



Modern Slavery in the Japanese Context

7 April 2024

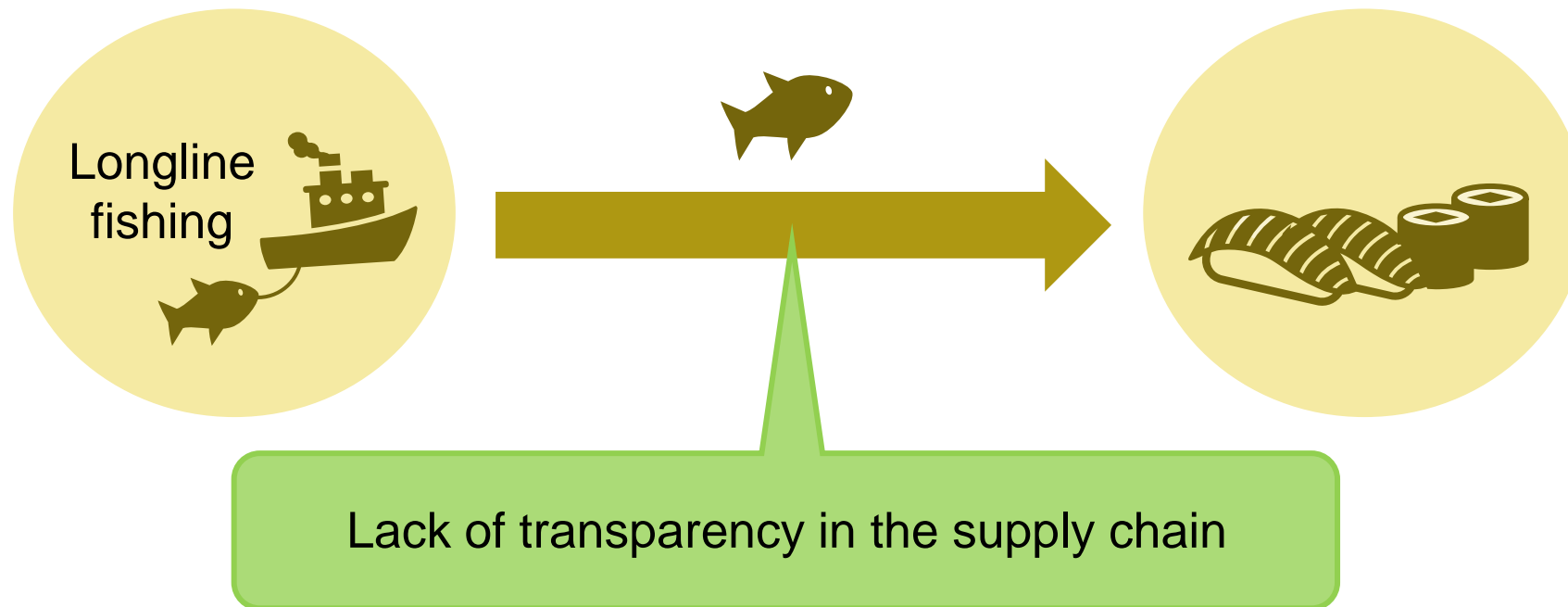
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Concerns raised by Human Rights NGOs

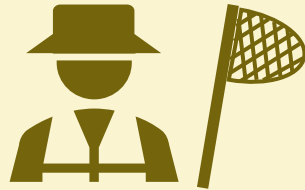
“Tuna in the Black Box:
Human rights risks hidden in the opaque tuna supply chain
from Korean vessels to the Japanese market”

Human Rights Now Report (December 2023)



Human Rights Now Website <https://hrn.or.jp/news/24930/>

Human rights abuses in supply chains



Migrant
Workers

- Long working hours of +12 hours
- Low wage (1/10 of national seafarers)
- Unpaid wages
- Illegal deduction from salaries
- Verbal and physical violence and abuse

Analysis of the HRDD or procurement policy of the following enterprises:

TOYO REIZO
Co., Ltd.

Mitsubishi
Corporation

Try Sangyo Co.

Sojitz Corporation

AEON Co., Ltd.

Seven & i Holdings
Co., Ltd.

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Technical Intern Training Program (TITP)

“forced labour” nature

Issues raised by the ILO, the UN treaty bodies and the USDOS

- transfer (change of an employer) not admissible
- confiscation of documents and passports
- fees paid by workers to sending agencies in their home countries

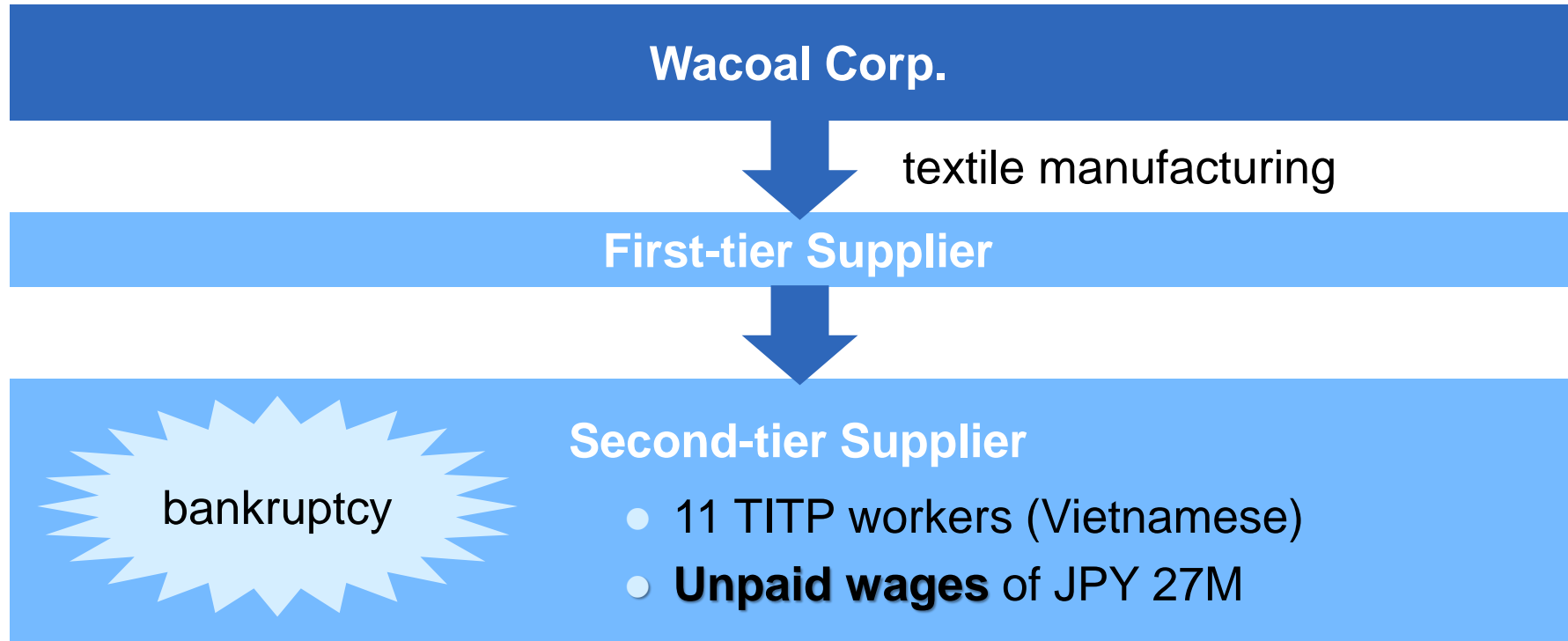
new system
will replace TITP
but...?

measures taken by enterprises

- self-assessment questionnaires sent to suppliers
- on-site audits

updated
HRDD
required?

Measures taken to mitigate negative impacts



- Measures taken by Wacoal Holdings Corp.
 - wage compensation & preventive measures (20 Nov 2022)
 - JPY 5M contributed to NPO supporting TITP workers & commitment to strengthen local audits (6 Dec 2022)

Key takeaways

As an attorney advising corporate clients:

- Forced labour is one of the most serious human rights risks
- Learn from good practice on mitigating negative impacts and update the HRDD process
- Ask: “is the remediation effective?” “any remedy provided to the affected stakeholders?”
- Continue to have dialogue with stakeholders (workers, labour unions, and NGOs)
- Still has “responsibility to respect human rights” even if there is no HRDD legislation