

# Drones: A New Frontier



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### 1. Introduction

Unmanned Aircraft Systems / Vehicles (UAS UAV - or *Drones*, as they are commonly known) refer primarily to an unmanned aircraft which is guided by a remote control.

The very first attempt to use a contraption that could be flown on its own accord was reported in the 1800s, when Austrians attacked the city of Venice with balloons laden with explosives<sup>1</sup>. The first pilotless aircraft was designed by the US Army during World War I. These unmanned aerial vehicles could not, however, be used during the war as by the time they were actually developed, the war had ended. Nonetheless, these UAVs called '*Kettering Bugs*' were meant to fly as aerial torpedoes<sup>2</sup>. Later, during the 1930s, the United States and England, both independently developed the world's first radio-controlled aircraft. In 1935, the British developed "Queen Bee", a radio-controlled target drone, which is also believed to have led to the use of term "drone," for radio-controlled unmanned aircraft<sup>3</sup>.

These advancements led to UAVs being used for in a number of new capacities but primarily for military use such as acting as decoys in combat, launching missiles against fixed targets and dropping leaflets for psychological operations<sup>4</sup>. The development and usage of drones continued to be predominantly for warfare by the military until the end of the twentieth century when flying remote controlled aircraft substantially grew as a hobby. During the 1960s, breakthroughs in transistor technology led to radio-controlled components becoming miniaturized enough to be sold to civilian customers at a reasonable cost which, in turn, led to a boom in radio-controlled planes being sold as toys during this decade.

The last decade has seen a significant increase in innovation and commercial interest within the drone-tech space. As mentioned earlier, whilst erstwhile drones were primarily used for military purposes, beginning in the early-2010s, a host of new uses were proposed for drones. As a result of their ability to reach the inaccessible places at low costs, drones are now being used by countries and governments

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<sup>1</sup><https://www.efadrones.org/austria/#:~:text=Austria%20was%20the%20first%20country,remotely%20set%20off%20the%20bombs.>

<sup>2</sup> <https://www.iwm.org.uk/history/a-brief-history-of-drones>

<sup>3</sup> <https://interestingengineering.com/a-brief-history-of-drones-the-remote-controlled-unmanned-aerial-vehicles-uavs>

<sup>4</sup> *Supra*, at 2 above.

for a number of purposes ranging from rescue operations, surveillance, delivering goods to transporting time-sensitive medical supplies<sup>5</sup>.

Recently, we have seen India taking massive strides towards becoming a pioneer in drone operations and use in a safe, commercially-savvy manner. While on one hand, the Indian government has approved hyper-local delivery start-ups such as *Dunzo*, *Swiggy*, *Zomato* to start testing Beyond the Visual Line Of Sight (BVLOS) drones for commercial deliveries<sup>6</sup>, with the current tension with China over its national borders, the Indian government is also mulling the usage of drones for military use as well<sup>7</sup>.

Suffice to say that drones are being seen by the governments across the world, as an important aide in its policies, both from a commercial as well as non-commercial perspective. Not to mention the plethora of opportunities (and challenges) that will be generated from the commercial usage of drones, and one can see why drones are considered the “new frontier”.

## 2. Challenges - India

A recent FICCI and EY report noted that the UAS market in India will touch \$885.7 million by 2021, when the global market size will be \$21.47 billion<sup>8</sup> (approximating to only about 3.8%).

With so much potential to tap into this lucrative market and with such clear pitfalls in terms of safety and security that need to be managed, policy makers across the world are having a tough time in ensuring that they come up with clear and distinct drone laws. This is because, in addition to making the laws, enforcement of the same is seemingly a challenge as well.

In 2014, India imposed a sudden ban on the use of civil drones. This came after a Mumbai-based pizza parlour tried to use an unmanned vehicle to air-drop pizzas<sup>9</sup>. The explanation provided at that time was the lack of regulatory laws in place for consumer drones. The said draft guidelines on operation of unmanned aircraft took sometime in the making, and were issued by the Director-General of Civil Aviation (DGCA) in 2016 and were eventually passed only in 2018<sup>10</sup> (Guidelines).

What this delay resulted in, was setting back the emerging domestic drone industry in India by years, which in turn, gave an opportunity to China to turn it into a profitable venture. This was because during the interim years (2014-18) imported drones (mainly from China) became easily available both online and offline platforms as *toys*. It took **four** years for the Indian government to start seeing the flaws of their policy (ban) and thus, missed their opportunity to encash on the seemingly obvious technological advancements that had been made in India within the drone / general aviation domain.

Even when the Guidelines were finally issued, reversing the 2014 ban, the Guidelines still seemingly lacked bite — for instance, the policy provided for restrictive clauses such as the controversial ‘No

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<sup>5</sup> <https://edition.cnn.com/2018/12/21/health/medical-transport-drones-scli-intl/index.html>

<sup>6</sup> <https://swarajyamag.com/news-brief/dawn-of-the-age-of-drones-dgca-gives-approval-to-hyperlocal-start-ups-to-test-drone-delivery>

<sup>7</sup> <https://www.hindustantimes.com/india-news/india-eyes-acquisition-of-predator-drones-from-us/story-nVOOMnUWNh7KokbqE9uVYM.html>; and <https://theprint.in/defence/india-planning-to-order-heron-drones-spike-anti-tank-guided-missiles-from-israel/460752/>

<sup>8</sup> <https://www.financialexpress.com/industry/technology/indias-drone-market-expected-to-grow-885-7-mn-by-2021-jobs-look-like-a-guarantee-here/1340848/>

<sup>9</sup> <https://dronelife.com/2014/09/04/mumbai-drone-ban-bring-industry-stand-still/>

<sup>10</sup> <https://dgca.gov.in/digigov/portal/?dynamicPage=dynamicPdf/130574958&maincivilAviationRequirements/6/0/viewDynamicRulesReq>

Permission, No Take-off' (NPNT) clause, the only one of its kind within the industry. All drone manufacturers were required to have an NPNT software add-on on their drones, failing which, drones could not be sold in India.

The Guidelines heavily relied on a Digital Sky platform, which is supposed to be the only platform that can grant automated permission to own and operate drones. It has been over one and a half years since the enactment of the Guidelines, and the digital sky platform is yet to be functional to allow NPNT clearance. While it is understandable that the Civil Aviation Ministry has worked very hard to operationalise the Digital Sky platform, considering the complexity of the matter, challenges still remain.

In addition to the permit-oriented restrictions, there are the hardware specifications that have to be met for the drones manufactured and operated in India to be compliant with the prevailing regulations.

Some of the restrictive specifications as prescribed under the guidelines, are not required by any other country. Accordingly, international manufacturers are unlikely to make changes to the specifications of their drones for such a small piece of the pie (3.8%). This, in turn, will be India's loss as domestic manufacturers will make concessions to meet the hardware specifications, which will drive up the cost of Indian-made drones in comparison to their international counterparts, leading to black-marketing and flouting of the very rules that the government has promulgated to ensure the safe operation of drones in the country.

### 3. Legal Road Map and Latest Developments in India

While we have alluded to some of the developments within the domain in the preceding paragraphs, we will now delve into the road map of how the regulatory provisions have blossomed in India and the latest developments (both from a legal and non-legal perspective).

As mentioned previously, the Government of India issued draft Guidelines on the operation of unmanned aircraft in 2018<sup>11</sup>. The Guidelines were followed by the release of the Drone Ecosystem Policy Roadmap by the Ministry of Civil Aviation in 2019<sup>12</sup>. Subsequently, several new initiatives were launched by the authorities which focused towards capacity-building of the drone ecosystem in 2019 and this trend has seemed to continue in 2020.

For instance, in May 2019, the DGCA invited an expression of interest from consortiums willing and able to conduct experimental BVLOS operations of drones in the Indian airspace.

Later in August 2019, Maharashtra government entered into an MoU with the Indian national mapping agency – Survey of India – to use drones for mapping 40,000 villages to fix locations of village boundaries, canals, canal limits, and road<sup>13</sup>. In November 2019, Coal India used drones to check illegal mining and pilferage.

The aforementioned instances resulted in the Indian Government having adopted an evidence-based regulatory approach, wherein drone users were asked to provide proof-of-use of drone technology. This initiative materialised earlier this year (June 2020) when the DGCA approved hyper-local delivery start-ups to start testing BVLOS drones for deliveries<sup>14</sup>.

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<sup>11</sup> *Ibid.*

<sup>12</sup> [https://www.civilaviation.gov.in/sites/default/files/Monthly\\_Summary\\_January\\_19.pdf](https://www.civilaviation.gov.in/sites/default/files/Monthly_Summary_January_19.pdf)

<sup>13</sup> <https://economictimes.indiatimes.com/news/politics-and-nation/survey-of-india-signs-mou-with-maharashtra-govt-to-map-40000-villages-using-drones/articleshow/70495628.cms?from=mdr>

<sup>14</sup> *Supra*, at 1 above.

Then, in June this year the DGCA issued draft guidelines for setting up schools (Remote Pilot Training Organisations - **RPTOs**) for training pilots who intend to operate UASs (Draft Drone School Guidelines)<sup>15</sup>.

This is a first-of-its-kind initiative taken by the Indian government to streamline the entire drone-based regulatory policies and to ensure that the unmanned aerial vehicles can be operated safely and in compliance with the various regulatory conditions.

The Draft Drone School Guidelines propose to allow willing organisations under central and state governments, government-approved universities, and even private drone manufacturers to sign up as drone pilot training schools. This is a significant paradigm shift in the government's ideology because until now, the only organisations that have been allowed to operate as RPTOs have been a very small number of flight training organisations authorised by the DGCA.

Additionally, per the Draft Drone School Guidelines, the RPTOs are to establish facilities and provide physical environment conducive to the learning, in addition to class rooms equipped with training aids like computers, projectors, monitors etc. Additionally, it will be mandatory for RPTOs to have radio telephony training and testing facility along with a library for ground subjects, regulations and remote flying techniques, DGCA circulars, aircraft manuals, and civil aviation regulations. The RPTOs will also be required to prepare training manuals and have them approved by DGCA. This means that going forward, not only will there be a common platform for all drone operators to work on, but it will be far easier for the regulator(s) to identify violators<sup>16</sup>.

Not only that, India is probably amongst the first (if not the first) country to use drones for aerial surveillance and other COVID-19 related work. Nicknamed GARUD (Government Authorisation for Relief Using Drones), the portal seeks to establish "fast track conditional exemptions to government agencies for COVID-19 related drone operations<sup>17</sup>." Under the GARUD platform, government entities may use drones for aerial surveillance, aerial photography and public announcements related to COVID-19.

This is essentially a stop-gap measure until the Digital Sky platform can handle NPNT permissions<sup>18</sup>, and gives some amount of legality to drones operating in India, especially by the government agencies themselves (considering that the Guidelines are still in the draft stage).

#### **4. Comparative Analysis vis-à-vis Other Countries**

As mentioned previously, while India is presumably one of the first countries to issue official guidelines in relation to establishing a government-certified school dedicated to the operation of drones in the country, there are other countries that have regulations in relation to operation of drones.

Narrowing our focus to the ASEAN countries<sup>19</sup>, the general intent for operation of drones remains consistent (except in Brunei<sup>20</sup>), being:

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<sup>15</sup> [https://www.medianama.com/wp-content/uploads/FTC02\\_2020Draft\\_June2020-1.pdf](https://www.medianama.com/wp-content/uploads/FTC02_2020Draft_June2020-1.pdf)

<sup>16</sup> As of mid-August 2020, three (3) drone-training schools have received approval from the DGCA - <https://www.medianama.com/2020/08/223-dgca-approves-two-drone-schools-hyderabad/>

<sup>17</sup> <https://government.economictimes.indiatimes.com/news/digital-india/ministry-of-civil-aviation-launches-garud-portal-to-fast-track-approval-of-drones-for-covid-19-operations/75591825>

<sup>18</sup> The DGCA has recently approved operations by NPNT compliant drones in several green zones such as Tumkur in Karnataka, Kharsa in West Bengal, Neemrana in Rajasthan and Nandyal in Andhra Pradesh.

<sup>19</sup> Brunei, Cambodia, Indonesia, Laos, Malaysia, Myanmar, the Philippines, Singapore, Thailand, and Vietnam.

- Drone pilots must maintain a visual line of sight with their drone at all times.
- Drones exceeding a minimum weight need to be registered.
- A permit is not required to fly a drone that weighs 7 kilograms (15 pounds) or less that is being flown 200 feet or below. If flying a drone heavier than 7 kilograms (15 pounds) or above 60 meters (200 feet), a permit is required.
- Drones cannot be flown over people or crowds.
- Drones may not interfere with emergency service providers, or over vehicles where their presence may distract the driver.
- Drones may not be flown in the vicinity of an airport.
- Drones may only be flown during daylight hours.

While the general provisions of drone operations remain adequately open-ended and liberal, considering the infinite usage of drone technology, some countries are facing headaches of a different variety. It's not that people are being caught flying drones near airports / air base<sup>21</sup>, or are operating drones in other no-fly zones<sup>22</sup>, there have been reports of drones being used now for illicit cross-border drug-peddling<sup>23</sup>.

While assimilating the regulations re drones that have been enacted by all the countries across the world is huge task (and probably beyond the scope of the current article), we set out below, a brief (non-exhaustive) overview of some the countries that have issued guidelines in relation to drone operations within their territorial boundaries.

Country	Brief Overview of Regulation	Useful Resources
Singapore	Air Navigation (101 – Unmanned Aircraft Operations) Regulations	<a href="https://www.caas.gov.sg/docs/default-source/docs---legal/air-navigation-(101-unmanned-aircraft-operations)-regulations-2019.pdf">https://www.caas.gov.sg/docs/default-source/docs---legal/air-navigation-(101-unmanned-aircraft-operations)-regulations-2019.pdf</a>
China	Flying a drone is legal in China, however, there is a difference between commercial & recreational drone use and both are subject to different set of restrictions and code of conduct.	<a href="http://www.caac.gov.cn/index.html">http://www.caac.gov.cn/index.html</a>
Australia	Specific rules and regulations for unmanned aircraft are contained in Part 101 of the Civil Aviation Safety Regulations 1998 (CASR)	<a href="https://www.casa.gov.au/standard-page/casr-part-101-unmanned-aircraft-and-rocket-operations">https://www.casa.gov.au/standard-page/casr-part-101-unmanned-aircraft-and-rocket-operations</a>

<sup>20</sup> According to Brunei's national aviation authority, drones are banned in Brunei and if you try to enter the country with a drone it will be confiscated at customs.

<sup>21</sup> <https://www.todayonline.com/singapore/first-individuals-charged-flying-drones-without-permit-near-airbase>

<sup>22</sup> <https://www.express.co.uk/news/uk/691834/Man-jailed-flying-drone-eight-times-prisons-arrested>

<sup>23</sup> <https://www.straitstimes.com/singapore/courts-crime/two-men-used-drone-to-transport-drugs-from-johor-baru-to-kranji-reservoir>

Country	Brief Overview of Regulation	Useful Resources
Austria	The first country to use unmanned aerial vehicles <sup>24</sup>	<a href="https://www.austrocontrol.at/en/aviation_agency/licenses_permissions/flight_permissions/rpas">https://www.austrocontrol.at/en/aviation_agency/licenses_permissions/flight_permissions/rpas</a>
Belgium	Royal Decree of 10 April 2016 distinguishes three different types of activity depending on the weight of the drone and the place of operation.	<a href="https://dronerules.eu/en/recreational/news/new-drone-legislation-in-belgium">https://dronerules.eu/en/recreational/news/new-drone-legislation-in-belgium</a>
Canada	Drone pilots must follow the rules in the <i>Canadian Aviation Regulations</i> (CARs).	<a href="https://tc.canada.ca/en/aviation/drone-safety/flying-your-drone-safely-legally">https://tc.canada.ca/en/aviation/drone-safety/flying-your-drone-safely-legally</a>
Germany	Provisions of the Air Traffic Regulation (LuftVO), in particular article 21a-f, the Air Traffic Act (LuftVG) and the Air Traffic Approval Regulation (LuftVZO) govern the operating of drones.	<a href="https://dronerules.eu/en/professional/regulations/germany">https://dronerules.eu/en/professional/regulations/germany</a>
Italy	<p>Civil Aviation Authority (ENAC) govern the operation of drones via the below rules:</p> <ul style="list-style-type: none"> <li>○ Regulation on Remotely Piloted Aerial Vehicles - Issue No. 4 of 21 May 2018;</li> <li>○ Informative Notice No. 007/2017 on the implementation of standard scenarios for specialised critical operations;</li> <li>○ Guidelines 2016/004-NAV in respect of the design certification process;</li> <li>○ Guidelines 2017/001-NAV on the risk assessment for flight operations;</li> <li>○ Circular LIC-15 of 9 June 2016 regarding training centres and pilot licences; and</li> <li>○ Circular ATM-09 of 24 May 2019 on the use of airspace.</li> </ul>	<a href="https://www.lexology.com/library/detail.aspx?g=68903659-fba4-47d5-bdb7-0a8a7ea3cf39">https://www.lexology.com/library/detail.aspx?g=68903659-fba4-47d5-bdb7-0a8a7ea3cf39</a>
Japan	Amendment to the Aeronautical Act issued on September 11 2015 to introduce safety rules on Unmanned Aircraft / Drones, new rules came into force on Dec 10 2015.	<a href="https://www.mlit.go.jp/en/koku/uas.html">https://www.mlit.go.jp/en/koku/uas.html</a>

<sup>24</sup> *Supra*, at 1 above.

Country	Brief Overview of Regulation	Useful Resources
New Zealand	Part 101 Rules for Unmanned Aircraft must be followed, and Part 102 Certification required when flying which do not comply with Part 101 Rules.	<a href="https://www.aviation.govt.nz/drones/rules-and-regulations-for-drones-in-new-zealand/">https://www.aviation.govt.nz/drones/rules-and-regulations-for-drones-in-new-zealand/</a>
Poland	Use of drones regulated by Aviation Law Act	<a href="https://www.loc.gov/law/help/regulation-of-drones/poland.php">https://www.loc.gov/law/help/regulation-of-drones/poland.php</a>
Switzerland	Operation for drones weighing up to 30 kgs can be found in the DETEC Ordinance on Aircraft of Special Categories.	Federal Office for Civil Aviation (FOCA) website: <a href="https://www.bazl.admin.ch/rpases">https://www.bazl.admin.ch/rpases</a>
United Kingdom	From 30 November 2019, it is illegal to fly a drone without registering and passing a theory test	<a href="https://uavcoach.com/drone-laws-in-united-kingdom/">https://uavcoach.com/drone-laws-in-united-kingdom/</a>
United States	Different rules apply according to the type of drone flyer someone is.	<a href="https://www.faa.gov/uas/">https://www.faa.gov/uas/</a>
Greece	Regulation –General framework for flights of Unmanned Aircraft Systems – UAS, Published in Government Gazette B/3152/30.9.2016 - Original text published in Greek Language by the Hellenic Civil Aviation Authority.	<a href="https://dagr.hcaa.gr/docs/HCAA%20UAS%20Regulation.pdf">https://dagr.hcaa.gr/docs/HCAA%20UAS%20Regulation.pdf</a>
Israel	<p>Israel's current permit process for non-military/civil UAV operation involves reviewing the individual company, its operations, and the UAVs it intends to use for these purposes. Further details on Israeli civilian drone regulations are not in English, but according to an unofficial translation, drones are not permitted to operate higher than 50 meters, within 2 km of an airport, or within 250 meters of a residential area, crowd, or school.</p> <p>A formal UAV rule-making process is underway, but may “take several years to complete,” according to CAAI UAV Air Systems Air Worthiness Regulations, Section 2, paragraph 3.5.</p>	
Turkey	There is regulation on the use of UAVs weighing above 20 kilograms. The regulation however, is in Turkish and has yet to be translated into an English version.	<a href="https://iha.shgm.gov.tr/public/index?language=2">https://iha.shgm.gov.tr/public/index?language=2</a>

Country	Brief Overview of Regulation	Useful Resources
Denmark	The owner/operator of a UAV weighing less than 25 kg is responsible for ensuring that flights are conducted in accordance with the regulations outlined in BL 9-4: Regulations on Unmanned Aircraft Not Weighing More than 25 kg (attached as pdf). Additional rules outlined in AIC B 08/14, which is currently only available in Danish.	<a href="https://dronerules.eu/en/professional/regulations/denmark">https://dronerules.eu/en/professional/regulations/denmark</a>  <a href="https://www.njordlaw.com/wp-content/uploads/2017/01/new-danish-drone-rules-in-2016-and-2017.pdf">https://www.njordlaw.com/wp-content/uploads/2017/01/new-danish-drone-rules-in-2016-and-2017.pdf</a>
France	<p>The use of drone in France is submitted to 2 laws :</p> <ol style="list-style-type: none"> <li>1. The 17 December 2015 law about the conception of UAV</li> <li>2. The 17 December 2015 law about the use of UAV in aerial space</li> </ol>	<a href="https://www.droneregulations.info/France/FR.html#country-search">https://www.droneregulations.info/France/FR.html#country-search</a>
Korea	Both civil and military drones are widely used in South Korea, however, no official English-language documentation of regulations can be found. Secondary sources indicate that drones may be flown up to 492 feet, cannot weigh over 26.4 lbs, and cannot be flown over sensitive areas such as nuclear power plants and military bases. Commercial usage is said to require registration from the Ministry of Land, Infrastructure, and Transport.	<a href="https://www.droneregulations.info/South+Korea/KR.html#country-search">https://www.droneregulations.info/South+Korea/KR.html#country-search</a>

Suffice to say, that drones have the potential of being game-changers especially considering that they are small, cheap, easily available and (for the time-being) not unduly regulated.

### 5. Gazing Into a Crystal Ball – Predictions for the Industry

We have already elucidated some of the commercial usages of drones – being rescue operations, surveillance, delivering goods, transporting time-sensitive medical supplies etc. However, with the obvious benefits that the synergy between the product (drone) and the technology brings, there is a potential to open up a “*pandora’s box*”.

In the future, drones may be used for just about everything – from property agents listing residential properties and using drones to create beautiful video tours of such properties, to a person potentially notifying the car insurance company of an accident and drones can then be immediately deployed by the insurer to assess the accident scene, document the damage with photos and video etc.

From a legal standpoint, drone-tech is set to challenge the archaic set of laws, rules and regulations considering the over-arching effects of the technology in question. Not only may the rules re privacy have to be rewritten, but international carriage of goods – once considered the wanton of merchants and shippers – will witness a ‘sea change’ as the whole practice of international trade (including INCOTERMS) will have to be revised specifically for supply of goods by drones.

In my opinion, we're still really struggling with how to integrate the drone-tech from a regulatory perspective, from a public-perception perspective, as well as from a privacy perspective.

### About The Author

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