



Action Point

2.2-1

Review a group of your past purchase contracts - I

◆ **What have you tried to obtain in the contracts from your suppliers?**

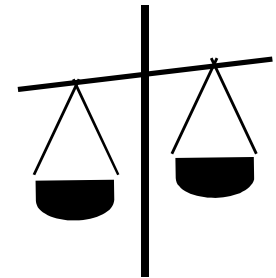
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◆ **What have you tried to avoid?**

◆ **Identify any trends that come out of your review.**

Different legal systems

- The Civil Law countries:
 - ◆ Europe except United Kingdom
 - ◆ Francophone and lusophone Africa
 - ◆ Latin America, Quebec and State of Louisiana
 - ◆ Northern Africa, Middle East, Turkey, Iran, Afghanistan
 - ◆ China, Japan and Korea
- Background laws and codes of obligations as well as documents other than the contract itself play an important role



Different legal systems

- The Muslim Law countries:
 - ◆ Northern Africa, Middle East, Iran, Afghanistan...
- The role of Sharia and non Sharia law varies from country to country
- In many cases, Civil or Common law traditions have an influence as well

