Foreign lawyers and international judges

Dr Alexander Ressos, TEP
Attorney-at-Law (Switzerland and Germany),
Solicitor (England & Wales and Hong Kong)
Of Counsel, KGP Legal LLC
alexander.ressos@kgplegal.com.sg
www.ressos.com.sg

The international bench

The defining feature of the SICC is its bench. The Chief Justice may designate High Court judges and International Judges to hear its cases. In October 2026 the court's website listed 26 International Judges and 18 Singapore judges. The International Judges included eight from England and Wales, seven from Australia and three from the United States, together with judges from New Zealand, France, Germany, Japan, China, Canada and India and the former Hong Kong judge Anselmo Reyes.[1] Several had led the highest courts of their own countries, among them Robert French of Australia, Beverley McLachlin of Canada and Lord Neuberger of the United Kingdom.[2]

The civil law members are few in number, although their presence matters. Judges from France, Germany, Japan and the People's Republic of China give the court credibility with parties from jurisdictions that do not share the common law. Two new International Judges, David Goddard of New Zealand and Sir Nigel Teare of the United Kingdom, took office on 5 January 2026 for an initial term of one year.[3]

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The model has its costs. The International Judges sit only when designated for a case and most of them live abroad, which requires careful scheduling of hearings and deliberations. In the court's own assessment the advantages are greater. A foreign party facing a Singapore counterparty can be offered a bench that includes a judge from its own legal tradition, which arbitration offers through party appointment and national courts generally cannot.

Foreign lawyers before the SICC

Foreign lawyers may act in SICC proceedings if they are registered with the court under section 36P of the Legal Profession Act 1966 and the Legal Profession (Representation in Singapore International Commercial Court) Rules 2014. Full registration allows a foreign lawyer to appear and plead in the SICC and in the Court of Appeal in relevant proceedings, to represent a party and to give advice and prepare documents. Restricted registration allows appearance only to make submissions on questions of foreign law.[4] Registration costs S$300, is generally valid for one year and may be renewed. Since 1 November 2017 registered foreign lawyers have been exempt from the need for a work pass for up to 90 days in a year.

The register is substantial. On 2 November 2026 it listed 148 foreign lawyers, 138 with full and 10 with restricted registration, from 25 jurisdictions.[5] Registration allows counsel who already appear in Singapore-seated arbitrations to follow their clients into court. The rules also bind foreign lawyers to a code of ethics and to the disciplinary framework of the Singapore profession.

Offshore cases and their limits

Full foreign representation is confined to offshore cases, which in substance means cases with no substantial connection to Singapore. The 2013 committee gave as examples cases in which Singapore law does not govern the dispute, or in which the choice of Singapore law is the only link with the city.[6] In a case connected with Singapore, the parties must be represented by Singapore advocates and solicitors,

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although foreign lawyers may still make submissions on foreign law. The distinction protects the local profession, which Chapter J.III discusses, while opening the court to disputes that would otherwise never come to Singapore.

The limitation has a practical effect on contract drafting. A Swiss bank and an Indonesian borrower who choose the SICC and English law in a loan agreement with a Singapore branch may find that their case is not offshore, so that Singapore counsel must lead. Parties who want to bring their own lawyers should consider this connection when they choose the court. The SICC itself has encouraged its use by young Singapore lawyers through an independent counsel scheme and by asking lead counsel to give junior lawyers parts of the advocacy.[7]

The court as an export: Bahrain and the International Committee

The SICC has also become a model for other states. On 20 March 2024 the governments of Singapore and Bahrain signed a treaty to establish a Bahrain International Commercial Court and a designated body in Singapore to hear appeals from it.[8] The Singapore International Commercial Court (International Committee) Bill, read for the first time on 14 October 2024, created that body. It consists of Supreme Court judges, International Judges and ad hoc members from the court of the referring jurisdiction. Its decisions are final and are treated as judgments of the foreign court.[9]

The Bahrain International Commercial Court was launched in Manama on 5 November 2025, with Jan Paulsson as its president. Modelled mainly on the SICC, it sends its appeals to the International Committee in Singapore.[10] Under this arrangement a Singapore court hears appeals from the courts of another sovereign state, much as the Privy Council in London once heard appeals from Singapore. The arrangement extends Singapore's legal influence into the Gulf, where it competes with the courts of the Dubai and Abu Dhabi financial centres.

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Notes

1. Singapore Courts, "Judges" (SICC), judiciary.gov.sg, last updated 20 October 2026: 26 International Judges, among them Thomas Bathurst, Anthony Besanko, Roger Giles, Douglas Jones, Anthony Meagher, David Rivkin, Christopher Sontchi, Simon Thorley, Sir Henry Bernard Eder, David Goddard, Dominique Hascher, Peter Meier-Beck, Yuko Miyazaki, James Michael Peck, Sir Vivian Ramsey, Anselmo Reyes, Sir Nigel Teare, Zhang Yongjian, James Allsop, Lady Arden, Robert French, Lord Mance, Beverley McLachlin, Lord Neuberger, Sir Bernard Rix and Arjan Kumar Sikri; 18 Singapore judges on the first-instance and appellate benches. Distribution by jurisdiction derived from the biographies on the page. ↩

2. Singapore Courts, "Judges" (SICC), judiciary.gov.sg, last updated 20 October 2026, biographies: Robert French, Chief Justice of the High Court of Australia (2008–2017); Beverley McLachlin, Chief Justice of the Supreme Court of Canada; Lord Neuberger of Abbotsbury, President of the Supreme Court of the United Kingdom (2012–2017). ↩

3. Prime Minister's Office, media release "New appointments to Supreme Court bench and Singapore International Commercial Court", 19 September 2025 (judiciary.gov.sg): Justice David John Goddard and Justice Sir Nigel Teare appointed International Judges from 5 January 2026 to 4 January 2027. Singapore Courts, media release of 24 September 2025 on the publication *Charting New Waters: The Singapore International Commercial Court After Ten Years* (judiciary.gov.sg): two new international judges from New Zealand and the United Kingdom, appointments effective January 2026. ↩

4. Singapore Courts, "Registration of Foreign Lawyers before the SICC", judiciary.gov.sg (last updated 15 September 2025): registration under s 36P of the Legal Profession Act 1966 and rules 5 and 6 of the Legal Profession (Representation in Singapore International Commercial Court) Rules 2014, renamed with effect from 1 November 2018; scope of full and restricted registration; fee of S$300; validity generally one year, renewable; work pass exemption since 1 November 2017 for the first 90 days in a year. Ministry of

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Law, press release of 7 October 2014: foreign-qualified lawyers subject to the same disciplinary framework as Singapore-qualified lawyers. SICC main page (judiciary.gov.sg): registered foreign lawyers subject to a Code of Ethics. ↩

5. Singapore Courts, "Register of Foreign Lawyers", judiciary.gov.sg, accurate as at 2 November 2026: 148 registered foreign lawyers (138 full registration, 10 restricted registration) from 25 jurisdictions, plus one registered law expert. ↩

6. Ministry of Law, press release of 3 December 2013, footnote 3: foreign counsel may appear where a case has no substantial connection to Singapore, for example where Singapore law does not govern or where the choice of Singapore law is the only link. ↩

7. *The Business Times*, 21 October 2025, p. 2: independent counsel scheme appointing lawyers about five years into practice to give legal perspectives on difficult points of law; the court asks lead counsel to give parts of the advocacy to junior team members. ↩

8. Ministry of Law and Singapore Courts, press release "Singapore and Bahrain sign bilateral treaty on appeals from the Bahrain International Commercial Court", 20 March 2024: treaty signed by K Shanmugam SC and Nawaf bin Mohamed AlMouada in a virtual ceremony; establishment of the BICC and of a designated body in Singapore to hear appeals; preceded by a memorandum of understanding and a memorandum of guidance on money judgments signed in May 2023. ↩

9. Ministry of Law and SG Courts, joint media release on the Singapore International Commercial Court (International Committee) Bill, 14 October 2024 (judiciary.gov.sg): first reading on 14 October 2024; International Committee composed of Supreme Court judges, SICC International Judges and ad hoc members from the referring foreign court; judgments treated as those of the referring court; decisions final. ↩

10. Singapore Courts, media release "Singapore and Bahrain partnership enhances trust and neutrality for international commercial disputes", 7 November 2025 (judiciary.gov.sg): BICC launched on 5 November 2025 in

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Manama; based mainly on the SICC model; president Professor Jan Paulsson; appeals from the BICC to the International Committee of the SICC. ↩

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Author contact: Dr Alexander Ressos, TEP · contact@ressos.com

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