



Atsumi & Sakai

Anti-Slavery and Human Trafficking Statement for business year ending 31 December 2025

This statement sets out the steps that Atsumi & Sakai and its affiliates (“A&S”, “we”, “us” or “our”) takes to ensure that modern slavery and human trafficking are not taking place in any part of our business or supply chains. We try to maintain the highest ethical and professional standards and expect the same from our suppliers.

Background

A&S is a full-service Tokyo-headquartered law firm. In addition to our Japanese business we have offices in the United States, United Kingdom, Belgium, Vietnam and Germany and we strive to ensure that A&S’s principles are upheld in Japan and overseas.

Policies & Procedures

We have in place a Basic Policy on Anti-Slavery and Human Trafficking and expect all suppliers we are looking to work with to establish and enforce their own suitable policies, processes, and compliance procedures within their businesses and supply chains that require the implementation and enforcement of effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

In addition, our Rules on Ethics and a Code of Conduct that contains appropriate policies to reflect our commitment to acting ethically and with integrity in all our business relationships. These policies are regularly revised and include:

- HR policies to ensure a working environment based on respect, fairness, trust, support and transparency;
- Whistleblowing and grievance procedures that encourage anyone who has concerns to raise them, by providing protection and support; and
- Anti-bribery and anti-money laundering policies as financial vigilance is required to prevent the money laundering that comes with criminal activity including modern slavery.

Due diligence processes for slavery and human trafficking

Our ongoing assessment is that we are at low risk of slavery or human trafficking occurring within our business or direct supply chains. This assessment is based on the fact that we are a client-focused professional services business comprising skilled lawyers in a strictly regulated sector. Our direct suppliers are primarily in property and facilities management, human resources and technology.

However, we acknowledge that slavery and human trafficking may exist in jurisdictions in which we operate and from which we procure goods or services and as such we are committed to taking appropriate action to ensure that modern slavery and human trafficking are not present in our business, within our supply chain or any other associated activities. We have taken steps to:

- Establish a reporting system for concerns or suspicions
- Identify and assess potential risk areas in our supply chains including sending out supplier questionnaires to approximately 150 suppliers
- Mitigate the risk of slavery and human trafficking occurring in our supply chains
- Monitor potential risk areas in our supply chains
- Protect whistleblowers

Supplier adherence to our values

We have zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply with our values we have put in place a Supplier Policy which we require our suppliers to comply with.

Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our business and our supply chains, we conduct annual training for our lawyers and staff.

Our effectiveness in combating slavery and human trafficking

In the business year ending 31 December 2025 we continued to review the effectiveness of the steps that we had in place to ensure that there is no slavery or human trafficking in our supply chain and took steps to refresh and improve the measures we have in place.

We have not identified any suspected slavery or human trafficking in our supply chain, but we are committed to continuing to improve our practices in today's continually changing environment and refining our policies, training and reporting structures for more effective processes moving forward.

Atsumi & Sakai

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and constitutes our anti-slavery and human trafficking statement for the business year ending 31 December 2025. It was approved by the Management Committee.



Hiroo Atsumi

Managing Partner

Atsumi & Sakai

Date: 29 June 2026