

CONYERS



Section 47 Trustee Act 1975 (Bermuda) Compendium

Preface

The purpose of this publication is to gather together in a single place jurisprudence related to Section 47 of Bermuda's Trustee Act 1975 for the benefit of practitioners and advisors in Bermuda and beyond. We provide some background and (non-exhaustive) commentary, and statutes, cases and other materials are provided in the appendices.

The law is stated as at the date below. Like the jurisprudence itself, the intent is this will be an evolving document and we will update it at least annually. Constructive comments and criticism are welcomed.

Conyers Dill & Pearman

Bermuda

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Relevant Legislation Compendiums

[Bermuda Trustee Act 1975 Compendium](#)

[Bermuda Companies Act 1981 Compendium](#)

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1. INTRODUCTION

Certainty is existential for every trustee: what property they hold, for whom and upon which terms. So even the most meticulously drafted trust deeds and plans are best efforts. If a trust must be certain, unlike corporate constitutions and other commercial agreements, then a power of amendment may introduce more questions than it answers: who shall have that power, how shall it be exercised? In the event of challenge could a foreign court or creditor compel the powerholder to exercise the power to amend the trust in his favour?

Almost inevitably then trustees may encounter situations and circumstances where they find themselves ill equipped or, worse, hamstrung. In an acrimonious divorce between beneficiaries, for example, where they may wish to act to support a settlement; where a trust may need to be restructured to prevent fracturing of family relationships; or to introduce new provisions and powers to replace outdated ones inapplicable in the modern context.

The role of the chancery courts to assist trustees in their administration of trusts of course is well established in trust law. Indeed, one could argue the existence of the jurisdiction arises from trustees' burden of achieving certainty in an uncertain world! All modern trusts jurisdictions have provisions in their laws allowing for trustees to apply to the courts for assistance in various circumstances. However over the last 15 years Bermuda significantly has developed its Supreme Court's jurisdiction under section 47 of the Trustee Act 1975. This statute, which is a hybrid of sections from England's Settled Land Act 1925 and Trustee Act 1925, has proved to be an invaluable tool to trustees in some of the most testing circumstances. The section has been extensively analysed by both local trust lawyers, as well as leading members of London's chancery bar. This exercise is ongoing.

2. BACKGROUND

Case Law

The most often cited case law in respect of the termination of trusts is *Saunders v Vautier*¹. *Saunders v Vautier* establishes the principle that if all beneficiaries are ascertained, of full age and capacity and beneficially entitled to the entirety of the trust fund then they may call for the trust fund to be transferred to them, even if, prima facie, it defeats the known intentions of the settlor. This is strictly not an example of a variation of a trust rather a termination of the trust, perhaps in advance of the date on which the settlor, or in the case of *Saunders v Vautier* the testator, had specified.

It is of course open to the trustees to vary a trust by agreement of all the beneficiaries affected by the variation provided they are of full age and capacity. However, it is often the case that trusts have wide classes of discretionary beneficiaries, including minor and unborn children, and therefore variation by agreement is likely to be frustrated.

¹ (1841) 41 ER 482

3. ENGLAND & WALES LEGISLATIVE BACKGROUND

In England & Wales there are three legislative bases upon which a trust can be varied; s64 Settled Land Act 1925 (“SLA 1925”), s57 Trustee Act 1925 (“TA 1925”) and s1 Variation of Trusts Act 1958.

It is generally accepted that the various legislative provisions from England & Wales are the origin of the Bermuda law and so their legislative text and case law remain a useful source for all those practising in Bermuda.

Of limited modern application is s64 Settled Land Act 1925 (set out in Appendix A) as no new settled land act settlements can be created. The leading modern case in respect of this section concerns the Blenheim estates². An application was made by the trustees of the Blenheim estates to convey settled land to the trustees of a new trust. The legislation sets out that ‘*Any transaction affecting or concerning the settled land act ... which in the opinion of the court would be for the benefit of the settled land ... or the persons interested under the settlement, may, under an order of the court, be effected by a tenant for life, if it is one which could have been validly effected by an absolute owner ...*’. Here the court held that provided the proposed transaction was for the benefit of the settled land or the beneficiaries then the word ‘*transaction*’ should be widely and not narrowly construed.

An alternative, though limited, basis for variation of trusts in England & Wales is s57 Trustee Act 1925 (set out in Appendix A). This allows a variation which is ‘*expedient*’ in respect of the ‘*management or administration of any property vested in trustees*’. It is settled law that this is narrowly construed and applies only to frustrations in respect of administrative decisions that the trustees may wish to make. In *Chapman v Chapman*³ it was held that the power conferred upon the court by the section is restricted to supervision and control of trust property which does not include alteration to the underlying beneficial interests of the trust. More helpful modern case law in *Sutton v England*⁴ does establish precedent that if the proposed transaction of which the trustees seek the court’s approval has an incidental impact upon the beneficial interests then the court has jurisdiction to make the order sought.

There is more limited case law on the meaning of the word ‘*expedient*’ which can be found in *Re Craven’s Estate*⁵. It was held that ‘*expedient*’ in the context of the legislation means ‘*expedient*’ for the trust as a whole, not simply for one beneficiary.

The final statutory basis in England & Wales for variation of a trust is s1 Variation of Trusts Act 1958. ‘*The court may if it thinks fit*’ approve arrangements for beneficiaries who lack capacity and unborn beneficiaries, amongst others. This creates a limited ability to approve a proposed arrangement for certain categories of beneficiaries. Importantly, the court will expect consent from all capable beneficiaries to the proposed scheme and the court cannot approve a resettlement simply variation or revocation of an existing trust.

² Hambro v Duke of Marlborough [1994] Ch 158

³ [1954] AC 429

⁴ [2011] EWCA Civ 637

⁵ [1937] Ch 431

4. BERMUDIAN LEGISLATIVE BACKGROUND

The legislative bases for variation in Bermuda are s47 & s48 Trustee Act 1975 (“TA 1975”) (set out in Appendix B) which are based on the law of England & Wales. As stated by Ian RC Kawaley CJ (as he then was) in *Re ABC Trusts*⁶ in respect of s47 ‘*This power is actually broader than that conferred by the provisions of s48 which explicitly deal with variation alone*’. The s48 TA 1975 power is comparable to the English Variation of Trusts Act 1958 and therefore requires all the capable beneficiaries to consent to the variation which is proposed which makes it of more limited application. We therefore focus here on s47 which has more established case law and a greater scope for development.

The judgement in *GH v KL*⁷ by Ground CJ states that s47 ‘*appears to be an amalgam of two English provisions, being s57 of the Trustee Act 1925 and section 64 of the Settled Land Act 1925, one effect of which is to remove the limitation to administrative matters contained in the former. I have no doubt, and in any event it must be presumed, that this was deliberate on the part of the [Bermuda] legislature*’.

‘*Transaction*’ is defined in both s47 TA 1975 and s64 SLA 1925 in similar terms and, for instance, in the *Duke of Marlborough* case above, has been given the widest possible meaning which encompasses more than simply administrative changes to the trust and this is the approach that the courts in Bermuda have taken to the scope of the meaning of ‘*transaction*’ under s47.

The s57 TA 1925 hybrid element is the inclusion of the word ‘*expedient*’. The ability for the court to approve a transaction is triggered by the question of whether the transaction is ‘*expedient*’ and *Re Craven’s Estate*, mentioned above, outlines the judicial interpretation of the word in this context. Essentially, is it for the benefit of the beneficiaries of the settlement (rather than simply one of them) and will it allow the trustees to better satisfy its objects?

The question for the court in respect of a s47 application is therefore twofold:

- First, can the court as a matter of law confer upon the trustees the power that they request;
- Second, is it expedient to do so?

Importantly, the section does not require the consent of all the capable beneficiaries.

5. SCOPE OF S47 & JUDICIAL INTERPRETATION

The key case in respect of s47 is *GH v KL*⁸. This concerned a Will which established three separate trusts, one for each of the children of the settlor together with their issue. The Will Trusts did not meet the objectives of the wider family and they wanted to make a number of changes including:

- Addition of a successor professional trustee (as one of the trustees did not wish to act);
- Power for the family to select a successor family trustee;

⁶ *Re ABC Trusts* [2012] SC (Bda) 65 Civ

⁷ *GH v KL* ref

⁸ 2011 SC (BDA) 23 Civ

- Powers of appointment for successor investment and legal trustees and of an administrative trustee;
- Variation of the remuneration of the family trustee;
- Ability to accumulate income and pay out of each settled share an amount to the children of the current life tenant;
- Permit resettlement of one son's share of residue (subject to consent of a third party);
- Variation of investment powers.

Ultimately the court approved all of the changes listed above and found that the above were 'transactions' within the broad meaning of the section. Importantly for the development of the Bermudian jurisprudence in this area it was also held that the legislation and English case law '*at least contemplates the possibility of the Court sanctioning a transaction which is expedient for one beneficiary and neutral for the others ...*'.

Furthermore, the judgement goes on to state that '*if the proposal is otherwise plainly expedient, then there is no limitation in the statute which prevents its sanction simply on the grounds that it is designed in the interests of tax efficiency, and nothing to justify my importing such a restriction*'.

6. USES & EXAMPLES IN PRACTICE

Given the wide interpretation afforded by s47 TA 1975 to approve 'transactions' the uses of the legislation are widely varied and potentially capable of extension beyond the current case law. To date successful applications by trustees to the Bermuda court have included:

- The extension of perpetuity periods of trusts (though this has reduced following the 2015 amendments to the Perpetuities & Accumulations Act 2009);
- Variation of beneficial interests;
- Tax efficiency, often relevant in the jurisdiction of residence or domicile of the beneficiaries. It should be noted that, unlike statutory variations in other jurisdictions, s47 does not require all beneficiaries to be joined as parties to the application to court. Not only does this achieve administrative efficiencies and costs, it can be useful in tax planning. Some tax systems can deem a participating beneficiary as having constructive receipt.

7. CASES

*Re ABC Trusts 2012*⁹ – here, an application was made to include modern charging clauses into the Trust Deed, extend perpetuity period and remove a restriction whereby the trustee had to consider whether a charity would be considered charitable under the laws of Prince Edward Island.

*Re ABC Trusts 2015*¹⁰ – an example of a contested application where the majority of the beneficiaries consented to settlement with certain tax authorities but one beneficiary explicitly did not consent.

⁹ [2012] SC (Bda) 65 Civ

*Re E Trust 2018*¹¹ – an application to add a charitable Foundation as the primary beneficiary following the death of the settlor.

*Re GA Settlement 2019*¹² – general modernisation and update to trust provisions which were an overhang from an earlier Lichtenstein settlement.

*Re XYZ Trust 2012*¹³ – restricting of a trust and amendment of the bye-laws of underlying companies against the backdrop of a family dispute between the children of the Patriarch's first and second marriages.

8. CONFIDENTIALITY

A major concern for most clients is keeping their affairs as private as possible in an increasingly intrusive world.

Bermuda's position is in marked contrast to the position of "open justice" in England and Wales. It is generally accepted in the Courts of Bermuda that non-controversial trust restructurings are private matters and such applications should be heard in private and judgements anonymised.

In the matter of the *BCD Trust*¹⁴, CJ Kawaley states that *'It seems to me that in this type of case it is inherently consistent with the public interest and the administration of justice generally that applications such as these should be anonymised and dealt with as private applications, where there is no obvious public interest in knowing about an internal trust administration matter.'*

This is distinct from many jurisdictions, in particular England & Wales, where there is a presumption of open justice and in all but the rarest of circumstances an application for a confidentiality order will be refused.

¹⁰ [2015] SC (Bda) 29 Civ

¹¹ [2018] SC (Bda) 38 Civ

¹² [2019] SC (Bda) 38 Civ

¹³ [2017] SC (Bda) 111 Civ

¹⁴ [2015] SC (Bda) 83 Civ

APPENDIX A - UK Statutes**Settled Land Act 1925 c. 18 s. 64** (as originally enacted)**64. General power for the tenant for life to effect any transaction under an order of the court.**

- (1) Any transaction affecting or concerning the settled land, or any part thereof, or any other land (not being a transaction otherwise authorised by this Act, or by the settlement) which in the opinion of the court would be for the benefit of the settled land, or any part thereof, or the persons interested under the settlement, may, under an order of the court, be effected by a tenant for life, if it is one which could have been validly effected by an absolute owner.
- (2) In this section " transaction " includes any sale, extinguishment of manorial incidents, exchange, assurance, grant, lease, surrender, reconveyance, release, reservation, or other disposition, and any purchase or other acquisition, and any covenant, contract, or option, and any application of capital money (except as hereinafter mentioned), and any compromise or other dealing, or arrangement; but does not include an application of capital money in payment for any improvement not authorised by this Act, or by the settlement ; and " effected " has the meaning appropriate to the particular transaction; and the references to land include references to restrictions and burdens affecting land.

Settled Land Act 1925 c. 18 s. 64 (as at 1 December 2020)**64. General power for the tenant for life to effect any transaction under an order of the court.**

- (1) Any transaction affecting or concerning the settled land, or any part thereof, or any other land (not being a transaction otherwise authorised by this Act, or by the settlement) which in the opinion of the court would be for the benefit of the settled land, or any part thereof, or the persons interested under the settlement, may, under an order of the court, be effected by a tenant for life, if it is one which could have been validly effected by an absolute owner.
- (2) In this section “transaction” includes any sale, [...] ¹, exchange, assurance, grant, lease, surrender, reconveyance, release, reservation, or other disposition, and any purchase or other acquisition, and any covenant, contract, or option, and any application of capital money, [...] ² and any compromise or other dealing, or arrangement; [...] ² and “effected” has the meaning appropriate to the particular transaction; and the references to land include references to restrictions and burdens affecting land.

Trustee Act 1925 c.19 s. 57 (as originally enacted)**57. Power of court to authorise dealings with trust property.**

- (1) Where in the management or administration of any property vested in trustees, any sale, lease, mortgage, surrender, release, or other disposition, or any purchase, investment, acquisition, expenditure, or other transaction, is in the opinion of the court expedient, but the same cannot be effected by reason of the absence of any power for that purpose vested in the trustees by the trust instrument, if any, or by law, the court may by order confer upon the trustees, either

generally or in any particular instance, the necessary power for the purpose, on such terms, and subject to such provisions and conditions, if any, as the court may think fit and may direct in what manner any money authorised to, be expended, and the costs of any transaction, are to be paid or borne as between capital and income.

- (2) The court may, from time to time, rescind or vary any order made under this section, or may make any new or further order.
- (3) An application to the court under this section may be made by the trustees, or by any of them, or by any person beneficially interested under the trust.
- (4) This section does not apply to trustees of a settlement for the purposes of the Settled Land Act, 1925.

Trustee Act 1925 c.19 s. 57 (as at 1 December 2020)

57. Power of court to authorise dealings with trust property.

- (1) Where in the management or administration of any property vested in trustees, any sale, lease, mortgage, surrender, release, or other disposition, or any purchase, investment, acquisition, expenditure or other transaction, is in the opinion of the court expedient, but the same cannot be effected by reason of the absence of any power for that purpose vested in the trustees by the trust instrument, if any, or by law, the court may by order confer upon the trustees, either generally or in any particular instance, the necessary power for the purpose, on such terms, and subject to such provisions and conditions, if any, as the court may think fit and may direct in what manner any money authorised to be expended, and the costs of any transaction, are to be paid or borne as between capital and income.
- (2) The court may, from time to time, rescind or vary any order made under this section, or may make any new or further order.
- (3) An application to the court under this section may be made by the trustees, or by any of them, or by any person beneficially interested under the trust.
- (4) This section does not apply to trustees of a settlement for the purposes of the M1Settled Land Act, 1925.

Variation of Trusts Act 1958 c. 53, s.1 (as originally enacted)

1. Jurisdiction of courts to vary trusts.

- (1) Where property, whether real or personal, is held on trusts arising, whether before or after the passing of this Act, under any will, settlement or other disposition, the court may if it thinks fit by order approve on behalf of-
 - (a) any person having, directly or indirectly, an interest, whether vested or contingent, under the trusts who by reason of infancy or other incapacity is incapable of assenting, or

- (b) any person (whether ascertained or not) who may become entitled, directly or indirectly, to an interest under the trusts as being at a future date or on the happening of a future event a person of any specified description or a member of any specified class of persons, so however that this paragraph shall not include any person who would be of that description, or a member of that class, as the case may be, if the said date had fallen or the said event had happened at the date of the application to the court, or
- (c) any person unborn, or
- (d) any person in respect of any discretionary interest of his under protective trusts where the interest of the principal beneficiary has not failed or determined,

any arrangement (by whomsoever proposed, and whether or not there is any other person beneficially interested who is capable of assenting thereto) varying or revoking all or any of the trusts, or enlarging the powers of the trustees of managing or administering any of the property subject to the trusts:

Provided that except by virtue of paragraph (d) of this subsection the court shall not approve an arrangement on behalf of any person unless the carrying out thereof would be for the benefit of that person.

Variation of Trusts Act 1958 c. 53, s. 1 (as at 1 December 2020)

1. Jurisdiction of courts to vary trusts.

- (1) Where property, whether real or personal, is held on trusts arising, whether before or after the passing of this Act, under any will, settlement or other disposition, the court may if it thinks fit by order approve on behalf of—
 - (a) any person having, directly or indirectly, an interest, whether vested or contingent, under the trusts who by reason of infancy or other incapacity is incapable of assenting, or
 - (b) any person (whether ascertained or not) who may become entitled, directly or indirectly, to an interest under the trusts as being at a future date or on the happening of a future event a person of any specified description or a member of any specified class of persons, so however that this paragraph shall not include any person who would be of that description, or a member of that class, as the case may be, if the said date had fallen or the said event had happened at the date of the application to the court, or
 - (c) any person unborn, or
 - (d) any person in respect of any discretionary interest of his under protective trusts where the interest of the principal beneficiary has not failed or determined.

any arrangement (by whomsoever proposed, and whether or not there is any other person beneficially interested who is capable of assenting thereto) varying or revoking all or any of the trusts, or enlarging the powers of the trustees of managing or administering any of the property subject to the trusts:

Provided that except by virtue of paragraph (d) of this subsection the court shall not approve an arrangement on behalf of any person unless the carrying out thereof would be for the benefit of that person.

- (2) In the foregoing subsection “protective trusts” means the trusts specified in paragraphs (i) and (ii) of subsection (1) of section thirty-three of the M1Trustee Act, 1925, or any like trusts, “the principal beneficiary” has the same meaning as in the said subsection (1) and “discretionary interest” means an interest arising under the trust specified in paragraph (ii) of the said subsection (1) or any like trust.
- (3)^{F1} the jurisdiction conferred by subsection (1) of this section shall be exercisable by the High Court, except that the question whether the carrying out of any arrangement would be for the benefit of a person falling within paragraph (a) of the said subsection (1) [F2who lacks capacity (within the meaning of the Mental Capacity Act 2005) to give his assent is to be determined by the Court of Protection]
- (4)^{F3}
- (5) Nothing in the foregoing provisions of this section shall apply to trusts affecting property settled by Act of Parliament.
- (6) Nothing in this section shall be taken to limit [F4the powers of the Court of Protection].

APPENDIX B - Bermuda Statute**Trustee Act 1975, s. 47** (as at 1 December 2020)**47. Power of court to authorise transactions relating to trust property**

- (1) Where any transaction affecting or concerning any property vested in trustees, is in the opinion of the court expedient, but the same cannot be effected by reason of the absence of any power for that purpose vested in the trustees by the instrument, if any, creating the trust, or by any provision of law, the court may by order confer upon the trustees, either generally or in any particular instance, the necessary power for the purpose, on such terms and subject to such provisions and conditions, if any, as the court may think fit and may direct in what manner any money authorised to be expended, and the costs of any transaction, are to be paid or borne as between capital and income.
- (2) The court may, from time to time, rescind or vary any order made under this section or may make any new or further order.
- (3) An application to the court under this section may be made by the trustees, or by any of them, or by any person beneficially interested under the trust.
- (4) In this section, "transaction" includes any sale, exchange, assurance, grant, lease, partition, surrender, reconveyance, release, reservation, or other disposition, and any purchase or other acquisition, and any covenant, contract, or option, and any investment or application of capital, and any compromise or other dealing, or arrangement.

48. Jurisdiction of court to vary trusts

- (1) Subject to subsection (2), where property is held on any trusts or settlements arising under any will, settlement or other disposition, the court may if it thinks fit by order approve on behalf of -
 - (a) any person having, directly or indirectly, an estate or interest, whether vested or contingent, under the trusts or settlements who by reason of infancy or other incapacity is incapable of assenting; or
 - (b) any person (whether ascertained or not) who may become entitled, directly or indirectly, to an estate or interest under the trusts or settlements as being at a future date or on the happening of a future event a person of any specified description or a member of any specified class of persons so, however, that this paragraph shall not include any person who would be of that description, or a member of that class, as the case may be, if the said date had fallen or the said event had happened at the date of the application to the court; or
 - (c) any person unborn; or
 - (d) any person in respect of any discretionary interest of his under protective trusts where the interest of the principal beneficiary has not failed or determined,

any arrangement (by whomsoever proposed, and whether or not there is any other person beneficially interested who is capable of assenting thereto) varying or revoking all or any of the trusts or settlements, or enlarging the powers of the trustees of managing or administering any of the property subject to the trusts or settlements.

- (2) Except by virtue of subsection (1)(d) the court shall not approve an arrangement on behalf of any person unless the carrying out of the arrangement would be for the benefit of that person.
- (3) In subsection (1), "protective trusts" means the trusts specified in section 25(1)(a) and (b) or any like trusts, "the principal beneficiary" has the same meaning as in section 25(1) and "discretionary interest" means an interest arising under the trust specified in section 25(1)(b) or any like trust.
- (4) Nothing in this section shall be taken to limit the powers conferred by section 47.

This publication should not be construed as legal advice and is not intended to be relied upon in relation to any specific matter. It deals in broad terms only and is intended merely to provide a brief overview and give general information.

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APPENDIX C - Bermuda Cases

[Re ABC Trusts \[2012\] SC \(Bda\) 65 Civ \(13 November 2012\)](#)

[GH v KL et al \[2011\] SC \(Bda\) 23 Civ \(2 December 2010\)](#)

[Re BCD Trust \[2015\] SC \(Bda\) 83 Civ \(30 November 2015\)](#)

[Re ABC Trusts \[2015\] SC \(Bda\) 29 Civ \(10 September 2014\)](#)

[Re The E Trust \[2018\] SC \(Bda\) 38 Civ \(23 April 2018\)](#)

[Re GA Settlement; Re GB Settlement; Re GC Settlement \[2019\] SC \(Bda\) 38 Civ \(14 June 2019\)](#)

[Re XYZ Trust \[2017\] SC \(Bda\) 111 Civ \(12 December 2017\)](#)

[Re The B Trust \[2020\] SC \(Bda\) 30 Com \(23 July 2020\)](#)

[Re The H Trust \[2019\] SC \(Bda\) 27 Com \(30 April 2019\)](#)

Available upon request

Von Knieriem v Bermuda Trust Company Limited [1994] Bda LR 50

Trott v Outerbridge 1983 Civil Jurisdiction No. 161

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