

ANA GROUP MODERN SLAVERY STATEMENT

(Year ended March 2020)

1. Introduction

This statement has been published in accordance with the Modern Slavery Act 2018. It sets out the steps taken by ANA Group during the year ending 31 March 2020 to prevent modern slavery and human trafficking in our business and supply chains.

2. Our business and supply chains

ANA Group is in the airline transport sector, and consists of ANA Holdings, 56 subsidiaries and 14 affiliated companies. We have 122 flight destinations, including 65 cities in Japan and 57 cities internationally, and the number of group employees is 46,580 (all as of March 31, 2021). Though our business is centered on air transport including airport ground support, we operate other related businesses, in sectors such as travel services and trade and retail. More detailed information on our organization and business is available at <https://www.ana.co.jp/group/en/about-us/>

In Australia, All Nippon Airways Co., Ltd. operates flights to and from Sydney and Perth, and other group companies provide associated services, such as cargo and logistics, trade and retail, in support of this route.

We source most of the goods and services in our operations. Centering on our air transport business, our procurement activities focus on sourcing aircrafts, fuel, and in-flight goods. We collaborate with a large number of business partners, contractors and suppliers across our supply chains, and request all our partners (including our suppliers) to do business in a way that respects human rights in line with ANA Group policies described below.

3. Policies in relation to slavery and human trafficking

In April 2016, the ANA Group inaugurated the ANA Group Policy on Human Rights, based on internationally recognized human rights as set out in the International Bill of Human Rights (the Universal Declaration of Human Rights and the two International Covenants), the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the UN Global Compact's Ten Principles, and the UN Guiding Principles on Business and Human Rights. Based on this policy, the ANA Group has been working to ensure that human rights are respected.

ANA Group Policy on Human Rights is available at

https://www.ana.co.jp/group/en/csr/effort/pdf/humanrights_e.pdf

The Policy covers all individuals and groups that may be affected through the ANA Group's business activities and business relationships. This commitment applies to all executives and employees of the ANA Group, and we will continue to encourage our contractors and suppliers to support this policy and to adopt similar policies. The Policy was drafted with input from three external human rights organizations and approved by the Board of Directors for its inception and disclosure.

In the following policies, the ANA group declares its commitment for preventing and eliminating any form of modern slavery and human trafficking in our business and supply chain.

- ANA Group's Social Responsibility Guidelines

The ANA Group has laid down the Social Responsibility Guidelines as a code of conduct for all executives and employees of the ANA Group. In the section (4) titled "We will respect human rights and diversity," the Guidelines specify "compliance with the International Covenants on Human Rights and other international human rights standards, as well as relevant laws, regulations, and social norms," and disavow "child labor and forced labor within the Group" and "transaction with any company engaging in such labor." An e-learning program is available to deepen the understanding of all executives and employees of the ANA Group in the materials covered by the Guidelines. Education and training, moreover, is provided to new employees every year. ANA Social Responsibility Guideline is available at https://www.ana.co.jp/group/csr/basic_approach/pdf/responsible_guideline_eng.pdf

- Responsible Procurement

The ANA Group contributes to create social value not only by providing safe and secure service, but also taking initiative in procurement activities that are conscious to regions and global society and environment. In 2020, in order to promote sustainable procurement activities in entire supply chain, we revised past policies and newly established the ANA Group Procurement Policy. More detailed information of the Group Procurement Policy is available at https://www.ana.co.jp/group/en/csr/supply_chain_management/

This Policy consists of Basic Procurement Policy and Supplier Code of Conduct and requires to suppliers "responsible procurement activity in consideration of its impact on human rights" including respect of human rights and exclusion of all form of discrimination, prohibition of forced labor and child labor, respect of freedom of association and collective bargaining rights, ensuring safe and sanitary work environment, and respect for rights of indigenous people. The Policy is further used as a benchmark in the selection of business partners as well as tool for periodic post-selection monitoring. Through these measures, the ANA Group works actively to gain the understanding and cooperation of partner companies.

These policies are available at the following sights.

https://www.ana.co.jp/group/en/csr/supply_chain_management/pdf/basic_procurement_policy_en.pdf
and https://www.ana.co.jp/group/en/csr/supply_chain_management/pdf/supplier_code_of_conduct_en.pdf

4. Governance Structure for Ensuring Respect for Human Rights

At the ANA Group, planning and deliberations on policies and measures for promoting ESG management, including “business and human rights,” are conducted within the Group ESG Management Promotion Committee, the Group Management Committee, and other bodies. Particularly important issues are brought before the Board of Directors.

The Chief ESG Promotion Officer (CEPO) is responsible for the ANA Group’s activities related to human rights. To promote the activities across the ANA Group, each Group company is assigned the ESG Promotion Officer (EPO, responsible for promoting ESG management), and each Group company and department is assigned the ESG Promotion Leaders (EPLs, leaders in promoting ESG management).

- Group ESG Management Promotion Committee

The ANA Group has established the Group ESG Management Promotion Committee, which is placed under the supervision of President and CEO of ANA Holdings Inc. and presided by the CEPO (Senior Executive Vice President of ANA Holdings Inc. in charge of Corporate Sustainability). The committee is comprised of full-time directors, senior vice presidents, and full-time auditors of ANA Holdings Inc., and executive officers (EPOs) from all ANA Group companies. As per regulations, the committee meets at least twice each year for timely discussions not only on “business and human rights,” but also on a comprehensive range of topics for timely discussion. The important issues linked to management strategy are proposed to the Group Management Committee and brought before the Board of Directors to ensure smooth coordination in the implementation of activities. The Group ESG Management Promotion Committee convened four times in FY2020.

Date	Agenda Items Related to “Business and Human Rights”	Main Comments (summary)	Attendance Ratio
July 10, 2020	• Dialogue with expert on ESG	[Chair] Issues of environment and human rights in supply chains could become serious risks depending on how to deal with.	97% (64 out of 66)
October 28, 2020	• Interim activities report for FY2020	[Member] Supplier management is challenging, and it is easier said than	92% (61 out of 66)

	<ul style="list-style-type: none"> • Revision of the ANA Group Procurement Policy 	done. There should be effective/strong progress management.	
January 21, 2021	<ul style="list-style-type: none"> • Report of Survey on Employment Conditions of Foreign Workers • Internal/external Dialogue on ESG management promotion 	[Member] There is a need for further improvement in terms of what should be screened at time of audits, and what terms and conditions to be set out in outsourcing contracts of foreign workers, in order to advance to a next stage.	97% (61 out of 63)
March 17, 2021	<ul style="list-style-type: none"> • Summary for FY2020 and activities planning for FY2021 	[Member] We should ensure being on the right track regarding ESG, while dynamics both domestic and overseas are accelerating.	95% (63 out of 66)

5. Our Due Diligence Process

The ANA Group has established a following mechanism for human rights due diligence, in accordance with the processes detailed in the United Nations Guiding Principles on Business and Human Rights and been working to ensure the due diligence process.



6. Our Human Rights Impact Assessment

In FY2016, the ANA Group assessed the impact of potential human rights risks that our business activities may have in each of our business segments and destination countries (human rights impact assessment) and identified specific priority human rights themes for reducing such risks.

(1) Conducting Human Rights Impact Assessment

The Group identified potential human rights risks that business of the ANA group may have with the support of Verisk Maplecroft and Caux Round Table Japan (CRT Japan) in accordance with the processes described below.

Scope of the Assessment

Business activities	Air Transportation, Airline Related (Airport Ground Support, Aircraft Maintenance, Cargo and Logistics, Vehicle Maintenance, Catering etc.), Trade and Retail, Travel Services
Countries and areas	Japan, UK, France, Germany, Belgium, China, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, Taiwan, Korea, Australia, Canada, USA
Social environmental issues assessed (using Verisk Maplecroft indices)	13 Indices: Child Labor, Decent Wages, Decent Working Time, Discrimination in the Workplace, Forced Labor, Freedom of Association, Collective Bargaining, Migrant Workers, Occupational Health and Safety, Trafficking in Persons, Total GHG Emissions, Air / Water Quality, Corruption

For this assessment, social and environmental risk data provide by Verisk Maplecroft were used. We conducted interviews within the Group by reference to the assessment result and consulted overseas human rights experts (Danish Institute for Human Rights, former member of the UN Working Group on Business and Human Rights, ELEVATE) for advice and identified the following four human rights themes (as well as countries of flight destinations) that the ANA Group should focus on to prevent and reduce human rights risks.

The above set of processes for human rights impact assessment is repeated periodically, to make sure if there are any emerging human rights issue. The most recent one being in 2019 identified "AI and human rights" as new issues, however through dialogues with external experts we confirmed it was not necessary to change current four themes. We have been

working on risk prevention/ mitigation associated with the four themes, as a priority human rights theme of the ANA Group.

(2) Priority Human Rights Themes

We have important responsibility in “safety” and “respecting and paying due consideration to the human rights of our customers and employees of the Group”. We have established organizations dedicated to addressing these themes on an ongoing basis as a priority issue within the ANA Group. These organizations use appropriate management cycles in the handling of risks. We also recognize importance of the following four human rights themes defined in the Group’s supply chains, and have been working on risk prevention/mitigation.

<Theme 1> Respect the Human Rights of Migrant Workers in Japan

<Theme 2> Strengthen Supply Chain Management of In-flight Meals

<Theme 3> Prevent the Use of Airplanes in Human Trafficking

<Theme 4> Anti-Bribery

- Respect the Human Rights of Migrant Workers in Japan

In FY2020 we conducted a survey on employment conditions of foreign workers in 92 companies (ANA Group companies and major companies we outsource services to) utilizing the Global Supply Chain Worker Data Management System.

In order to grasp real employment situation of foreign workers, interviews were conducted with seven foreign workers from 1 Group company and 2 partner companies that provide contract service to the Group companies. (ANA Catering Service CO. LTD Narita factory, on December 15, with 2 workers; Tokyo Operation Partners Co., Ltd., on March 11, with 4 workers; and NT Aqua Twins Corporation, on March 23, with 1 worker) Issues identified in the interviews were promptly addressed for improvement.

- Strengthen Supply Chain Management of In-flight Meals

In FY2020 the ANA Group Procurement Policy, comprised of the Basic Policy and Supplier Code of Conduct Policy has been established based on revision of the previous policies. Through explanatory meetings and orientations for suppliers, we have been asking understanding and compliance with the new Policy and will continuously work towards strengthening supply chain management.

Especially to the supply chain of in-flight meals, we have been collecting information of producers and factories related to food ingredients through the Blue Number Initiative.

- Prevent the Use of Airplanes in Human Trafficking

Recognized that this is one of the material issues that should be addressed by the whole airline

industry, the ANA Group and Narita International Airport Corporation (NAA) co-hosted a seminar on December 10. In the seminar, the International Organization Migration (IMO) and the National Police Agency provided lectures on the reality of human trafficking. To the following panel discussion, discussants were invited from Narita International Airport Corporation (NAA), International Air Transport Association (IATA), Japan Airline Co., Ltd. (JAL), and All Nippon Airways Co., Ltd. (ANA) and a video message from Airline Ambassadors International was also introduced during the discussion, which was facilitated by CRT Japan. There were totally 180 participants. We will also work with government agencies and other airlines to prepare the ground for implementing actions against human trafficking across the entire airline industry and raising deterrent effects.

- Anti-Bribery

Following face-to-face seminars held in 2019, we held on-line seminars in China on competition and anti-bribery laws for ANA Group employees and employees on overseas assignments. Similar on-line seminars were also held in North America. As the impact of COVID-19 continues, we are planning to organize more on-line seminars as well as e-learning programs for Europe and Asia by utilizing on-line.

7. Grievance Mechanism

The ANA Group has set up the ANA Alert, a contact point accessible by all workers engaged in the business operations of the ANA Group, including those working for our partner firms and contractors, to report, notify, or consult not only on compliance-related cases, but also on any human rights concerns. We reassure callers that their privacy as well as that of other parties concerned will be protected and that they will not be unfairly treated for reporting cases. In FY2020, there were 192 calls made to the ANA Alert for reporting or consultation.

In addition to the above, in FY2020 we have started to implement a new grievance mechanism that meets the requirements of the Guiding Principles with the cooperation of Caux Round Table Japan, an independent, third-party organization. We will continue to improve the effectiveness of our grievance mechanism while ensuring effective engagement and dialogue with relevant stakeholders.

8. Training to eradicate forced labor and human trafficking

To ensure that each Group employee has an understanding of the importance of respect for human rights and that s/he embeds that understanding into the Group's day-to-day business operations, we have been providing trainings to raise awareness of human rights risks, including risks of forced labor and human trafficking, to all Group employees.

We organized an annual e-learning program from FY2015 to FY2019 for all employees of the Group companies. In FY2020 we uploaded the e-learning materials actually used for the Group's internal training to the web site to promote and recommend the employees in the ANA Group as well as that of suppliers to take the training. Moreover, additional trainings have been provided to new employees and newly appointed managers at ANA Group, using actual cases to improve their understanding on newly recognized global human rights risks(trends) and issues.

9. Plan for the next year and onward

In FY2019, the ANA Group established the medium- to long-term goals to enable systematic operation of a management cycle for "business and human rights". As continuous commitments to 2030, the goals set forth 'responsibility to respect human rights' and 'promote responsible procurement and supply-chain management'. In FY2020 with concrete Key Performance Indicators (KPI) set down, we operated and managed progress (follow-up assessment) towards achievement of the goals.

In FY2021 we especially focus on human rights of vulnerable people in supply chains, where concerns with uncertainty have been arising due to impact of the COVID-19 infection. Through dialogues with stakeholders, we will continuously make efforts to understand reality of the situation and reduce human rights risks.

A series of activities included in this statement was approved by the Board of ANA Group and signed on its behalf by:



Shinya Katanozaka

President and CEO

ANA HOLDINGS INC.

September 28, 2021