

# 11. Superchart World Financial Law (2) Five key indicators

| TOPIC          | Napoleonic | Roman-Germanic | Common Law |
|----------------|------------|----------------|------------|
| Set-off        |            |                |            |
| Debt Transfers |            |                |            |
| Security       |            |                |            |
| Trust          |            |                |            |
| Tracing        |            |                |            |

|                |  |
|----------------|--|
| Set-off        | Is set-off available generally on the insolvency of a debtor-creditor?   |
| Debt Transfers | Is the assignment of debts free of a need to give notice to the debtor, if it is to be effective on the insolvency of the assignor?      |
| Security       | Is security wide and protected on insolvency?  |
| Trust          | Is the trust (divided ownership) freely available for all assets and effective on the insolvency of the trustee?                         |
| Tracing        | Is the tracing of wrongfully-taken assets freely available on the insolvency of the ultimate holder, including tracing into mixed money? |

No Yes