

Human Rights Report 2023



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*The series of steps taken was approved by the Board of the ANA Group.

Message from Our CEO

The ANA Group will maintain its “life-long journey” to ensure respect for human rights, which requires a continuous approach.

Due to the unexpected circumstances of the COVID-19 pandemic, people around the world faced many situations that they could never have imagined under normal circumstances.

Although life is at last returning to normal, climate change and global instability continue to threaten the human rights of the most vulnerable people in our society. Under these deplorable circumstances, people’s awareness is changing significantly, and respect for human rights is now considered more important than ever.

During the COVID-19 pandemic, the movement of people was greatly restricted, and the ANA Group experienced its most severe management crisis in its history. Now that we have overcome that crisis, people around the world are realizing firsthand the importance of being able to see each other face to face, and I firmly believe that the corporate value of connecting people, goods, and experiences, which the ANA Group should provide to society, remains unchanged.

The unprecedented challenges we experienced in the last few years have underscored the importance of the ANA Group’s conducting business operations based on respect for human rights.

The Importance of People in the ANA Group

Thanks to all of our ANA Group employees and employees in our supply chain, we were able to overcome this crisis. In the FY2023-25 ANA Group Corporate Strategy, which was formulated in February 2023 as the pandemic recovery phase of our strategy, “people,” who have been at the core of the ANA Group’s value creation, are positioned as a key element in ESG management. In this medium-term corporate strategy, we also made a commitment to invest in human capital in various areas including human resource development, creation

of a sustainable work environment, improvement in people’s well-being and productivity, and ensuring thorough respect for human rights throughout the supply chain.

We at the top level of management are committed to respecting human rights, placing particular emphasis on ongoing human rights due diligence centered on engagement with rights-holders.

The Value of the ANA Group

On the occasion of our 70th anniversary in 2022, which we celebrated with the support of all our stakeholders, we renewed our management vision of the past 10 years: Uniting the World in Wonder - ANA inspires our employees, customers, and society to explore endless possibilities with diverse connections that start in the sky.

Together with our group employees, we conceived of this management vision following the COVID-19 pandemic as a reaffirmation of our responsibility to society and the value of the existence of the ANA Group. This vision embodies our employees’ strong desire to enthusiastically continue to take on challenges and bring smiles to the faces of people by providing new value while working closely with customers and society, filling the world with expectations and joy, and valuing each and every person around the world.

I always remind our employees and executives of the importance of “mutual respect” for each other. It can be said that the actions of each and every group employee based on “respect for human rights” are the key to achieving our group management vision.

In 2018, we were the first Japanese company to publish a human rights report. In that report, we described our duty to address human rights as “a life-long journey that requires



a continuous approach.” We will respond appropriately to changes in the environment, society, and business model of the ANA Group in accordance with the United Nations’ Guiding Principles on Business and Human Rights, which continue to serve as our framework for human rights.

Even at management meetings in recent years, there has been more robust discussion on specific initiatives to address human rights. Through ongoing, active disclosure of information, we are engaging in vibrant dialogue with overseas stakeholders and steadily promoting respect for human rights from a global perspective, including in Europe, where new legislation is being enacted increasingly.

The ANA Group aims to realize our new management vision, “Uniting the World in Wonder,” and to “help to fulfill the hopes and dreams of an interconnected world” in accordance with our mission statement. To achieve these ends, as president and CEO, I will make every effort to continue to lead the ANA Group on the long journey of human rights compliance and take on new challenges.

President and Chief Executive Officer

A handwritten signature in black ink, appearing to read 'Koji Kurata', written over a light blue background with a subtle cloud pattern.



40,507

Consolidated group employees



276

Operational aircraft



38.74

million Passengers flown in FY2022

Domestic services: **34.53** million

International services: **4.21** million



54

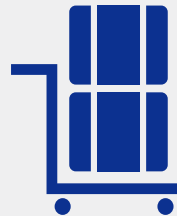
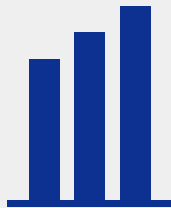
Consolidated subsidiaries

13

Equity-method subsidiaries and affiliates

1.7074

trillion yen
In operating revenues (consolidated)



1.058

million Tons of transported goods in FY2022

Domestic services: **253** k tons

International services: **805** k tons

No. of routes in service (*ANA brand)

International routes: **53**

Domestic routes: **142**



Major Group Companies

ANA HOLDINGS INC.

Air Transportation

ALL NIPPON AIRWAYS CO., LTD.(ANA)
ANA WINGS CO, LTD.
Air Japan Co., Ltd.
Peach Aviation Limited

Airline-Related Businesses

ANA AIRPORT SERVICES Co., Ltd.
*Airport ground support
ANA Base Maintenance Technics Co., Ltd.
*Aircraft maintenance
ANA MOTOR SERVICE CO., LTD.
*Vehicle maintenance
ANA Cargo Inc.
*Cargo and logistics
ANA CATERTING SERVICE CO., LTD.
*Catering
ANA TELEMART CO., LTD.
*Call/contact center

Travel Services

ANA X Inc.
ANA Akindo Co., Ltd.

Trade and Retail

ALL NIPPON AIRWAYS TRADING CO., LTD.

Others

ANA Strategic Research Institute Co., Ltd.
*Research/Think tank
ANA FACILITIES CO., LTD.
*Real estate/Building maintenance

Policies and Structure for Human Rights



■ Basic Stance on Human Rights

The ANA Group promotes initiatives in human rights in accordance with 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 which set the global standards.

■ ANA Group Policy on Human Rights

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. In July 2023, we revised this policy and significantly expanded the content in response to changes in the environment surrounding business and human rights.

The policy applies to all individuals and groups that may be affected by the ANA Group's business activities and business relations. In addition to applying this policy to all employees of the ANA Group, we will continue to encourage our contractors and suppliers to adopt similar policies and to provide them support in their efforts. Threats and assaults against human rights defenders are rampant around the world at present. The ANA Group is concerned about this situation, and firmly states in the policy that it will not tolerate or be complicit in threats, intimidation or attacks against human rights defenders.

The policy was formulated (and revised) and published after receiving advice on its content from an external specialized human rights organizations and after obtaining the approval of the Board of Directors.

ANA Group Policy on Human Rights:

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

Reference: ANA Group Modern Slavery Statements

Each year the ANA Group issues the ANA Group Modern Slavery Statement in accordance with the United Kingdom's Modern Slavery Act 2015. We also ensure reliable reporting in accordance with Australia's Modern Slavery Act that came into effect in January 2019.

ANA Group Modern Slavery Statements:

https://www.ana.co.jp/group/en/csr/human_rights/pdf/modern_slavery_statement.pdf

■ ANA Group's Social Responsibility Guidelines

In 2014, the ANA Group established the Social Responsibility Guidelines as a code of conduct for all executives and employees of the ANA Group. Under No. 4 of these guidelines, "Respect human rights and diversity," the ANA Group makes a commitment to comply with International Covenants on Human Rights and other international human rights standards as well as relevant laws, regulations and social norms, and not to allow child labor or forced labor within the group or to trade

with any company engaging in such labor. The ANA Group also conducts training and education programs to deepen all employees' understanding of the content of the guidelines.

ANA Group Social Responsibility Guidelines:

https://www.ana.co.jp/group/csr/basic_approach/pdf/responsible_guideline_eng.pdf

■ ANA Group Procurement Policy

The ANA Group revised the ANA Group Purchasing Policy, which was formulated in 2013, and in 2020 established the ANA Group Procurement Policy comprised of the Basic Procurement Policy and Supplier Code of Conduct to promote more sustainable procurement activities throughout the supply chain.

This policy is based on the United Nations Guiding Principles on Business and Human Rights, the International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, and the International Covenant on Economic, Social and Cultural Rights), and the core labor standards of the International Labour Organization's ILO Declaration on



Fundamental Principles and Rights at Work, which states people’s fundamental rights at work, as well as conventions pertaining to the human rights of workers including wages and working hours, the United Nations Declaration on the Rights of Indigenous Peoples, and other international norms related to human rights.

The policy requires suppliers to respect and comply with international norms regarding human rights and labor, including the prohibition of child labor and forced labor. This policy, moreover, is used as a benchmark in the selection of business partners as well as a tool for periodic post-selection monitoring. Through these measures, the ANA Group works actively to gain the understanding and cooperation of partner firms.

ANA Group Procurement Policy and Specific Initiatives for Responsible Procurement:

https://www.ana.co.jp/group/en/csr/supply_chain_management/#anc03

Other Policies

In addition to the above, the ANA Group has drawn up various policies as part of an aggressive effort to create a conducive work environment from the perspective of human rights.



Other Policies

Category	Policy Area	Policy Name	Established	Details/Link
E	Environment	• ANA Group Environmental Policies	Established 2017 (revised 2023)	Environmental Policies https://www.ana.co.jp/group/en/csr/environment/policy/#anchor002
		• ANA Group Biodiversity Policy	Established 2023	Biodiversity Policy: https://www.ana.co.jp/group/en/csr/regional_creation/biodiversity/#anc02
S	Safety	• ANA Group Safety Principles, Course of ANA Group Safety Action	Principles: Established 2004 *Supporting the group Course: Established 2011	Safety Principles, Course of Safety Action: https://www.ana.co.jp/group/en/safe/outline/philosophy/
		• ANA Group Health Frontier Declaration	Established 2016	Health Frontier Declaration, Occupational Safety and Health Policy: https://www.ana.co.jp/group/en/csr/human_resources/health_care/#anc01
	• ANA Group Occupational Safety and Health Policy	Established 2007		
	Human Resources and Diversity, Equity & Inclusion (DEI)	• ANA Group Code of Conduct for the Employment of People with Disabilities	Established 2015	Code of Conduct for the Employment of People with Disabilities https://www.ana.co.jp/group/en/csr/diversity_inclusion/promotion_diversity/promoting_employment_of_people_with_disabilities/#anchor002
		• Universal Service Policy	Established 2017	Universal Service Policy https://www.ana.co.jp/group/en/csr/policy/pdf/us_service_policy.pdf
		• ANA Group Diversity, Equity & Inclusion Promise	2015 D&I Declaration formulated (revised 2022)	ANA Group Diversity & Inclusion Promise https://www.ana.co.jp/group/en/csr/diversity_inclusion/promotion_diversity/
	• ANA Group Basic Policy on Respect for Diversity of Sexuality (LGBTQ+)	Established 2022	ANA Group Basic Policy on Respect for Diversity of Sexuality (LGBTQ+): https://www.ana.co.jp/group/en/csr/diversity_inclusion/promotion_diversity/lgbtq/#anchor002	
Others	• ANA Group Communication Declaration	Established 2023	Communication Declaration: https://www.ana.co.jp/group/en/csr/policy/pdf/communication_policy.pdf	
G	Governance	• Fundamental Policy on Corporate Governance	Established 2015 (Revised 2017)	Fundamental Policy on Corporate Governance: https://www.ana.co.jp/group/en/about-us/governance/pdf/governance181130.pdf
		• ANA Group Tax Policy	Established 2021 (Revised 2022)	Tax Policy: https://www.ana.co.jp/group/en/csr/tax-policy/
		• ANA Group Declaration of Information Security	Established 2001 (Revised 2015)	Information Security Declaration: https://www.ana.co.jp/group/en/csr/risk_management/security/#anc02

In the ANA Group, planning and deliberations on policies and various 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 Group Chief Sustainability Officer (CSO) is responsible for the ANA Group’s activities related to human rights. To promote the activities across the ANA Group, an ESG Promotion Officer (EPO, responsible for promoting ESG management) is appointed at each group company, and ESG Promotion Leaders (EPLs, leaders in promoting ESG management) are appointed in each group company and department.

■ Group ESG Management Promotion Committee

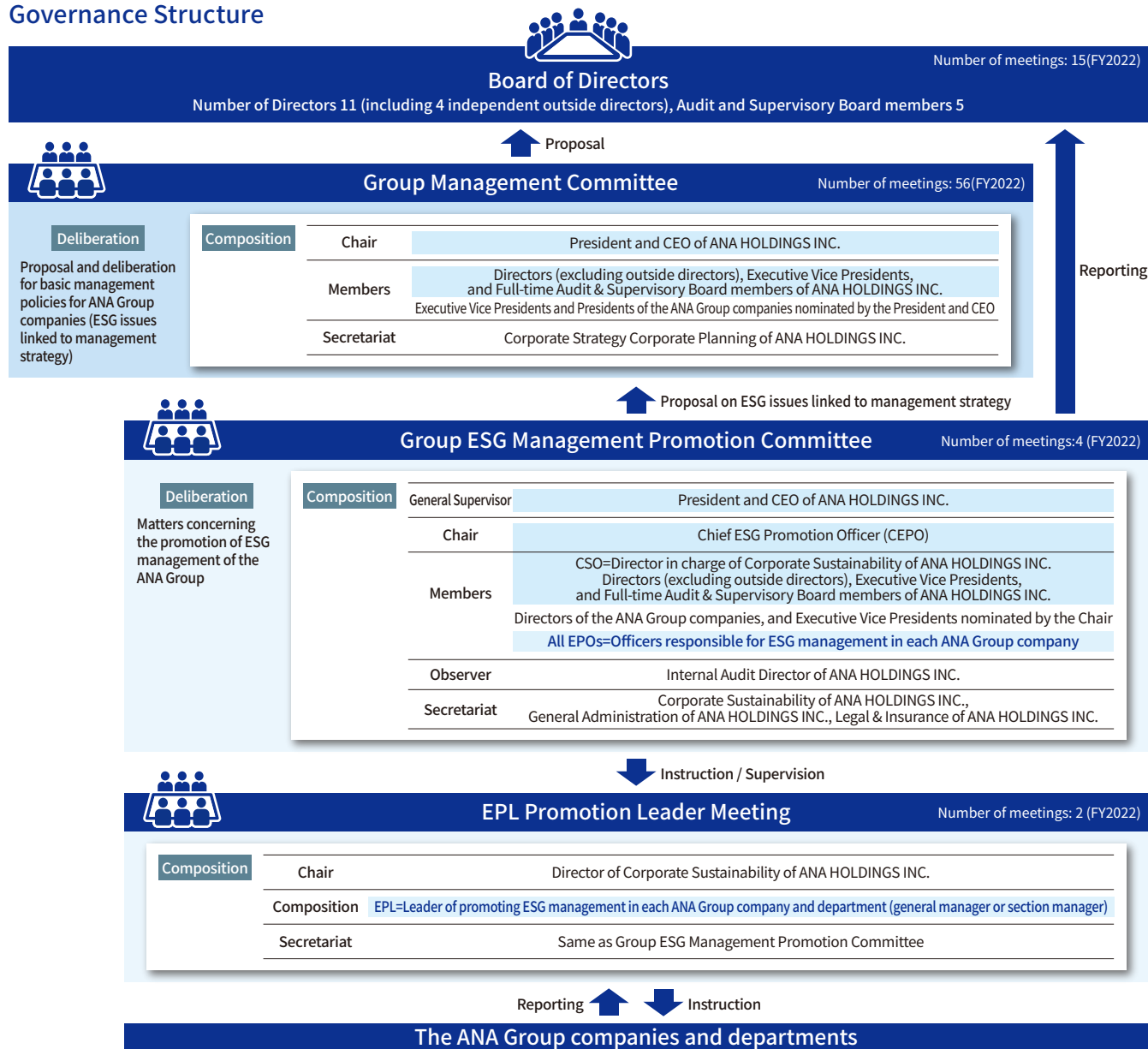
The ANA Group has established the Group ESG Management Promotion Committee, which is placed under the supervision of President and CEO of ANA HOLDINGS INC. and presided by the Chief ESG Promotion Officer (CEPO). The committee is comprised of full-time directors, executive vice presidents, and full-time Audit & Supervisory Board members 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, including efforts in reducing environmental impact, risk management based on risk mapping, compliance, and stakeholder dialogue.

The important issues linked to management strategy are presented for discussion to the Group Management Committee and brought before the Board of Directors to ensure smooth coordination in the implementation of activities.

As officers responsible for promoting ESG management, including “business and human rights,” the EPOs from all group companies participate in the meetings of the Group ESG Management Promotion Committee. Through their participation, the discussions at the meetings are shared across all group companies. The EPOs and EPLs work in close coordination to properly implement necessary measures.

Governance Structure



■ Meetings of the Group ESG Management Promotion Committee

Since 2022, the Group ESG Management Promotion Committee has conducted a total of eight meetings.

Meetings of the Group ESG Management Promotion Committee

Date	Agenda Items Related to “Business and Human Rights”	Main Comments (Summary)	Attendance Ratio
January 20, 2022	<ul style="list-style-type: none"> External evaluation results for main ESG Dialogue with external experts 	[General Supervisor] “Business and human rights” has become a very important term, and at times has led to boycott activities. This is a topic with which we are very familiar.	99% (66 out of 67)
March 17, 2022	<ul style="list-style-type: none"> Summary for FY2021 and activities planning for FY2022 Results of interviews with workers at suppliers 	[General Supervisor] I would like attendants at this meeting to commit to memory the term “business and human rights.”	99% (67 out of 68)
July 13, 2022	<ul style="list-style-type: none"> Human rights/environmental due diligence workshop 1) Response to letters relating to technical intern trainees of partner companies 	[General Supervisor] The due diligence workshop is an excellent initiative. I believe that while it may not seem particularly important at a single business site, when the initiative is shared across the group as a whole, people may realize it is of considerable importance. [Member] It is clear that appropriate responses were given in a proper manner.	99% (67 out of 68)
October 21, 2022	<ul style="list-style-type: none"> Human rights/environmental due diligence workshop 2) FY2022 interim report for activities planning 	[General Supervisor] Various matters were reported and I felt that there was a particularly strong awareness of issues surrounding the employment and work environment of foreign workers.	91% (62 out of 68)
January 26, 2023	<ul style="list-style-type: none"> Results of a survey on the state of employment in the supply chain External evaluation results for main ESG Dialogue with external experts 	[General Supervisor] I would like the survey on employment conditions to be continued. Although we were told that there were no particular issues this time, I would like to ask you to do careful follow-up at each workplace.	97% (66 out of 68)
March 24, 2023	<ul style="list-style-type: none"> Summary for FY2022 and activities planning for FY2023 	[General Supervisor] As resources become increasingly tight, the demand for foreign workers is expected to increase. I would like to ask you to monitor the work environment even more than you have in the past.	94% (64 out of 68)
July 21, 2023	<ul style="list-style-type: none"> Initiatives for determining the latest trends and working environment of foreign workers and safe employment channel 	[Chair] To develop foreign workers within the company as a substantial workforce, improving recruitment and the work environment to support this is vital. [Member] In the ANA Group, it is important to create relationships that enable foreign workers to work together in an environment where they never feel vulnerable but have a strong support system, and where all employees support each other.	97% (67 out of 69)
October 24, 2023	<ul style="list-style-type: none"> Determine the conditions of respect for the human rights of foreign workers and the work environment Current status and future outlook regarding the utilization of foreign workers within the ANA Group 	[Chair] The 92% response rate for the questionnaire survey of foreign workers, which included contractors, was sufficiently high. However, the rate could be higher. It would be good to let respondents know that their responses to the survey will lead to improvement in their own treatment. I would like to see the survey continued.	97% (68 out of 70)

■ ESG Promotion Officer (EPO), ESG Promotion Leader (EPL)

In the ANA Group, an ESG Promotion Officer (EPO) is appointed at each group company as the person responsible for promoting ESG management. Furthermore, in each group company and department, ESG Promotion Leaders (EPLs) are appointed to lead ESG activities in their respective organizations.

Decisions made at the Group ESG Management Promotion Committee and the Group Management Committee are implemented across the ANA Group as a whole in close coordination with the EPOs and EPLs. We also actively create opportunities to discuss each human rights theme we are tackling with relevant contractors and suppliers. By sharing ANA Group policies and the importance of taking active steps to follow them, we are enhancing the effectiveness of our human rights measures.

As mentioned above, the EPOs are members of the Group ESG Management Promotion Committee, and as such, information is shared with them on policies and challenges discussed at meetings of the committee. The EPLs meet twice a year at the ESG Promotion Leader Meeting where they share information not only on “business and human rights,” but also on a comprehensive range of topics including the environment, risk management, and compliance, to ensure activities are properly implemented.

■ Group Management Committee

The Group Management Committee, chaired by the President and attended by full-time directors and full-time Audit & Supervisory Board members, was established to play a complementary role to the Board of Directors. The substantial transfer of decision-making authority over operational matters to the Group Management Committee (with decisions made reported to the Board of Directors) means that management issues can be discussed more rapidly and in more detail, and that the management process can be expedited.

To further promote ESG management, in FY2019 the ANA Group set down medium- to long-term goals for ESG, which include “business and human rights,” and obtained approval of these at a meeting of the Group Management Committee.

In addition, FY2023-25 ANA Group Corporate Strategy, which the Group Management Committee deliberated on, includes “respect for human rights across the supply chain” as a priority initiative in ESG management, and the committee confirmed that the ANA Group will continue to promote respect for human rights in our corporate activities in accordance with the United Nations Guiding Principles on Business and Human Rights (see P.10 for details).

■ Commitment from Senior Management

To clarify the responsibility of senior management in corporate business performance, the ANA Group has introduced performance-based executive compensation and the following benchmarks concerning “business and human rights” are linked to the remuneration of directors.

- Employee satisfaction: Achievement of the target number of points in the ANA’s Way Survey, an internal group survey
- Safety: Payment reduction indicator in the event a security or safety incident that has a major impact on society occurs
- External ESG ratings: Inclusion in the Dow Jones Sustainability World Index (DJSI World), rating of A- or higher by the Carbon Disclosure Project (CDP)*

* These external assessments always reflect the latest global trends and requests from stakeholders, and also allow us to measure the ANA Group’s promotion of ESG management relative to other companies.

ANA HOLDINGS INC. has been selected for inclusion in the DJSI World Index for six consecutive years since 2017, and received industry-best scores in 2017, 2018, 2020, and 2021. For human rights questions alone, ANA HOLDINGS INC. achieved industry-best scores in 2016, 2017, 2019, 2021, and 2022. In addition, CDP selected ANA HOLDINGS INC. for CDP Climate Change A List in 2022.



■ Important issues for the ANA Group (Materiality)

Taking into consideration the opinions of external stakeholders, the ANA Group conducts a mapping analysis based on the two axes of “impact on the ANA Group's business operations” and “impact on stakeholder interest, society and the environment” to identify key issues (materiality). After deliberation on the results at the Group Management Meeting, they are brought

before the Board of Directors where key issues (materiality) are identified. Human rights was identified as one of the key issues, and we have been making various efforts to address this. In July 2020, to address this key issue, we formulated medium- to long-term ESG goals that we aim to achieve by 2050 in efforts to further promote ESG management.

■ Links to the FY2023-25 ANA Group Corporate Strategy

In February 2023, we announced the FY2023-25 ANA Group Corporate Strategy to achieve our medium- to long-term ESG goals. In our consideration of this mid-term corporate strategy, we again confirmed key issues (materiality). Since FY2020, amid the ongoing impact of COVID-19 and unpredictable changes in the environment, the ANA Group has been united in its efforts to overcome the company's difficulties through ingenuity, motivation, and autonomy of each employee. We believe that strengthening investment in human capital, which is the source of generating the “power of people” and “power of the organization,” and promoting reform while allowing diverse human resources to demonstrate their individual strengths will support the medium- to long-term sustainable growth of the ANA Group. We have added “human resources,” which has long been the foundation of value creation for the ANA Group, and we have identified the environment, people (human capital, DEI, human rights), and regional revitalization as key issues for the ANA Group.

ESG-Related Goals to 2050

1. **Reduce CO2 Emissions from Aircraft Flight Operations to net zero**
 - Introduce operational improvements
 - Adopt New Aircraft Technologies, etc.
 - Utilize Sustainable Aviation Fuel (SAF) and other low-carbon
 - Utilize negative emission technologies (NETs)
 - Utilize the emissions trading scheme
2. **Reduce CO2 emissions from all non-aircraft flight operations to net zero**
 - Enhance energy efficiency and upgrade aging facilities and equipment
 - Utilize renewable energy
 - Promote the use of electric vehicles (EVs)/fuel cell vehicles (FCVs) when upgrading airport vehicles
3. **Reduce waste of resources to zero**
 - Switch from single-use plastic products to environmentally friendly materials
 - Promote the recycling of plastic cargo materials
 - Digitize resources such as in-flight magazines, time tables, travel pamphlets, waybills
4. **Reduce food waste by 50%, including food waste from in-flight meals**
 - Monitor the waste of in-flight and domestic airport lounge meals, and optimize the number of meals loaded, etc.

SDG-related Commitments to 2030

1. **Responsibility to respect human rights**
 - Based on the UN Guiding Principles on Business and Human Rights, the ANA Group will make every effort to promote the respect of human rights in our corporate activities
2. **Promote responsible procurement and supply-chain management**
 - Manage procurement in consideration of its impact on the environment and human rights, and build and manage a fair and transparent supply chain
3. **Use innovation to solve social issues**
 - Provide new value through the use of avatars, drones, MaaS, etc. and working in partnership with other industries
4. **Develop human resources for sustainable growth**
 - Develop a personnel force and a sustainable work environment in which employees can raise their productivity and contribute to sustainable corporate growth
5. **Respond to the diversity of our customers**
 - Respect the needs and diversity of each customer and promote universal services in both products and services
6. **Conservation of biodiversity**
 - Promote and expand measures to stop illegal wildlife trade, and contribute to the conservation of biodiversity
7. **Regional revitalization**
 - Contribute to regional revitalization through social contribution activities and solutions for social issues

We identified important issues that the Group should address through the following process:

- 1) We ascertained long-term issues faced by international society and confirmed that they were consistent with our management philosophy and strategy.
- 2) We analyzed whether we could contribute to resolving these issues through our business activities from three perspectives: "Management Philosophy/Strategies," "Strengths of the ANA Group," and "Social Trends."
- 3) We then assessed these issues based on two axes: the impact they have on ANA Group business (management axis), and the impact they have on society and the environment, and the level of stakeholder interest (social axis), and selected those with a high degree of importance as important issues.

Key issues identified have been discussed and deliberated in the Group Management Committee and approved by the Board of Directors.

In addition, under the FY2023-25 ANA Group Corporate Strategy, we aim to contribute to solutions to social issues through our business. As a corporate group indispensable to society, we also aim to promote ESG management while creating ongoing value by strengthening initiatives in our new core issues (the environment, people, regional revitalization, etc.) and the governance structure. In regard to human rights in particular, we have set “respect human rights across the supply chain” as a major initiative and we are promoting activities to achieve that. We have been conducting impact assessments to determine where human rights risks exist in the supply chain and we have been prioritizing issues (see P.17-20 for details).



ESG Management Initiatives in the FY2023-25 ANA Group Corporate Strategy

	Materiality	Main Initiatives	Relevant SDGs
E	Environment	1) Climate change measures, reduction in CO ₂ emissions	
	People (human resources, DEI, human rights)	2) Investment in human capital (human resource development, creation of a sustainable work environment, improvement in people's well-being and productivity)	
S	Regional revitalization	3) Ensuring thorough respect for human rights throughout the supply chain	
		4) Using innovation to contribute to solutions for social problems	
G	Strengthening the governance structure	5) Ensuring appropriate information disclosure and transparency	

Sustainable Corporate Value Creation Through the Simultaneous Creation of Social and Economic Value

ESG Management Initiatives and Achievement of Goals



ANA Group Medium- to Long-term Environmental Goals

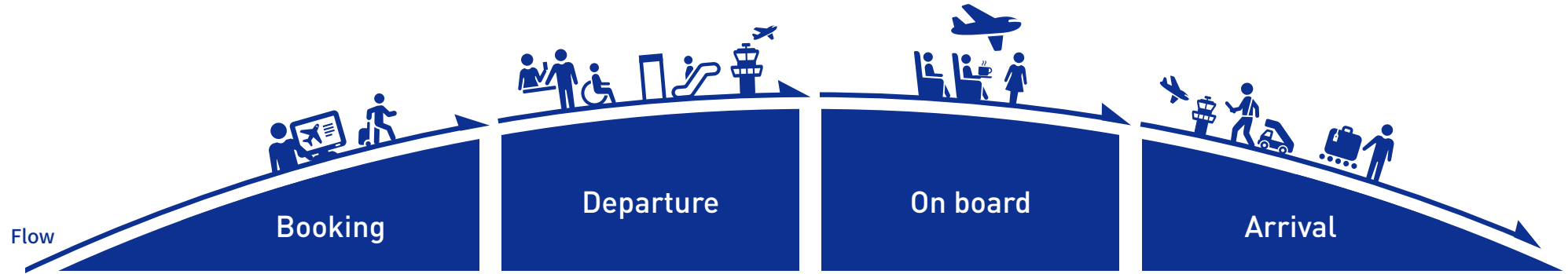
Medium-term Management Goals (External Assessment)

- Selection as a constituent stock of the DJSI World Index
- CDP rating of A- or higher

ANA Group’s Main Activities on Human Rights

	2015 – 2017	2018 – 2020	2021 (single year)	2022 (single year)	2023 (single year)	
Policies	<ul style="list-style-type: none"> Established the ANA Group Policy on Human Rights (2016) Published the ANA Group Diversity & Inclusion Declaration (2015) Established the ANA Group Code of Conduct for the Employment of People with Disabilities (2015) Announced the ANA Group Health Frontier Declaration (2016) 	<ul style="list-style-type: none"> Established medium- and long-term goals on ESG (2019) Established the Universal Service Policy (2018) Revised the ANA Group Procurement Policy (2020) 		<ul style="list-style-type: none"> Established the ANA Group Basic Policy on Respect for Diversity of Sexuality (LGBTQ+) 	<ul style="list-style-type: none"> Revised the ANA Group Policy on Human Rights Established the ANA Group Communication Declaration Revised the ANA Group Environmental Policies Established the ANA Group Biodiversity Policy 	
Assessment and Measures	General	<ul style="list-style-type: none"> Conducted human rights impact assessment and identified three areas of focus (2016) Added the fourth area of focus (prevention of human trafficking) through dialogue (2017) 	<ul style="list-style-type: none"> Conducted human rights impact assessment a second time (2019) 	<ul style="list-style-type: none"> Conducted human rights impact assessment and identified five areas of focus 		
	Foreign Workers	<ul style="list-style-type: none"> Conducted interviews of foreign workers employed by partner firms (conducted every year since 2017) 	<ul style="list-style-type: none"> Organized “Points to Note When Hiring Foreigners” and shared these with all group companies (every year since 2019) Started operation of the grievance mechanism “NINJA” (2020) Started operation of the Global Supply Chain Worker Data Management System (2020) Conducted the “Worker Employment Status Survey” (conducted regularly since 2020) 	<ul style="list-style-type: none"> Conducted a direct questionnaire survey of technical intern trainees in the supply chain (conducted regularly since 2021) 		
	Supply chain	<ul style="list-style-type: none"> Conducted a questionnaire survey of approximately 200 business partner firms for monitoring (2015 - 2017) 			<ul style="list-style-type: none"> Launched supplier management using eBase, a product information database 	
	Human trafficking		<ul style="list-style-type: none"> Conducted workshops on prevention of human trafficking (2018, 2020) Launched in-flight reporting to prevent human trafficking (2020) 			
	Privacy, AI & Metaverse					<ul style="list-style-type: none"> Commenced privacy governance initiatives Commenced dialogue with group companies involved in new business (AI/metaverse human rights risk)
	Other	<ul style="list-style-type: none"> Established the ANA Group Anti-Bribery Handbook (2016) Conducted seminars on anti-bribery (ongoing every year since 2017) Held the ANA Group D&I Forum (ongoing every year since 2015) 	<ul style="list-style-type: none"> Distributed the ANA Group handbook, “Understanding LGBT” to all employees (2018) Established the Group D&I Promotion (current DEI Promotion) 	<ul style="list-style-type: none"> First recipient of the D&I Team Award in Japan (IATA) 	<ul style="list-style-type: none"> Established Group CDO 	<ul style="list-style-type: none"> Launched internal ALLY Activities (ANA Group LGBTQ+Allies)
Dialogue	External	<ul style="list-style-type: none"> Dialogue with human rights experts in Japan (ongoing communication since 2015) Dialogue with human rights experts from abroad (ongoing annually since 2016 as a regular review of a series of initiatives) Interviews with actual victims of human trafficking in Thailand (ongoing from 2017 until 2019) Approaching business partners (contractors and suppliers) based on the policy (every year) Dialogue with workplaces in Southeast Asia and other countries that send workers to Japan, with the aim of determining actual conditions (2017-2019, 2023-) 		<ul style="list-style-type: none"> Dialogue with ESG investors regarding human rights activities (ongoing annually since 2018) Participated in the formulation of the Engagement and Remedy Guidelines with multi-stakeholder involvement (2019) 		
	Internal	<ul style="list-style-type: none"> Commenced human rights e-learning for all ANA Group employees (ongoing since 2015) Conducted in-house training related to business and human rights (conducted annually) 				
Information Disclosure	<ul style="list-style-type: none"> Issued a group statement in accordance with the UK Modern Slavery Act 2015 (issued annually since 2016) 	<ul style="list-style-type: none"> Published the ANA Group Human Rights Report (published periodically since 2016) Submitted a report to the government in accordance with the Australian Modern Slavery Act 2015 (published annually since 2018) 				

ANA Group's business value chain and impact on human rights



Human rights themes and group companies related to the ANA Group aviation services

Booking

Theme Privacy governance

Group companies AKD / ATM / ASY, etc.

P.35

Ground handling

Theme Work environment of foreign workers

Group companies ANAAS, etc.

P.21

Aircraft's stores, In-flight meals

Theme Responsible procurement

Group companies ANATC / ANAC, etc.

P.29

Aircraft maintenance

Theme Responsible procurement of maintenance parts

Group companies LTC / BTC, etc.

P.20

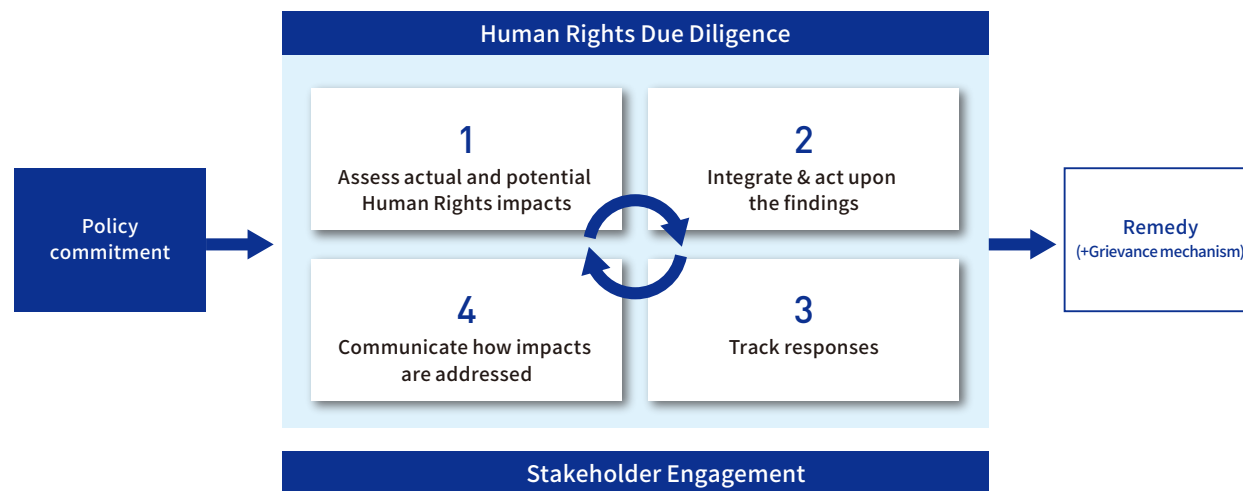
Overall process

<p>Customer service</p> <p>Theme Universal Services</p> <p>Group companies ANA / ANAAS, etc.</p> <p>P.19</p>	<p>Safety</p> <p>Theme Flight safety, etc.</p> <p>Group companies All group companies</p> <p>P.19</p>	<p>Employees</p> <p>Theme Workstyle reforms, support for work-life balance</p> <p>Group companies All group companies</p> <p>P.37</p>	<p>Legal compliance</p> <p>Theme Eradicate corruption</p> <p>Group companies All group companies</p> <p>P.20</p>	<p>Environment</p> <p>Theme Environmental sustainability</p> <p>Group companies All group companies</p> <p>P.20</p>	<p>Human Trafficking</p> <p>Theme Prevent the use of airplanes in human trafficking</p> <p>Group companies ANA, AJX, etc.</p> <p>P.33</p>
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* AKD: ANA Akindo Co., Ltd. ATM: ANA TELEMART CO., LTD. ASY: ANA Systems Co., Ltd. ANAAS: ANA AIRPORT SERVICES Co., Ltd. ANATC: ALL NIPPON AIRWAYS TRADING CO., LTD. ANAC: ANA CATERING SERVICE CO., LTD. LTC: ANA Line Maintenance Technics Co., Ltd. BTC: ANA Base Maintenance Technics Co., Ltd. AJX: Air Japan Co., Ltd.

Management Cycle

In accordance with the UN Guiding Principles on Business and Human Rights, the ANA Group has established a management system and cycle, as described below, 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 (see P.5 for details).

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 (see page 41 for details).

We also regularly approach our business partners (contractors and suppliers) based on these policies (see P.42 for details).

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 (see P.17-20 for details).

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 (see P.44 for details).

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 (see P.21-38 for details).

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 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 (see P. 10, P. 44 for details). 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 United Nations Guiding Principles on Business and Human Rights called “Ninja,” which is a contact point operated by Caux Round Table Japan (CRT Japan), an independent, third-party organization (see P.39-40 for details).

Human Rights Due Diligence





Chikako Miyata
Executive Vice President
Group CSO (Chief Sustainability Officer)
ANA HOLDINGS INC.



Hiroshi Ishida
Executive Director
Caux Round Table (CRT) Japan

Ishida: As laws and regulations related to business and human rights become stricter in Europe and other countries around the world, the ANA Group has invariably focused on respecting human rights based on the Guiding Principles. How do you see the current situation?

Miyata: Up until now, we have focused on creating structures and mechanisms in line with the Guiding Principles. As the next step, we believe it is important to approach rights-holders and resolve the issues identified by human rights due diligence through engagement.

Respect for human rights is a particularly important issue in the supply chain that supports the business activities of the ANA Group. First, we have started by going directly to the site and responding to the situation in wherever we can start of. We are making efforts to directly listen to the foreign workers involved in domestic ground handling and catering operations, and to make necessary improvements accordingly.

Special Discussion

Since 2015, the ANA Group has been building a management structure and implementing human rights due diligence in accordance with the United Nations Guiding Principles on Business and Human Rights (Guiding Principles). ANA Group CSO Chikako Miyata and CRT Executive Director Hiroshi Ishida held a discussion on the topic "Initiatives for Respecting Human Rights Through Engagement with Rights-Holders.*" As an independent third party, CRT Japan provides support to the ANA Group in its initiatives to respect human rights.

* Rights-holders are individuals or social groups that have particular entitlements in relation to duty-bearers (state or non-state including enterprises), and they may be affected by enterprises' activities.(e.g., employees, business partners, customers, communities.)

Ishida: I understand that the ANA Group regularly conducts questionnaire surveys targeting each and every foreign worker, and also has a grievance mechanism called "Ninja" that allows foreign workers to seek advice and voice complaints anonymously in their native language from the workplace at any time.

Miyata: Many Japanese companies at present are finding it difficult to set up a mechanism for dealing with grievances. A grievance mechanism is a necessary construct for implementing human rights due diligence under the Guiding Principles. Furthermore, it is important not only to create a mechanism but also to actually make it work. I realized that we can build relationships of trust with rights-holders by listening to them at the work site and taking steps to respond sincerely.

Ishida: "Duty of care" is a topic of discussion mainly in Europe. I believe that management's commitment to respecting human rights will become important in the future. How are human rights positioned in management and the business strategy in the ANA Group?

Miyata: In view of the trend toward the legislation of human rights due diligence in Europe, I believe it is necessary to address human rights as an important management issue. We are conscious of integrating ESG issues including human rights into our management strategy.

The ANA Group's business is supported not only by our

employees but also by a host of people in the supply chain. In Japan, the labor shortage is an issue, and we need to recruit diverse human resources including foreigners to pursue various roles at ANA. Creating an environment where all people involved in the ANA Group can work enthusiastically will lead to the sustainable growth of the ANA Group.

To promote hiring from overseas, I believe we must take initiative in building a safe, secure employment channel.

Ishida: For the ANA Group, each rights-holder is an important asset - as human capital, and efforts to respect human rights form the foundation for enhancing this important asset.

Miyata: We do not believe that human rights risks will ever be reduced to zero. New issues always arise, so we would like to continue to work steadily with the support of CRT Japan as a third party, to reduce risks through necessary measures and respond appropriately when problems occur.



In accordance with procedures described in detail in the UN Guiding Principles on Business and Human Rights, the ANA Group is building a human rights due diligence framework. Human rights due diligence is an ongoing process whereby a company preventively investigates and identifies issues, corrects these through appropriate procedures, and discloses externally the progress and results of its activities to prevent or mitigate any adverse human rights impact the company may have on society.

■ Human Rights Impact Assessment

In 2016, the ANA Group conducted a human rights impact assessment of the potential human rights risks posed by the ANA Group's business activities in all its business areas and countries where it flies, and identified three human rights themes that we intend to focus on to prevent risks from occurring in the future. The impact assessment was conducted with the cooperation of Verisk Maplecroft and CRT Japan.

Every year since 2017, we have been conducting reviews on important human rights themes with the inclusion of outside experts. In addition, we review, as necessary, the human rights themes we prioritize, taking into account advice obtained through dialogue with investors and risks identified within the group's risk management system. Specifically, at a review with human rights experts in September 2017, human rights experts pointed out that the ANA Group should address the

Process of Human Rights Impact Assessment Conducted in 2016

- 1 We identified potential human rights risks posed by the ANA Group's business activities according to business content and country/region where we operate. Using social and environmental risk data provided by Verisk Maplecroft, we comprehensively identified risks in the course of conducting the assessment.
- 2 In cooperation with CRT Japan, we conducted interviews with each company and department within the group in regard to the management status of risks identified in Step 1. Based on the results, we narrowed down those human rights themes for which we determined a proper internal management structure was lacking.
- 3 We obtained advice from human rights experts regarding the human rights themes narrowed down in Step 2. With the approval of the Board of Directors, we then identified human rights themes that the ANA Group will focus on in future efforts to prevent and respond to risks.

issue of “prevention of human trafficking” as an important human rights theme. After internal discussion and approval, this theme was added as a new priority human rights theme (a total of four themes).

Furthermore, in 2019, a human rights impact assessment was conducted again, using almost the same process as in 2016. As a result, new human rights issues such as “AI and human rights” and “children's human rights” were identified as issues of concern. After dialogue with outside experts, however, we came to the conclusion that we should focus on the four existing human rights themes at this time. In this way, we have continued our efforts on preventing and responding to risks based on the following four themes.

- 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: Eradicate Corruption

■ 2022 Human Rights Impact Assessment

In light of changes in the international environment surrounding business and human rights as well as changes in the ANA Group's business environment and business portfolio, we believed it was necessary to reconsider our priority human rights themes and conducted a human rights impact assessment in 2022. We established a venue for discussing and confirming across the group any concerns that could be potential risk factors in businesses developed and conducted by the ANA Group, including new businesses, from a human rights and environmental perspective in addition to the four existing themes. Representatives from over 35 departments and group companies came together to discuss human rights and environmental risks in their daily work. The discussion was facilitated by CRT Japan and Conservation International Japan.



Discussion of the human rights impact assessment conducted in 2022

- **Verisk Maplecroft**
Verisk Maplecroft is a leading global risk analytics, research, and strategic forecasting company. It provides data-driven solutions and advice on the impact of political, human rights, economic and environmental risks on organizational resilience and sustainable procurement.
- **Caux Round Table Japan (CRT Japan)**
Caux Round Table is a global network of business leaders, aimed at ensuring business contributes to a freer, fairer and more transparent society. Caux Round Table Japan assists companies in promoting human rights activities.
- **Conservation International Japan**
Conservation International Japan is the Japanese branch of an international NGO which has offices in 29 countries around the world and makes policy recommendations related to climate change and biodiversity.

Process of the Human Rights Impact Assessment conducted in 2022



Examples of Main Potential Risks Identified in Step 1

- Procurement/ Production**
 - Employment and work environment of foreign workers (including technical interns)*
*Target: Domestic and overseas suppliers
 - Environmental impact due to waste oil and wastewater from maintenance factories
 - Electricity usage during ripening of imported bananas
- Sales/ Business**
 - 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**
 - 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**
 - Environmental impact due to food loss and food waste
 - Environmental impact due to chemicals used in building maintenance
 - Recycling of industrial waste
- Other**
 - 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.

Legend: Human Rights, Environment

Scope of the Human Rights Impact Assessment

Business activities:	Air transportation, airline-related business (airport ground support, aircraft maintenance, cargo and logistics, vehicle maintenance, catering, etc.), trade and retail, sales & marketing, real estate and building maintenance, human resources & business support, IT-related business
Countries and areas:	Japan, UK, France, Germany, Belgium, Austria, Russia, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, China, Taiwan, Hong Kong, Korea, Australia, Canada, USA, Mexico
Social and environmental risk indicators:	Child labor, fair wages, fair working hours, workplace discrimination, forced labor, freedom of association and right to collective bargaining, migrant workers, workplace health and safety, human trafficking, greenhouse gases, air/water quality, corruption, etc.

■ Priority Human Rights Themes

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 themes 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).

■ Management Systems Relating to Other Human Rights Themes

The following themes were identified through the human rights impact assessment process (see P.17-18 for details) but were not included as priority human rights themes because we believe that good management systems are already in place for these themes.

Flight safety

“Safety” is the overriding value and foundation underlying the ANA Group’s corporate activities. At the ANA Group, a specialized safety promotion unit applies a PDCA cycle for risk management in the four fields of aircraft operation, passengers, employees, and security based on the ANA Group Safety Principles and the Course of ANA Group Safety Action. Each year, numerical targets are set for safety incidents in the above four fields. The Group Safety Promotion Committee (under the general supervision of the President of All Nippon Airways Co., Ltd. and chairmanship of the Senior Executive Vice President of All Nippon Airways Co., Ltd.), as the highest decision-making body in the ANA Group’s safety promotion system, convenes monthly to report high-risk incidents and issues and to deliberate on risk mitigation and other measures. The safety targets and achievements are reviewed every fiscal year.

Provision of value to customers (safe, comfortable travel, universal services, etc.)

As a company “attentive to the voices of our customers,” the ANA Group has instituted a specialized unit for enhancing customer satisfaction (CS), which systematically reviews our services and products from the customers’ standpoint for improvement. Specifically, we gather abundant information from online CS surveys, quality monitoring, analysis of “customers’ voices,” and reports from employees to properly assess the quality of our services and implement concrete steps for improvement. The progress made from this cyclical process is periodically monitored by the Customer Experience (CX) Strategy Committee (under the general supervision of the President of All Nippon Airways Co., Ltd. and chairmanship of

	<p>Theme 1 → P.21</p>	<p>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.</p>
	<p>Theme 2 → P.29</p>	<p>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.</p>
	<p>Theme 3 → P.33</p>	<p>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.</p>
	<p>Theme 4 → P.35</p>	<p>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 platform business.</p>
	<p>Theme 5 → P.36</p>	<p>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.</p>

the Chairman of the Board of Directors of All Nippon Airways Co., Ltd.). For 10 consecutive years since 2013, we have been awarded five stars in the World Airline Star Rating conducted by Skytrax of the UK in recognition of ANA Group Airlines as having the highest quality in the world.

Prevention of corruption

In accordance with the ANA Group Compliance Regulations, we are working to strengthen compliance awareness throughout the ANA Group as a whole under the Group ESG Management Promotion Committee, which is an advisory body to the Board of Directors. We at the ANA Group recognize the importance of promoting efforts to prevent problems involving human rights issues from worsening in the country concerned through involvement in bribery and corruption, and have established the ANA Group Anti-Bribery Regulations regarding measures for preventing bribery. We are also working to raise awareness and disseminate these regulations through employee education. We also have an internal investigation and whistleblowing system in place to prevent bribery. Education on bribery and corruption as well as anti-competition laws is also provided in Japanese and English for executives and employees at each overseas branch. Furthermore, the ANA Group makes it a condition of signing contracts with business partners that they take measures to prevent bribery and corruption.

Responsible procurement of maintenance parts

In accordance with approved maintenance manuals provided by aircraft manufacturers, such as Boeing and Airbus, the ANA Group purchases official aircraft parts from designated manufacturers. The design of aircraft must be approved by the aviation regulatory body in the country of manufacture (in the United States, the Federal Aviation Administration) as well as the Japan Civil Aviation Bureau (JCAB). Aircraft parts are manufactured by designated manufacturers in accordance with this design, and are regularly audited. The parts to be used are inspected by aviation authorities or by manufacturers approved by aviation authorities. The approved parts come with a certificate signed by the inspector. On the receiving end, a qualified inspector from the ANA Group's aircraft

maintenance company must examine the papers and the parts prior to receipt.

Protection of the environment

Environmental destruction may lead to violation of the “right to an adequate standard of living” and other basic human rights. To meet our responsibility as an airline group operating a large fleet of aircraft, the ANA Group engages in ongoing efforts to mitigate environmental impacts under the ANA Group Environmental Policies. In 2021, after discussions in the Group Management Committee, we made a commitment to reach net zero emissions by fiscal 2050 in the ANA Group's 2050 Environmental Goals, and formulated the 2030 Environmental Targets as a path to those goals. Furthermore, in May 2023, following discussions in the same committee, we updated our target for FY2023 to reduce CO₂ emissions from aircraft as well as our transition strategy for achieving a decarbonized society. Going forward, we will continue to pursue four strategic approaches centered on the use of sustainable aviation fuel (SAF): operational improvements and technological innovations in aircraft, low-carbon aviation fuel through the use of SAF, the implementation of an emissions trading scheme, and the utilization of Negative Emissions Technologies*. Our aim is to achieve carbon neutrality by 2050, while also taking economic rationality into consideration.

* Negative Emissions Technologies (NETs): A general term for CO₂ removal technologies such as Direct Air Capture (DAC) that permanently remove CO₂ from the atmosphere through capture, absorption, storage and immobilizing processes.

Consideration for employee human rights

Based on ANA's Way, our group code of conduct that embodies the spirit of our founding, the ANA Group is committed to the “power of people,” who continue to make efforts and take on challenges, and the “collective capability of the group” (power of the organization), which practices collaboration and cooperation beyond organizational boundaries. We believe that these are our strength and the source of value creation. Moreover, we believe that the ultimate goal of our human resource strategy is to “sustainably increase corporate value”

and “realize enriched lives for employees, their families, and all those involved in the ANA Group.” Under the leadership of the Chief Human Resource Officer (CHO), whose position was established in 2022, we set up a department specializing in human resource strategy, which is pursuing enhanced employee engagement with the aim of building a human resource portfolio comparable to the ANA Group's management strategy, cultivating an organizational culture that facilitates change, and promoting participation of all employees in a way that diverse employees can demonstrate their individual strengths. In addition, we have established a department under the Group Chief Diversity, Equity & Inclusion Officer (CDO), which is dedicated to advancing DEI by promoting diversity in human resources (diversity in gender, disability, nationality, career development, age, etc.) and the widespread penetration of equity and inclusion. Going forward, we will continue to aim for a sustainable increase in corporate value by maximizing the “power of people” and the “power of the organization,” while further strengthening investment in human capital and promoting DEI.





Theme 1: Respect the Human Rights of Migrant Workers Working at Contractors and Vendors in Japan and Overseas

<p>Why We Consider This Theme To Be Important</p>	<p>Workers of a wide range of nationalities support the ANA Group's business activities. Recent media reports have uncovered various human rights abuses of foreign technical interns and students from abroad in Japan. Since many foreign workers work in the ANA Group's supply chain, we believe that there are potential human rights risks, and since 2016 we have made this a priority human rights theme and have taken various measures, focusing mainly on group companies and their partner firms such as contractors. In the future, we will expand the scope of our work environment monitoring to include IT vendors and other parties, and we will take steps in accordance with international standards.</p>
<p>Relevant Stakeholders</p>	<ul style="list-style-type: none"> • ANA Group employees • Employees of partner firms (contractors and IT vendors, etc.) in Japan and overseas • Foreign workers and other individuals employed at the above firms, etc.

■ Activities to Date

Determination of employment conditions

Since 2017, the ANA Group has been making efforts to determine the employment status of workers in its supply chain to "identify adverse impacts on human rights" in the human rights due diligence cycle. In 2017, we first conducted a survey on the employment status of foreign workers working at group companies and partner companies to which we outsource work, targeting the airport ground handling business and catering business. Through this survey, we confirmed that approximately 1,370 people were employed.

In 2020, we began operating our Global Supply Chain Worker Data Management System, and in October of the same year, conducted a survey of employment conditions targeting 37 group companies and 55 major partner companies (mainly in the ground handling business), and confirmed the employment of 1,693 foreign workers from 48 countries.

In October 2022, we expanded our employment status

survey to 40 group companies and 127 major partners and suppliers, confirming the employment of 5,967 foreign workers from 67 countries.

The information obtained from this survey is used for risk analysis and is linked to direct questionnaire surveys for foreign workers. We plan to continue to ascertain the employment situation through this survey.

* The number employed includes all persons with residence status in Japan based on their status such as permanent resident or long-term resident, persons with a residence status that allows them to work as engineers/specialists in humanities/international services, technical interns, etc., and international students. In addition, the number includes not only full-time employees but also contract employees, technical intern trainees, part-time workers and temporary employees.



Screen displaying the Global Supply Chain Worker Data Management System

Direct questionnaire surveys of foreign workers

Based on our employment status surveys, we conduct questionnaire surveys of technical interns, who are generally considered to be at high potential risk among foreign workers, and we gather the opinions of the workers themselves. The survey, which is conducted anonymously online, is available in 10 languages. It consists of 34 questions based on the Dhaka

Main Questions of the Questionnaire Survey

Principle	Question
Principle 1	Did you make any payment to a temporary employment agency or HR recruitment agency for employment at your current workplace? (For example, a placement fee, Japanese language training fees, etc.)
	Did you have to borrow money to pay the fees?
Principle 2	Was your employment contract written in a language you can understand?
	Were you ever forced to agree to or sign an employment contract by the agency or company that arranged your employment?
Principle 3	Were the rights you have as a worker explained in the employment contract? Please choose from the following all the items that were explained to you.
Principle 4	Do you yourself have possession of your identification documents (passport, residence card, etc.), not your company (factory or temporary employment agency)?
Principle 5	Are you being paid the wage you were promised in your contract?
Principle 6	Has your company ever stopped you from joining or forming a union?
Principle 7	Have you been briefed on occupational health and safety (about the possibility of accidents occurring during work)?
Principle 8	Do you feel you are living in a housing environment that is healthy and safe?
Principle 9	Does your company have a point of contact where you can raise concerns or worries without fear of retaliation?
Other	If you have any questions, etc. regarding the questionnaire survey, please feel free to write them down.

Principles for Migration with Dignity (Dhaka Principles), which are international norms for protecting the human rights of foreign workers. Results of the survey are used mainly for analyzing human rights risks.

In June 2021, we conducted the survey on approximately 300 technical interns, whose employment was confirmed through an employment status survey, and received responses from 198 interns (response rate: 66.0%).

In June 2023 as well, we again conducted the survey on approximately 370 technical interns whose employment was confirmed through an employment status survey, and we received responses from 333 interns (91.2% response rate).

If we detect the possibility of human rights risks based on information obtained from workers through the questionnaire survey, we also conduct interviews of company representatives and interviews with workers through an independent third party to confirm the facts, with the aim of taking corrective action as necessary. In addition to this survey, we also provide information about our grievance mechanism “Ninja” and endeavor to improve its effectiveness of this grievance mechanism.

Face-to-face interviews of foreign workers

Every year since 2017, we have been conducting face-to-face interviews and checking the living space of those foreign workers of companies where employment status surveys indicate some concern about potential risk. Interviews are conducted with the cooperation of third-party CRT Japan to ensure objectivity and neutrality. When it is necessary to interview both foreign workers and Japanese employment supervisors, separate interviews are always conducted.

In accordance with the Dhaka Principles, which are international norms for protecting the human rights of foreign workers, we conduct interviews not only on basic matters such as details of work but also on working hours, wages, health and safety, communication in the workplace, and other opinions about the company. At the time of the interview, we also check the worker’s actual residence, rest areas in the workplace, and the actual work environment.

Record of Interviews Conducted

Date	Company	Location	Nationality and No. of Interviewees	Residence Status of Foreign Workers
06/2017	Company A (ground handling operations)	Haneda	Nepalese: 2 Filipino: 2 Vietnamese: 2 Chinese: 2 Japanese supervisor: 1	Part-time casual workers (international students) Full-time regular employees
07/2017	Company B (ground handling operations)	Narita	Filipino: 4 Japanese supervisor: 1	Technical interns
09/2018	Company C (catering operations)	Haneda	Nepalese: 3 Japanese supervisor: 1	Part-time casual workers (international students) Full-time regular employees
		Kawasaki	Nepalese: 2 Vietnamese: 3 Japanese supervisor: 1	
12/2019	Company D (ground handling operations)	Haneda	Nepalese: 4 Vietnamese: 3 Mongolian: 3 Japanese supervisor: 1	Part-time casual workers (international students) Full-time regular employees
12/2020	Company D (catering operations)	Narita	Australian: 1 Canadian: 1 Japanese supervisor: 1	Full-time regular employees
03/2021	Company A (ground handling operations)	Haneda	Nepalese: 3 Mongolian: 1 Japanese supervisor: 1	Part-time casual workers (international students) Full-time regular employees
03/2021	Company E (cleaning operations)	Other	Thai: 1 Japanese supervisor: 1	Full-time regular employees
07/2021	Company F (food supplier)	Other	Indonesian: 4 Japanese supervisor: 1	Technical interns
04/2022	Company G (ground handling operations)	Narita	Vietnamese: 6 Japanese supervisor: 1	Technical interns
05/2022	Company H (ground handling operations)	Narita	Vietnamese: 27 Japanese supervisor: 1	Technical interns Specified skilled workers
07/2022	Company C (ground handling operations)	Narita	Vietnamese: 4 Japanese supervisor: 2	Technical interns

Questionnaire survey of companies on the status of business and human rights initiatives

In 2022, in addition to the employment status survey, we conducted a questionnaire survey of group companies and major partner companies to confirm the status of business and human rights initiatives and received responses from 92 companies (40 group companies, 52 major partner companies).

While our intention was to conduct a survey that could provide an accurate understanding of the status of business and human rights initiatives at each company, we wanted to reduce the work involved in responding to the questionnaire. Therefore, we had third-party CRT Japan supervise the survey, and we set the number of questions at 10, which is fewer than a general self-assessment questionnaire (SAQ). The survey also included a free entry field.

In light of the results of the survey, we approached individually those companies that were found to be lacking in initiatives, and we worked with them to raise the standards of business and human rights initiatives throughout the supply chain. In the future we intend to conduct the survey regularly to determine the status of business and human rights initiatives.

Sharing ANA Group policies

Since 2017, we have been sharing with our partner firms the ANA Group's policies for ensuring respect for human rights, as well as matters for consideration when employing foreign workers.

Every year since 2019, we have been sharing "Matters for Consideration When Employing Foreign Workers" with all ANA Group companies at the Group ESG Management Promotion Committee and the EPL Committee, and we also ask our group companies to share this information with their partner firms.

In 2020, the ANA Group Procurement Policy was revised, and before commencing business with new suppliers, we ask them to understand and agree this policy. During regular communication and through the survey on the status of business and human rights initiatives, we also endeavor to ensure the policy is known to partner firms with which we have already signed contracts.

Constructing a safe employment channel for workers

It has been pointed out that among foreign workers, technical interns in particular are often burdened with debts and other problems in their home countries due to illegal brokerage fees. To overcome this problem, the ANA Group believes that it is necessary to create a safe, reputable employment channel. As part of this effort, we visited India in 2022 together with third-party CRT Japan, and held talks with organizations that send workers to Japan and checked training facilities.



Visit to India

Grievances and remedy

The ANA Group considers its grievance mechanism (Ninja), which is capable of collecting directly from workers their opinions and feedback, to be a particularly effective tool in determining the work environment of foreign workers, and has made efforts to expand the scope of its coverage and increase its effectiveness. Focusing on this mechanism, we have been sincerely responding to concerns regarding the work environment of foreign workers raised through various channels.

Future Policies

We will continue to share various policies such as the ANA Group Human Rights Policy, the ANA Group Procurement Policy, and Matters for Consideration When Employing Foreign Workers not only within the group, but also with partner firms and other relevant parties. Likewise, we will cooperate with one another to promote discussions for improving the work environment so that it is more respectful of human rights.

We believe that we have established a basic structure for a human rights due diligence cycle consisting of a series of actions such as 1) Identification, analysis, and evaluation of adverse impacts on human rights, 2) Implementation of appropriate measures, 3) Follow-up and evaluation of the effectiveness of measures, and 4) Provision of information to external parties. Going forward, we will continue to make efforts to refine and

Main Concerns Raised and Results of Remedy Measures (see pages 24-28 for details)

Date	Details	Reporter	Reporting Channel	Status
12/2019	Request for work environment improvements made during an interview by foreign workers working at a partner firm	Foreign workers	Third party interview	Case closed
04/2021	Claim of a human rights violation involving the forced return (forced repatriation) of technical interns working at a supplier	NPO	Letter	Case closed
01/2022	Request for human rights investigation of technical interns working at partner firms	Unknown	Letter (anonymous)	Case closed
07/2023	Internal report by foreign workers working at a partner firm regarding salary, working environment, etc.	Foreign workers	"Ninja"	Case closed
09/2023	Risk concerns at a partner firm revealed during a direct questionnaire survey of technical interns	Foreign workers	Questionnaire survey	Case closed

Case (1) Request for Work Environment Improvements at a Partner Firm Made by Foreign Workers During Interviews

<Summary> In interviews with foreign workers at a major partner firm conducted in 2019, it was confirmed that there was a generally good relationship with the firm, but there was also some mention of dissatisfaction with the work environment. In cooperation with the partner firm, we have been implementing prompt corrective measures. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

December 2019 Third-party organization CRT Japan conducted interviews with foreign workers at Partner Firm A as described below.
Target: 11 foreign workers of Partner Firm A (persons holding visas in the category of Engineer/Specialist in Humanities/International Services, Permanent Resident, or Spouse of a Japanese National/Permanent Resident)
Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan
Results: While the working environment was generally satisfactory, there were requests for spaces for breaks and naps, as the workers' work hours were affected by flight delays and equipment changes.

December 2019 Partner Firm A renovated its facilities and added a room for resting with a 50-person capacity.

March 2020 Partner Firm A conducted further facility renovations, converting a goods warehouse into a rest area with a 100-person capacity.

March 2021 A third-party interview was conducted again for follow-up purposes.
Target: 4 foreign workers of Partner Firm A (persons holding visas in the category of Engineer/Specialist in Humanities/International Services, Permanent Resident, or Spouse of a Japanese National/Permanent Resident)
Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan
Results: A lounge room was also added to the facilities, and it was confirmed that an environment where employees can take a safe, comfortable rest had been secured. Workers commented that the addition of more rest space had improved their work performance.

Haneda Airport Terminal 3 standby area (former warehouse)



Before



After



Case (2) Claim of a Human Rights Violation Involving the Forced Return (Forced Repatriation) of Technical Interns at a Supplier

<Summary> We received a report from an external NPO concerning a human rights violation involving the forced return of technical interns by an ANA Group supplier. We arranged a meeting for face-to-face dialogue with the NPO and others in the presence of third-party organization CRT Japan, and we exchanged opinions on the role that the ANA Group should play while striving to understand the true intentions of the claimant, and we took necessary measures. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

April 2021 The NPO indicated that there was a human rights violation by an ANA Group supplier. We received a letter from the NPO asking the ANA Group's view of this action and what measures it intended to take.

May 2021 In the presence of CRT Japan, we held face-to-face talks with the NPO and the workers claiming damages. In addition, together with a representative from the group company, we visited the headquarters of the supplier (Company X) indicated by the NPO as where the problem occurred, and shared information. In the course of our talks, we confirmed that the incident occurred at the supplier's Factory A (Kanagawa Prefecture) prior to the ANA Group's commencement of trade with the supplier concerned. Furthermore, we also confirmed that the group company had completed a quality check of Company X's Factory B in Gunma Prefecture in the lead up to commencement of trade with the factory. Although the factory was a different entity, we decided that we needed to confirm that no human rights violations were occurring at Factory B, with which we plan to commence trade.

July 2021 We asked CRT Japan to confirm the status of human rights initiatives at Factory B. CRT conducted an interview survey.

Target: Factory supervisor and foreign workers (nationalities of the foreign workers differed from the nationalities at Factory A)

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: We confirmed that there were no cases of forced repatriation at Factory B, nor were there any human rights violations of particular concern. We also checked Company X's labor-related regulations and documents, on-site management system, recruitment system, etc., and determined that there were no problems with the company's current management structure.

July 2021 We shared the results with the NPO. In light of the above, the ANA Group determined that there were no problems at Factory B, and began new transactions.

May 2022 We again held talks with Company X to do a follow-up survey, and we confirmed that there were no problems.

Case (3) Claim of Human Rights Violations Involving the Forced Return (Forced Repatriation) of Technical Interns at Partner Firms

<Summary> We received an anonymous letter addressed to the president of ANAHD stating, “ We request an investigation into possible human rights violations involving technical interns at Narita Airport.” In cooperation with third-party organization CRT Japan, we conducted a direct questionnaire survey of technical interns working at contractors. In addition to determining the actual situation based on responses from rights-holders, we identified contractors where it was believed further face-to-face dialogue was necessary and we conducted face-to-face interviews with their workers. While confirming that problems cited in the letter did not occur, we worked with the contractors concerned to take corrective measures in response to dissatisfaction and complaints expressed by technical interns during the interviews. A summary of the main actions taken in relation to this case is described below.



Interviews with foreign workers



<Actions in Chronological Order>

January 2022 We received an anonymous letter stating, “We request an investigation as we are concerned about the illegal employment of technical interns working at Narita International Airport and their subsequent unfair dismissal.”

February 2022 Since there are no technical interns employed by ANA Group companies in the Narita Airport area, we asked our partner firms (contractors) to confirm whether any technical interns were working illegally, by investigating whether their actual work was consistent with their qualifications. Results of the investigation concluded that there was no inconsistency between the technical intern training plan certified by the Organization for Technical Intern Training and the actual work content of the technical interns.

Focusing on face-to-face dialogue with the work site, we cooperated with third-party organization CRT Japan in conducting a direct questionnaire survey of 124 technical interns working at five partner firms (contractors).

Target: 124 foreign workers employed at five contractors in the Narita Airport area

Method of implementation: Anonymous questionnaire survey accessed via a QR code

Results: We checked a small number of responses stating the respondents had experienced unfair employment-related treatment or threats of dismissal. There were also responses indicating that respondents were “anxious or dissatisfied” with their current work and life in Japan. Because we were able to confirm cases in which the rights of workers (which are stated in employment contracts and are to be respected) were not being fully respected, we will ensure that these workers’ rights are respected. On the other hand, the survey was unable to confirm what the parties concerned considered to be “unfair treatment in employment” or the “threat of dismissal.”

April-May 2022 Results of the above questionnaire survey identified two firms where it was determined that further face-to-face dialogue was necessary, and we conducted face-to-face interviews with their workers.

Target: 33 foreign workers working at two partner firms (contractors) where responses of concern were confirmed in a questionnaire survey

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: It was confirmed that there was no discrepancy between the content of the work explained to the foreign workers by the sending organization and the actual content of their work, and that there were no “threats of dismissal.” On the other hand, it was confirmed that there were some deficiencies in workload management, appropriate management and supervision of employees, and communication with Japanese employees. Furthermore, because of this, some respondents indicated that they felt “unfair treatment related to employment.” It was also confirmed that some employees were “anxious and dissatisfied” in regard to working hours, paid leave, wages, and living in dormitories.

June-July 2022 Through interviews conducted, we were able to confirm what the parties concerned considered to be “unfair employment-related treatment” and where they felt “anxiety and dissatisfaction” in their current work and life. Through our group companies, we held talks with the two firms, which agreed to increase opportunities for dialogue with workers and improve explanations of regulations and rules regarding work. In addition, improvements were promptly made in the living environment of the dormitories, which had been the subject of complaints from workers, with arrangements for single rooms for all those who requested one.

October 2022 To monitor the progress of the initiatives described above, we conducted face-to-face interviews with workers again and confirmed that satisfaction with the workplace and living environment had improved and that the improvement measures had been widely introduced. Therefore, we have decided to close this case.

Case (4) Internal Report Regarding Salary and Work Environment from Technical Interns at a Partner Firm

<Summary> A post from foreign workers working at a partner firm appeared on “Ninja”, the ANA Group’s grievance mechanism. In cooperation with third-party organization CRT Japan, we conducted face-to-face interviews with the workers concerned. We also worked with the firm concerned to take corrective action in response to dissatisfaction and other issues identified at that time. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

July 2022 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 immediately asked the group company associated with the partner firm to investigate whether the partner firm had policies in place and what the actual work situation was.

July 2022 We received a reply from the partner firm via the group company stating that wages were being paid in accordance with contracts. Then we responded to the workers’ post, saying, “The firm is paying wages in accordance with contracts. We would like to conduct a more accurate investigation of this matter.” In addition, third-party organization CRT Japan conducted a face-to-face interview survey with the foreign workers at the partner firm as described below.

Target: 5 foreign workers (technical interns) working at the partner firm that was the subject of the complaint posted on “Ninja”

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

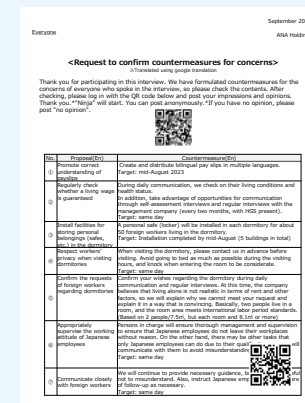
Results: In regard to wages being “too low” someone made the comment, “It would be nice to receive more.” However, it was confirmed that there was no actual situation that would constitute violation of a contract. Nevertheless, all of the foreign workers send remittances back to their home country of the Philippines, and it was confirmed that the effects of the weaker yen had increased the burden of sending remittances. Furthermore, some workers did not have an accurate understanding of the details of deductions from their paychecks. There were also some complaints about the living conditions in the dormitory and the working attitude of Japanese employees.

August 2022 We received a report from the partner firm concerning the implementation of corrective measures in response to worker dissatisfaction, which was mainly confirmed through interviews. Measures such as making pay slips available in multiple languages and improving the living environment in the dormitory by installing lock boxes for storing valuables, etc. were promptly implemented.

September 2022 We communicated details of the complaint that had been posted as well as details of their corrective measures in three languages (Japanese, English, and Tagalog). At the same time, we once again informed all technical interns of the partner firm about the grievance mechanism “Ninja”. No new posts have been received as of the present.



Lock boxes for storing valuables installed in the dormitory as a corrective measure



Information sheet for foreign workers

Case (5) Risk Concerns at a Partner Firm Revealed During a Direct Questionnaire Survey of Technical Interns

<Summary> A direct questionnaire survey of technical interns in the supply chain identified a partner firm that posed concerns about the existence of risks. However, results of face-to-face interviews with workers subsequently conducted with the cooperation of third-party organization CRT Japan found no evidence of any problematic situations. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

June 2023 In a direct questionnaire survey of technical interns, some workers indicated that at the time of the signing of their employment contracts there was insufficient explanation about the overall rights of workers including paid vacations, and that the briefing on occupational health and safety was not in a language they could understand.

September 2023 In light of these responses, we requested the partner firm where the workers concerned work to conduct a face-to-face interview survey with the foreign workers to further check the location of risk. Third-party CRT Japan conducted the interview survey with the foreign workers at the partner firm as described below.

Target: 6 foreign workers working at a partner firm where there were expressions of dissatisfaction (technical interns: 4, specified skilled workers: 2)

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: No problems of concern regarding contracts were detected. All interviewees responded that their contracts were written in their native language and that they were able to understand the content. In regard to occupational health and safety, no particular problems were found in the work operations of the workers. Although workers indicated that some notices on bulletin boards at the workplace were in Japanese only, workers checked with their senior colleagues if they had any questions. No other events that could particularly result in human rights risks were confirmed. On the other hand, some positive aspects were apparent. A framework for facilitating daily communication between foreigners and Japanese supervisors had been established.

In view of the results of the interviews, we have asked the partner firm to take various measures such as measures for ensuring that all workers accurately understand safety-related notices and measures for carefully explaining correct information on how to read pay slips, etc. We will strengthen collaboration and cooperation to create a more conducive work environment for foreign workers.



Interviews with foreign workers



Theme 2: Identify Human Rights Issues and Environmental Burdens in the Supply Chain

<p>Why We Consider This Theme To Be Important</p>	<p>With advancing globalization in recent years, corporate supply chains are also expanding throughout the world. At the same time, to solve problems such as forced labor and child labor that are prevalent around the world, not only government agencies but also corporate entities must take responsibility for their entire supply chain and exercise appropriate control. In fact, there are many cases where the brand value of a client has been significantly damaged due to problems discovered at a supplier. Legislation to have companies check and report human rights and environmental issues in the supply chain is making progress in each country, and we believe that failure to address these issues will be a major management risk.</p> <p>A single airplane consists of approximately three million parts, and the supply chain for these is both complex and extensive. Although the core business of the ANA Group is aviation, our mission is also to provide a safe, secure, and comfortable in-flight environment for our passengers. Therefore, we believe that building a highly transparent and traceable supply chain not only for aircraft parts but also for in-flight meals and in-flight goods is essential to fulfilling our responsibility to our customers.</p>
<p>Relevant Stakeholders</p>	<ul style="list-style-type: none"> • ANA Group companies • Partner firms and contractors • Business partners • Workers employed above, etc.

Policy

Establishment of the ANA Group Procurement Policy

In 2020, to promote more sustainable procurement activities throughout the supply chain, the ANA Group established the ANA Group Procurement Policy, which consists of the Basic Procurement Policy and Supplier Code of Conduct. This policy requires suppliers to provide more precise, comprehensive information than the previous ANA Group Purchasing Policy particularly in regard to human rights and the environment.

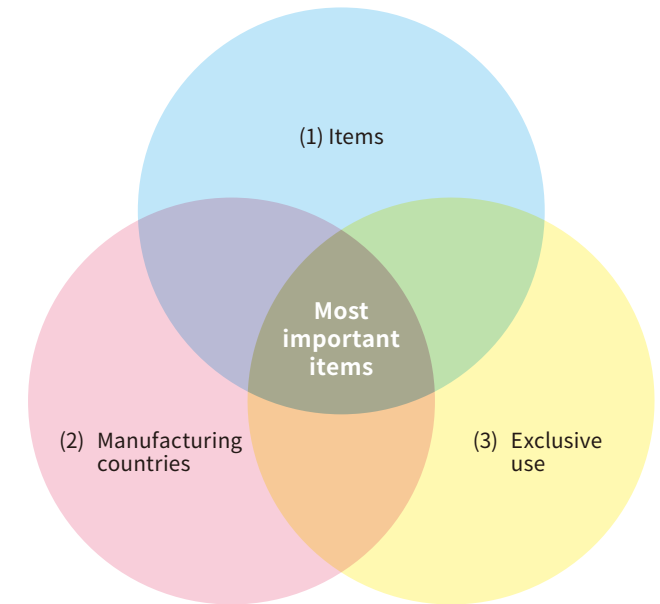
Basic Procurement Policy

1. The ANA Group has an open-door policy in our procurement activities, giving access to both domestic and foreign suppliers. Our procurement activities will comply with related laws, regulations, and rules, and will be based on fair, equitable, transparent processes under the principle of free competition. The ANA Group will endeavor to develop mutual trust and complementarity with our business partners.
2. The ANA Group will engage in responsible procurement activities that address human rights and environmental concerns.
3. The ANA Group will promote innovation and meet customers' expectations by working with suppliers who give priority to assuring quality, setting appropriate prices, and meeting delivery dates and who have a stable foundation for business management and adaptability to change.
4. The ANA Group will generate social and economic value from across our supply chains and contribute to creating a more sustainable world.

Outline of Supplier Code of Conduct

- | | | |
|--|---|--|
| <p>1. Quality Assurance and Business Continuity Plan</p> <p>1.1 Quality assurance and establishment of quality control systems</p> <p>1.2 Business continuity plan</p> <p>2. Compliance and Anti-Corruption Measures</p> <p>2.1 Compliance</p> <p>2.2 Fair trading</p> <p>2.3 Prohibition of bribery, corruption, etc.</p> <p>2.4 Elimination of any dealings with antisocial forces</p> <p>2.5 Management and protection of intellectual property, confidential information, and personal information</p> <p>2.6 Prevention and early detection of unlawful conduct</p> <p>2.7 Internal control systems</p> | <p>3. Labor Standards</p> <p>3.1 Respect for human rights and elimination of discrimination</p> <p>3.2 Elimination of abuse and harassment</p> <p>3.3 Elimination of forced labor</p> <p>3.4 Elimination of child labor</p> <p>3.5 Appropriate management of working hours</p> <p>3.6 Wages and benefits</p> <p>3.7 Respect for freedom of association and rights to bargain collectively</p> <p>3.8 Respect for foreign nationals and migrant workers</p> <p>3.9 Avoidance of aiding in human rights violation</p> <p>4. Safety and Sanitation</p> <p>4.1 Safe, sanitary working environment</p> <p>4.2 Response to industrial accidents</p> <p>4.3 Response to emergencies</p> <p>4.4 Communication</p> | <p>5. Environment</p> <p>5.1 Establishment of environmental management systems</p> <p>5.2 Response to climate change and biodiversity</p> <p>5.3 Efficient use of resources, energy, and water</p> <p>5.4 Management of chemical substances</p> <p>5.5 Control of contamination and pollution</p> <p>5.6 Green procurement</p> <p>6. Contribution to Local Communities</p> <p>6.1 Local communities</p> <p>6.2 Respect for the rights of indigenous peoples</p> <p>7. Information Disclosure</p> <p>8. Conflict Minerals</p> |
|--|---|--|

Concept of Most Important Items



Dissemination of the procurement policy

When commencing trade with all new suppliers, we ask them to understand and agree to the ANA Group Procurement Policy and Supplier Code of Conduct. After the commencement of trade, we also monitor their compliance status, and if any significant deviation from the policy or code of conduct is found, we ask them for improvement plans and provide feedback in efforts to seek their understanding and cooperation in sustainable procurement.

Supply Chain Management of Procured Goods

To promote responsible procurement in the ANA Group, we appoint procurement managers in all major departments and these managers work with our suppliers to achieve a sustainable society.

Analyzing and identifying risk in the supply chain

The ANA Group engages in procurement activities globally and conducts procurement transactions valued at approximately 1.2 trillion yen annually with approximately 9,900 firms (as of March 2023).

To identify important items, we use three indicators: (1) items,^{*1} (2) manufacturing countries,^{*2} and exclusive use of the ANA Group. Commodities that fall under all three of these categories in particular are classified as “most important

items” and are prioritized in efforts to build a robust supply chain. The importance of items and manufacturing countries are determined with reference to ESG risk standards defined by international organizations such as the International Air Transport Association (IATA). Using these indicators, we identified uniforms and linen used on board as “most important items” in fiscal FY2020, and tableware and cutlery in fiscal FY2022.

*1 Items: Evaluated by environment, working conditions, fair trade, sustainability, etc.

*2 Manufacturing countries and regions: Evaluated by environment, health, human rights, corruption, etc.

Content of ANA Survey on Sustainability

Theme	Example of questions
General sustainability	Creation of management systems, training, etc.
Quality assurance and business continuity plan	Creation of quality control systems, creation of BCP systems, etc.
Compliance and anti-corruption measures	Compliance with laws and regulations, respect for international norms, anti-corruption, etc.
Labor standards	Respect for human rights, appropriate management of working hours, wages and benefits, and respect for foreign nationals, etc.
Safety and sanitation	Safety and sanitation, response to emergencies
Environment	Green procurement, control of contamination and pollution, efficient use of resources, energy, and water
Contribution to local communities	Decisions on whether or not activities that contribute to local communities are implemented, etc.
Information disclosure	Protection of personal information, leakage of sensitive information, etc.
Conflict mineral initiatives	Use of conflict minerals, etc.
Supply chain	Status of initiatives in the supply chain, etc.

Communication with suppliers

When commencing trade with new business partners, the ANA Group asks suppliers to understand and comply with its procurement policy. Even after the commencement of transactions, we also share information and exchange opinions, as appropriate, as well as regularly monitor our partners' handling of labor and human rights issues and the status of their improvement by conducting surveys, inspections, and interviews with employees. If we discover a risk or issue with a supplier, we check the supplier's improvement plans, provide feedback, and endeavor to continuously ascertain conditions.

For suppliers that handle most important items in

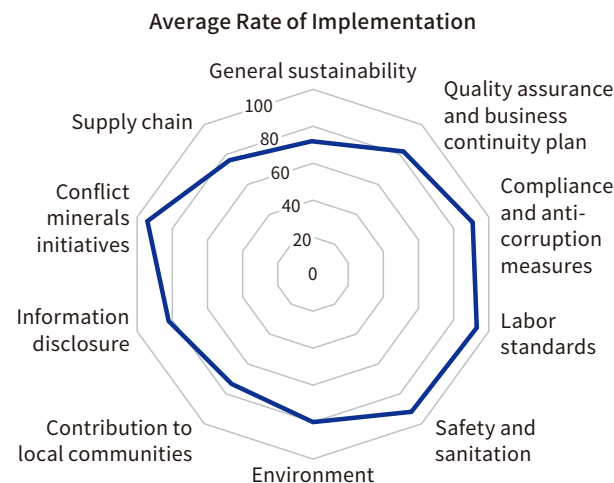
particular, we hold briefing sessions on the ANA Group Procurement Policy and also conduct our own survey on sustainability.

From FY2020 to FY2022, we conducted surveys of 23 suppliers of uniforms, cabin linen and tableware/cutlery, and checked their average rate of implementation of sustainability activities as shown in the table below.

After we conduct a sustainability survey, we provide feedback to the suppliers by analyzing and evaluating the status of their efforts. For survey items that receive low assessment scores, we conduct follow-up activities to take corrective action. These include checking details through interviews and providing support through suggestions for improvements. This survey is a valuable opportunity for suppliers to deepen their understanding of responsible procurement within the ANA Group and for ANA to build a robust supply chain.

Furthermore, to determine the implementation status of sustainability initiatives at tier 2 and tier 3 suppliers as well, in 2021, we had third-party CRT Japan conduct a face-to-face interview survey with overseas production factory workers at a tier 3 supplier of most important items in Vietnam.

ANA Survey on Sustainability



Supply Chain Management of In-flight Meals

ANA Catering Service Co., Ltd. (ANAC), which brings together suppliers involved in the production of in-flight meals, plays a leading role in various initiatives while promoting the ANA Group Procurement Policy and Supplier Code of Conduct with suppliers.

Analyzing and identifying risk in the supply chain

ANAC classifies suppliers on the basis of the transaction amount and manufactured items, and manages them on the basis of risks.

When selecting new suppliers, ANAC conducts checks in accordance with the ANA Supplier Code of Conduct through on-site audits prior to entering into a contract, in efforts to prevent human rights issues from occurring. If any issue is found, ANAC confirms that it has been rectified before signing a contract.

Analysis and Identification of Risk in the Supply Chain

Category	Standard for Selection	No. of Firms	Management Method
High risk	Transaction amount * Including private brand (PB) manufacturers	10	Regular audits Operation of grievance mechanism Worker employment status surveys "ANAC Suppliers Gatherings" Periodic confirmation of written pledges
Medium risk	Transaction amount	18	Worker employment status surveys "ANAC Suppliers Gatherings" Periodic confirmation of written pledges
Low risk	Tier 1 suppliers other than the above and main tier 2 suppliers	124	Periodic confirmation of written pledges

*The number of firms as of September 2023

Communication with suppliers

As our basic platform for managing our suppliers, we use eBASE, a product information database. The database software supports the construction, integrated management, and utilization of product and content information within the company as well as the exchange of product information between companies. Approximately 95% of ANAC's tier 1 suppliers have introduced this software. Using eBASE, the ANA Group has obtained signed pledges of the ANA Group Supplier Code of Conduct from 146 tier 1 suppliers and six tier 2 suppliers.

For high-risk and medium-risk suppliers, every year we confirm the employment status of foreign workers through the Survey of the Employment Status of Foreign Workers (see page 21 for details) conducted by ANA HOLDINGS INC. Furthermore, to build good relationships with suppliers, we regularly hold "ANAC Suppliers Gatherings", which serve as a forum for

sharing information.

For high-risk suppliers, in addition to regular hygiene audits, ANAC employees make direct visits every year to conduct checks in accordance with the ANA Supplier Code of Conduct. In addition, we make efforts to determine the views and opinions of workers by providing information about our grievance mechanism "Ninja".

In-house Training

The ANA Group regularly conducts in-house education and training to ensure the steady penetration of our procurement policy. In FY2022, we held three training sessions for approximately 100 ANA Group procurement managers on matters such as compliance with social norms and laws and regulations in procurement activities, and the importance of making ongoing efforts to reduce environmental impacts. We will continue to provide ongoing training and education.

Future Policies

Through briefing sessions and the utilization of our systems, we will make efforts to further disseminate the ANA Group Procurement Policy throughout the entire supply chain. While conducting reviews as appropriate, we will also further reinforce the management structure for items and suppliers that require more vigorous risk management.

By 2030, we will strive to realize "Responsible Procurement" while actively disclosing information and engaging in dialogue with stakeholders. We will also appropriately comply with relevant laws and regulations of each country.



Screen of the steps for periodic confirmation of written pledge on eBase



"ANAC Suppliers Gatherings"






Theme 3: Prevent the Use of Airplanes in Human Trafficking

<p>Why We Consider This Theme To Be Important</p>	<p>With flights to cities all over the world, the ANA Group is a global airline group connecting Japan and the world.</p> <p>However, there is a risk that services provided by airlines like ours could inadvertently be used by third parties to violate human rights, and one typical example of this is human trafficking. Human trafficking is said to be the fastest growing crime in the world, and we believe it is our responsibility to make efforts to prevent human trafficking.</p> <p>The issue of human trafficking was raised at the IATA’s annual general meeting in Cancun, Mexico in June 2017. Furthermore, at an annual review with human rights experts in September 2017, they recommended that the group address the issue of preventing human trafficking as one of our priority human rights themes. The ANA Group is working with other airlines, industry organizations, relevant ministries and agencies, and civil-society organizations to promote initiatives to prevent human trafficking.</p>
<p>Relevant Stakeholders</p>	<ul style="list-style-type: none"> • ANA Group companies • Immigration Services Agency of Japan and other government agencies • Industry organizations, etc.

■ Activities to Date

In-flight reporting to prevent human trafficking

In April 2019, we commenced operation of a procedure for reporting suspected cases of human trafficking to the Immigration Services Agency of Japan. When there are indications of human trafficking during a flight operated by a group company, cabin attendants will make a comprehensive

-  • The person traveling with the suspected victim interferes and does not allow the suspected victim to answer questions
-  • The person traveling with the suspected victim cannot spontaneously answer basic question about the suspected victim (such as age, name, etc.)
-  • The suspected victim does not know his/her destination or what he/she will be doing after arrival there

assessment of the situation and decide whether to report it.

Prior to implementation of the reporting procedure, training was provided to not only all cabin attendants but also all group employees on the issue of human trafficking to raise their awareness of the problem. In 2020, information concerning the United Nations Convention against Transnational Organized Crime (Palermo Convention) was added to the cabin attendants’ manual to further raise awareness of human trafficking among all cabin attendants. Since then, new cabin attendants have been receiving training through e-learning to ensure they have a thorough understanding of the procedure.

Some of the steps of this reporting procedure have been incorporated into the ICAO Guidelines (Circular 352) for training cabin attendants in identifying and responding to human trafficking.

Cooperation with related organizations (organization of events and participation in campaigns)

The ANA Group believes that actively disclosing the efforts we are making to prevent human trafficking will lead to greater deterrence against human trafficking. Therefore, in cooperation with other airlines, industry organizations, relevant ministries and agencies, and civil-society organizations, we have been holding events aimed at preventing human trafficking and have been disclosing the results.

In April 2018, we invited to Japan experts from Airline Ambassadors International, an NPO that provides programs to airlines and other organizations to prevent human trafficking, and held a workshop at Haneda Airport. The workshop was organized with the support of CRT Japan, the International Organization for Migration (IOM), and Not for Sale Japan (NFSJ), the Japanese branch of U.S. NGO Not for Sale, and included the



Workshop at Haneda Airport

participation of government offices, other airlines, and civil-society organizations.

In May 2018, at the Contact-Point Liaison Meeting on Human Trafficking Cases, organized annually by the National Police Agency with other related government agencies and embassies, we presented the ANA Group's views on human trafficking and what we are doing to address the issue. At the meeting the participating organizations confirmed that they would actively work together to prevent human trafficking. The ANA Group has participated in the meeting every year since then.

In December 2020, we co-hosted an online seminar with Narita International Airport Corporation (NAA) and invited the National Police Agency's Human Trafficking Prevention Section. In addition to the support of CRT Japan and the International Organization for Migration (IOM), we also received cooperation from the industry organization IATA as well as other airlines. Approximately 180 people, including employees, airport personnel, and citizen groups were in attendance.

Since 2020, the ANA Group has been participating in the Blue Heart Campaign every year. Organized by the United Nations Office on Drugs and Crime (UNODC), the campaign is aimed at preventing human trafficking. During the campaign,



Panel discussion at the seminar

people show solidarity with victims and raise awareness for the prevention of human trafficking by wearing the campaign's blue heart symbol. ANA Group employees at Narita Airport also wore the heart-shaped lapel pins.



Employee wearing a Blue Heart Campaign lapel pin

In-house education

Human trafficking can be prevented and victims protected only if the issue of human trafficking is correctly understood and appropriate action taken by all of our cabin attendants, ground staff, and employees regularly attending our customers. In 2018, we launched the e-learning program "We Prevent Human Trafficking!" for all employees of the ANA Group to provide them with insight into how human trafficking is related to our business. At that time, 94% of our employees participated in the program. This e-learning program is now available for all group employees to take at any time.



Future Direction

We will continue our efforts for the smooth operation of procedures related to reporting and for training of employees for this purpose. Likewise, we will continue to work with government agencies and other companies in the industry to engage in activities that can increase the momentum of the airline industry as a whole in tackling this issue and enhancing deterrent effects.



Theme 4: Protect Customer Data and Give Consideration to Privacy

<p>Why We Consider This Theme To Be Important</p>	<p>The ANA Group has always handled personal data in its mainstay air transportation business, such as collecting customers' names and contact information when customers purchase airline tickets. The personal data entrusted to us is handled with the strictest care and is protected and managed in accordance with the laws and regulations of various countries, including Japan's Act on the Protection of Personal Information. In addition, in non-air business that we are currently strengthening, we are required to provide information that meets the particular needs of individual customers. This means we need to collect and analyze information concerning individual customers such as customer attribute information, purchasing history in online shopping, and location information. When handling such information, we do not simply comply with laws and regulations, but proactively align our approach to privacy with social demands and quickly evolving times. We recognize that if consideration of the protection of customer data and privacy is lacking, there is a potential risk of human rights violations, so we have set this as a new priority theme.</p>
<p>Relevant Stakeholders</p>	<ul style="list-style-type: none"> • ANA Group companies • ANA Group customers and other stakeholders, etc.

Activities to Date

We regularly revise our privacy policies and internal regulations to comply with domestic and international laws and regulations regarding personal data protection. We ensure appropriate compliance with amendments to Japan's Act on the Protection of Personal Information which came into effect on April 1, 2022, as well as changes in regulations in various countries such as the United States, Europe, China, and Thailand. Furthermore, we conduct education to ensure that each and every employee understands the importance of privacy protection and the need for strict handling of personal data.

In addition, one of the views expressed at our human rights impact assessment workshop in 2022 was that "as the ANA Group's business becomes more diversified, failure to handle customers' personal data more carefully than ever before could lead to the inadvertent violation of human rights." At the same time, the Ministry of Internal Affairs and Communications and the Ministry of Economy, Trade and Industry had released the

"The Guidebook for Corporate Privacy Governance in the Digital Transformation (DX) Era Ver. 1.2." Using this as a reference, the ANA Group commenced a full-fledged study of basic approaches to Privacy Governance initiatives.



Data Protection and International Carriage By Air Seminar

In April 2023, ANA HOLDINGS INC. established the Privacy Governance Team as a dedicated governance structure, and is working to establish a platform business that utilizes customer data assets and to strengthen Privacy Governance from the viewpoint of not only legal compliance but also ethical appropriateness. The progress of the team's efforts are regularly reported at the Group Management Committee and Group ESG Management Promotion Committee.

Future Direction

We will work to further strengthen our Privacy Governance system by disclosing Privacy Governance Fundamental Policy and Principles of Conduct internally and externally as well as by reviewing internal regulations and enhancing employee education, privacy impact assessments and business inspections.



Theme 5: Respect Human Rights When Providing AI, Metabase and Other Services

<p>Why We Consider This Theme To Be Important</p>	<p>In recent years, the ANA Group has been expanding its business areas from aviation to next-generation mobility, from the extraordinary to the everyday, and from the real to the virtual. avatarin Inc., a startup company launched by ANA HOLDINGS INC., and ANA NEO, Inc. established by ANA HOLDINGS INC. are developing businesses that utilize artificial intelligence (AI) and are working on projects using 3D virtual space built into smartphones.</p> <p>While the research, development and utilization of AI enriches people's lives, there is a risk that, depending on its use, it may lead to privacy violations and other human rights issues. Recognizing the existence of unforeseen human rights risks, we have set this as a new priority theme that we must address in the future.</p>
<p>Relevant Stakeholders</p>	<ul style="list-style-type: none"> • ANA Group companies • ANA Group customers and other stakeholders, etc.

Activities to Date

ANA NEO, Inc. is currently developing a virtual travel platform called ANA GranWhale. The ANA GranWhale virtual travel platform app allows customers to freely and comfortably enjoy their travels by recreating wonderful destinations and cultures and passing them on to future generations. Consisting of services such as V-TRIP, a virtual travel space, and Sky Mall, a shopping space, the app offers new spaces for customers to explore in the real and virtual worlds. Terms of use have been established to prevent violations of the human rights of customers during use of the service through means such as impersonation, slander or other discriminatory remarks.

Future Direction

We will work in close cooperation with avatarin and ANA NEO as the developers of new services from a human rights point of view to determine whether customers are comfortable using these services.



ANA GranWhale



In addition, we are actively working on various human rights themes.

■ Work style reforms and work-life balance support (diverse work styles for supporting healthy, enriched lives)

The ANA Group is developing a work style structure to enable employees to lead fulfilling lives, including balancing their work with childcare and providing care for aged family members.

In 2023, the ANA Group established a special paid leave policy (three days) for male employees to support them in childcare responsibilities and household chores, addressing a societal concern regarding male participation in such tasks. Our goal is to ensure that all eligible male employees utilize this special paid leave as a standard practice. By implementing this policy uniformly across all group companies and setting unified objectives, we aim to alleviate any concerns male

employees may have about taking leave. Additionally, we are actively implementing measures to reassess the distribution of individual duties within the workplace and to encourage the active involvement of senior employees, as well as fostering mutual support among group companies within the same industry.

At the same time, the ANA Group is working to further promote autonomous work styles by making the in-house dress code more flexible and allowing people to choose from a variety of work style options as we move forward toward becoming a group where diverse human resources can maximize their individual strengths.

■ Gender equality and diversity in decision-making positions

The ANA Group is committed to attaining a 30% representation of female executives and managers at the earliest opportunity

within the 2020s. In pursuit of sustainable growth and the creation of new value, we are diversifying our decision-making positions, reviewing our personnel and support systems, and providing equitable opportunities for personal development, including skills enhancement. Our objective is to foster an organizational culture where employees can embrace challenges and actively contribute, regardless of their attributes or circumstances, including achieving a healthy work-life balance.

Despite Japan's low ranking in the World Economic Forum's Global Gender Gap Index, ANA has been recognized for its efforts in promoting diversity and inclusion. In 2021, we received the Diversity & Inclusion Team Award at the International Air Transport Association (IATA) Diversity and Inclusion Awards, making us only the second airline globally and the first Japanese airline to achieve this honor. Additionally, we actively share our initiatives beyond the aviation industry at events such as the United Nations Global Compact Leaders Summit and the International Civil Aviation Organization's (ICAO) Global Aviation Gender Summit, contributing to a broader societal dialogue on diversity and inclusion.

In Japan, some group companies, including ANA, have achieved the highest level of "Eruboshi Certification" based on the Act on Promotion of Women's Participation and Advancement in the Workplace established by the Ministry of Health, Labor and Welfare.



An employee enjoying time with his children



Seminar on balancing work and raising children



Highest level of Eruboshi Certification



IATA Diversity & Inclusion Team Award

■ LGBTQ+ (Respect for Sexual Diversity)

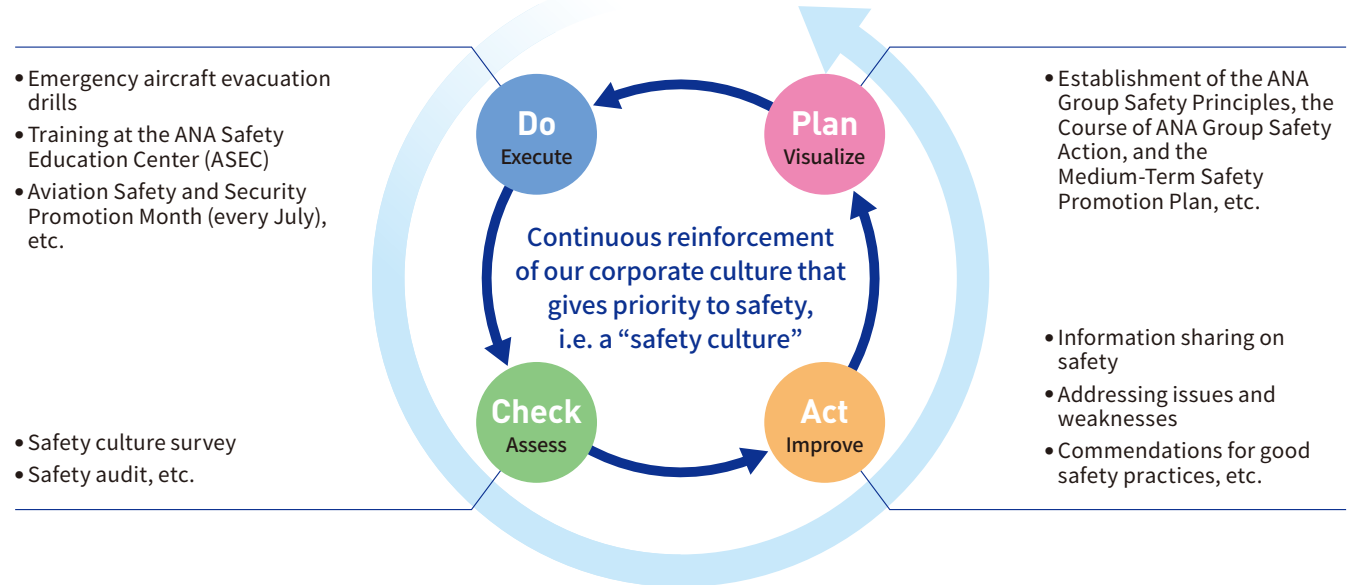
The ANA Group has established the Basic Policy on Respect for Diversity of Sexuality (LGBTQ+), and as a company is committed to supporting same-sex partners and prohibiting discrimination. In addition to providing benefits for same-sex and common-law partners, the ANA Group has created a work environment that is mindful of sexual minorities, and provides education for all executives and employees. Furthermore, we have also established a written policy prohibiting harassment of LGBTQ+ employees and a contact desk for consultation and is working to create a workplace where all employees respect each other's diversity.

In the PRIDE Index assessment by “work with Pride,” a Japan-based NPO that evaluates companies' diversity management regarding sexual minorities, ANA and 37 ANA Group companies received the highest rating of Gold. As of FY2023, ANA has received this award for eight consecutive years. In addition, with our allies (ANA Group LGBTQ+ Allies) we are working on activities in which employees learn about LGBTQ+ and support them through their daily activities. We are expanding the circle of understanding of diversity, including disseminating information to society.



Employee participants in Tokyo Rainbow Pride 2023

Aiming to “pursue and provide the world’s highest safety standard”



■ Commitment to Safety

For the ANA Group, safety forms the core of our business. Ensuring safety is our paramount mission in all of our businesses, regardless of business segment or brand. To this end, all executives and employees of the ANA Group have made a common oath in the form of the ANA Group Safety Principles and the Course of ANA Group Safety Action. We use the PDCA cycle to continuously make improvements and ensure that we prioritize safety above all else in our corporate culture, whether we are nurturing human talents or creating new systems in which safety is fundamental.

■ Human Rights of Children

An impact assessment in 2019 identified the human rights of children as a new issue. In response, the ANA Group held an online seminar on children's rights and business principles in 2020 in cooperation with Save the Children Japan, a public interest incorporated association, to better understand the potential risks of the ANA Group in regard to the human rights of children.

Furthermore, from FY2020 to FY2022, we made a total of 13 donations, including 11 food items and 2 toy items. Reduction in the number of flights due to COVID-19 restrictions resulted in unused in-flight meals. Through Save the Children Japan, the ANA Group donated rice crackers, apple juice and other foodstuffs to children from single-parent households. We have also been donating food and toys to elementary and junior high schools, medical institutions, and child welfare facilities in areas around Narita and Haneda Airports.

In our series of human rights initiatives, we place great importance on our grievance mechanism, which is a framework for promptly picking up on potential or apparent human rights risks from feedback from workers, and then taking measures to effectively address any adverse impacts identified. Therefore, we make continuous ongoing efforts to disseminate this mechanism and improve its operation.

■ Contact Points for Various Grievances

To further enhance the effectiveness of ensuring respect for human rights, the ANA Group has established multiple contact points for listening to concerns and complaints from various stakeholders.

In addition to these contact points, a number of ANA Group companies and partner firms have put in place their own mechanisms to listen to the voices of their employees. For example, ANA Catering Service (ANAC), which is responsible for the group's catering business, has been operating a mechanism called ANAC Direct Mail since 2014. This mechanism is available to contract employees as well as full-time employees, who can directly report concerns or complaints with the assurance that their privacy will be protected. By regularly organizing social events, ANAC also creates an environment where foreign workers, including workers from partner firms, and Japanese staff can communicate naturally in a relaxed atmosphere.

■ Overview of the “Ninja” Grievance Mechanism

“Ninja”, a grievance mechanism that commenced operation in November 2020, is a contact point for receiving complaints. Operated by CRT Japan, a third-party organization, it receives a wide range of reports from workers regarding not only violations of human rights but also various complaints and concerns. The use of “Ninja” is intended primarily for workers in the ANA Group supply chain but this does not preclude its use by workers at group companies. The service is available in seven languages 24 hours a day, 365 days a year. Persons making a report can also use “Ninja” anonymously without fear of disadvantage. (Users can also make reports in their real names.)

The contact point aims to prevent the problems of workers

Contact Points for Grievances

Name	Main Target	Description
“Ninja” (Contact point for grievances)	Workers working in the ANA Group supply chain	A platform for workers working in the ANA Group supply chain, “Ninja” is a contact point for receiving complaints and concerns on diverse matters as well as inquiries and reports on human rights violations. The service is provided and operated by third-party organization CRT Japan, and is available in seven languages. Users may use “Ninja” anonymously without fear of disadvantage.
ANA Alert (Contact point for making whistleblower reports)	Primarily for employees working in the ANA Group	A platform for compliance-related issues such as violations of laws and regulations as well as internal rules, ANA Alert is accessible to all ANA Group executives, employees, and temporary personnel as well as ANA Group retirees and employees of business partners of the ANA Group. Protection of the privacy of callers and other relevant parties is assured and assurance that no punitive measures will be taken against persons seeking consultation or cooperating in confirming facts is also given. A contact point has also been established at an external law firm. Reports can also be made in English.
ANA Desk for Comments and Requests	Customers	This is a contact point for customers who use ANA services, and receives not only inquiries regarding ANA services but also concerns and opinions regarding human rights and other matters. Customers can make contact by phone, email, or letter. The service is also available in English.
Inquiries for Shareholder Relations	Shareholders	This is a contact point for answering inquiries from shareholders and can be reached by telephone.

* Use of the above services does not preclude users from making use of public contact points such as the National Contact Points (NCPs) established by the Japanese government in accordance with the OECD Guidelines for Multinational Enterprises.

from becoming serious when they do not know where to turn for advice, and to resolve as early as possible issues that are the cause of workers' dissatisfaction and concerns. The ANA Group encourages workers working in the supply chain to make use of this system.

The flow of procedures “Ninja” follows after a user raises an issue is shown on the following page.

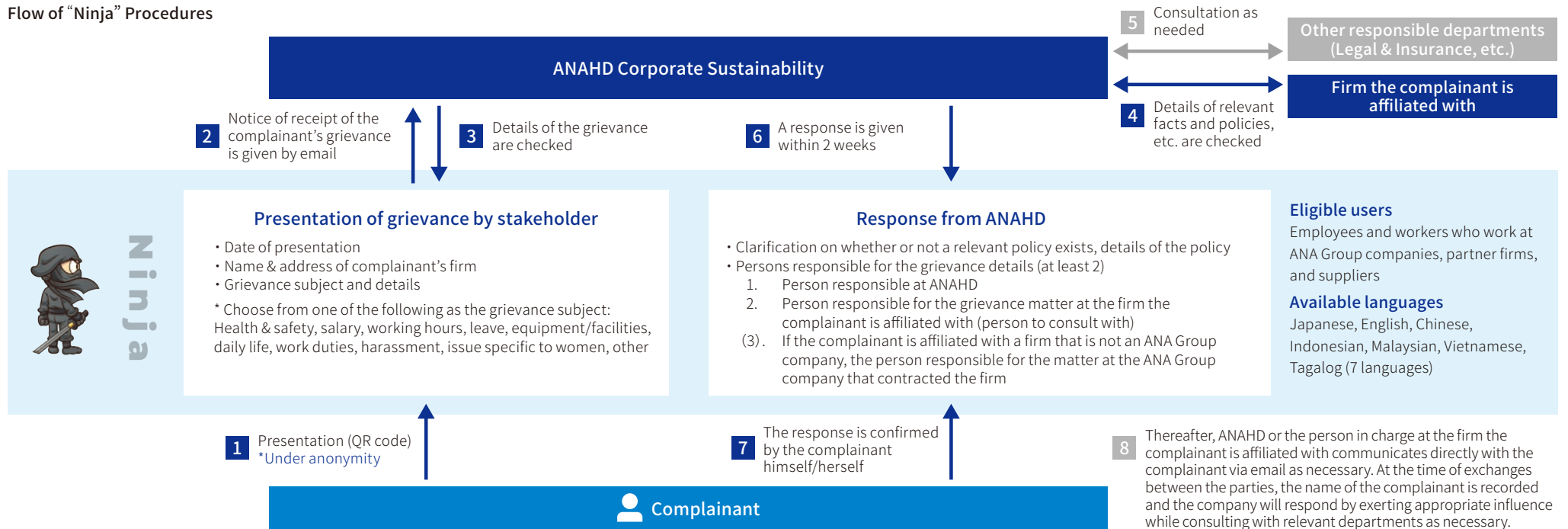
■ Promoting the Use of “Ninja”

To promote the use of “Ninja”, the ANA Group has been making efforts to improve awareness and effectiveness of the mechanism by posting information of “Ninja” on its website, putting up posters in workplaces and rest areas, and sending notices including QR codes directly to technical interns and specified skilled workers. In FY2023, we contacted a total of 365 technical interns and specified skilled workers at group companies and major contractors of the ANA Group.



Poster providing information about “Ninja”

Flow of “Ninja” Procedures



Receipt of complaints via “Ninja”

To date, we have received 18 complaints, and responded to each within two weeks. In our response, we stated whether there was an existing policy concerning the matter and who the person in charge was, and we took necessary actions for each case (see page 27: Case (4) for details). Eleven of the cases were presented by workers within the ANA Group, and we responded to these after sharing information with the Legal & Insurance Department.

Among all the complaints presented, there were no compliance violations or incidents that would be considered serious human rights violations.

Receipt of Complaints by “Ninja”

Subject of complaint	2020	2021	2022	2023	Total
Harassment			8		8
Salary				3	3
Everyday life				2	2
Working hours, leave		1	1		2
Work content				2	2
Health			1		1
Total	0	1	10	7	18

Future Direction

To make our grievance mechanism more effective, we believe that it is necessary to increase the level of trust in “Ninja” of workers working at contractors outside the group. We believe that by receiving more feedback and views and using these to improve the group's policies and measures as well as strengthen cooperative relationships with contractors, we will be able to build a robust supply chain for all stakeholders. Therefore, while recognizing that establishing a contact point like “Ninja” is not in itself a goal, we will continue to work on the design and operation of this grievance mechanism that actively responds to the voices of workers, and we will take various measures to broaden its penetration and improve trust in it.

Stakeholder Engagement

The stakeholders we have dialogue with and the method of dialogue will vary depending on the human rights theme. To achieve effective engagement, the ANA Group considers how best to approach our stakeholders in order to understand their views and wishes, and uses their feedback to improve our initiatives. We also regularly report the results of our initiatives to stakeholders and modify our responses as appropriate in response to their feedback. The ANA Group believes that building good relationships with stakeholders will result in appropriate risk management. The stakeholders we have dialogue with are selected with the advice from CRT Japan and other external organizations from outside the ANA Group.

■ Communication with Employees

In promoting ESG management which includes business and human rights, the ANA Group engages in direct dialogue with employees and conducts training based on the employees' position and work duties as well as e-learning to ensure that all employees as individuals view ESG as their own personal responsibility. Activities for promoting ESG implemented by ANA Group companies and offices are introduced in internal publications such as Sustainability News, which is published regularly, and this helps raise employee awareness.

Direct dialogue with employees

Engaging in direct dialogue with employees from group



Front cover of Sustainability News Vol.3

companies and internal departments, Group CSO Chikako Miyata and members of the Corporate Sustainability department share and exchange opinions on ESG activities including business and human rights. We make constructive use of the feedback we receive from employees to plan our future activities.

Meetings Convened as of September 2023

Town meeting convened by Group CSO	4 times
Direct dialogue meeting convened by members of the Corporate Sustainability department.	3 times



Direct dialogue meeting

Implementation of e-learning

We have created an e-learning program for employees to further deepen their understanding of business and human rights, and since 2015, we have also made the program available in our internal online training system so that employees can access it whenever they want to. From April 2015 to September 2023, more than 200,000 employees in total took the course.

List of e-learning materials

- What are human rights? (PDF format)
- Respect for human rights in dealing with customers (PDF)
- Corporate social responsibility and human rights (animation/PDF)
- Prevent human trafficking! (animation)
- Human rights required of the world's leading airline group: Leave no one behind!



e-learning screen

Education and training for employees

Every year we conduct human rights awareness education based on our employees' positions and duties (new executive training, new manager training, new employee training, etc.).

We are also strengthening the relationship of trust between labor and management by holding labor-management talks with unions and joint labor-management events. In fiscal 2023, we held a total of two study sessions for labor unions on ESG management and these resulted in lively exchanges of opinions.



Exchange of views with labor unions

Communication with Contractors, Suppliers and other Business Partners

To implement efforts to ensure respect for human rights throughout the supply chain in accordance with the UN Guiding Principles on Business and Human Rights, we communicate the ANA Group Policy on Human Rights, the ANA Group Procurement Policy and our other various policies to contractors and suppliers and request compliance with these. We also cooperate with contractors and suppliers in promoting various initiatives to create a work environment that will ensure increased respect for human rights.

Dissemination of the procurement policy

In efforts to disseminate the ANA Group Procurement Policy (revised in 2020) throughout the supply chain, we ask our suppliers and vendors to confirm and comply with the policy not only at the time of the signing of new contracts but also in the course of our regular communication after the commencement of business transactions.

Dialogue with suppliers

We actively engage in dialogue with suppliers and vendors through various means including surveys on the status of employment of workers, questionnaire surveys of workers, face-to-face interviews with workers, information about our “Ninja” grievance mechanism, and our prompt responses to issues raised by workers through various contact points.

Provision of educational material

By making e-learning used in our in-house education and training also available to business partners, we are laying the groundwork for an environment where we can promote business and human rights initiatives throughout the supply chain.

Communicating ANA Group Efforts to Outside the Company

The ANA Group makes active efforts to communicate information about our initiatives to ensure respect for human rights. Since 2022, our Group CSO has had the opportunity to give lectures and participate in panel discussions at seminars outside the company approximately 30 times. We make constructive use of the feedback we receive at such seminars in our future initiatives.

Overview of Engagement Activities

Year	No. of Times	Main Details
2022	19	<ul style="list-style-type: none"> ×SDGs Consortium Meeting “Practice in Communication” The Graduate School of Social Design
2023 (as of November)	11	<ul style="list-style-type: none"> Refinitiv Human Rights Seminar Collaborative symposium with the National Federation of Associations of Human Rights Volunteers and companies The 12th: 2023 Business and Human Rights Conference in Tokyo



Communicating the ANA Group's Efforts

■ Dialogue with ESG Investors

In 2022, we engaged in dialogue with overseas ESG investors and experts regarding the progress of the ANA Group's ESG management.

Theme: Progress in ESG Management in the ANA Group
Investors and specialists who participated in the dialogue

● Business & Human Rights Resource Centre

Phil Bloomer

Executive Director

● World Benchmarking Alliance

Namit Agarwal

Social Transformation Lead

Talya Swissa

Engagement Manager

Sofia del Valle

Engagement Manager Social Transformation

● UBS

Antonia Sariyska

Global Wealth management CIO Sustainable Investing Analyst, Director

Eileen Tian

Global Wealth Management APAC CH Desk North Asia GTP

Makiko Tanaka

Global Wealth Management APAC CH Desk North Asia Client Advisor, Associate Director

● Church Commissioners for England

Dan Neale

Responsible Investment Social Themes Lead

Olga Hancock

Deputy Head of Responsible Investment

Isobel Mitchell

● Federated Hermes

Haonan Wu

Engagement, EOS at Federated Hermes

Shoa Hirotsato

Engagement EOS at Federated Hermes

● EIRIS Foundation

Peter Webster

CEO

Main Comments Concerning the ANA Group

ESG in general

- The axis of ESG evaluations of companies is shifting to one that is directly linked to business strategy and examines whether governance frameworks are functioning effectively in resolving negative impacts on society. It focuses on whether companies are building structures (decision-making mechanisms of management) that can enhance corporate sustainability even in uncertain and unsettled times.
- There is a trend to clamp down on greenwashing. In the disclosure of information, ensuring a high level of transparency and disclosing management systems that encompass the supply chain are essential.

The environment

- Reduction of CO₂ emissions is the top priority theme in the aviation industry. By clearly demonstrating that you are taking a leading position in solving this problem will differentiate you from other airlines. It is important for you to disclose and explain to investors a roadmap for reductions by 2030 and 2050 (measures at the individual company level and industry/country level) that is linked to business and growth strategies.

Human capital and human rights

- We are watching ANA with significant interest as an entity that identifies human rights issues and appropriately implements corrective measures in accordance with the United Nations' Guiding Principles on Business and Human Rights. Issues such as forced labor, working hours, and living wages are common risks in supply chains across sectors, and we continue to pay attention to strengthening the supply chain management in areas such as face-to-face dialogue with on-site workers, the acceptance of complaints and concerns, and decision-making involving management.
- We pay close attention to human capital management and human resource strategies that contribute to the realization of a long-term vision and business strategies, and we look

forward to the ANA Group's setting and disclosing KPIs in this regard.

● Business & Human Rights Resource Centre

An international NGO that tracks the human rights impacts of more than 10,000 companies in more than 180 countries and publishes the information in 10 languages.

● World Benchmarking Alliance

An initiative proposed and established in 2018 by the United Nations Foundation, AVIVA (British insurance company), and the Index Initiative (Dutch NGO). Developed benchmark indicators to evaluate the contribution of companies towards achieving SDGs.

● UBS

Founded in Switzerland, one of the world's largest financial groups. Provides high-quality financial services in over 50 countries.

● Church Commissioners for England

Registered charity established in 1948. Manages the property and assets of the Church of England and supports its activities and mission.

● Federated Hermes

Global investment management company headquartered in the United States. In 2018, US Federated Investors acquired UK Hermes Investment Management.

● EIRIS Foundation

Charity registered in England and Wales that engages in responsible investment. Has over 30 years' experience providing information about ethical finance and business practices to the public.



Dialogue with European ESG investors

Review of the ANA Group's Human Rights Activities Regularly

Since 2016, the ANA Group has held regular annual dialogue on human rights with international experts to receive their advice regarding the group's efforts to ensure respect for human rights.

Summary of the review in 2023

On October 19, 2023, we invited human rights experts from two overseas organizations to Tokyo and reported on the progress of the ANA Group's efforts to respect human rights. We received advice regarding our group's overall efforts in the area of human rights, as well as recommendations on matters such as our approach to disclosure of human rights due diligence, addressing issues in the supply chain, and the employment of foreign nationals.

Based on the advice we received during this review, we will continue to promote efforts to ensure respect for human rights.

Human rights experts who participated in the dialogue

- **UNDP (United Nations Development Programme)**

Asia Pacific

Sean Christopher Lees

Business and Human Rights Specialist

- **World Benchmarking Alliance**

Jill van de Wall

Research Analyst



Main comments from human rights experts

On the disclosure of the process of human rights due diligence and its progress

- While a human rights impact assessment was conducted in 2022 and priority human rights themes were once again identified, it would be better to clearly indicate that you continually review human rights risks on an annual basis. In disclosing the progress of your efforts, it would be easier to understand if you did it in a story-like manner by giving specific examples of engagement when you report on identifying rights-holders and addressing their issues in accordance with the human rights due diligence process.

On human rights and environmental issues in the supply chain

- The upstream area of the supply chain can be thought of as a blind spot. Certification itself may not be functioning properly, so direct engagement with producers is important.
- In addition to initiatives for decarbonizing fuel, tackling human rights and environmental issues such as food

waste, plastic packaging, deforestation in areas where raw materials are produced, etc. from the perspective of in-flight meal services is an effective approach.

On the formulation of a policy for the employment of foreign workers

- It is wonderful that you have formulated a policy on the employment of foreign workers and that you are implementing it across the group. It would be good if you could incorporate the policy into a set of guidelines when you apply it to actual business operations.

- **UNDP (United Nations Development Programme)**

Leading agency of the United Nations' development network, working in more than 170 countries around the world to assist developing countries in achieving their development goals.

- **World Benchmarking Alliance**

An initiative proposed and established in 2018 by the United Nations Foundation, AVIVA (British insurance company), and the Index Initiative (Dutch NGO). Developed benchmark indicators to evaluate the contribution of companies towards achieving SDGs.



UN Guiding Principles Reporting Framework

To report in compliance with the United Nations Guiding Principles (UNGP) Reporting Framework, the ANA Group refers to the UNGP Reporting Framework Index in the preparation of our human rights reports. The table below indicates where readers can find information that addresses the framework requirements in this report.

For full details on the framework, please visit <https://www.ungpreporting.org/>

Section of the Framework		Pages
Part A	Governance of Respect for Human Rights	
A1	Policy Commitment	
A1.1	How has the public commitment been developed?	P.5
A1.2	Whose human rights does the public commitment address?	P.5, P.47
A1.3	How is the public commitment disseminated?	P.14
A2	Embedding Respect for Human Rights	
A2.1	How is day-to-day responsibility for human rights performance organized within the company, and why?	P.7-9
A2.2	What kinds of human rights issues are discussed by senior management and by the Board, and why?	P.7-9
A2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	P.5-6, P.14, P.32, P.34, P.39, P.41-42
A2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	P.5-6, P.14, P.23, P.29-32, P.39, P.42
A2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	P.44
Part B	Defining the Focus of Reporting	
B1	Statement of salient issues	P.19, P.21-36
B2	Determination of salient issues	P.17-18
B3	Choice of focal geographies	P.18
B4	Additional severe impacts	P.19-20, P.37-38
Part C	Management of Salient Human Rights Issues	
C1	Specific Policies	
C1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	P.5-6, P.24
C2	Stakeholder Engagement	
C2.1	How does the company identify which stakeholders to engage with in relation to each salient issue, and when and how to do so?	P.21-36, P.39-40, P.41-43
C2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	P.21-36, P.39-40, P.41-43

Section of the Framework		Pages
C2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	P.21-36, P.39-40, P.41-43
C3	Assessing Impacts	
C3.1	During the reporting period, were there any notable trends of patterns in impacts related to a salient issue and, if so, what were they?	P.21-36
C3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	P.21-36
C4	Integrating Findings and Taking Action	
C4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	P.14, P.21-36
C4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	P.21-36
C4.3	During the reporting period, what action had the company taken to prevent or mitigate potential impacts related to each salient issue?	P.21-36
C5	Tracking Performance	
C5.1	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	P.24-28
C6	Remediation	
C6.1	Through what means can the company receive complaints or concerns related to each salient issue?	P.39-40
C6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	P.39-40
C6.3	How does the company process complaints and assess the effectiveness of outcomes?	P.39-40
C6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	P.39-40
C6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	P.39-40, P.24-28

Corporate Human Rights Benchmark (CHRB) Indicators

To ensure respect for human rights, the ANA Group refers to the indicators of the CHRB (Corporate Human Rights Benchmark) in promoting its activities.

The table below indicates the CHRB measurement themes (limited to themes A to C common to all industries) and the corresponding pages where relevant information can be found in this report.

For more information on the CHRB, please visit <https://www.worldbenchmarkingalliance.org/corporate-human-rights-benchmark/>

Themes and Indicators		Pages
A	Governance and policy commitments	
A.1	Policy commitments	
A.1.1	Commitment to respect human rights	P.5, P.47
A.1.2.a	ILO Declaration on Fundamental Principles and Rights at Work	P.5, P.47
A.1.2.b	Health and safety and working hours	P.5, P.47
A.1.3	Commitment to respect human rights particularly relevant to the sector: Vulnerable groups	(Not included)
A.1.4	Commitment to remedy	P.39-40, P.47
A.1.5	Commitment to respect the rights of human rights defenders	P.5, P.47
A.2	Board level accountability	
A.2.1	Commitment from the top	P.2, P.7-9
A.2.2	Board accountability	P.7-9
A.2.3	Incentives and performance management	P.9
A.2.4	Business model strategy and risks	P.8, P.13
B	Embedding respect and human rights due diligence	
B.1	Embedding respect for human rights in company culture and management systems	
B.1.1	Responsibility and resources for day-to-day human rights functions	P.7-9
B.1.2	Incentives and performance management	P.9
B.1.3	Integration with enterprise risk management	P.7-9
B.1.4.a	Communication/dissemination of policy commitment(s) to workers and external stakeholders	P.5-6, P.14, P.32, P.34, P.39, P.41-42
B.1.4.b	Communication/dissemination of policy commitment(s) to business relationships	P.5-6, P.14, P.23, P.29-32, P.39, P.42

Themes and Indicators		Pages
B.1.5	Training on human rights	P.14, P.32, P.34, P.41-42
B.1.6	Monitoring and corrective actions	P.14
B.1.7	Engaging and terminating business relationships	P.30, P.31
B.1.8	Approach to engaging with affected stakeholders	P.22, P.41-43
B.2	Human rights due diligence	
B.2.1	Identifying human rights risks and impacts	P.17-18
B.2.2	Assessing human rights risks and impacts	P.19-20
B.2.3	Integrating and acting on human rights risks and impact assessments	P.21-39
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	P.21-39
B.2.5	Communicating on human rights impacts	P.21-39, P.41-43
C	Remedies and grievance mechanisms	
C.1	Grievance mechanism(s) for workers	P.39-40
C.2	Grievance mechanism(s) for external individuals and communities	P.39
C.3	Users are involved in the design and performance of the mechanism(s)	P.39-40
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	P.39-40
C.5	Prohibition of retaliation for raising complaints or concerns	P.39
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	P.39
C.7	Remediating adverse impacts	P.40
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	P.40

ANA Group Policy on Human Rights

We in the ANA Group understand that we must respect the human rights of all persons affected by our business activities (hereinafter “rights-holders”). To safeguard their dignity and show them respect, the ANA Group hereby establishes the ANA Group Policy on Human Rights (hereinafter “the Policy”) based on the Guiding Principles on Business and Human Rights adopted by the United Nations Human Rights Council in June 2011, and will promote every effort to respect human rights.

1. Basic Stance on Human Rights

The ANA Group supports and respects the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights), which stipulates the fundamental human rights of all persons, and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work(*) as well as other international treaties and declarations related to the protection of human rights, including conventions on workers’ human rights such as wages and working hours, the OECD Guidelines for Multinational Enterprises, and the United Nations Declaration on the Rights of Indigenous Peoples. Furthermore, as a signatory to the Ten Principles of the United Nations Global Compact, we also support and respect this.

(*) This includes support and respect for the International Labour Organization’s Core Labour Standards: the effective abolition of child labor, the elimination of all forms of forced or compulsory labor, the elimination of discrimination in respect of employment and occupation, freedom of association and the effective recognition of the right to collective bargaining, and a safe and healthy working environment.

The Policy is a commitment by the ANA Group to respect human rights based on its Mission Statement, Management Vision, ANA’s

Way and other internal policies to fulfill its responsibility to respect the human rights of its rights-holders.

It is also a pledge that the ANA Group will not allow or contribute to any threat, intimidation, or attack against human rights defenders.

2. Scope of Application

The Policy applies to all executives and employees of the ANA

Group (all staff including officers, permanent staff and contract staff). The ANA Group will also continuously encourage its business partners and suppliers not only to support the Policy but also to adopt a similar policy, and will cooperate with its business partners and suppliers in promoting respect for human rights.

3. Responsibility to Respect Human Rights

The ANA Group understands that its business activities may directly or indirectly cause adverse human rights impacts. We will fulfill our responsibility to respect human rights by not violating the human rights of our rights-holders, and by taking appropriate steps to implement remedies where our business activities may cause or contribute to any adverse impacts on human rights. Although we recognize that we cannot completely ascertain all the ways in which the ANA Group’s operations, products, and services are used, we do not intend for any of them to be used in any way that violates human rights. In the case where an adverse impact on human rights caused by our business partners and suppliers is suspected to be linked to our operations, products, or services, we will ask them to respect human rights and not violate them.

4. Human Rights Due Diligence

To fulfill its responsibilities in regard to respect for human rights in accordance with procedures described in the Guiding Principles on Business and Human Rights, the ANA Group will establish and continually implement a system of human rights due diligence. Human rights due diligence is an ongoing process of preventively investigating and identifying issues, correcting these through appropriate procedures, and externally disclosing progress and results of its activities in order to prevent or mitigate any adverse impacts on human rights the ANA Group may have on society.

5. Dialogue and Consultation

In the process of implementing the Policy, the ANA Group will apply the expertise of independent third parties on human rights, and will sincerely engage in dialogue and consultation with its rights-holders.

6. Education and Training

The ANA Group will provide appropriate education and training to its executives, employees and, as necessary, to business partners

and suppliers to ensure that the Policy is integrated into its business activities and is implemented effectively.

7. Remedy

If it becomes clear that the ANA Group’s business activities have caused or contributed to adverse human rights impacts, whether directly or through its involvement with business partners or suppliers, we will work to remedy such impacts through dialogue and appropriate procedures in accordance with international standards.

8. Responsible Executive Officer

The ANA Group will entrust a Chief Sustainability Officer (CSO) with the responsibilities of implementing the Policy and supervising compliance with the Policy.

9. Information Disclosure

The ANA Group will disclose the progress and results of its efforts to respect human rights on its website and through other media.

10. Compliance with Applicable Laws and Regulations

The ANA Group will comply with applicable laws and regulations of each country and region in which it operates. Where there is a conflict between internationally recognized human rights principles and the laws and regulations of a country, we will seek ways to respect internationally recognized human rights principles to the maximum extent possible.

The Policy has been approved by the Board of Directors of ANA HOLDINGS INC., and signed by the Representative Director, President and CEO.

July 28, 2023

Koji Shibata,

President and CEO, ANA HOLDINGS INC.

Established on April 1, 2016

Revised on July 28, 2023



ANA HOLDINGS INC.

Sustainability Promotion Dept.

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