

## Chapter 1

# Saudi Arabia

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## I INTRODUCTION

Saudi Arabia is returning to space with a bold vision, over 37 years after Prince Sultan bin Salman Al Saud's space trip that made him the first Saudi Arabian citizen, Arab, Muslim and member of a royal family<sup>2</sup> to ever visit the final frontier.

In May 2023, two Saudi Arabian astronauts, including the first female Arab, joined a mission to the International Space Station (ISS)<sup>3</sup> to support discussions on next-generation space stations<sup>4</sup> and conduct experiments to provide important data for Earth.<sup>5</sup>

This is only part of Saudi Arabia's activities in exploring and expanding its space capabilities and investing in its future in space,<sup>6</sup> which may be a golden opportunity for space.<sup>7</sup>

Saudi Arabia has been witnessing exciting advancements in space law as the national law is constantly evolving to meet Saudi ambitions to exploit the space sector with an emphasis on satellite communication, Earth observation, research, international cooperation and tourism. This is to name only a few of the activities within the emerging space industry in Saudi Arabia that are aligning with international space legal frameworks and regulations.

## II LEGAL, REGULATORY AND POLICY FRAMEWORK

At the core of Saudi Arabia's space ambitions is a regulatory framework formed largely in line with the United Nations and the International Telecommunication Union's (ITU) requirements and standards. Historically, Saudi Arabia signed and ratified five main international treaties and agreements that regulate space activities: the 1967 Outer Space Treaty (ratified by Saudi Arabia in 1976); the 1968 Rescue Agreement (ratified by Saudi Arabia in 2021); the 1972 Liability Convention (ratified by Saudi Arabia in 1976); and the 1975 Registration Convention (ratified by Saudi Arabia in 2012). It is worth highlighting that Saudi Arabia withdrew from the 1984 Moon Agreement on 5 January 2023, and this

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2 <https://www.britannica.com/biography/Sultan-ibn-Salman-Al-Saud>.

3 <https://ara.tv/revpk> (<https://english.alarabiya.net/>).

4 Saudi Arabia in talks over plans for next-generation space stations ([thenationalnews.com](https://thenationalnews.com)).

5 <https://english.alarabiya.net/infocus/2023/10/04/Saudi-space-mission-delivers-groundbreaking-data-for-Earth-Astronaut-scientists>.

6 <https://www.reuters.com/article/us-saudi-economy-space-idUSKBN27D1ZH>.

7 <https://spacewatch.global/2016/05/saudi-arabias-vision-2030-golden-opportunity-space-2/>.

withdrawal will take effect as of 5 January 2024.<sup>8</sup> Saudi Arabia also signed the Artemis Accords on 16 July 2023,<sup>9</sup> which signifies that its eyes are set on the Moon and its resolve on peaceful and sustainable space exploration and exploitation.

Saudi Arabia is also a signatory to other agreements, namely the 1971 Agreement Relating to the International Telecommunications Satellite Organization, the 1976 ARABSAT Agreement, the 1976 Convention on the International Mobile Satellite Organization and the 1992 International Telecommunication Constitution.

The Saudi Council of Ministers Resolution dated 1 November 2022 established the Supreme Space Council, a government agency headed by Crown Prince Mohammed bin Salman. Its responsibilities include approving policies and strategies for space programmes and annual plans, as well as monitoring the implementation of the strategy and achieving compatibility with various sectors and national needs. The Council of Ministers also changed the name of the Communications and Information Technology Commission (CITC) to the Communications, Space and Technology Commission (CSTC).

The Council of Ministers later approved changing the Saudi Space Commission (SSC) to the Saudi Space Agency (SSA) on 13 June 2023.<sup>10</sup>

The SSA's statutes have been approved, and its objectives align with Saudi Arabia's aspirations for a more advanced quality of life, as the statutes aim to create better and 'safer environments for its citizens while creating new opportunities for more profitable innovations that support the Saudi economy'.<sup>11</sup>

The SSA stated in a press release that its strategy requires setting goals that focus on space science and exploratory missions, creating new opportunities in the space sector and 'empowering national cadres to achieve growth and progress in a way that serves the country and humanity'.<sup>12</sup>

Moreover, as conveyed by the United Nations Committee on the Peaceful Uses of Outer Space,<sup>13</sup> Saudi Arabia currently does not have any practices relating to the definition and delimitation of outer space and has yet to develop or implement a national framework for space law that covers such matters.

Nevertheless, the sector's regulations are being developed. Saudi Arabia has drafted a space law that falls in line with its policies and treaties and that aims to encourage the expansion and regulation of its space investment, industry and research. This space law draft (the Draft) remains to be passed as a law and is currently following the Saudi legislative process in this regard.

The Draft, though neither final nor yet in force, describes the territorial boundaries and areas covered by space law, including Saudi Arabia's land territory and territorial waters subject to the sovereignty of Saudi Arabia and the airspace above it. This includes any area enjoying special economic status and airspace, as well as outer space and the space operations area.

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8 United Nations Treaty Collection - Depositary Notification C.N.4.2023.TREATIES-XXIV.2 (<https://treaties.un.org>).

9 Saudi Arabia Signs Artemis Accords and Joins International Space Exploration Program (<https://www.spa.gov.sa/2370318>).

10 HRH Crown Prince Chairs Cabinet Session ([spa.gov.sa](https://www.spa.gov.sa)).

11 Saudi Space Agency ([ssa.gov.sa](https://ssa.gov.sa)).

12 <https://ssa.gov.sa/>.

13 UNOOSA Documents and Resolutions Database, National legislation and practice relating to the definition and delimitation of outer space, 2022 (A/AC.105/865/Add.27).

The Draft defines air space as any area beginning at mean sea level and reaching the maximum possible limit for air traffic control and defines outer space as the area above Earth's atmosphere and the space operations area above 80km or more than the mean sea level.

The Draft also addresses:

- a* launch and re-entry, outlining guidelines for launching objects into space and bringing them back to Earth;
- b* space activities and space-related terms, outlining guidelines for various activities relating to space, including space activities, space-related activities, high-altitude activities and astronomically advantageous areas;
- c* scientific research and development activities and incentive programmes;
- d* space systems and space data;
- e* satellite navigation systems and earth remote sensing, describing the technologies used for navigation and remote sensing operations in space;
- f* space activity licences and licences used for providing satellite communications services, manned space flight activities, earth remote sensing, space monitoring activities, space data operators, use of space nuclear power sources and dual-use goods, space resources and high-altitude activities;<sup>14</sup>
- g* sustainability of space activity and space debris mitigation;<sup>15</sup>
- h* utilisation of resources in outer space;
- i* space nuclear power sources and devices used in space energy generating activities that use nuclear material, radioisotopes or nuclear reactors; and
- j* dual-use goods, defined as goods and technologies of shared civil, commercial and military uses.

The Draft also differentiates between incidents and accidents relating to space activities, detailing their potential consequences, and addresses space safety, incidents and operators' liability, describing the guidelines, roles and responsibilities of operators of space activities and licensed persons (natural or juristic) in space-related activities.

Article 16 of the Draft outlines the liability of the operator for damage caused to either the surface of the Earth or to aircrafts in flight due to the carrying out of space activities or to other space objects. Such claims against the operator shall be made within one year, and the operator shall not be held liable if all licence obligations were fulfilled, unless wilful misconduct or gross negligence is involved.

Article 17 of the Draft outlines Saudi Arabia's liability towards third parties in the event of damage incurred by space activities. Saudi Arabia may seek recourse against the operator that carried out the operation relating to the compensation and the amount of insurance or financial guarantees provided or paid for by the operator. Saudi Arabia shall compensate the injured party for the sums exceeding the amount of available insurance and guarantees.

Except for space activity carried out by the government of Saudi Arabia, Article 18 of the Draft mandates operators to maintain an insurance policy, from an insurance company approved by the CSTC, against liability that may be incurred in the context of the licensed 18 activities in order to compensate for damage that may be caused to a third party by the operator's space activity.

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14 Articles 6 to 12 of the Draft.

15 Article 14 of the Draft.

CSTC regulations shall set out the necessary criteria for liability insurance requirements in relation to space activities, and exemptions from this requirement may be partially or fully granted to an operator for low-risk activities.

Article 19 of the Draft covers miscellaneous provisions pertaining to liability according to which the operator shall be held liable for damage to natural persons or property during manned space flight. This Article also stipulates that a special agreement with the owner of such a facility shall be made by the operator if the latter uses Saudi Arabia's launch sites or facilities, detailing any applicable limitations of liability between the parties for any damage that may be caused to Saudi Arabia, its facilities or its property. When determining compensation, various elements are observed, including launch specifics, hardware and technological information, and technical data.

In this context, claims must be filed within one year of the day following the date on which the damage occurred. Further reinforcing operator liability, the last paragraph of Article 19 stipulates that in all other cases not covered by the provisions of Chapter 4 (Articles 16 to 19), the operator shall be held liable for any damage resulting from the activities carried out by the operator.

### **III REGULATION IN PRACTICE**

Until the Draft enters into force, the CSTC remains Saudi Arabia's digital regulator, according to Saudi Arabia's Telecom Regulations (issued by Royal Decree No. (M/12) of 12/03/1422H (3 June 2001) and Council of Ministers Resolution No. (74) of 05/03/1422H (27 May 2001), and it remains the agency charged with regulating and issuing telecommunications-related licences in Saudi Arabia, including space-related telecommunications licences.

At the international level, the ITU is the United Nations specialised agency for information and communication technologies. This global agency handles the provision of satellite space segment capacity and its coordination. The ITU is represented in Saudi Arabia by the CSTC as the national administrator and national regulator of frequency spectrum that determines and allocates the future need of frequency spectrum for space services<sup>16</sup> and ensures coordination on both the national and international levels.

According to the national Telecom Regulations and their implementing regulations, the main licence categories are telecommunications licences, radio frequency licences, numbering licences and equipment licences.

When it comes to regulating space telecommunications, the CSTC has been working to improve and update the regulatory framework on the space sector by best practices and international recommendations and issued non-terrestrial network (NTN) regulations following the principle of 'technology neutral'<sup>17</sup> under three main regulatory texts (the NTN Regulations):

- a* Regulations for Provisioning of Operation Services of NTNs;
- b* Regulations for Provisioning of Telecommunication Services over NTNs; and
- c* Regulation for Registration of Telecommunication Space Stations.

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16 *ibid.* CSTC's space radio communication services outlook.

17 <https://www.spa.gov.sa/w1787110> (CITC Publishes Non-Terrestrial Networks (NTN) Regulations).

The NTN Regulations clearly distinguish between providers of NTN operation services, providers of telecommunications services and the registration of telecommunications space stations.

The regulation for registration of telecommunications space stations applies to all telecommunications space station operators that provide their capacity over Saudi Arabia. Any telecommunications space station capacity provider that is providing satellite capacity over Saudi Arabia must register with the CSTC as a registered telecommunications space station capacity provider. Registered telecommunications space station capacity providers may provide their capacity only to the holders of a 'provision of operation service of NTN telecommunication networks' permit or any other service provider that holds a licence or other permit to provide such services in Saudi Arabia. This registration does not grant the right to provide telecommunications services over NTNs or provide operation services of NTN telecommunications networks.

Incorporating in the registry and updating any information is free of charges and fees. There is no defined duration of the registry. However, all registered telecommunications space station capacity providers must update the registry with any amendments or notify the CSTC if the telecommunications space station is replaced or its lifespan has expired.

Under the 'technology neutral' principle, NTNs consist of variants of space-borne and aerial communication networks, including geostationary, middle earth orbit and low earth orbit satellite constellations; high altitude platform systems (HAPS); low altitude platform systems (LAPS); Earth stations in motion (ESIM); air-to-ground (A2G) networks; direct-to-device (D2D) satellite communication services; large constellations; and 55G complementary ground components, altogether setting the field to become an integral part of the much-anticipated 6G.<sup>18</sup>

According to the CSTC, A2G communication is defined as heterogeneous networks that are engineered to utilise satellites, HAPS and LAPS to build communication access platforms. Furthermore, A2G is a special air-borne application that provides internet on civilian aircraft via a terrestrial network.<sup>19</sup> HAPS is defined by the CSTC as a station located on an object at an altitude of 20 to 50km and at a specified, nominal, fixed point relative to the Earth,<sup>20</sup> whereas LAPS is defined by the CSTC as a station located on an object at an altitude of 1 to 12km and at a specified, nominal, fixed point relative to the Earth.<sup>21</sup>

Additionally, the CSTC defined the satellite internet of things (IoT) as working on communication between satellite networks and IoT sensors or IoT end nodes.<sup>22</sup> ESIM technology can be defined as Earth stations communicating with geostationary satellite orbit (GSO) or non-GSO space stations operating in the fixed satellite service (FSS) operating on moving platforms (such as aircraft, ships or any vessel) in specified frequency, with an express exemption of foreign licensed ESIMs crossing Saudi Arabia from local licensing.

NTN Regulations distinguish between electronic communications networks and non-publicly available electronic communications services providers and operators and regulate the necessary licensing under a simplified general class licence (GCL), which replaces the previous Telecom Regulation Class B licence. GCL is defined by the CSTC (Article 6.2

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18 CSTC's space radio communication services outlook, August 2023 (<https://regulations.citc.gov.sa/>).

19 <https://www.cst.gov.sa/en/ntn/Pages/air-borne.aspx>.

20 *ibid.* CSTC's space radio communication services outlook.

21 *ibid.*

22 *ibid.*

of the Regulations for Provisioning of Operation Services of NTN and Article 6.2 of the Regulations for Provisioning of Telecommunication Services over NTN) as a class licence that allows the provision of any of the telecommunications services authorised under the licence.

The Regulations for Provisioning of Operation Services of Non-terrestrial Networks applies to providers of operation services of NTNs that are authorised by the CSTC and any other service provider that has obtained a licence or other permit that allows the provision of these services in Saudi Arabia.

The conditions of the Regulations for Provisioning of Operation Services of Non-terrestrial Networks apply to anyone who builds and operates an NTN for the provisioning of voice telecommunications services through NTNs, provisioning of internet and data transmission services through NTNs, value-added services relating to services through NTNs, and any other telecommunications services relating to NTNs that the CSTC deems necessary according to the growth and expansion of the telecommunications sector and based on the CSTC's judgement. Such services may include one or more of the following technologies:

- a* global mobile personal communication services and personal mobile communications systems and networks via satellite (GMPCS network);
- b* very small aperture antenna (VSAT) services;
- c* broadband satellite services (BSS);
- d* systems of identical Earth stations;
- e* connectivity systems on aircrafts (airborne or spaceborne); and
- f* any other technology relating to NTNs that the CSTC deems necessary to include in the scope of the services according to the growth and expansion of the telecommunications sector and based on the CSTC's judgement.

The Regulations for Provisioning of Telecommunication Services over Non-terrestrial Networks, on the other hand, apply to service providers of telecommunications services over NTNs that are authorised by the CSTC. These services include the provisioning of voice telecommunications services through NTNs, provisioning of internet services and data transmission through NTNs, value-added services relating to services through NTNs, and any other telecommunications services relating to NTNs that the CSTC deems necessary via the same technologies listed in the Regulations for Provisioning of Operation Services of Non-terrestrial Networks. A 'provision of operation services of non-terrestrial network permit' is required before the building or operating of any NTNs. The duration of the permit to provide the authorised services would be the same as the duration of the general class licence unless any of the permits are cancelled or terminated by the CSTC.

Accordingly, the CSTC regulates satellite telecommunications services largely in line with ITU guidelines and covers VSAT networks, GMPCS, BSS, FSS and mobile satellite service (MSS) and ground-based satellite terminals located in Saudi Arabia.

The main licence categories according to the CSTC<sup>23</sup> are VSAT, GMPCS and BSS:

- a* VSAT allows the establishment of a telecommunications network in Saudi Arabia using VSAT technology conforming to international standards.
- b* GMPCS systems, networks and services generally know a distinction between GMPCS operations and GMPCS provision. GMPCS operations allows the installation, operation and management of networks for GMPCS in Saudi Arabia according to

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23 *ibid.* CSTC's space radio communication services outlook, page 10.

CSTC guidelines and requirements, aiming to ensure reliability, reporting and continuity of service according to international standards. GMPCS provision allows the provision of basic services, emergency services, short message services, short information messages services, data services, value-added services and closed user groups on a non-exclusive basis. CSTC requirements for such services cover aspects such as invoicing, non-discrimination, quality of service, reporting to the CSTC and consultation on tariffs.

- c BSS provision allows the provision of broadband satellite services, including the provision of voice services, data services, internet and related value-added services, whether mobile, fixed or limited in mobility telephone, in addition to satellite capacities, according to the Saudi National Platform describing the procedure to obtain a permit for the provision of the broadband satellite services.<sup>24</sup> Receive-only terminals receiving authorised broadcast signals in the BSS do not require a licence. Similarly, receive-only terminals operating in exclusive FSS bands do not require a licence.

On a relevant note, the import activity of telecommunications and IT hardware and equipment to Saudi Arabia is also regulated by the CSTC according to the Procedure for Approving and Importing Telecommunications and IT Equipment, enacted by Council of Ministers' Decree No. (100) dated 8/8/1415 H (corresponding to 10/1/1995 G). Some of these conditions relate to the type of entity that can undertake the importation, while other requirements apply to the importation process and the release of equipment at Saudi customs or with other agencies or authorities.

Fees for obtaining licences for the provisioning of telecommunications services over NTN and the provisioning of operation services of NTN are subject to the Frequency Use Licence Remuneration Regulation applicable to spectrum licences<sup>25</sup> in accordance with the Decision of the Council of Ministers No. 632 dated 14 June 2022 and published on the CSTC website.

#### IV YEAR IN REVIEW

Saudi Arabia has been witnessing groundbreaking development in many fields, not limited to its space programme and space law. Recent years have also witnessed a tangible acceleration in Saudi Arabia's space programme and space activities. Additionally, KSU-CubeSat was the first 1U satellite launched by King Saud University in Saudi Arabia. The satellite was built and developed by College of Engineering students to prepare a training *Handbook on Small Satellites*. One hundred and forty-five engineering students at the University in the field were involved in designing and programming satellites in line with Saudi Arabia's Vision 2030. The specific objective of the KSU-CubeSat is to send telemetry and images by a small camera from space and repeat a received voice signal.<sup>26</sup>

According to the Saudi Press Agency,<sup>27</sup> the SSC launched Saudi Arabia's first astronaut programme dedicated to training Saudi competent personnel to undertake long- and short-term space flights. Human space flights aim to increase Saudi Arabia's expansion and

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24 <https://www.my.gov.sa/>, Permit For the Provision of The Broadband Satellite Services (my.gov.sa).

25 Up-to-date information on licence application and the applicable fees can be found on the CSTC website.

26 <https://www.itu.int/pub/R-HDB-65-2023>.

27 <https://www.spa.gov.sa/w1788241>.

global presence and improve its capabilities and competitiveness in areas such as science, engineering, research and innovation. In the coming months, Saudi Arabia plans to launch its National Space Strategy, which will reveal space programmes and initiatives that aim to serve humanity from space.

Council of Ministers Resolution dated 1 November 2022 established the Saudi Space Council headed by Prime Minister Crown Prince Mohammed bin Salman. Its roles include approving policies and strategies for space programmes, annual plans, monitoring the implementation of the strategy, and achieving compatibility with various sectors and national needs.

The Council of Ministers also changed the name of the CITC to the CSTC, which reflected Saudi Arabia's growing interest in space and technology.

The Council of Ministers also approved changing the name from the SSC to the SSA on 13 June 2023.<sup>28</sup>

Additionally, the Council of Ministers Resolution approved the SSA statute for the importance of focusing on industry and innovation in the space sector. The SSA's strategy focused on the development of satellite systems and technologies, monitoring and tracking space objects and debris, executing human exploration and operation missions, preparing and supporting studies and research relating to the space sector and its technologies, developing the capabilities of national cadres in all areas of the space sector, cooperating with international and regional bodies to support the space sector locally, representing Saudi Arabia in regional and international events, concluding agreements and memorandums of understanding relating to the SSA's activities locally and internationally and, finally, developing human and technological skills.

Saudi Arabia has also established initiatives such as the Communications, Space and Technology Commission's Space Entrepreneurship Alliance and the Saudi Space Accelerator Program,<sup>29</sup> aiming to attract, incubate and accelerate 20 space start-ups and entrepreneurs invested in the fields of space tourism, exploration, satellite communication and space photography.

In May 2023, Saudi Arabia sent two astronauts, including its first female astronaut, to the ISS, in collaboration with Axiom Space. Astronauts Rayyanah Barnawi and Ali al-Qarni lifted off to the ISS from NASA's Kennedy Space Center in Florida<sup>30</sup> on a SpaceX Falcon 9 rocket aboard a SpaceX Dragon spacecraft as part of the Axiom 2 space mission.

In the last quarter of 2023, the SSA and King Abdullah University of Science and Technology reinforced collaboration under their Space Research, Development and Innovation Workshop,<sup>31</sup> intending to place Saudi Arabia's space programme among the top 10 space programmes on the international level, with research, development and innovation targets ranging across six research focus areas: Earth observation; communication and positioning, navigation and timing; launch; astronomy and space exploration; microgravity research; and space situational and domain awareness.

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28 HRH Crown Prince Chairs Cabinet Session (spa.gov.sa).

29 <https://ssa.gov.sa/en/news/acceleratorprogram/>.

30 <https://ara.tv/revpk> (<https://english.alarabiya.net/>).

31 KAUST Forms Cooperation Partnership with SSA to Support Research, Development, Innovation (spa.gov.sa).



Another significant event marking the international diplomatic and space scene was Saudi Arabia's withdrawal from the Moon Agreement. Not long after it had joined the Artemis Accords on 16 July 2023, Saudi Arabia became the first state to ever withdraw from any of the UN's space treaties. Australia, Mexico and Saudi Arabia are the only signatories to both the Artemis Accords and the Moon Agreement. Some speculate that Saudi Arabia's withdrawal from the Moon Agreement was a result of conflicts between the principles of the Moon Agreement and those of the Artemis Accords.

The Artemis Accords are a set of non-binding multilateral arrangements aimed at guiding the future of space activity and space exploration with the goal of a manned landing on the lunar surface by 2025.<sup>32</sup>

According to NASA,<sup>33</sup> the principles of the Artemis Accords reinforce and implement the Outer Space Treaty. The principles also reinforce the commitment to the Registration Convention and the Rescue Agreement.

The principles of the Artemis Accords commit the signatories to peaceful space non-military exploration and deconfliction of activities as signatory nations commit to preventing harmful interference and supporting the principle of due regard, as required by the Outer Space Treaty.

The Artemis Accords also guarantee transparency, interoperability and commitment to emergency assistance to guarantee full cooperation between signatories that undertake to implement 'safety zones' that remain to be universally defined but should form a basis for long-term lunar civil and commercial missions and should also prevent harmful interference, implementing Article IX of the Outer Space Treaty and reinforcing the principle of due regard.<sup>34</sup>

Additionally, signatories commit to the release of scientific data; to preserving outer space heritage; to sustainable, responsible and safe exploration and exploitation of space resource in compliance with the Outer Space Treaty; and to properly planning for the safe disposal of orbital debris and to guaranteeing the full commitment to the registration of space objects (since any nation participating in the Artemis Accords must be or become a signatory to the Registration Convention).

## **V OUTLOOK AND CONCLUSIONS**

With Vision 2030 as a catalyst and the CSTC and the SSA at its vanguard, Saudi Arabia's ascent in the space sector has made it an active participant in the global space race for sustainable space exploration and exploitation.

In summation, Saudi Arabia's plans and activities in the space sector stand as a testament to its vision and its responsible and forward-looking ambitions of space exploration. Currently, the Draft is following the Saudi legislative process; nevertheless, the trajectory of Saudi Arabia's space industry and regulations seems set for exponential evolution. Anticipated

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32 How NASA's Artemis programme plans to return astronauts to the moon (nationalgeographic.com).

33 NASA, International Partners Advance Cooperation with First Signings of Artemis Accords, <https://www.nasa.gov/news-release/nasa-international-partners-advance-cooperation-with-first-signings-of-artemis-accords/>.

34 <https://www.nasa.gov/> (Michelle L D Hanlon, Due Regard and Safety Zones: Understanding the Commercial Implications of Recent Policy and Legislation).

trends include the passing of the Draft and its implementing regulations with an emphasis on galvanising economic growth through the space industry, technological innovation, safety and collaboration with local and international stakeholders.

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Patrick Chabar is an experienced consultant and litigator with a decade of progressive experience in commercial, civil and administrative law and litigation. His expertise cover contractual and corporate law, contract negotiations and drafting, legal writing and legal research, in addition to an insight into intellectual property and licensing.

In addition to the above, Patrick also has experience of case management regarding disputes relating to contractual and corporate law, construction law, insurance law and banking and finance.

Patrick was previously heading the litigation department of a prominent law firm in Lebanon and was an in-house lawyer at British American Tabaco (Levant and Yemen), with emphasis on legal drafting, compliance and MENA area contract law.

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