

## ABSTRACT

### **‘The Public Policy Exception in Private International Law: Litigation and Arbitration from a Comparative Perspective’**

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The public policy (ordre public) exception to the enforcement of foreign acts and judgments has historically been a vital instrument of private international law doctrine. It has been accordingly perceived both as a safety valve that has encouraged the liberalization of cross-border enforcement and as a mechanism to give extra effect to forum policies – and biases. The EU legal integration project has long aimed to minimize or even abolish ordre public invocations within the EU, especially with regard to Member State judgments.

My paper examines the present-day role of the public policy exception to the enforcement of judgments in international commercial litigation – an area where national policies have traditionally differed less starkly than with regard to family law, for example. It compares, to that effect, the public-policy treatment of court judgments and arbitral awards.