

## GC

# The tech sector during the elections

Social media and content-sharing platforms are now an integral part of electoral processes, acting as a conduit for the campaigning of and advertising by parties and candidates, and a forum for public discourse. The 2024 elections present unique challenges arising from the scale and significance of the votes. If tech companies are perceived to have performed poorly during the elections, this could shape not only the reputation of the sector, but also the subsequent policy agendas they face from governments.

Platforms are faced with managing the tension between applying uniform rules (or as close as possible) globally and the need to balance the diversity in cultural norms across countries. Content moderation also needs to navigate the varied expectations of governments about the correct balance between policing harmful content and misinformation. and freedom of expression. In the United States, the legacy of alleged Russian interference in the 2016 election and the

suspension of Donald Trump's social media accounts after the 2021 Capitol attack have politicised content moderation, with conservatives and liberals closely scrutinising tech companies.

The ability of tech platforms to ensure consistency in decisions across jurisdictions has been further complicated by new content moderation legislation in a number of countries. This has raised the spectre of enforcement actions against companies ahead of and during election campaigns. The most consequential is the EU's Digital Services Act which introduces a range of obligations on larger platforms to identify and mitigate risks to the democratic process. In the US, a patchwork of state laws is emerging, with the Supreme Court expected to take a decision on the validity of laws in Texas and Florida. These examples question the extent to which platforms will localise implementation of content moderation laws or, to ease compliance, apply decisions over multiple jurisdictions.

The volatile mood surrounding online electoral content has been heightened by the growth of generative Artificial Intelligence (AI). Generative AI allows users to create highly authentic text, audio, visual and audio-visual content easily and at scale, prompting recent warnings from James Cleverly, the UK Home Secretary, and organisations such as the UN that the elections could face a barrage of AI manipulation. It is currently unclear whether such warnings will be realised, though a number of high-profile incidents have compounded concerns, including fabricated "robocalls" of President Biden in New Hampshire and a deepfake audio of UK opposition Kier Starmer. While initiatives such as the "Tech Accord to Combat Deceptive Use of AI in 2024 Elections" are designed to coordinate industry responses, common practices and standards for monitoring, labelling, preventing and removing Al generated misinformation are still evolving and will continue to do so throughout this year.

#### **MAJOR ELECTIONS SCHEDULED IN 2024**





**UK:** TBC

# New content moderation legislation



#### THE DIGITAL SERVICES ACT

- Large platforms and search engines must identify potential risks to the democratic process, civic discourse and the electoral process, and put in place mitigation measures.
- → Further guidance is expected from the European Commission on countering electoral disinformation and is likely to cover AI content.
- → EU enforcement action against X (formerly Twitter) in December 2023 included the charge that it had not sufficiently assessed democratic risks in its risk assessment and questioned its platform manipulation policy.



#### **STATE LAWS**

- → The Supreme Court is considering laws in Florida and Texas which seek to place limits on the content moderation practices of tech platforms, such as removing accounts and/or content.
- → Other states like New York have pushed for greater obligations on companies to address illegal, harmful and misleading content.
- → A number of states have introduced laws regulating Al's use in political campaigns. Texas, for example, prohibits the publishing of deepfakes to influence an election 30 days prior to a ballot.



#### THE ONLINE SAFETY ACT

- → A committee will be established to advise Ofcom, the UK's online safety regulator, on misinformation and media literacy.
- → News and political content are treated as special categories under the Act with protections included for journalistic content and content of "democratic importance".

# The new policy cycle

The 2024 elections mark the conclusion of the current policy cycle in the US, EU and UK. As governments set out new policy agendas towards the end of this year and into next, it is not certain that the "techlash" will maintain the same intensity and momentum. We could see a slowing of reform similar to what happened with the financial services sector in the mid-2010s.

In the EU, the fundamental political driver for the "techlash" remains - most large technology companies are not European, prompting questions over European competitiveness and upholding "European values". However, it is likely that the EU will dedicate more time and resources to regulating rather than legislating. The European Commission has assumed regulatory powers over the world's largest companies through the Digital Services Act (DSA) and the Digital Markets Act (DMA). This requires a major investment in and reallocation of personnel, resources and political attention to oversee the new regimes.

In the US and UK, much depends on which party wins the elections. In the UK, the Conservatives and Labour are broadly aligned in looking to position the UK as a competitive tech and AI hub while intervening selectively to address perceived harms. It is on the latter where the parties diverge, with Labour, for example, focused on working rights in the so-called "gig economy".

In the US, the Biden Administration has been active in AI, antitrust and privacy through executive orders (EOs) and enforcement actions from federal agencies. If his first term record is a good indicator for his second, a Trump Presidency is likely to be less focused on these issues and may act to repeal or modify Biden's EOs, slowing or even reversing the "techlash" in the US.

#### WILL THE EU'S "TECHLASH" FOLLOW THE PATTERN OF THE FINANCIAL CRISIS?

	FINANCIAL SERVICES	TECH
PHASE 1:	2007 - 2009	2012 - 2019
Initial scrutiny and legislation	<ul> <li>→ Solvency II</li> <li>→ Capital Requirements Directive (CRD) II</li> <li>→ Deposit Guarantee Schemes</li> </ul>	<ul> <li>→ General Data Protection         Regulation (GDPR)</li> <li>→ Copyright directive</li> <li>→ DG Comp tax cases</li> <li>→ Platform to business regulation</li> </ul>
PHASE 2:	2009 - 2014	2019 - 2024
Comprehensive legislative reform	<ul> <li>→ CRD III</li> <li>→ CRD IV</li> <li>→ AIFMD</li> <li>→ MIFID II</li> <li>→ MAD</li> <li>→ MIFIR</li> <li>→ PSD II</li> </ul>	<ul> <li>→ DSA</li> <li>→ DMA</li> <li>→ Al Act</li> <li>→ Data Act</li> <li>→ NIS II</li> <li>→ European Cyber Resilience Act</li> <li>→ Ecodesign and single charger</li> </ul>
	→ EU supervisory bodies	→ Platform Workers Directive
PHASE 3:	2014 - 2019	2024 ONWARDS
Momentum saps (?)	<ul> <li>→ Capital Markets Union</li> <li>→ Interchange Fee Regulation</li> </ul>	<ul> <li>→ Digital Fairness Act?</li> <li>→ Digital Networks Act?</li> <li>→ GDPR 2.0?</li> <li>→ Revised copyright directive?</li> </ul>

# Tech policy after the EU elections

Since 2019, the Von der Leyen Commission has overseen an ambitious programme of digital legislation, building on the reforms of its predecessor, the Juncker Commission. This second wave of regulation began where the last left off: addressing perceived harms from large tech platforms, while also addressing growing cyber security challenges, shaping global standards and exerting geopolitical influence by exporting its regulatory approach, even as Europe's economy lags on competitiveness and innovation.

Broad consensus allowed the EU to move quickly, passing laws such as the DSA, the DMA and the AI Act. The cybersecurity agenda has also progressed smoothly - though differences over pursuing a sovereignty agenda have delayed certification schemes for the US-dominated cloud market.

Despite these successes, certain contentious issues will be chalked up as failures. EU member states proved unable to resolve fierce debates around balancing the protection of minors with the right to

privacy in the proposed Child Sexual Abuse Material (CSAM) Regulation. Separately, co-legislators have failed to pass the Platform Workers Directive, which was designed to establish EU-wide criteria around platform employment and in turn combat false self-employment in the "gig economy". There is an open question of whether the EU will attempt to revive these proposals after the elections or if they will be indefinitely paused.

Implementing and enforcing recently passed digital laws - particularly the DSA and DMA - will be a crucial test of the European Commission's credibility. Its new direct supervisory powers also mean it is on the hook for ensuring large tech companies comply. The latter have been pouring resources into legal challenges against designations as 'gatekeepers' or Very Large Online Platforms, while the Commission's services have been recruiting industry expertise, aided by lay-offs in the tech sector, but unlikely to be truly competitive as an employer for the top experts. Election year will prove a test of the DSA in particular.

which was intended to address problems around attempts to manipulate European democratic processes. The question is likely not if, but when the first major fines are issued.

Alongside implementation of existing laws, the contours of the Commission's next digital agenda are beginning to emerge, amidst speculation that the totemic GDPR could be revised. A major focus on telecoms infrastructure is expected, reflecting concerns that roll out of 5G is falling behind. The precise details will hinge on which Commissioner secures the digital and competition portfolios, with a more ambitious agenda likely if Thierry Breton assumes these responsibilities. Momentum is also building around a "Digital Fairness Act" which is currently ill defined but could include issues ranging from consumer rights online to the rights of children in the digital environment and advertising policy. It is also unlikely that the AI Act will be the end of the story in Brussels, with interest growing in reviewing the EU's Copyright Directive.

## THE EMERGING AGENDA: THE NEXT EUROPEAN COMMISSION

#### **GDPR 2.0**

How to revise the GDPR will be shaped by the policy priorities it enables: protecting children, reducing ad tracking and developing EU AI models. A reform could reignite the debate about a centralised enforcement function.

#### **DIGITAL NETWORKS ACT**

→ The Commission has signalled in a February white paper that it intends to bring forward reforms of the telecommunications sector, responding to pressure from the sector over a perceived investment gap.

#### DIGITAL FAIRNESS ACT

→ Consumer protection is the next major area for platform policy. Action is likely to stem from the ongoing 'digital fairness check' of consumer law.

#### **COPYRIGHT DIRECTIVE**

→ Rightsholders from many creative sectors have complained that the EU Copyright Directive provides insufficient protection for their IP from generative AI, prompting a possible re-opening of the Directive.

#### TARGETED ADVERTISING

→ If the European Commission's co-regulatory 'Cookie Pledge' fails to reduce ad targeting based on user tracking, hard law could be the next step.

#### **ECONOMIC SECURITY**

→ The EU will move to ensure tech in 'critical technologies' - AI, advanced semiconductors, quantum and biotechnology - doesn't leak to strategic rivals, though questions remain about the levels of EU funding.

# The review of the GDPR

The GDPR holds a unique place in EU digital legislation and more broadly in Europe's perception of itself as a global standard setter. It symbolises a European value - the right to privacy - while also attracting intense criticism about its complexity and overbearing interference in the daily life of the European electorate. The major fines imposed on US tech giants in recent years represent attempts to tackle a perceived "wild west" online while also being seen as insufficiently deterrent, at risk of being written off as merely the cost of doing business in Europe for large technology firms. It was also the originator of the digital 'Brussels Effect', with the GDPR being imitated globally and data adequacy decisions now important economic levers in the EU's international relations.

The basic principles of the GDPR were agreed after intense and hotly contested negotiations. How to enforce them subsequently pit European authorities against each other. Ireland, home to many of global tech companies' European

HQs, has been blamed for perceived laxity in supervising the companies it hosts. The European Commission has already moved to improve cooperation among national authorities with new rules - as well as take on new direct supervisory powers over Big Tech to avoid other laws meeting the same fate.

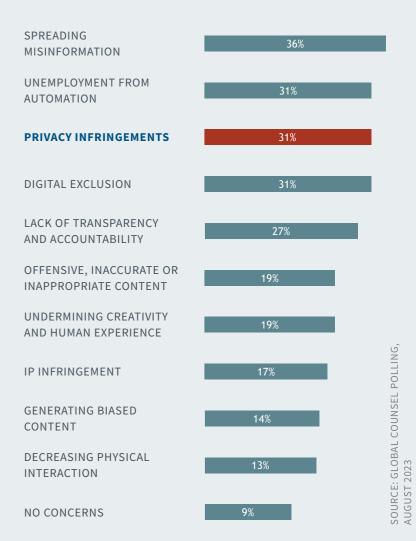
The need to reform is also divisive - but policy pressure to do so will come from several angles. MEPs are likely to be the greatest supporters for reopening core elements of the GDPR. Some call for targeted reform to boost European competitiveness by improving access to research data to better train European AI models. Complaints about the compliance burden on businesses and civil society are also routinely heard, prompting calls for a fundamental rethink. Privacy hawks will resist, fearing attempts to weaken the protections afforded to individuals.

Member states in the Council will hesitate to launch a root-and-branch reform, especially since the most obvious problem, the governance and enforcement model, is already being addressed. However, a number of issues have been identified as potential candidates for reform including measures to ease compliance for SMEs and local authorities, clarifications on the appropriate application of anonymisation and pseudonymisation, and reforms to data adequacy processes.

The GDPR will also come under pressure from other items on the Commission's agenda, namely efforts to protect children online, which could partly hinge on data processing to verify the age of users; and a likely push to tackle tracking of users for the purpose of targeted advertising, which could touch upon the regime for collecting consent for data processing. In these cases, the GDPR is not the sole legal instrument available but it sits at the nexus of multiple policy priorities, and as one of Europe's most well-known laws, makes for an easy target.

## PRIVACY REMAINS A MAJOR CONCERN FOR THE PUBLIC DESPITE THE GDPR

Most concerning generative AI risks, % of German adults (n=1,005) selecting each risk in top three



# Tech policy after the US elections

Despite Congress struggling to pass major tech legislation during the Biden administration, there has been significant activity across the executive and state levels. Initiatives aimed at strengthening US industrial strategy, enhancing national security, and addressing competition with China have seen the most progress, as seen by export controls targeting advanced semiconductors, and the establishment of an outbound investment screening mechanism.

Furthermore, Executive Orders and the efforts of federal agencies such as the Federal Trade Commission (FTC) have pushed forward tech regulation and enforcement actions, though their efforts have more often than not faced legal challenges and industry pushback. Similarly, states have advanced tech policy on issues such as AI, privacy, and children's online safety, though they are also increasingly facing legal challenges.

A Republican presidency would likely push to reverse some Democratic policies but may also look to press ahead with new policy agendas. On the former, a Republican presidency is likely to shift the policies of certain agencies like the FTC, though this would necessitate initiating new rulemaking process, which can prove lengthy. A particular target could be the provision in the AI Executive Order invoking the emergency powers of the Defense Production Act, which has been viewed as executive overreach by Republicans.

On the latter, Section 230 of the Communications Decency Act, which shields tech platforms from liability for user generated content, could prove a focal point under a Republican president. During Donald Trump's first term, he signed an executive order attempting to curb some of its protections—this was revoked by President Biden. The former president has criticised tech companies, arguing that they have a liberal bias in content moderation decisions, with such fears intensifying following controversy over historically inaccurate images produced by Google's Gemini AI image generator. Such tensions came to a head

when major social media platforms removed Trump's account for policy violations related to inciting violence, prompting many conservatives to explore alternatives such as Truth Social.

On antitrust, while expectations are that scrutiny from the FTC and Department of Justice (DoJ) would reduce under a Republican Presidency, it is worth noting that the Trump administration challenged and launched investigations into several high-profile mergers and acquisitions. Ongoing cases like the DOJ's lawsuit against Google for monopolising internet search and advertising started under the Trump administration. All that said, Republican-led antitrust agencies are likely to re-evaluate the focus on the digital sector in competition policy, the FTC's current alignment with other authorities globally like DG Competition and the Competition and Markets Authority (CMA), and the current interventionist approach towards most large technology mergers and acquisitions.

### THE EMERGING AGENDA: A POTENTIAL REPUBLICAN PRESIDENCY

#### **CONTENT MODERATION AND SECTION 230**

→ Republicans critique platforms for using Section 230 as a shield to implement left-leaning content moderation policies and censoring conservative viewpoints.

#### ARTIFICIAL INTELLIGENCE

Republicans are concerned that large language models will institutionalise liberal political preferences. Republicans also advocate for continued investment in AI R&D, including expanding tax credits to foster innovation and maintain competitiveness vis-à-vis China.

#### **ANTITRUST**

→ Republicans are open to addressing the market dominance of online platforms but some also caution against major changes that could hurt innovation and US competitiveness with China.

#### **DATA PRIVACY**

→ Republicans support federal privacy legislation that pre-empts state laws and is not overly prescriptive, aiming for a balanced approach that protects consumer privacy without undermining innovation.

# US policy on Chinese tech

While both Republican and Democrat administrations have targeted Chinese technology, policy tools have differed. The Trump administration imposed restrictions on specific Chinese companies, including Huawei, and increased tariffs broadly across Chinese goods. In contrast, the Biden administration has leveraged a "small yard, high fence" strategy, intensifying restrictions on Chinese entities' access to advanced technologies.

Despite these differences in approach, the working assumption is that US policy towards Chinese technology will remain largely consistent regardless of the election result, with both sides positioning to be "tough" on China, a popular approach with voters. On the campaign trail, President Biden will look to show evidence of slowing China's technological growth, while his opponent will argue that Biden's efforts have been insufficient.

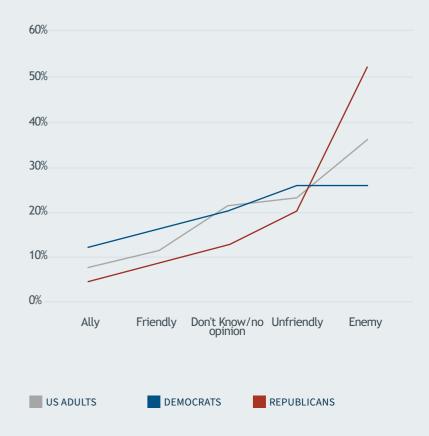
A new administration is likely to take stock and identify where restrictions could be enhanced. This includes addressing gaps related to advanced semiconductors in areas such as chip IP, design and infrastructure, such as data centres. A notable move was the Commerce Department's draft rule requiring US cloud companies to disclose foreign entities developing AI applications and training large language models on their platforms.

A more assertive option could be reviewing how the Commerce Department's Bureau of Industry and Security (BIS) permits exports to Chinese companies. Concerns were raised last year when SMIC manufactured an advanced chip for Huawei's Mate 60 Pro smartphone. In response, Rep. Mike Gallagher (R-WI), who chairs the House Select Committee on China, called for an end to technology exports to Huawei and SMIC. House Republican committee chairs have called on BIS to lower its approval rates of licenses and exceptions for dualuse technology transfers to China.

A new administration might also look to expand the extraterritorial impact of its policies. The semiconductor agreement with the Netherlands was a significant win for the Biden administration and it is plausible that policymakers will look to involve more allied countries. Indeed, Republicans such as Rep. Michael McCaul (R-TX), Chair of the Foreign Affairs Committee, have suggested working with like-minded countries to modernise global export-controls.

A final channel is restrictions to curb the flow of US investments into entities tied to China's military, emerging tech companies and human rights abuses—a sentiment echoed by the House Select Committee on China. Congress may consider legislation to prohibit investment in Chinese companies included on government sanctions and red-flag lists or codify restrictions on a sectoral basis, including the technology sectors on the Office of Science and Technology's Critical and Emerging Technologies list.

#### REPUBLICAN VOTERS ARE PARTICULARLY SINOSCEPTIC



# Tech policy after the UK general election

Following the UK's exit from the EU there were expectations within the Conservative Party that the UK would apply its new regulatory autonomy to diverge from EU tech legislation. The GDPR was singled out as being overly prescriptive and an example of where the UK could gain a competitive advantage by diverging from the EU.

In practice, the Conservative government's record has been more nuanced. The headline rhetoric has been avowedly pro-tech and there have been a handful of clear attempts at divergence with the EU, most notably modest reforms to the GDPR under the Data Protection and Digital Information Bill and in the government's decision not to replicate the Al Act in the UK. However, in other areas the government's agenda has mirrored that of Brussels, most notably the Online Safety Act and the Digital Markets, Competition and Consumers Bill. Meanwhile, the CMA has gained a reputation and industry criticism for being one of the toughest authorities globally on mergers and acquisitions.

This apparent contradiction can also be seen in the approach of the Labour party, which has largely avoided committing to detailed policy and is keen to position itself as pro-tech and pro-business. Shadow Secretary of State for Technology (DSIT), Peter Kyle's proposals for a Regulatory Innovation Office responds to concerns that the UK's economic regulators might be 'scaring off' inward tech investment and reducing opportunities for UK start-ups. This same instinct is reflected in Labour's decision to emphasise the potential opportunities of tech and AI for public sector reform.

There are two areas where Labour's pro-tech positioning could become strained in course of the 2024. The first is AI regulation where heightened attention from industry, the media and, importantly, the trade unions, as well as the government's decision to defer introducing primary law, has prompted Labour into supporting AI legislation. The details are currently sparse beyond commitments to put AI regulation on a statutory footing and clearer powers to

oversee the most advanced AI models. Should Labour take power, they will be keen to avoid accusations that they are following the EU's approach of an AI Act and advocating proposals which cut across their ambitions to leverage AI to drive public sector reform.

The second is where Labour's pro-tech agenda conflicts with other policy goals. The clearest example is Labour's employment reforms which could have notable implications for online work apps. Another is the UK's poor fiscal position, which has already prompted Labour to re-evaluate its flagship policy in green investment. After the election, Labour's desire to maintain fiscal discipline while increasing investment in public services is likely to prompt a review of potential revenue streams. In the tech sector, the focus would likely fall on the UK's digital services tax (although this is contingent on the OECD process) and other digital taxes.

## THE EMERGING AGENDA: A POTENTIAL LABOUR GOVERNMENT

#### **REGULATORY INNOVATION**

→ Labour plans to establish a Regulatory Innovation Office (RIO) which would expedite regulatory approvals for new technologies and ensure better coordination between the UK's economic regulators.

#### PUBLIC SECTOR DIGITISATION

There is a strong interest across the Labour frontbench in harnessing technology to make public services more efficient and more citizen-centric.

#### ΑI

→ Labour has proposed introducing a legal basis for the regulation of AI by sectoral regulators and is exploring strengthening powers for enhance scrutiny of the most advanced AI models.

#### **ONLINE SAFETY**

Previous proposals to legislate for an Online Safety Bill 2.0 appear to have been scrapped. This will come under pressure from campaigning for further restrictions on children's use of smartphones and social media.

#### TELECOMS AND BROADBAND

→ Labour has made high-level commitments to both strengthening consumer protections, including introducing a social tariff policy, and increasing roll out of 5G and fibre but has yet to provide policy detail.

# SOURCE: GLOBAL COUNSEL POLLING, JANUARY/FEBRUARY 2024

# The New Deal for Working People

Ambiguity over employment status and the use of self-employed labour by technology platforms has generated headlines over the past decade, prompted by a series of legal challenges and tribunal cases against ride-hailing and delivery apps. Under the May government, there was initial momentum for reform with the 2017 Taylor review of "modern working practices", endorsement of a series of measures by the government and a subsequent manifesto commitment by the Conservatives in 2019 to "protect those in low paid work and the gig economy". However, progress on this agenda has largely stalled over the intervening five years.

In response, Labour has proposed the 'New Deal for Working People', which was first launched in 2021, setting out a range of employment reforms to the labour market as a whole, but with notable ramifications for those in gig work. Amongst other things, this included the banning of zero-hours contracts, minimum wage

increases and a single worker status that would capture everyone but the genuinely self-employed. This would mean a move away from the current system that has three types of employment status (employees, self-employed and workers, with the latter group not eligible for certain benefits like sick pay or protection from unfair dismissal) towards a more simplistic dichotomy (worker versus self-employed) in which the division with self-employment would be clarified. All workers would be eligible for employee statutory rights under this framework. These proposals have proved popular when polled with the public.

Last year, Labour moderated some of its proposals. For example, instead of immediately introducing the policy of a single worker status, it indicated that it would 'move towards' this through a process of consultation. This was criticised by some trade unions, though self-employed organisations welcomed the shift in approach

while remaining guarded about the remaining package of measures in the New Deal.

While the Labour leadership. supported by trade unions and influential figures like Deputy Leader Angela Rayner, has recently doubled down on its New Deal policy agenda, there are questions as to whether there could be further changes down the line. This is especially so given that the New Deal has thus far been shaped primarily by trade unions and Labour HQ with relatively little input from the private sector, and with increasing scrutiny from business associations.

#### PUBLIC PRIORITISES WORKER RIGHTS OVER EMPLOYMENT RATES AND AFFORDABILITY

Trade-off exercise (% selecting each option), UK adults (n=2,077)



Companies should provide employment benefits, even if these make certain services more expensive

Companies should make certain services more affordable, even if it means fewer rights for their workers



Better for workers to have stronger employment rights, even if fewer people are employed

Better to have more people employed, even with fewer employment rights

Don't know

# GC's tech and elections credentials

#### **EU: ELECTIONS AND AI**

GC provides an integrated service to a leading model developer on key EU legislation such as the AI Act, as well broader policy issues related to electoral integrity. GC's support includes strategy development and senior counsel, in-depth policy analysis, events convening and support on public policy engagement.

#### **EU: GDPR ENFORCEMENT**

GC advises a number of technology companies navigating the political and reputational impact of GDPR enforcement actions. This has included in-depth assessments of the enforcement processes, the varied approaches of national data protection authorities and insight into the European Data Protection Board.

#### **UK: ELECTORAL CONTENT POLICY**

GC provides comprehensive support for a global social media company in navigating the implementation of the Online Safety Act, the ongoing debate in the UK around online safety and on electoral integrity policies ahead of the general election.

#### **UK: SELF-EMPLOYMENT POLICY**

GC has advised several on-demand work platforms on self-employment classification and adjacent policies, such as IR35 and the application of VAT to mobility platforms. This includes deep dive assessments of the potential impact of the New Deal for Working People on the freelancer industry.

#### **US: AI POLICY**

GC advised an AI developer on engaging with federal-level AI policy, including the Biden Administration's executive orders. GC's support comprised in-depth policy analysis and stakeholder mapping, as well as the research, drafting and design of a major thought leadership report targeted at government stakeholders.

# US: SEMICONDUCTOR RESTRICTIONS

The GC team supports a leading semiconductor company in navigating evolving US restrictions on semiconductor supply chains, the development of outbound investment screening tools and the interplay between US measures and those of European countries, including US bilateral agreements with countries such as the Netherlands.



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