



# **Confidentiality in International Commercial Arbitration: A Comparative Analysis of the Position under English, US, German and French Law**

*Kyriaki Noussia*

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Arbitration is an essential component in business. In an age when transparency is a maxim, important issues which the laws governing arbitration currently fail to address are the extent to which disclosure of information can be constrained by private agreement along with the extent to which the duty to preserve confidentiality can be stretched. Absent a coherent legal framework and extensive qualitative and quantitative data, it is equally difficult to suggest and predict future directions. This book offers a tool for attaining centralised access to otherwise fragmentary and dispersed material, as well as a comprehensive analysis and detailed exposition of the position in relation to confidentiality in arbitration in the jurisdictions of England, USA, France and Germany.

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