



## **Atsumi & Sakai**

### **Anti-Slavery and Human Trafficking Statement for business year ending 31 December 2022**

This statement sets out the steps that Atsumi & Sakai and its affiliates (“A&S”, “we”, “us” or “our”) take 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 and Germany and we strive to ensure that A&S’s principles are upheld in Japan and overseas.

#### **Policies & Procedures**

We expect all parties we are looking to work with to have suitable policies, processes, and compliance in place within their own businesses and supply chains to prevent child labour, modern slavery and human trafficking. We have or are putting in place appropriate policies to reflect our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains. These 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 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 permanent 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

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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 are now taking steps to:

- Identify and assess potential risk areas in our supply chains.
- Mitigate the risk of slavery and human trafficking occurring in our supply chains.
- Monitor potential risk areas in our supply chains.
- Protect whistle blowers.

### 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 are putting in place a supply chain compliance program.

### Training

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we are preparing to provide training to our lawyers and staff.

### Our effectiveness in combating slavery and human trafficking

The business year ending 31 December 2022 is the first for which the firm has met the criteria requiring the making of an Anti-Slavery and Human Trafficking Statement as until the end of that business year it was not certain that we would be required to make Anti-Slavery and Human Trafficking Statement. We have since then reviewed 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 found the preventive measures to be in need of refreshing and improvement, though we have not identified any suspected slavery or human trafficking in our supply chain. 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.

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 2022. It was approved by the Management Committee.



Hiroo Atsumi  
Managing Partner  
Atsumi & Sakai

Date: 28 June 2023