

# **ANA GROUP MODERN SLAVERY STATEMENT**

## **(Year ended March 2023)**

### **1. Introduction**

This statement has been published in accordance with the Modern Slavery Act 2018 and discloses the steps taken during the year ending 31 March 2023 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., 54 subsidiaries, and 13 affiliated companies. We have a consolidated workforce of 40,507 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 108 destinations, including 54 domestic and 54 international destinations (all as of March 31, 2023). 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. Based on this policy, the ANA Group has been advancing initiatives for the respect of human rights. ANA Group Policy on Human Rights is available at

[https://www.ana.co.jp/group/en/csr/effort/pdf/humanrights\\_e.pdf](https://www.ana.co.jp/group/en/csr/effort/pdf/humanrights_e.pdf)

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 three external human rights organizations 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's Social Responsibility Guidelines

The ANA Group has laid down the Social Responsibility Guidelines as a code of conduct for all of our Group executives and employees. 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](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/](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/basic_procurement_policy_en.pdf)

[https://www.ana.co.jp/group/en/csr/supply\\_chain\\_management/pdf/supplier\\_code\\_of\\_conduct\\_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 February 2022, ANA HOLDINGS INC. appointed Chikako Miyata as Executive Vice President and Group CSO (Chief Sustainability Officer), responsible for overseeing overall sustainability initiatives including human rights throughout the ANA Group.

In addition, under the collaboration between the CSO and the Chief ESG Promotion Officer (CEPO), who oversees the Group's risk management and compliance, each Group company has an appointed ESG Promotion Officer (EPO: officers responsible for promoting ESG management). To promote the initiatives across the ANA Group, each Group company and department has an appointed ESG Promotion Leaders (EPLs: leaders for promoting ESG management).

### Implementation Structure



- **Group ESG Management Promotion Committee**

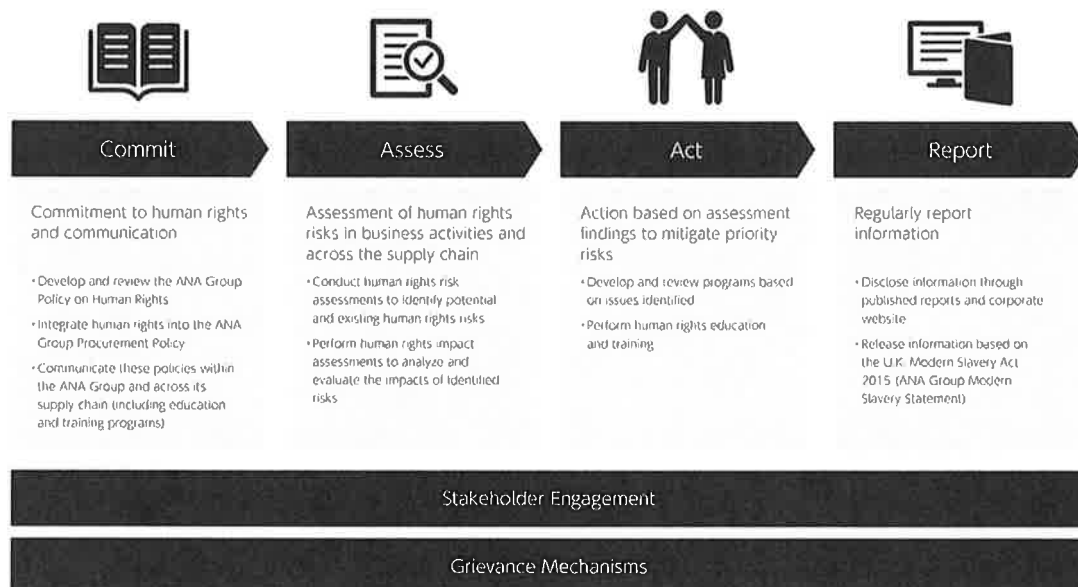
ANA HOLDINGS INC. has established the Group ESG Management Promotion Committee, which is placed under the supervision of its President and CEO and presided over by the CEPO. The committee is comprised of full-time directors, senior vice presidents, full-time auditors of ANA HOLDINGS INC., and executive 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. 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 for activity implementation. Group ESG Management Promotion Committee convened four times in FY2022.

Date	Agenda Items Related to “Business and Human Rights”	Main Comments (summary)	Attendance Ratio
July 13, 2022	Response to the letter regarding the Technical Intern Trainee at Narita Airport	Understood that efforts have been made to respond to the letter regarding the technical intern trainee at Narita Airport. Continue to make efforts to identify the situation of foreign workers.	99% (67 out of 68)
October 21, 2022	Human rights and environment due diligence workshop	The human rights and environment due diligence workshop is a very good initiative. The exchange of opinions among representatives from each group company and department was a	91% (62 out of 68)

		significant achievement.	
January 26, 2023	Survey on the employment status of foreign workers	Surveying the employment status of foreign workers is beneficial because it puts pressure on the contractors in a healthy way. The survey needs to be continuously conducted.	97% (66 out of 68)
March 24, 2023	Activity Summary for FY2022 and Activity Plan for FY2023	Further dialogue with each division on the five human rights issues to be addressed in FY2023 and beyond. It is also an interesting new perspective on AI and human rights.	93% (63 out of 68)

## 5. Due Diligence Process

The ANA Group has established the following mechanism for human rights due diligence in accordance with the processes detailed in the UN Guiding Principles on Business and Human Rights and we have been pursuing our human rights activities accordingly.



## 6. Human Rights Impact Assessment

### (1) Initiatives on Priority Human Rights Issues

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.

## 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	Japan, UK, France, Germany, Belgium, China, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, Taiwan, Korea, Australia, Canada, USA
Social and 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

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, as in FY2021, we continued to address the following four supply chain issues identified from the above impact assessment.

- <Issue 1> Respect the Human Rights of Migrant Workers in Japan
- <Issue 2> Strengthen Supply Chain Management of In-flight Meals
- <Issue 3> Prevent the Use of Airplanes in Human Trafficking
- <Issue 4> Anti-Bribery

- Respect the Human Rights of Migrant Workers in Japan

In FY2020, we used the Global Supply Chain Worker Data Management System to conduct a survey of the employment status of foreign workers at ANA Group companies and a total of 92 major contractors. In FY2022, we conducted our second survey covering 40 group companies and 127 major contractors. As a result, we confirmed the employment of 5,967 foreign workers from 67 countries. Based on this result, in March 2023, we conducted direct interviews, together with a third-party organization, with foreign workers (technical intern trainees and specified skilled workers) in a major contractor where potential human rights risks were identified, to ascertain the actual working environment. We confirmed that there are no salient human rights issues that require urgent actions and identified areas for improvement in the working environment. We provided feedback on the results of this interview to the contractor and asked them to take action to improve the working environment.

- Strengthen Supply Chain Management of Uniforms, Linens, and in-flight Meals

In FY2020, we revised the existing policies and newly established the ANA Group

Procurement Policy, which consists of the Basic Procurement Policy and the Supplier Code of Conduct. We analyzed priority risk factors in our supply chains and identified uniforms and linen used for in-flight services as high-priority items. Acting on these results, we held briefing sessions regarding the ANA Group Procurement Policy to seven uniform suppliers in Japan in FY2020, nine linen-related suppliers in FY2021, and seven suppliers of tableware and cutlery in FY2022 to ensure that all of our suppliers understood the concept of responsible procurement. Additionally, we conducted ESG surveys of the suppliers at the briefing sessions. Through this process, we were able to understand and evaluate the initiatives taken on by each supplier, offer advice on the intentions of the ANA Group, and strengthen dialogue with all of our suppliers. Furthermore, in FY2021, we enlisted the help of a third-party organization to conduct online interviews focused on production plant workers at our Tier 3 overseas suppliers in Vietnam to better understand our Tier 2 and Tier 3 suppliers.

Regarding in-flight meals, we held briefing sessions for suppliers, promoted understanding of information on producers and vendors related to food ingredients using the system, and asked for understanding and cooperation with the ANA Group Procurement Policy.

- Prevent the Use of Airplanes in Human Trafficking

All Nippon Airways Co., Ltd. continued to operate the program started in 2019 to report potential cases of human trafficking found on flights and collect information from immigration authorities in Europe and the United States. We recognize that this is an important topic that the airline industry as a whole should address, and we will continue to collaborate with authorities and other companies in the industry to ensure that this issue is addressed as a priority across the entire aviation industry, and continue to participate in initiatives that eliminate human trafficking.

- Anti-Bribery

We provided training for newly appointed managers of the Group. In addition, we also provided customized online training to meet the needs of each Group company. A dedicated website has been set up within the Group's shared portal to provide information and materials, and a new inquiry form has been opened to facilitate the implementation of education at each Group company. In FY2022, we provided seminars to a total of 96 employees.

## (2) Impact Assessment Conducted in FY2022

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.

Subsequently, we sought advice from international experts, United Nations Development Programme and World Benchmarking Alliance, and their insights contributed to the identification of the following five human rights issues that the ANA Group will focus on to prevent risks.

Given our important responsibility for "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 issues on an ongoing basis as a priority issue within the ANA Group. These organizations respond to risks based on appropriate management cycles and continue actively addressing them. We also recognize the importance of the following five human rights issues in the Group's supply chains and will work on risk prevention and mitigation.

<Issue 1> Identify the Working Environment Situation of Migrant Workers at Japanese and International Suppliers and Vendors

<Issue 2> Use Customer Information with Respect for Privacy

<Issue 3> Externally Promote Awareness of Human Trafficking

<Issue 4> Identify Human Rights Issues and Environmental Impacts in the Supply Chain

<Issue 5> Address Human Rights Impact when Providing Services Using Ai and Metaverse

## **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 FY2022, a total of 225 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 FY2022, we received four reports made from rights-holders via Ninja.

Furthermore, in addition to reports and consultations received through the above contact points, in FY2021 we received an anonymous letter to the President regarding a concern over unfair treatment of a technical intern trainee.

#### <Ninja> Reports related to whistleblowing

The four 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.

#### <Human Rights Issue Related to Technical Intern Trainee: Anonymous Letter to the President>

In January 2022, we received an anonymous letter addressed to then President Katanozaka, voicing concern about the illegal employment and unfair dismissal of a technical intern trainee working at the Narita International Airport, thus requesting an investigation. In February, given that there were no technical intern trainees employed by the Group companies in the Narita Airport district, we surveyed the partner companies (contractors) on any instances of illegal employment of technical intern trainees. The result concluded that “there is no discrepancy between the technical intern training plan accredited by the Organization for Technical Intern Training and the actual work contents.” Meanwhile, we worked with CRT Japan to conduct anonymous surveys using a QR code for a total of 124 trainees employed at five partner companies and this allowed us to comprehend the ground reality through the voices of rights-holders. As a result, we identified two partner companies that require further in-depth investigation through direct dialogues. In May 2022, we surveyed 33 technical intern trainees and specified skilled workers employed by these partner companies through direct dialogues. We confirmed that none of the problems pointed out in the letter had occurred, and we also interviewed the trainees about their specific concerns and complaints regarding the working and living environment. In cooperation with the two partner companies, we implemented remedial measures. Subsequently, in October, with CRT Japan we conducted a direct follow-up interview for technical intern trainees and specified skilled workers to confirm that their working and living environments had improved as a result of the remedial measures taken.

[https://www.ana.co.jp/group/en/csr/human\\_rights/remedies/pdf/remedial\\_status.pdf](https://www.ana.co.jp/group/en/csr/human_rights/remedies/pdf/remedial_status.pdf)

## 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 2022, 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. In November 2022, we held dialogues with the Business and Human Rights Resource Centre and the World Benchmarking Alliance. In the dialogue with the Business and Human Rights Resource Centre, we received feedback on the ANA Group's commitment to respect human rights. We were commended for our series of direct dialogues with rights-holders, remedial actions, monitoring surveys, and information disclosure in response to the above-mentioned grievances. In the dialogue with World Benchmarking Alliance, we received endorsement of our approach to identifying human rights issues and developing internal management systems through impact assessments.

## **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 168 companies completed it in FY2022. 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 May to July 2022. 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 2022, 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 FY2022. 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 FY2022, we operated and managed progress (follow-up assessment) toward achieving the goals.

In FY2023, 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.

October 31, 2023