ANA GROUP MODERN SLAVERY STATEMENT (Year ended March 2016)

1 Introduction

This statement has been published in accordance with the Modern Slavery Act 2015. It sets out the steps taken by ANA Group during the year ending 31 March 2016 to prevent modern slavery and human trafficking in our business and supply chains.

2 Our business and supply chains

ANA Group is in the airline sector, and consists of group ANA Holdings Inc., 117 subsidiaries and 45 affiliated companies. We have 90 flight destinations, including 49 cities domestically in Japan and 41 cities internationally, and the number of group employees is 34,919 as of 31 March 2016. Though our business is centred on air transport, we operate other related business, in sectors such as travel services and trade and retail. More detailed information on our organisation and business is available at http://www.ana.co.jp/group/en/about-us/

In the UK, All Nippon Airways Co., Ltd. operates flights to and from London Heathrow Airport, and other group companies provide associated services, such as cargo and logistics, trade and retail, in support of this route. ANA Sales Europe Ltd., headquartered in London, provides travel service within the UK.

We source most of the goods and services in our operations. Centring on our air transport business, our procurement activities focus on sourcing aircrafts, fuel, and in-flight goods. We collaborate with business partners, contractors and suppliers across its supply chains, and requests to do business in a way that respects human rights, in particular to avoid forced labour and human trafficking, in line with ANA Group policies.

3 Policies in relation to slavery and human trafficking

An integral part of our approach to human rights is the prohibition of all forms of modern slavery in our organisation and in our supply chains. In line with the UN Guiding Principles on Business and Human Rights, we are committed to respecting internationally recognised human rights as set out in the International Bill of Human Rights (the Universal Declaration of Human Rights and the two International Covenants), and the International Labor Organization on Fundamental Principles and Rights at Work. ANA Group is a participant in the UN Global Compact and supports its Ten Principles.
ANA Group Policy on Human Rights articulates ANA's commitment to respect human rights. This applies to all executives and employees of the ANA Group, including permanent staff and contract staff. ANA Group makes a clear commitment in the Policy to encourage its business partners, contractors and suppliers to support the Policy, and to adopt a similar policy. We also commit to cooperate with them in promoting respect for human rights. ANA Group Policy on Human Rights is available at https://www.ana.co.jp/group/en/csr/effort/pdf/humanrights_e.pdf

ANA Group's Social Responsibility Guidelines is a code of conduct for all executives and group employees. The guidelines state that ANA Group employees are expected to 'respect human rights and diversity', in particular 'laws and social norms based on internationally recognized human rights'. They must 'not only prevent employees getting involved in, but also prevent them doing business with business partners, contractors and suppliers where child labour and forced labour are used.'

ANA Alert, our Compliance Reporting System, receives concerns regarding potential non-compliance with the Human Rights Policy and ANA Group’s Social Responsibility Guidelines. It is open to all executives and employees, including temporary personnel. The privacy of the caller is protected, and any punitive measures against those who seek consultation or cooperate with an investigation is strictly prohibited.

ANA Group Purchasing Policy defines the minimum standards that ANA Group suppliers are required to adhere to, including the prohibition of child labour and forced labour, and requires them to comply with internationally recognised human rights. ANA Group Purchasing Policy consists of Basic Policies, Purchasing Principles, and Supplier Management Policy. All these policies are available at http://www.ana.co.jp/group/en/csr/partner/supply_chain.html

4 Our Due Diligence Processes

Due Diligence is an ongoing process for the ANA Group, whereby the Group preventively investigates and identifies issues, corrects those through appropriate procedures, and discloses externally progress and results of its activities to prevent or mitigate any negative impact on human rights the Group may have on society. We understand that human rights situations are dynamic and that we need to conduct our due diligence based on up-to-date information and understanding of human rights standards.
Within our organisation - We have sought inputs from human rights experts to enhance our understanding on potential risks of forced labour and human trafficking within our organisation.

Within our supply chains - To ensure there is no forced labour or human trafficking within our supply chains, we have conducted CSR questionnaires over 136 of our major suppliers, and started a periodic audit at the factories of contractors in our catering business.

5 Training about forced labour and human trafficking

We understand the need for ensuring that respect for human rights and the avoidance of forced labour and human trafficking is embedded into the day-to-day operation of each Group employee. To this aim, we provide training to raise awareness of human rights risks, including risks of forced labour and human trafficking, to all Group employees. Our two-part e-learning course was completed by nearly 92.0% of Group employees in 2015. Additional training courses on the complexity of human rights risks with some actual cases were provided to new employees and newly appointed managers at ANA Group.

6 Plans to strengthen our approach in the future

Over the next 12 months, we will continue to strengthen our due diligence process, to identify where forced labour and human trafficking risks may exist in our business and supply chains, and assess the gravity of risk for these individuals whose (human) rights we are seeking to uphold. We will also establish measures and key performance indicators to effectively manage those risks within any identified high-risk sectors and countries we operate. We will also increase the level of engagement with business partners, contractors and suppliers to ensure they avoid involvement in forced labour and human trafficking.

This statement was approved by the Board of ANA Group and signed on its behalf by:

Shinya Katanozaka
President and CEO
ANA Holdings Inc.
February 1, 2017