

ANA GROUP MODERN SLAVERY STATEMENT

(Year ended March 2024)

1. Introduction

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 and discloses the steps taken during the year ending 31 March 2024 to prevent modern slavery and human trafficking in the ANA Group ("we") and our supply chains.

2. Business and Supply Chains

The ANA Group operates within the air transport sector and consists of ANA HOLDINGS INC., 55 subsidiaries, and 13 affiliated companies. We have a consolidated workforce of 41,225 employees and with the air transportation business as our core, we operate the airline-related business such as airport ground support services, travel services, and trade and retail. With regard to the air transportation business, we operate flights to a total of 106 destinations, including 53 domestic and 53 international destinations (all as of March 31, 2024). More detailed information on our organization 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.

Centering on our air transportation business, we are engaged in global procurement activities with a focus on aircraft, fuel, and in-flight goods and have cultivated collaborative relationships with a large number of business partners, contractors, and suppliers across our supply chains to provide comfortable air services. We request all our partners and suppliers to appropriately address human rights issues in line with ANA Group policies described below.

3. Policies in Relation to Modern Slavery and Human Trafficking

In April 2016, the ANA Group established 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 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. In July 2023, the ANA Group revised and greatly expanded the content aiming to respond to changes in the environment surrounding business and human rights.

The policy covers all individuals and groups that may be affected by 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 adopt similar policies. The policy was drafted with input from external human rights experts including Caux Round Table Japan ("CRT Japan") and approved by the Board of Directors for its development and disclosure.

In the following policies, the ANA Group declares its commitment to prevent and eliminate any form of modern slavery and human trafficking in its business and supply chains.

ANA Group Policy on Human Rights is available at

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

- ANA Group's Social Responsibility Guidelines

The ANA Group laid down the Social Responsibility Guidelines as a code of conduct for all of our Group executives and employees in 2014. In section 4 titled "Respect human rights and diversity," the Guidelines indicate "compliance with the International Covenants on Human Rights and other international human rights standards, as well as relevant laws, regulations, and social norms," and no tolerance for "child labor and forced labor within the Group and transaction with any company engaging in such labor." We provide e-learning programs available for all of our executives and employees to deepen their understanding of the contents covered by the Guidelines and training for 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 will contribute to the creation of its social value not only by providing safe and secure services but also by taking initiative in local and global procurement activities with consideration for both the environment and society. In 2020, to promote sustainable procurement activities in our entire supply chains, we revised policies and newly established the ANA Group Procurement Policy. More detailed information on the Group Procurement Policy is available at

https://www.ana.co.jp/group/en/csr/supply_chain_management/

This policy consists of the Basic Procurement Policy and Supplier Code of Conduct and requires suppliers' "responsible procurement activity in consideration of its impact on human rights," including respect for human rights and elimination of discrimination, elimination of forced labor, and child labor, respect for freedom of association and rights to bargain collectively, respect for foreign nationals and migrant workers, avoidance of aiding in human

rights violations, ensuring safe and sanitary work environment, and respect for the rights of indigenous peoples. The policy is further used as a benchmark in the selection of business partners as well as a tool for periodic post-selection monitoring. When deviations are identified, we provide feedback, including confirmation of improvement plans, and when deemed necessary, we conduct investigations of Tier 2 and Tier 3 suppliers to ensure risk management throughout the supply chains. These policies are available at

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

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

4. Governance Structure to Respect Human Rights

ANA HOLDINGS INC.'s Sustainability Promotion Department is dedicated to advance the ANA Group's initiatives to respect human rights, including modern slavery and human trafficking. Also, 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 relevant bodies. Particularly important issues are further brought before the Board of Directors. Involving top management and gaining their commitment, we are promoting respect for human rights.

In FY 2021, ANA HOLDINGS INC. appointed Chikako Miyata as Executive Vice President and Group CSO (Chief Sustainability Officer), responsible for overseeing overall human rights initiatives throughout the ANA Group. In addition, each Group company has an ESG Promotion Officer (EPO: officers responsible for promoting ESG management) and each Group company and department has an ESG Promotion Leader (EPL: leaders for promoting ESG management) to promote initiatives across the ANA Group.

- Group ESG Management Promotion Committee

ANA HOLDINGS INC. has established the Group ESG Management Promotion Committee, which is placed under the supervision of its President and CEO and presided over by the CEPO (Chief ESG Promotion Officer). The committee is comprised of full-time directors, senior vice presidents, 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 a year for timely discussions not only on "business and human rights," but also on a comprehensive range of topics including environmental impact reduction initiatives, risk management based on risk mapping, and

stakeholder dialogues. Important issues linked to management strategy are proposed to the Group Management Committee and brought before the Board of Directors to ensure smooth coordination for activity implementation. Group ESG Management Promotion Committee convened four times in FY2023.

The EPOs of all Group companies, who are responsible for promoting ESG management, including business and human rights, attend the committee. Through the EPOs, the discussion contents at the committee are shared with the entire group, enabling each company to implement necessary measures in close collaboration with the EPO and EPL.

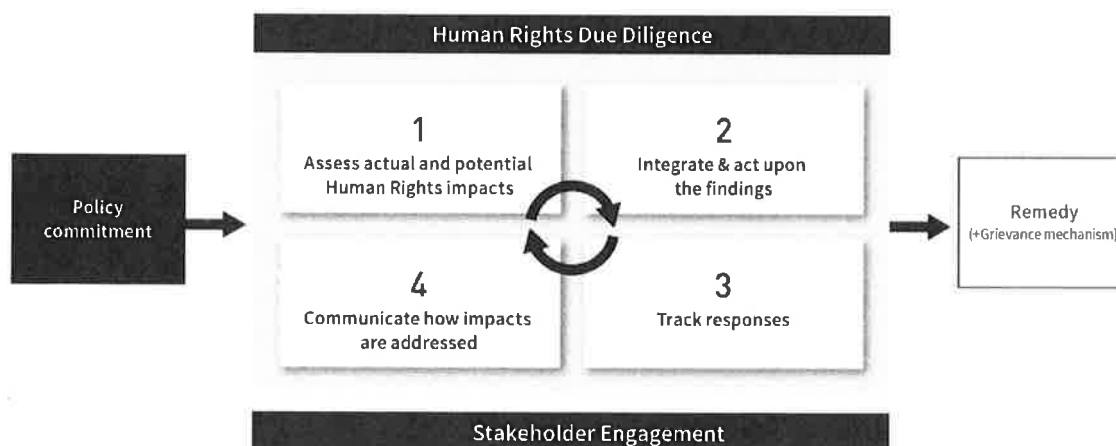
Date	Agenda Items Related to “Business and Human Rights”	Main Comments (summary)	Attendance Ratio
July 21, 2023	<ul style="list-style-type: none"> • Latest trends and working environment regarding foreign workers and initiatives for safe recruitment channels 	<ul style="list-style-type: none"> • It is important to enhance recruitment channels and the working environment to turn foreign workers into a competitive workforce within the group. (CEO) • The ANA Group needs to have a firm support system, to create a cooperative relationship such as support by all employees, and to ensure that foreign workers do not fall into a vulnerable position. (Committee member) 	97% (67 out of 69)
October 24, 2023	<ul style="list-style-type: none"> • Respect for the human rights of foreign workers and understanding of the working environment • Current status and future prospects for the employment of foreign workers within the ANA Group 	<ul style="list-style-type: none"> • The response rate for the survey of foreign workers, including those at contractors, was 92%, which is high enough, but could be higher. Expect an increase in the survey response rate by better informing them that their completion of the survey would lead to better treatment of themselves. This initiative should be continued. (CEO) 	97% (68 out of 70)
December 25, 2023	<ul style="list-style-type: none"> • Dow Jones Sustainability Indices (DJSI) 2023 	<ul style="list-style-type: none"> • ESG indicators are very important equity indicators from an investor's perspective. Gap analysis is necessary where scores are low, 	96% (67 out of 70)

	<ul style="list-style-type: none"> • Non-financial information disclosure legislation (trends in standards development, major required actions, etc.) 	but there are some differences between Japanese business practices and Western standards. While acknowledging areas not meeting global standards, the ANA Group should highlight areas of excellence in its initiatives. (CEO)	
March 19, 2024	<ul style="list-style-type: none"> • Survey on the employment status of foreign workers 	<ul style="list-style-type: none"> • It is important to periodically confirm the working environment for foreign workers. Although the survey this time was an interview with businesses regarding the employment environment for foreign workers, direct interviews and surveys with foreign workers should continue to be conducted. (CEO) 	91% (64 out of 70)

In addition, the "FY2023-2025 ANA Group Corporate Strategy," formulated in 2023, includes "respect human rights across the supply chain" as an important ESG management initiative. We will continue to ensure respect for human rights in connection with our corporate activities in accordance with the UN Guiding Principles on Business and Human Rights.

5. Due Diligence Process

In accordance with the procedures detailed in the UN Guiding Principles on Business and Human Rights, we have established the following human rights due diligence mechanism and are promoting a management system and cycle to ensure human rights are respected.



- Policy commitment and communication

The ANA Group has formulated the ANA Group Policy on Human Rights and various other policies related to human rights.

Information about these policies and the ANA Group's efforts in relation to human rights is communicated to all executives and employees of the ANA Group. For example, education and training on "business and human rights" is provided each year to new employees as well as new managers and directors. We have also prepared an e-learning program with content related to "business and human rights," and we are creating an environment that allows all Group employees to take part in the program. We also regularly approach our business partners (contractors and suppliers) based on these policies.

- Identification, analysis, and assessment of adverse human rights impacts

In 2016, 2019, and 2022, we conducted human rights impact assessments to identify important human rights themes in the supply chain and to address each of the identified themes.

We conduct an annual survey of the employment status of foreign workers in our group companies and suppliers. Based on the survey results, CRT Japan conducts an anonymous survey of foreign workers, verifies the responses, and identifies responses of concern, and if there are responses of great concern, conducts an interview survey at the company where the foreign worker works. In case of human rights violations, we have established a management system to take appropriate actions. In addition, each year we hold regular dialogue with international human rights experts and receive objective assessments and advice on the ANA Group's activities

- Implementation of appropriate measures

The ANA Group addresses important human rights themes in an appropriate manner by integrating the results of human rights impact assessments into a process of action.

- Follow-up assessment on the effectiveness of actions

In FY2019, the ANA Group established medium- to long-term goals for "business and human rights" to enable the systematic operation of a management cycle. Furthermore, in the FY2023- 25 ANA Group Corporate Strategy "respect for human rights across the supply chain" is one of the major initiatives for promoting ESG management, and we will continue to evaluate and verify the effectiveness of our activities while obtaining the advice of third-party experts. We will also consider formulating more specific key performance indicators (KPIs).

- Information disclosure outside the ANA Group

In 2018, the ANA Group became the first Japanese company to publish a human rights report, and since then has continued to publish a report regularly. The ANA Group also issues a statement under the Modern Slavery Act 2015 enacted in the United Kingdom as well as a statement under the Modern Slavery Act 2018 enacted in Australia. We will also ensure reliable reporting under the EU Corporate Sustainability Reporting Directive (CSRD), which will come into force in the future.

- Access to remedy

To further enhance the effectiveness of our respect for human rights, the ANA Group has established multiple contact points for receiving concerns and complaints from stakeholders. In addition to the existing contact points, in 2020 we launched a new grievance mechanism that complies with the UN Guiding Principles on Business and Human Rights called "Ninja," which is a contact point operated by CRT Japan, an independent, third-party organization.

6. Initiatives on Priority Human Rights Issues Identified from Human Rights Impact Assessments

In FY2016, ANA HOLDINGS INC. assessed the impact of potential human rights risks from ANA Group business activities across all ANA Group business segments and flight destination countries, using Verisk Maplecroft's social and environmental risk data to identify the human rights issues, in cooperation with CRT Japan. We conduct human rights impact assessments regularly. In FY2019 we confirmed new human rights issues by re-performing the same procedure and having dialogue with external experts.

In FY2022, given the ever-changing circumstances surrounding our business, we re-performed an impact assessment to identify potential human rights risks and environmental risks from the ANA Group's business activities with support from third-party organizations, CRT Japan and Conservation International Japan, to continue prioritizing our efforts to address human rights impacts, such as modern slavery. Building upon the result of the FY 2016 assessment, we conducted the FY 2022 impact assessment in the form of a collaborative workshop. This engaged more than 35 Group companies (air transportation, air transportation-related, trading, etc.) and ANA HOLDINGS INC.'s internal departments, to obtain insights closely aligned with the reality of the current environment surrounding the Group's businesses and operations. Through discussions, participants effectively identified human rights risks present within the Group's supply chains.

Please see page 18 of the Human Rights Report 2023 for the scope and process of the Human Rights Impact Assessment conducted in 2022. The potential risks identified for each value chain during this Human Rights Impact Assessment workshop are listed on the right.

Subsequently, we sought advice from CRT Japan and international experts, and their insights contributed to the identification of the following five human rights issues that the ANA Group will focus on to prevent risks.

The Human Rights Report 2023 is available at

https://www.ana.co.jp/group/en/csr/effort/pdf/Human_Rights_Report_2023_e.pdf

Examples of Main Potential Risks Identified in Step 1

	Human Rights	Environment
Procurement/ Production	<ul style="list-style-type: none"> Employment and work environment of foreign workers (including technical interns)* *Target: Domestic and overseas suppliers 	<ul style="list-style-type: none"> Environmental impact due to wastewater from maintenance factories Electricity usage during ripening of imported bananas
Sales/ Business	<ul style="list-style-type: none"> Data privacy management and protection of customer information Human rights violations due to discriminatory expression in advertising Employment and work environment of foreign workers (including technical interns)* *Target: Domestic and overseas contractors, IT workers, etc. involved in systems 	
Logistics/ Transportation	<ul style="list-style-type: none"> Complicity of pilots and flight attendants in transport of illegal goods and human trafficking Employment and work environment of foreign workers (including technical interns)* *Target: Domestic and overseas contractors, subcontractors, and subsequent subcontractors, etc. 	
Waste/ Recycling		<ul style="list-style-type: none"> Environmental impact due to food loss and food waste Environmental impact due to chemicals used in building maintenance Recycling of industrial waste
Other	<ul style="list-style-type: none"> Respect for human rights in new business areas (use of AI, metaverse*, etc.) *Metaverse: three-dimensional virtual space or service constructed inside a computer Discrimination during recruitment and differential treatment due to employment status, etc. 	

• Priority human rights issues

The paramount human rights theme for an airline is "safety." We also have an important responsibility in respecting and paying due consideration to the human rights of our customers and employees. We have set up dedicated organizations within the group to address these themes and respond to risks based on appropriate management cycles. Going forward, we will continue to focus on these issues. Furthermore, through a human rights impact assessment conducted in 2022 and a subsequent review, we identified the priority human rights issues described below based on the level of response within the ANA Group. We are making efforts to prevent risks from materializing while strengthening our cooperative relationships with business partners (contractors and suppliers).

<Issue 1> Respect the Human Rights of Migrant Workers Working at Contractors and Vendors in Japan and Overseas

We will expand our scope of determining the work environment of foreign workers from group companies to contractors and vendors in both Japan and overseas and will make efforts to promptly improve the work environment when a problem is identified.

For more details, please see pages 21-28 of the Human Rights Report 2023.

<Issue 2> Identify Human Rights Issues and Environmental Burdens in the Supply Chain

We must strengthen supply chain management not only for in-flight meals, but also for our business as a whole. In addition, we must check whether there are any risks not only from a human rights perspective but also from an environmental perspective

For more details, please see pages 29-32 of the Human Rights Report 2023.

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

We will work to prevent services provided by airlines from being unintentionally used by third parties for human trafficking, and we will also promote external awareness of this by stepping up our external communication.

For more details, please see pages 33-34 of the Human Rights Report 2023.

<Issue 4> Protect Customer Information and Give Consideration to Privacy

We will not only comply with laws and regulations, but will also take into account the demands of society regarding the use of customers' personal data not only in the airline business but also in the platform business. In 2023, we established a dedicated team to promote action on specific matters.

For more details, please see page 35 of the Human Rights Report 2023.

<Issue 5> Respect Human Rights When Providing AI, Metaverse, and Other Services

We will respond to human rights risks such as slander and impersonation of others based on assumptions of risks that may arise in the future in the three-dimensional virtual space created on the internet and in its services.

For more details, please see page 36 of the Human Rights Report 2023.

7. Grievance Mechanism

The ANA Group has set up multiple contact points accessible by all workers engaged in the business operations of the ANA Group, including those employed at our partner companies and contractors, to report, notify, or consult not only on compliance-related cases but also on 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 FY2023, a total of 273 calls were made to a contact point, ANAAlert, for reporting or consultation. In addition, in FY2020, we introduced a new grievance mechanism, "Ninja," developed in collaboration with CRT Japan to align with the requirements of the UN Guiding Principles on Business and Human Rights. In FY2023, we received seven reports made from rights-holders via Ninja.

Engaging with stakeholders, we will continue to improve the effectiveness of our grievance mechanisms and identify potential risk factors at an early stage to address them appropriately.

<Ninja> Reports related to whistleblowing

Six out of the seven reports received were all related to whistleblowing from ANA Group companies and therefore were transferred to the department in charge, where they were appropriately addressed.

<Ninja> Human rights issue related to Technical Intern Trainee

In July 2023, we received a post on "Ninja" from foreign workers at a partner firm stating that wages at the firm were lower than those at other airports and that overtime wages were not being paid. We confirmed through an ANA Group company associated with the partner firm that in accordance with contracts. Meanwhile, CRT Japan, a third-party organization, conducted direct dialogues with foreign workers at the partner company to further clarify the actual workplace conditions and identified no human rights violations. On the other hand, foreign workers voiced concerns and dissatisfaction about their work and living environments. In response to these comments, remedial measures were implemented in August 2023, including making pay slips available in multiple languages and improving the living environment. In September 2023, the partner firm notified all workers in multiple languages about the post to NINJA and the remedial measures taken and re-informed them about the grievance mechanism "Ninja". We have received no new posts regarding this matter from workers at the partner firm since then.

For more details, please see pages 39-40 of the Human Rights Report 2023.

8. Dialogue with Experts

Continuing from the previous year, we engaged in dialogues with overseas experts as part of our efforts to verify the effectiveness of the ANA Group's human rights due diligence procedures and results and to consider direction for future initiatives.

In October 2023, we held a dialogue with the United Nations Development Programme and the World Benchmarking Alliance on the theme of the ANA Group's progress in ESG management. Regarding respect for human rights, we received advice on what is needed to identify human rights and environmental issues along the value chain and what is needed when addressing climate change and human rights due diligence together, concerning the results of our FY2022 risk assessment. Also in December 2023, we discussed the progress of the ANA Group's ESG management with overseas ESG-related investors and experts mainly from the U.K., Switzerland, and France.

Through the series of dialogues above, the ANA Group's engagement with rights-holders, both in terms of its human rights due diligence process and grievance mechanisms, was positively

recognized by many experts. In the dialogue with the World Benchmarking Alliance, we received endorsement of our approach to identifying human rights issues and developing internal management systems through impact assessments.

On November 29, 2023, at the UN Forum hosted by the United Nations in Geneva, our Group CSO Chikako Miyata was invited to speak at a session to introduce a case study of the ANA Group's initiatives on engagement with rights-holders. Afterward, participating stakeholders provided feedback that the ANA Group is steadily taking steps in the right direction and that they expect us to continue our efforts and maintain our leading position.

9. Training

To ensure that all ANA Group employees respect human rights in their day-to-day business operations, we provided training to raise awareness of human rights risks including slavery and human trafficking.

Since 2015, we have organized an annual e-learning program for all the Group employees. From FY2020, the e-learning materials used for the Group's internal training are disclosed on our website. We encourage not only Group employees but also suppliers to take the training and 177 companies completed it in FY2023. Moreover, the CSO provided a lecture to newly appointed directors and auditors of the ANA Group on global trends and issues related to human rights as well as examples relevant to their daily operations.

10. External Engagement Activities

Following the previous year, ANA HOLDINGS INC. participated in the Stakeholder Engagement Program (Human Rights Due Diligence Workshop) organized by the Nippon CSR Consortium, with CRT Japan serving as the secretariat, from June to July 2023. NGOs/NPOs and experts raised a wide range of issues, focusing on human rights issues drawing attention in Japan and abroad, which provided knowledge on human rights necessary for conducting human rights due diligence as required by the UN Guiding Principles on Business and Human Rights. We also discussed human rights issues in the transportation industry with other participating transportation and logistics companies. We are promoting human rights initiatives while utilizing opinions from external stakeholders obtained from the engagement.

In October 2023, ANA HOLDINGS INC. participated as a presenter at the Global Conference on Business and Human Rights hosted by CRT Japan, where we presented our implementation of

human rights due diligence and remedial actions as a part of the grievance mechanism in FY2023. Furthermore, international human rights experts, representatives of human rights NGOs and NPOs, and other participating companies shared information on the latest global trends, views on business and human rights, and examples of human rights due diligence initiatives at a company level, which helped us deepen the understanding of global trends and business and human rights issues requiring urgent attention.

11. Plan for the next year and onward

In FY2019, the ANA Group established medium- to long-term goals to enable the systematic operation of a management cycle for "business and human rights." As continuous commitments to 2030, the goals set forth a responsibility to "respect human rights" and "promote responsible procurement and supply chain management." In FY2023, we operated and managed progress (follow-up assessments) toward achieving the goals.

In FY2024, we will pay closer attention to the human rights risks of rights-holders who are placed in vulnerable positions on the value chain, continue to identify the employment status of foreign workers in our Group and contractors, and strive to identify the actual situation and mitigate risks through dialogue with rights-holders. In addition, we will aim to develop safe recruitment routes for foreign workers and create a safe employment and working environment. With regard to the grievance mechanism, we will continue to address the voices of rights-holders appropriately.

A series of activities included in this statement was approved by the ANA HOLDINGS INC.'s Board of Directors and signed by:



Koji Shibata

President and CEO
ANA HOLDINGS INC.
July 30, 2024