World Atlas of Arbitration



Jurisdictional and institutional survey of international commercial arbitration

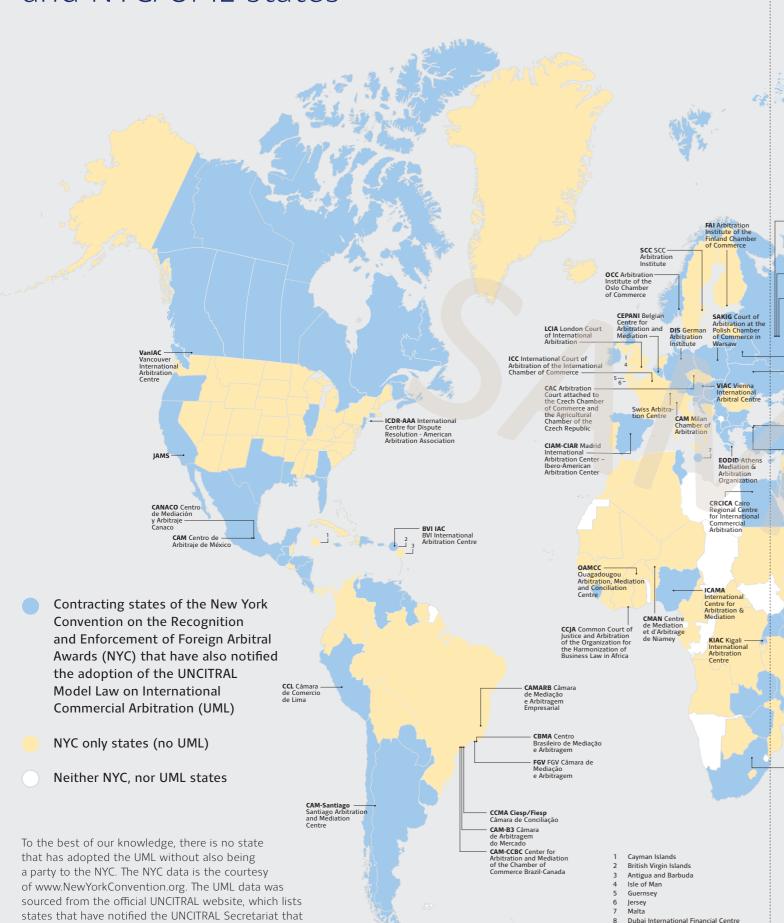
Edited by Roman Kramařík and Tomáš Král

World map of arbitral institutions and NYC/UML states

their arbitration laws are based on or influenced by the UML. Some states may have legislation influenced

appear on this map as non-UML countries.

by the UML but have not formally notified it, and thus



Europe CAC Arbitration Court attached to the Czech FAI Arbitration Institute of the Finland Chamber of Commerce, \$ N/A, 83

Chamber of Commerce and the Agricultural Chamber

CAM Milan Chamber of Arbitration, \$ 4.41 mil., 128
CEPANI Belgian Centre for Arbitration and Mediation,

CIAM-CIAR Madrid International Arbitration Center -

EODID Athens Mediation & Arbitration Organization

The first figure following each

institution's name represents the

statistics can be found in chart 1

(Institutional statistics).

institution's average amount in dispute

for 2020-2024, while the second figure

shows its average number of new cases

during the same period. More detailed

Ibero-American Arbitration Center \$ N/A. 9 DIS German Arbitration Institute, \$ N/A, 154

of the Czech Republic, \$ N/A, 530

\$ N/A. N/A

ICAC at the RF CCI

11 Astana International Financial Centre

12 Singapore

ICAC International Commercial Arbitration Court at the Ukrainian Chamber of Commerce and Industry, \$ N/A. 399

ICC International Court of Arbitration of the International Chamber of Commerce, \$ 109.20 mil., 842

LCIA London Court of International Arbitration, \$ N/A, 333

OCC Arbitration Institute of the Oslo Chamber of Commerce, \$ N/A, N/A

ICDR-AAA International Centre for Dispute Resolution - American Arbitration Association

JAMS, \$ N/A, 18,832 VanIAC Vancouver International Arbitration Centre

SAKIG Court of Arbitration at the Polish Chamber of Commerce in Warsaw, **\$ 1.46, 165**

VIAC Vienna International Arbitral Centre. \$ N/A. 44

SCC SCC Arbitration Institute, \$ N/A, 180

Swiss Arbitration Centre, \$ 18.60 mil., 100

North America
BVI IAC BVI International Arbitration Centre,

Latin America

CAM Centro de Arbitraje de México, \$ N/A, N/A CAMARB Câmara de Mediação e Arbitragem Empresarial, \$ N/A. N/A

CAM-B3 Câmara de Arbitragem do Mercado, \$ N/A, 28 CAM-CCBC Center for Arbitration and Mediation of the Chamber of Commerce Brazil-Canada, \$ 16.21 mil., 114 CAM-Santiago Santiago Arbitration and Mediation Centre,

CANACO Centro de Mediación y Arbitraje Canaco,

CBMA Centro Brasileiro de Mediação e Arbitragem \$ 3.36, 21

CCL Cámara de Comercio de Lima, \$ N/A, N/A CCMA Ciesp/Fiesp Câmara de Conciliaçã Mediação e Arbitragem Ciesp/Fiesp, \$ 6.89, 32 FGV FGV Câmara de Mediação e Arbitragem, \$ N/A. N/A

Asia
AIAC Asian International Arbitration Centre. \$ 33.32 mil., 99

BAC Beijing Arbitration Commission/Beijing International Arbitration Court, \$ 1.73 mil., 9,611 BICAM Borneo International Centre for Arbitration and Mediation, Kota Kinabalu, \$ N/A, N/A

CIETAC China International Econor Commission, **\$ 5.71 mil., 4,604**

\$ 37.72 mil., 345 IAC International Arbitration Centre of the Astana International Financial Centre, \$ N/A, N/A

IAC at the BelCCI International Arbitration Court at the BelCCI, \$ N/A, N/A ICAC at the RF CCI International Commercial Arbitration Court

at the Chamber of Commerce and Industry of the Russian Federation, \$ N/A, 641 ISTAC Istanbul Arbitration Centre, \$ N/A, 112 ITOTAM Istanbul Chamber of Command Mediation Centre, \$ N/A, N/A

KCAB Korean Commercial Arbitration Board, \$ 1.75 mil., 404 MCIA Mumbai Centre for International Arbitration, \$ N/A, 23 RAC Russian Arbitration Center, \$ N/A, N/A

RSPP Arbitration Centre at the Russian Unio of Industrialists and Entrepreneurs, \$ 0.95, 467
SIAC Singapore International Arbitration Centre,

TIAC Tashkent International Arbitration Centre, \$ N/A, N/A

Middle East and Africa AFSA Arbitration Foundation of Southern Africa, \$ N/A, N/A CCJA Common Court of Justice and Arbitration

of the Organization for the Harmonization of Business Law in Africa, \$ N/A, N/A CMAN Centre de Mediation et d'Arbitrage de Niamey,

\$ N/A, N/A CRCICA Cairo Regional Centre for International Commercial

Arbitration, \$ 5.17 mil., 72 DIAC Dubai International Arbitration Centre, \$ N/A, 261

ICAMA International Centre for Arbitration & Mediati KIAC Kigali International Arbitration Centre, \$ N/A, 22

NCIA Nairobi Centre for International Arbitration, \$ N/A, 24 OAMCC Ouagadougou Arbitration, Mediation and Conciliation Centre, \$ N/A, N/A

OCAC Oman Commercial Arbitration Center, \$ N/A, N/A TIArb Tanzania Institute of Arbitrators, \$ N/A, N/A

Oceania

ACICA Australian Centre for International Commercial Arbitration, \$ N/A, 16 NZIAC New Zealand International Arbitration Centre

World Atlas of Arbitration 2025 edition

Published by Axelerator, a.s. Ovocný trh 12 110 00 Prague 1 Czech Republic

With the support of JŠK, advokátní kancelář, s.r.o.







Suggested reference:

World Atlas of Arbitration (2025 edition), Roman Kramařík and Tomáš Král (eds.), Map 27.6 Annulment (serious irregularity)

Graphic design by Barbora Solperová

No part of this publication may be reproduced, stored in a retrieval system, or used for training of any Al model without the editors' permission.

Individual maps from this publication may be used for educational purposes if proper reference is given. Scholars are invited to request soft copies of specific maps for educational purposes by emailing: Roman.Kramarik@JSK.cz or Tomas.Kral@JSK.cz.

ISBN 978-80-11-07103-5

Table of contents

Introduction and methodology

- 1. Institutional statistics
- 2. Comparison of institutional costs
- 3. Domestic vs. international arbitration
- 4. Anti-suit injunctions
- 5. Interim measures / provisional relief
- 6. Interim measures / enforcement
- 7. Staying concurrent court proceedings
- 3. Arbitrability
 - 8.1 Shareholder disputes
 - 8.2 Employment disputes
 - 8.3 Consumer disputes
 - 8.4 Securities
- 9. Arbitrability (title to registered assets)
 - 9.1 Land, real estate, leasehold, etc.
 - 9.2 Registered shares
 - 9.3 Aircraft
 - 9.4 Seagoing or inland vessels
- 10. Insolvency during arbitration (same jurisdiction)
- 11. Suspension of proceedings due to foreign insolvency
- 12. Survival of arbitration agreement in insolvency
- 13. Optional arbitration clauses
- 14. Asymmetric arbitration clauses
- 15. Public domain evidence
- 16. Jurisdiction reviewed ex officio
- 17. Confidentiality
- 18. Non-signatories
 - 18.1 Full assignment
 - 18.2 Partial assignment
 - 18.3 Group of companies doctrine
 - 18.4 Piercing the corporate veil (alter ego) doctrine
 - 18.5 Third-party beneficiaries
 - 18.6 Agency relationship
 - 18.7 Implied consent, conduct successors or acquirers doctrines
 - 18.8 Securities
 - 18.9 Shareholder disputes
- 19. Binding nature of an award and pre-judicial questions (preliminary issues) in future cases
- 20. Reliability of witnesses (dishonest witnesses)
- 21. Use of illegally obtained evidence (annulment)
- 22. Use of illegally obtained evidence (refusal of enforcement)
- 23. Disregard of illegally obtained evidence (annulment)
- 24. Disregard of illegally obtained evidence (refusal of enforcement)
- 25. Denial of document production (annulment)
- 26. Denial of document production (refusal of enforcement)

27. Annulment

- 27.1 Ultra petita award grants more than was requested
- 27.2 Infra petita award fails to address some requests
- 27.3 Conflicted or prejudiced tribunal
- 27.4 Remedy not permitted
- 27.5 New evidence
- 27.6 Serious irregularity
- 27.7 Manifest disregard of evidence
- 28. Annulment (deviation by the parties)
- 29. Non-enforcement (deviation by the parties)
- 30. Time limit for annulment application
- 31. Appeal or single instance
- 32. Court fees
- 33. Duration
- 34. Third-party funding (disclosure)
- 35. Third-party funding (scope of disclosure)
- 36. Security for costs
- 37. Cut-off time for new evidence
- 38. New evidence after award
- 39. Prescription / statute of limitations

Jurisdictional contributors

Introduction and methodology

Introduction

Welcome to the first edition of the *World Atlas of Arbitration*—a fresh and innovative addition to the landscape of arbitration publications. While the format may be new, we don't claim full credit for inventing it. Our inspiration comes from the remarkable work of Professor Philip Wood and his *Maps of World Financial Law* (2008), which set a powerful precedent for global legal mapping. We also acknowledge the existence of other arbitration atlases—most of them regional in scope— and issuespecific maps that we encountered during the course of our research.

In the world of international arbitration, understanding the legal and cultural differences between jurisdictions is essential. These differences shape the perspectives of both parties and arbitrators and, if overlooked, can lead to surprises or even serious misunderstandings. The idea behind this Atlas was to create a tool that offers a global snapshot of key issues in international commercial arbitration—presented visually, in a way that makes complex data more accessible and comparative insights easier to grasp.

The World Atlas of Arbitration is a non-profit initiative, born out of our academic curiosity and professional enthusiasm for international commercial arbitration. The project was proudly sponsored by our law firm, JŠK, based in Prague, and made possible by a wide network of jurisdictional contributors from around the world.

We are especially grateful to Radim Bradáč, a junior lawyer at JŠK, whose tireless work in processing survey data was invaluable. We also extend our thanks to our outstanding student and admin team at JŠK for their behind-the-scenes support. Dissemination of the survey questionnaire was made possible with the help of ArbCEE, Vis Moot, Vis East and the Moot Alumni Association. We are also deeply appreciative of support from many professionals such as Louise Barrington, Alice Fremuth-Wolf, Ann Robertson, Emilia Onyema, Miroslav Dubovský, Martin Valasek and many others who helped amplify our call for participation.

This first edition of the *World Atlas of Arbitration* is both a beginning and an invitation: to explore, to compare and to continue deepening our collective understanding of international commercial arbitration around the globe.

The annual jurisdictional survey

This Atlas is built on a comprehensive jurisdictional questionnaire developed over several years. Each arbitration case we've worked on—and many books and surveys we've consulted—has contributed to the growing list of questions we sought to answer.

In January 2025, we shared a draft of the survey with leading arbitration practitioners and academics worldwide to ensure its feasibility across jurisdictions. After refining it, we distributed the final version and invited broad participation through professional networks and social media. The survey closed in May 2025, with over 200 responses covering 105 jurisdictions. The full questionnaire is available at www.ArbitrationAtlas.com.

The result: a dataset of over 14,000 entries, each manually processed and transformed into the colour-coded maps that form the heart of this Atlas. We hope to complete the remaining jurisdictions in the 2026 edition.

All survey responses relate to the legal situation as at 1 January 2025.

The methodology

Each map in this Atlas shows the original survey question and a legend explaining what each colour represents.

If a jurisdiction had only one respondent who either left a question unanswered or selected "not sure", it appears on the map as "no jurisdictional input available". When multiple respondents from the same jurisdiction disagreed and we couldn't reconcile the differences, the jurisdiction is marked as "uncertain".

Where possible, conflicting responses were manually resolved through desktop research, expert consultations, and, occasionally, the help of AI tools. While we aimed to provide the most accurate answers, these methods are inherently approximative. In such cases, the final call was ours—not that of the jurisdictional contributors.

Jurisdictions with no respondents are also marked as "no jurisdictional input available".

Some important warnings

Warning 1: No guarantee of accuracy.

This Atlas is based on a survey, not on academic or empirical legal research. Even if it were, real-life disputes are often resolved in ways that defy expectations. Neither the editors nor the jurisdictional contributors can be held liable if the actual outcome in a given case differs from the information presented here.

Warning 2: Significant generalisation was unavoidable.

Given the format of this Atlas, it was simply not possible to capture all the nuances and jurisdiction-specific details. The multiple-choice structure of the survey required us to phrase questions broadly and offer a limited set of answer options. Many contributors pointed out that none of the available answers fully reflected their jurisdiction's legal position. We did our best to offer a diverse and thoughtful set of options and will continue refining them in future editions.

Users should understand from the visual format alone that jurisdictional exceptions, conditions and qualifications likely apply in many cases.

Warning 3: Many answers are untested and subjective.

A significant number of questions in the survey concern issues that have not yet been tested before national courts in most jurisdictions. As a result, many responses reflect the personal and professional opinions of the contributors—often just one per country. In jurisdictions with multiple respondents, we frequently observed fundamental disagreements between some great legal minds. These differences were an important reminder about the subjective nature of most of the maps in this Atlas.

As participation increases in future editions, we hope the reliability and consistency of the maps will improve accordingly.

No geopolitical positions taken (disputed territories)

Some borders around the world remain subject to dispute. While we may hold personal views on these matters, this Atlas is not the forum for expressing them. For consistency and practicality, we have based the underlying maps on the official position of the Czech Republic, our home country.

This choice does not reflect the views or endorsement of the editors, the jurisdictional contributors or any affiliated institutions. It is a purely technical decision and should not be interpreted as taking a stance on any geopolitical issue.

Arbitral institutions

In addition to national arbitration laws, this Atlas includes a few pages dedicated to arbitral institutions. These institutions play a vital role in international arbitration by providing the procedural structure and administrative support necessary for the efficient and fair resolution of cross-border disputes.

To compile this section, we began with a desktop survey of publicly available statistical data, along with an analysis and comparison of fee structures. Regarding the statistical data, we then reached out to the institutions themselves, inviting them to review and, if necessary, correct the collected data or provide further details. Many responded positively—some even shared additional information beyond what is publicly available. We sincerely commend this openness and hope our work encourages further transparency and data-sharing in the arbitration community.

We aimed to make the list of institutions shown—especially in institutional map on the front endpaper—as broad and representative as possible. However, the selection is not exhaustive; it reflects both practical considerations and a degree of editorial discretion. If you believe another institution should be included in future editions, we would be happy to hear from you.

Comments and suggestions

As this is the first edition of the *World Atlas of Arbitration*, we recognise that there is room for improvement. If you believe a map should reflect a different result for your jurisdiction, or if you have feedback on any aspect of the Atlas—whether related to the survey questions, maps, arbitral institutions or anything else—please submit your comments at www.ArbitrationAtlas.com. We will review all submissions carefully and take them into account as we prepare the next edition.

Our thanks to the jurisdictional contributors

This Atlas is the result of our spirit of inquiry and our desire to contribute something both practical and academically valuable to the arbitration community. None of it, however, would have been possible without the extraordinary dedication of our jurisdictional contributors.

The survey was neither short nor simple. While contributors were free to skip questions, many chose instead to invest considerable time and effort, often undertaking additional research to provide the most accurate answers possible. We are deeply grateful for their commitment.

A full list of contributors who agreed to have their names published appears at the end of this Atlas. To all of them, we extend our sincere thanks.

Roman Kramařík and Tomáš Král

The editors

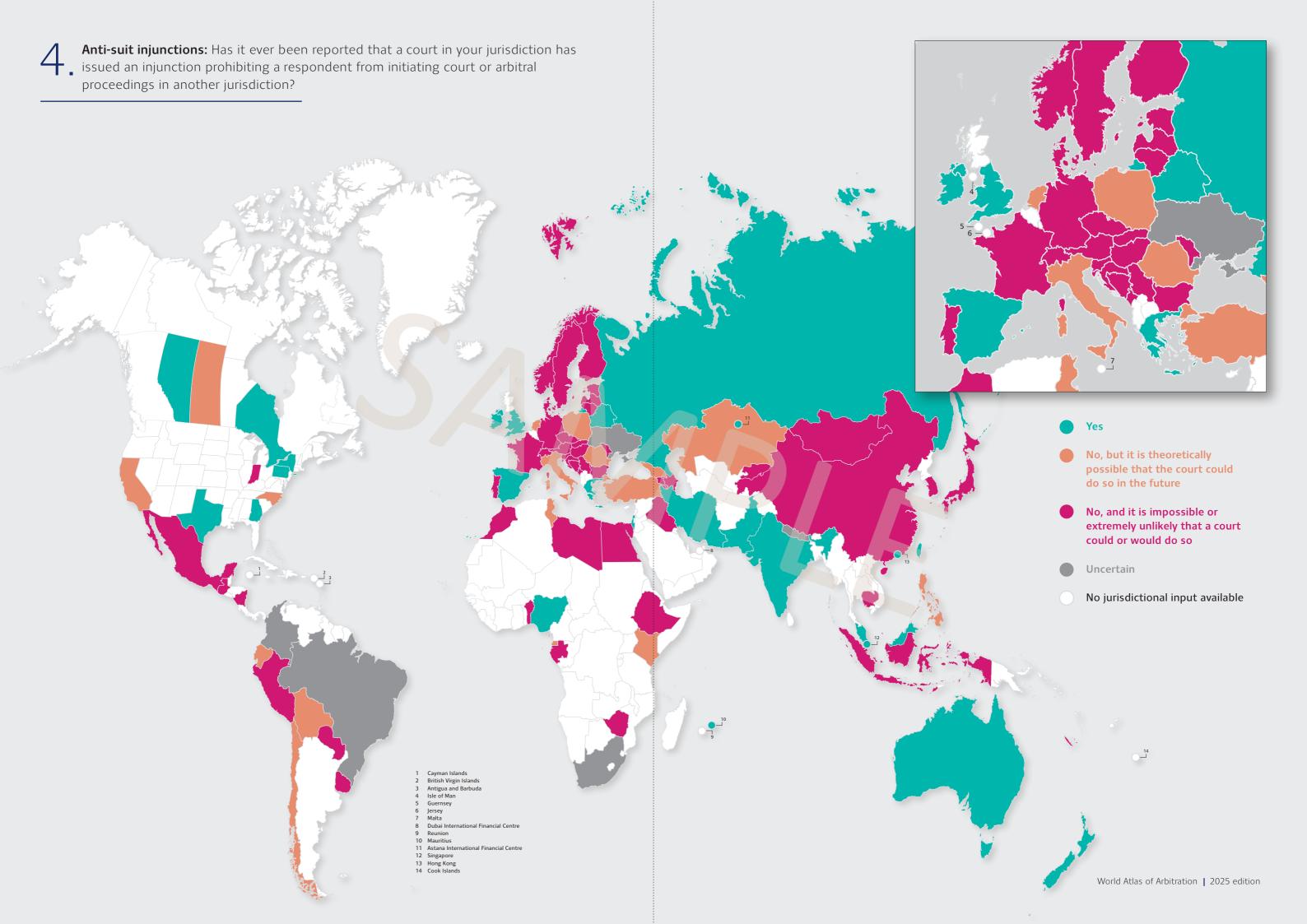
JUDr. Roman Kramařík, Ph.D. began his arbitration career as a stagiaire at the ICC in 1994. He later learned the art of professional advocacy in Big Law before leaving in 2004 to establish an independent Prague-based law firm, now known as JŠK. The firm has since grown into a respected full-service practice, where Roman remains a partner.

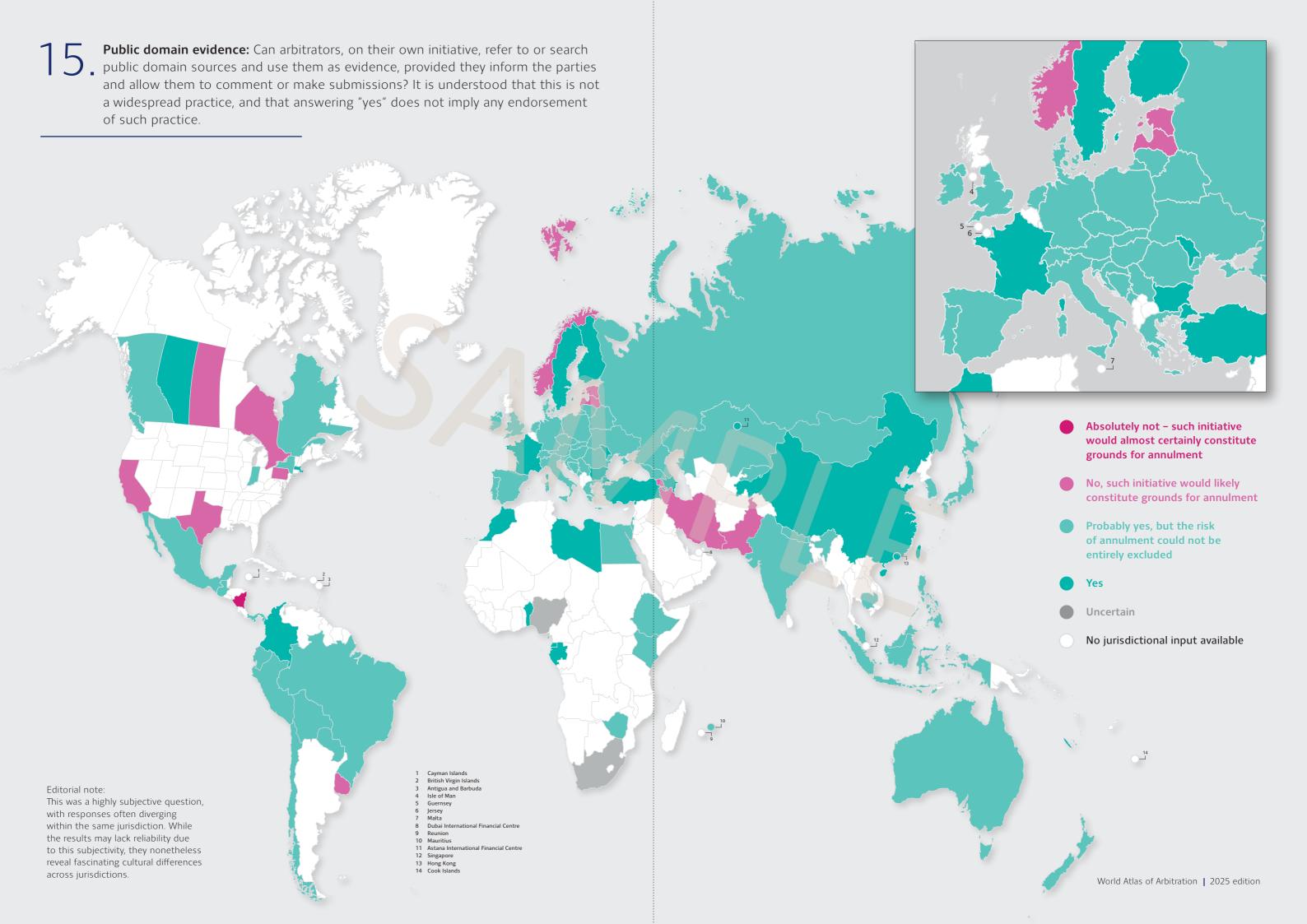
Roman acts regularly as both arbitrator and counsel. A pioneer by nature, he wrote his Ph.D. thesis on e-cash and e-commerce back in 1998. He drafted and won the first Czech anti-dumping application, created the first Czech stock option plan, prepared the first Czech concession agreement and helped resolve a shareholders' dispute by converting an oil refinery into several virtual processing refineries. Roman is an avid aviator and in 2018 became the first Czech pilot to solo circumnavigate the globe. No wonder he likes maps.

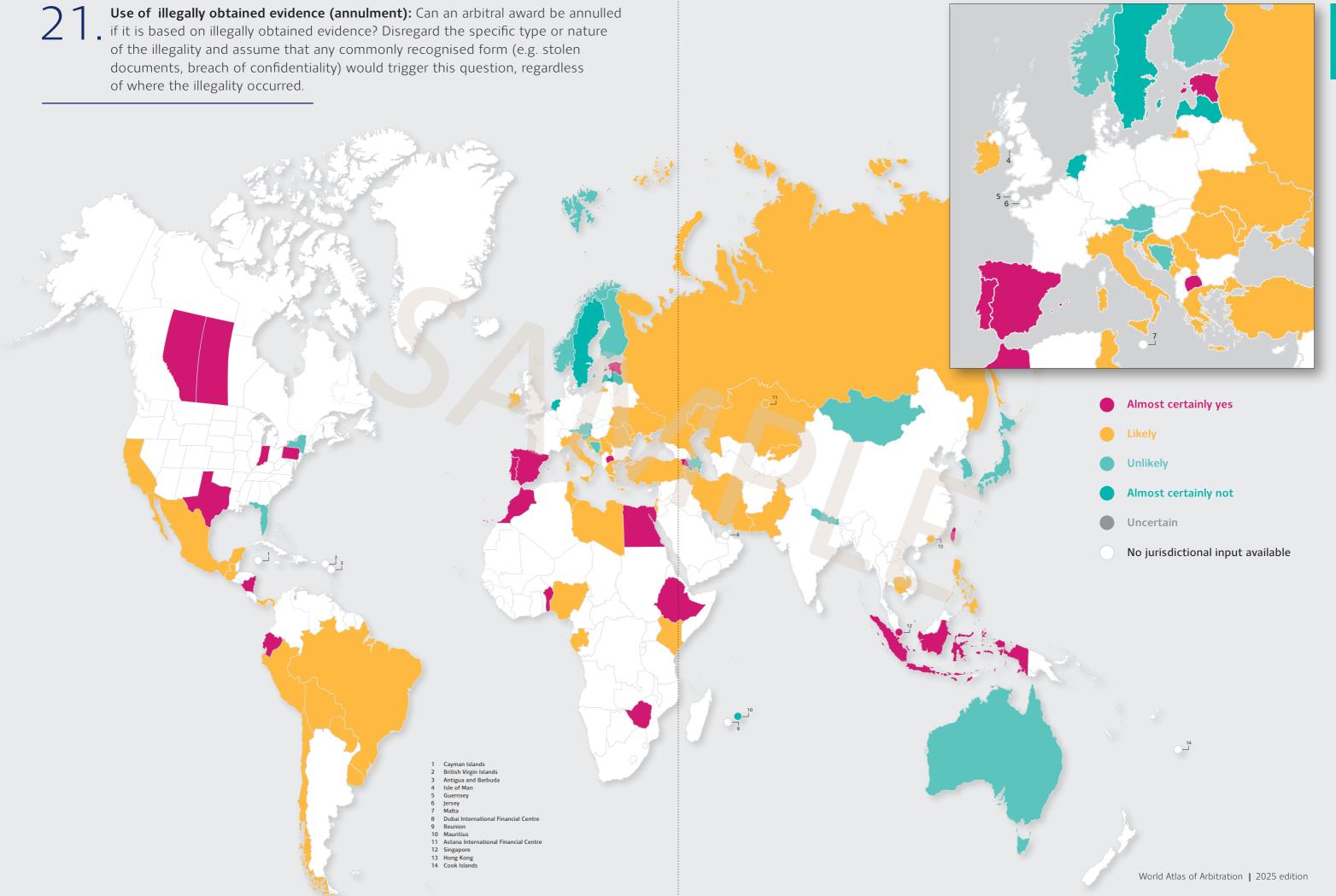
JUDr. Tomáš Král has always liked maps too—but ultimately chose law over geography. He earned his master's degree in law from Charles University in Prague (2014 – 2019), where he later completed his *rigorosum* (JUDr.). His legal education was enriched by several internships, most notably at the Court of Justice of the European Union in Luxembourg (in the cabinet of Advocate General Dr. Michal Bobek). In 2018, he also took part in the Exchange Program in International and Comparative Business Law at Bucerius Law School in Hamburg. It was there, in the classroom of Prof. Dr. Stefan Kröll, that he first discovered the field of international commercial arbitration.



The "Doubting Tomáš" quickly turned theory into practice and is now a bar-admitted attorney at JŠK (alongside Roman), specialising in dispute resolution, including arbitration—both as counsel and tribunal secretary. In addition to domestic arbitration, his work focuses primarily on proceedings under the ICC Arbitration Rules.







Jurisdictional contributors

Abdallah Aisha Abdou Majdi

Abdoul Kadir Maimouna Abeso Tomo Sergio Esono

Alerxe Cristina Alexandrova Dima Alexandru Catalin Alexiev Assen

Alper Gizem

Ammamuthu Ramasubramanian

Andrić Andrej Anischenko Alexey **Aschauer Christian** Assogba Nicolin **Audit Mathias** Barsukov Artem

Bhansali Pinky Bhojwani Manish Bilić Antun

Bivol Andrei Boronkay Miklós **Boulalf Abdelatif** Cipovic Ognjen d'Atri Eraldo

Davydenko Dmitry **Descours-Karmitz Romy**

Dilipkumar Dilloud Khushboo

Dillon Thomas Dimitrijević Stevan Dobrijević Stefan Droug Olexander Esperança Pina Miguel

Fellrath Isabelle Fentahun Arega Feris Jackwell Fletcher Tim

Flores Rueda Cecilia

Freitas Cabanillas Rodrigo Andrés

Fremuth-Wolf Alice Gagula Almir Galacio Elmar B. **Ganguly Bibhas**

Garcia da Fonseca Rodrigo

Gautschi Johann George Glenn R. Göker Selin Goudarzi Zahra Gray Kevin W.

Grinbergs Elvis Gryshko Sergiy **Gupta Amar** Gupta Ayushi Gupta Ridhi Haghshenas Arash

Hammick Mark

Hernandez Gerardo

Huamán Cabrera Alejandra Carolina

Chávez Bosque Francisco Chevalier Alejandro

Chin Roger Chouksey Disha Jeffries Andrew

Judkiewicz-Garvan Gosia Juozapaitytė Gailė

K R Yuwaraj

Kaibyldaeva Begaim Kartsep Raul Kekenadze Giorgi

Kiri San Klokić Derviš Koeda Mihiro Koleva Tsvetelina Kotvan Peter Kruc Marko

Kumar Mishra Aditya Kuper Michael László András Dániel

Leijnse Bartholomeus Maalouf Ruchdi Malskyy Markian Mani Tripathi Shivam

Martins Sofia Maslov Oleksii Mayomi Kolawole Mc Cafferty Padraic Mehtiyeva Kamalia Miklankova Lucia Mills Karen Möller Gustaf

Monnerat Mendes Isabela

Mourglia Mauricio Mundada Tushar Neupane Anjan Ng Eric

Nikolic Dragana **Nour Mariam**

Nový Zdeněk Nowaczyk Piotr Obo Idornigie Paul Onyema Emilia Orbelyan Aram Panamarova Darya Pandhare Anushka Paprota Piotr Parichha Suvashree Pavlou Stavros Pelicarić Fran Pepeljugoska Ana

Pereira Raul Perepelynska Olena

Pethő Peter Petkar Vishwanath Pietrini Felipe Podraza Witold Provazník Martin Psodorov Dragan Purba Rando

Quintero Uribe Raúl Racines Molina Adrian Raghavan Sandeep

Refinetti Domingos Fernando

Refrea Joice T. Reves-Kipp Anaid Rimavičienė leva Rosovsky Eyal Samardžija Lana Shaikenov Valikhan **Shanel Danni** Shrestha Prakrit Schäfer Lenka Schmidt Richard Simeri Joseph V. Singh Ankit Singh Arti

Skundberg Joshua

Smit Tim

Söderlund Christer Stanivuković Maja Steensgaard Kasper Sürenoğlu Sertuğ Sussman Edna Szaka Péter Šekštelo Albertas Šútava Paula

Taivalkoski Petri Tedioli Francesco Tkemaladze Sophie Tomczyk Barbara **Torgbor Edward** Tørum Amund Trisk Kevin J. Trunk Alexander

Tumurbagana Sergelen Tupaz Anthony Edsel F.

Turner Duncan Urdaneta Ricardo Valasek Martin I. Valinčić Dalibor Varaschin Ambrosia Vashkevich Aliaksei Vasileva Svetlana Vataev Sergei

Vengoechea Ballesteros Laura

Verçosa Fabiane Vošahlík Petr Vysúdilová Zuzana Wang Jihong Wang Lijing Wang Caidan

Waseem Haider Nehyyan Wawrzyniak Agnieszka

Wolff Michael Wu Pijan

Wyne Mutuma Kenneth

Yaitska Henriietta Yamada Ayahito Yilmaz Gizem **Zannier Cristian** Zhang Ruijia **Zhao Charles**

Zhussupov Yerlanbek

Zou Shihao Zykov Roman

541////

The World Atlas of Arbitration is a living, non-profit research and educational project.

Visit www.ArbitrationAtlas.com to:

- Order additional copies of this book to support the project
- Suggest improvements to the maps or survey questions
- Register your email to receive news, updates, or corrections



"An excellent and comprehensive overview of international arbitration law in the world's leading arbitral seats – invaluable for practitioners and others."

Gary Born

"An excellent tool to show parties, legislators, as well as students, at one view how an important question is regulated in a particular jurisdiction and what the prevailing international trend is.

Extremely useful, and I am already looking forward to the next editions, where hopefully only a few white spots will remain on the maps."

Stefan Kröll

