surfaced in the matter.

How to use: This newsletter also includes references to articles or client briefs where Dentons' lawyers took a deep dive into the selected topics. Links are also provided to primary legal source or press releases.

European Union

EU Commission drops investigation into České dráhy's alleged predation on Prague-Ostrava route. Railway companies may receive additional state funding

At the end of September 2022, the EU Commission closed its antitrust proceedings against state-owned rail incumbent České dráhy (ČD) for alleged abuse of dominance on the Praha-Ostrava route. After a decade-long inquiry, the EU Commission concluded that ČD had not implemented predatory prices to the detriment of competitors on the main route.

This is a welcome turnaround for ČD following its receipt in June 2020 of a formal Statement of Objections from the EU Commission. Also welcomed was the Commission's approval of a €180 million (CZK 4,500 million) Czech state aid scheme to improve environmental performance of rail and urban transport, by a Commission decision of November 10, 2022 (see press release here).

EU General Court largely confirms fine on Google for abuse of dominant position in Android case

On September 14, 2022, the EU General Court (GC) largely upheld the EU Commission's decision finding abuse of dominance by Alphabet/Google in the Android case (case T-604/18, *Google and Alphabet v Commission*).

The GC upheld the EU Commission's findings that Google abused its dominant position to the detriment of the general search services market by three groups of practices: (i) tying the Google Search app with the Play Store, (ii) tying its mobile web browser (Google Chrome) with the Play Store and the Google Search app, and (iii) making the licensing of the Play Store and the Google Search app conditional on agreements that contained anti-fragmentation obligations. The GC annulled the part of the EU Commission's decision related to alleged illegal exclusivity payments and decreased the fine from €4.34 billion to €4.125 billion—still a record amount.

The win may boost the EU Commission's ability to enforce competition law against digital platforms in multiple ways: It recognized user lock-in effects in digital ecosystems; it effectively endorsed the "decrease in quality" test for market definition around free products and flagged the role of "status quo bias" in competitive dynamics. But the GC also reprimanded the EU Commission for several procedural errors, including delays in writing up notes from certain meetings with third parties, their belated disclosure to Google and the fact that Google was not offered an oral hearing after the EU Commission had conducted some essential economic analyses. (The judgment is available here.)

Google appealed against the GC's decision, so we will have to wait for the final decision of the Court of Justice.

More regulatory uncertainty for M&A transactions thanks to EU Commissions' ultimate prohibition of the *Illumina/Grail* acquisition and CJEU's Advocate General Kokott's opinion on applicability of Article 102 TFEU to below-threshold concentrations. Another Kokott opinion, however, helps clarify standard of proof in EU Commission merger-control proceedings

The EU is showcasing its arsenal against "killer acquisitions." After an in-depth investigation, the EU Commission ultimately prohibited the implemented acquisition of Grail, a cancer-detection test company, by Illumina on September 6, 2022, finding that the vertical integration of Illumina with Grail could kill the ongoing "close" innovation race between developers of such tests. The ban came only five days after Illumina won its case against the US Federal Trade Commission trying to block the same transaction overseas. The case is the first example of referral to the EU Commission of a below-threshold transaction under the seismic shift of the EU Commission's policy already endorsed by the EU General Court (for more details on the saga, see our last CLQ here). The EU Commission's press release on its blocking decision is here.

In case C-449/21 *Towercast* (opinion of October 13, 2022, The CJEU's Advocate General Juliane Kokott opined that a concentration not subject to *ex ante* merger control can be reviewed by competition authorities *ex post* against

the standard of the prohibition of abuse of a dominant position, under Article 102 TFEU. Conversely, AG Kokott opined that if a concentration has been approved under the more specific rules of merger control, it can no longer be challenged as an abuse of dominant position. The AG's opinion expressly referred to a perceived gap in protection for below-threshold transactions seeking to acquire innovative startups ("killer acquisitions") and opined that to ensure effective protection of competition, this gap should be filled by the application of antitrust law. (The AG's opinion is available here.)

On October 20, 2022, AG Kokott issued another significant opinion seeking to clarify the standard of proof need by the EU Commission when prohibiting a concentration (case C-376/20 P – *Commission v CK Telecoms*). These CJEU proceedings were a follow up to the EU General Court's (GC) annulment of the EU Commission's prohibition in 2016 of the acquisition of Telefónica UK by Hutchison 3G UK—both UK mobile network operators. The GC found that the EU Commission had disregarded the standard of proof applicable to merger controls of concentrations giving rise to non-coordinated effects. The EU Commission appealed to the CJEU because it was not clear from the GC's ruling what the standard of proof should be. In AG Kokott's opinion, the test the EU Commission must discharge in its (prospective) economic analysis is the "balance of probabilities" or "plausibility" that the merger could significantly impede competition in the light of the various conceivable chains of cause and effect. The AG also considered that that standard should be the same for any type of concentrative effects, be they unilateral or conglomerate. This is the first case in which the CJEU had the opportunity to clarify such a fundamental concept of European merger control. (The AG's opinion is available here.)

Private enforcement in CJEU spotlight: Developments in follow-on damages claim case following EU Commission decision on cartel infringement by truck producers expand procedural options; ruling related to railway infrastructure overcharges grants rule of precedence to sectoral regulators, seemingly limiting claimants' rights to sue

On November 10, 2022, the CJEU delivered a ruling on the interpretation of the private damages directive (2014/104) provisions on discovery (judgment in case C 163/21, PACCAR). The Spanish court asked whether a national court may order the disclosure of documents that the possessing party has to create from new, by compiling or classifying information, knowledge or data in its possession. This has been equally unclear under Czech law. In a 2011 judgment, the Czech Supreme Administrative Court held that a party cannot be forced to disclose documents "*which it would have to create first following the request of the complainant*" (5 Aps 4/2011-*Telefónica*). This position has been now clearly overruled, with the CJEU holding that the possessing party may be ordered to create new documents if the information sought is relevant and the disclosure proportionate and necessary, considering also the legitimate interests and rights of the party under the obligation to disclose. (The CJEU's judgment is available here.)

In an opinion delivered on September 22, 2022, CJEU Advocate General Juliane Kokott considered that the costs of private antitrust damages proceedings may be split between the victim of the competition law infringement (claimant) and the infringer (defendant) if the victim's lawsuit is only partially successful. But where it has been partially unsuccessful because the suit is excessively difficult or practically impossible to quantify the damages, it is the defendant who must bear all costs, or at least a reasonable portion of the claimant's costs. (AG Kokott's opinion in case C-312/21, *Tráficos Manuel Ferrer SL, Ignacio v Daimler AG* is available here.)

In a preliminary ruling of October 27, 2022 (case C-721/20, *DB Station v ODEG*) the CJEU added some clarity to the conflict between the right of private claimants, under Article 102 TFEU, to a reimbursement of overcharges, and the reality that these fees may be subject to scrutiny by regulators under sectoral legislation (in this case, rules on the allocation of railway infrastructure capacity and the levying of charges for the use of railway infrastructure, according to the now repealed directive 2001/14). The court's ruling somewhat curtailed the claimant's freedom of choice of venues, holding that if the claimant intended to obtain reimbursement of possible overcharges of infrastructure works under competition law, it must first, before filing suit in a national court, refer the question of the overcharge's lawfulness to the national regulator. Moreover, the court held that national courts must take into account the regulators' prior decision in their assessment of follow-on damages actions. Commentators regard this

as a possible blueprint for interaction between national courts and the EU Commission under the now effective (as of November 1, 2022) Digital Markets Act. (The CJEU's ruling is available here.)

EU Commission sends Statement of Objections to Teva, alleging delay of generic competition and disparaging practices

On October 10, 2022, the EU Commission announced that it sent a formal charge sheet to the Israeli pharmaceutical company Teva, alleging that Teva has abused its dominant position by delaying generic competition to its best-selling multiple sclerosis drug, Copaxon.

The regulator claims that Teva may have sought to shield itself from competition from generic drug manufacturers in two ways. First, it artificially extended its basic patent protection by filing and withdrawing a secondary patent application, thereby forcing its competitors to file new lengthy legal challenges each time (sometimes referred to as a "divisional game"). Second, Teva allegedly implemented a systematic disparagement campaign targeting healthcare professionals to cast doubts on the safety and efficacy of competing generic medicines. Disparaging practices of pharmaceutical companies seems to be attracting ever more scrutiny—see our summary of the EU Commission's investigation into Vifor Pharma in our previous CLQ here.

If these allegations are confirmed, Teva could face fines for an abuse of dominant position under Article 102 TFEU. In 2020, Teva was already fined by the EU Commission for delaying the market entry of a cheaper generic version of modafinil (sleep disorders drug). (The EU Commission's press release is available here.)

Grand Chamber of CJEU rules that legal professional privilege (LPP) covers all communications between lawyers and their clients seeking legal advice, not only those in anticipation of defence

On December 10, 2022, the Grand Chamber of CJEU acknowledged that legal professional privilege ("LPP") is protected by both the right of defense under Art. 47 of EU Charter of Fundamental Rights and the right of protection of privacy in communications under Art. 7 and 8 of the European Convention on Human Rights. This revises years of established EU case law under which the LPP had been understood rather restrictively to apply in cases where advice is sought for purposes of defence against impending investigation or litigation.

Although the CJEU judgment concerns rules on administrative cooperation in the field of taxation, it will have broader impact because the scope of LPP affects the way the Commission can exercise its investigative powers. Since the Court has subsumed the LPP under the right to privacy in communications and aligned its interpretation with the case-law of the European Court of Human Rights, clients should no longer bear the burden of proving that communications in question were intended for the purposes and in the interests of the right of defence. Going forward, to be covered by the LPP, it should suffice that the communications are simply for the purpose of obtaining legal advice.

In the area of competition law, this development can be expected to improve the position of undertakings in Commission investigations in which dawn raids had taken place, for example. A broader scope of LPP will enable undertakings to argue that a wider range of documents should be removed from the Commission's file. (Judgement of the Court in case C-694/20, *Orde van Vlaamse Balies and Others*, is available here.)

From other EU news

The EU Commission published a **new guidance on leniency policy and practice** in the form of a *Frequently Asked Questions* (FAQ) document. The FAQ sets out the practical aspects of the marker system and the possibility to approach the competition authority on a "no-names" basis to explore what leniency possibilities are on the table, among other topics.

The EU Commission adopted the **Guidelines on the application of Union competition law to collective agreements by solo self-employed persons** on September 29, 2022 (text here). First of all, self-employed persons can technically be considered "undertakings," and so, under Article 101 TEFU, should not agree or collude

to restrict competition. But the EU Commission realized that self-employed persons may also be in the position of quasi-employees and as such, without teaming up, they can face difficulties when trying to influence their working condition. The new Guidelines set out the conditions under which collective agreements among the self-employed fall completely outside the scope of competition rules and also note the types of collective actions where the EU Commission will typically not intervene.

The EU Commission published its **revised Informal Guidance notice** on October 3, 2022. This is the first revision since 2003 of the EU Commission's policy on how it can provide comfort letters to parties uncertain whether their conduct is in line with competition law. Criteria in the previous notice had fallen under criticism for being too strict. In fact, the EU Commission issued comfort letters in only a handful of cases and under exceptional circumstances, such as the Antirust Covid-19 Temporary Framework (now withdrawn with effect from October 3, 2022), or alongside its fining decision against five German car manufacturers in the context of the AdBlue/car emissions investigation (you can read this rare specimen here) in July 2021. Somewhat looser new criteria indicate that the EU Commission will issue comfort letters in cases of novel or unresolved questions of competition law—where there is a broader interest in enhanced legal certainty. The EU Commission has further resolved not to impose any fines for good-faith actions taken by an applicant that relied on the comfort letter it received. (The new notice is available here.)

The EU Commission adopted the **Guidelines on State aid for broadband networks** on December 12, 2022 (available here), amending the 2013 Broadband Guidelines. The new rules contribute to the EU's strategic objectives of ensuring gigabit connectivity for everyone and 5G coverage everywhere by 2030. Thus, under certain conditions, the guidelines allow Member States to invest in areas where market does not provide end-users with a download speed of at least 1 Gbps and 150 Mbps upload speed, and explain how public support can be used to incentivise the take-up of broadband services. The new assessment framework for the deployment of mobile network introduced in the guidelines also enables Member States to support mobile networks where the investment would not otherwise have been undertaken by private operators. Finally, the guidelines simplify the rules and clarify some key concepts relevant for State aid assessment.

Microsoft's cloud computing practices under renewed scrutiny: On October 1, 2022, Microsoft implemented previously announced changes to its cloud services licensing agreements. These were supposed to address grievances voiced by a range of complainants (e.g. Aruba, Nextcloud, Slack) that Microsoft had been limiting consumers' choice in the cloud market through a variety of abusive practices. On November 9, 2022, however, an industry group including Amazon—a rival cloud services provider—filed a fresh complaint alleging that the changes were insufficient and moreover, added "new unfair practices to the list." The antitrust case is unfolding against the backdrop of Microsoft's proposed acquisition of Activision Blizzard, which the EU Commission is currently reviewing in detail under merger control rules.

Czech Republic

Czech competition authority (ÚOHS) likely to close probes into alleged oil stations' and grocery stores' price spikes amid the inflation and energy crisis pressures

Hospodářské noviny (Czech daily) reported on December 15, 2023, (available here (paywall)), quoting ÚOHS's chairman Petr Mlsna, that prior allegations of price cartel between oil stations made by the Minister of Finance Stanjura have not been confirmed. It seems rather that the oil stations have pursued the standard strategy of aligning prices with competitors, which is not in itself illegal.

Similarly, controls of grocery stores' margins conducted jointly by ÚOHS and the Ministry of Agriculture earlier this year seem to not have revealed a foul play. ÚOHS considers rather that these price rises have been anticipated and driven by the overall inflation. In any event, it is difficult to compare margins of certain selected products because grocery chains operate on the global margin concept (margin generated across the product portfolio). ÚOHS pointed out, though, that its hands have been tied as it could inspect only firms with annual turnover over 5 billion CZK, a threshold which is now going to be decreased to mere 50 million CZK thanks to a newly adopted amendment the

Significant Market Power Act (Dentons is preparing a standalone alert on this major legislative development – stay tuned).

Competition authority issues FY 2021 Annual Report, and amplifies trends in its activities

Some competitors have recently acted illegally, **obstructing dawn raids and impeding inspectors of the Office for the Protection of Competition (ÚOHS)** in the conduct of their work. In reaction has declared its intention to punish such unlawful conduct with the maximum possible fines.

On the positive side, ÚOHS is taking a new approach in its **competition compliance programs**, whereby companies found in violation of anti-competition rules may earn a "discount" on their fine—on top of the leniency program or settlement procedure—which are obligatory parts of the compliance program. Considering that this tool is brand new and untested, ÚOHS might take its inspiration from the practices of other competition authorities.

Do you know what to expect in the event of a dawn raid or competition compliance program? The following cases below should help give you an idea.

Dawn raid obstructions elicit severe fines

Executive directors of Marc spol. s r.o., EUROTUBES s.r.o. and HK STEEL TRADING s.r.o. blocked a ÚOHS on-site inspection during which the competition authority was to search and secure evidence of a possible cartel. ÚOHS found the behavior serious enough to impose the maximum fine on the two metallurgical materials suppliers. The companies will pay a total of CZK 959,000 (approx. €39,500). (The press release is available here.)

There have been more cases where ÚOHS penalized competitors for obstructing dawn raids. Vice President of ÚOHS Kamil Nejezchleb declared in October 2022 that intentional obstructions will not be tolerated and will automatically receive the maximum fine of 1 percent of the undertaking's turnover. ÚOHS has generally kept its word, imposing the maximum possible fine in several cases.

In one case, during a dawn raid an executive refused to hand over his mobile phone to inspectors while another handed over a computer and phone with the content altered or erased. ÚOHS imposed a maximum fine of CZK 22.5 million (approx. €926,000) on the company. (The press release is available here.)

In other case, a company under investigation would not allow ÚOHS inspectors to finish a dawn raid. The competition authority imposed a fine of CZK 1.87 million (approx. €77,000). (The press release is available here.)

First-ever "discounted" fine applied for implementation of compliance program

For entering into prohibited agreements on direct resale price maintenance, Z - TRADE s. r. o. was fined a reduced amount of CZK 17.649 million (approx. €726,500). ÚOHS said the discount was because the company requested a so-called settlement and, for the first time ever, the competition authority also took into account that the competitor had implemented a compliance program. Z - TRADE did not appeal and the decision has already become final. (A more detailed analysis of this case is available here.)

Regional Court annuls ÚOHS decision on RPM

On August 24, 2022, the Regional Court in Brno entirely annulled the decision of the ÚOHS' chairman to impose a record fine of CZK 40.793 million (approx. €1.68 million) on BABY DIREKT s.r.o. for alleged vertical price fixing. The court found the competition authority's decision illegal (unreviewable). Specifically, it found that ÚOHS had erred in establishing the existence of the alleged prohibited agreements and in identifying them. ÚOHS can still challenge the decision by filing a cassation complaint.

Cartel agreement on T&Cs results in severe fine

Food voucher providers Sodexo Pass Česká republika a.s., Edenred CZ s.r.o. and Up Česká republika s.r.o. were fined CZK 279.152 million (approx. €11.5 million) for coordinating their terms and conditions with retail chains on the maximum number of meal vouchers accepted per purchase. (The press release is available here.)

ÚOHS: Do not confuse energy sector price caps with tolerance of cartels

Even though price caps can interfere with normal market functioning by restricting free pricing and thus distorting market operating mechanism, ÚOHS wants it to be known that they are justified given the current situation in the energy market. However, the competition authority also noted that it will not tolerate cartels and will continue to monitor developments in the energy sector and will be ready to take firm action against possible distortions, restrictions or exclusions of competition in these markets. (The press release is available here, in Czech only).

Merger control activities

Some recently cleared mergers by ÚOHS:

- Acquisition of part of Sberbak CZ, a.s. v likvidaci consisting of its loan portfolio by Česká spořitelna, a.s.
- Acquisition of Expobank CZ a.s., a small bank controlled by Russian individuals, by Banka Creditas a.s., a medium-large bank.
- Acquisition of ARMEX Oil s.r.o. and ARMEX Vision s.r.o., by ARMEX GLOBAL a.s., resulting in exclusive control over both targets.
- Acquisition of ŠKODA JS a.s., a supplier of key nuclear components, and Middle Estates, s.r.o., by ČEZ, a. s.
- Acquisition of a minority share in HECHT MOTORS s.r.o., a leading Central European group in the production and sale of garden equipment, by Genesis Private Equity Fund IV.

Slovakia

Slovak Post must fulfill commitments imposed by Antimonopoly Office

In early 2021, the Antimonopoly Office (PMÚ) began to investigate the behavior of the state-owned Slovak Post, due to a suspicion of price discrimination. During the administrative proceedings Slovak Post proposed a list of commitments to the PMÚ that should eliminate the competition law concerns and conclude the proceedings. This list was subject to the PMÚ's approval.

During the proceedings, the PMÚ concluded that Slovak Post is likely to have a dominant position on the relevant market of delivery of mass-filed letters and that the application of different conditions for identical or comparable services provided to individual customers is likely to amount to an abuse of its dominant position.

The PMÚ ultimately agreed to close the proceedings by imposing certain commitments on Slovak Post, including an obligation to change the Postal Services Tariff and extensive reporting obligations towards the PMÚ. (The press release is available here, in Slovak only).

PMÚ Council annuls fine of almost €300,000

At the beginning of 2022, the PMÚ imposed a fine of almost €300,000 on an undisclosed undertaking active in the waste management sector for abuse of its dominant position.

The antimonopoly authority found the undertaking charging some municipalities significantly higher prices compared with others for landfilling mixed municipal waste, which it had no objective justification for, and that this amounted to an unfair trading condition. This behavior was therefore considered abuse of its dominant position.

The undertaking filed an appeal and almost eight months later, the PMÚ Council (as an appellate body) annulled the first instance decision, due to "new facts" that arose in the matter.

The PMÚ will hold new proceedings in the case and issue a new decision. (The press release is available here, in Slovak only).

Dawn raid in possible cartel case

The PMÚ surprised an undertaking from the forestry sector with a dawn raid on September 20, 2022, on suspicion of a possible cartel agreement. The PMÚ has stated that preventing cartel agreements is one of its strategic priorities. No further information on the investigation is available yet, but we will continue to monitor the situation. (The press release is available here, in Slovak only.)

Another dawn raid connected with possible bid rigging

In early October 2022, the PMÚ conducted a dawn raid on a company active in the IT sector, as it continues to fight against the most harmful anticompetitive behavior—cartels. It stated in a press release that undertakings active in the software development sector might have concluded a cartel agreement related to their bids in public procurements for an information migration system.

These suspicions are currently subject to investigation. (The press release is available here, in Slovak only).

Possible bid rigging agreement

The PMÚ began investigating several undertakings based on a suspicion that they are coordinating their bids in public procurement and tenders.

The public procurement and tender were supposed to be financed from the structural funds of the European Union under the Research and Innovation operational program.

Currently there is not much information on the matter, but we will continue to monitor the progress of this proceeding. (The press release is available here, in Slovak only).

Merger control activities

PMÚ approves merger in decision without justification

VIVALTO SANTÉ INVESTISSEMENT SA requested PMÚ approval for it to take direct exclusive control of Spanish undertaking Primerosalud S.L.U. No competition law concerns were identified, so the decision was issued without a justification. (The press release is available here, in Slovak only).

Creation of JV in the electronic toll collection sector

The PMÚ was asked to assess several transactions in the electronic toll collection sector, which resulted in the creation of a full-function joint venture. This merger also includes the Slovak undertaking SkyToll, a.s., which is currently responsible for the registration and payment of motorway vignettes in Slovakia, however, their contract is only valid till the end of 2022.

Since the assessment involved tender markets, the PMÚ also investigated the proximity of the competition and the existence of relevant competitors.

After careful consideration, the PMÚ green lit the merger. (The official press release is available here, in Slovak only).

Another merger in the tender market

Two undertakings active in bus transportation asked the PMÚ to approve their merger. Even though both undertakings are present in the same relevant product market, their activities do not overlap in the relevant

geographic market. That said, there is an overlap in the market of public tenders for the provision of bus transportation services.

When assessing the possible negative effects on competition, the PMÚ focused mainly on the relevant tender market. Since there were no concerns, the antimonopoly authority approved the merger. (The official press release is available here, in Slovak only).

We are happy to share our know-how. We will continue to prepare a selection of competition news on a quarterly basis, but you can keep track of exciting developments on our LinkedIn profiles (below).

Competition team of Dentons' Prague and Bratislava offices

Petr Zákoucký
Partner, Prague
D +420 236 082 280
petr.zakoucky@dentons.com
LinkedIn profile

Juraj Gyárfáš
Partner, Bratislava
D +421 2 2066 0239
juraj.gyarfas@dentons.com
LinkedIn profile

Adam Přerovský
Senior Associate, Prague
D +420 236 082 241
adam.prerovsky@dentons.com
LinkedIn profile

Tomáš Pavelka
Associate, Prague/Bratislava
D +420 236 082 222
tomas.pavelka@dentons.com
LinkedIn profile

Ján Dulovič
Associate, Bratislava
D +421 2 2066 0235
jan.dulovic@dentons.com
LinkedIn profile

Tomáš Jonáš
Associate, Prague
D +420 236 082 260
tomas.jonas@dentons.com
LinkedIn profile

Matěj Pavlík
Associate, Prague
D +430 236 082 287
matej.pavlik@dentons.com
LinkedIn profile

Kristína Kresťanková
Paralegal, Bratislava
D +421 2 2066 0421
kristina.krestankova@dentons.com
LinkedIn profile

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