The ANA Group has a Human Rights Policy ("the Policy") based on the International Bill of Rights (the Universal Declaration of Human Rights and the two International Covenants), the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights. ANA Group will continue to further respect for human rights.

In addition to the Human Rights Policy, the ANA Group has Social Responsibility Guidelines, a code of conduct that provides us with a clear understanding of what is expected of every Group executive and employee in relation to human rights. This enables each staff member to "do the right thing" in our day-to-day duties.

<Social Responsibility Guidelines>

- **We will respect human rights and diversity.**
  - We ensure that human rights are respected at all times when conducting the ANA Group's corporate activities.
  - We respect the cultures, customs, history, values and social norms of each country and region and remain conscious of the views of concerned parties in our actions.
  - We respect the individuality of our colleagues and the diversity of our teams and organizations, and cooperate to create a sound and positive workplace environment free from harassment of any kind.

**Statement under UK Modern Slavery Act 2015**

ANA Holdings has published a statement covering the year 2015, in accordance with the UK Modern Slavery Act. Please refer to the statement here.

**Implementation Structure**

ANA Group has appointed a Chief CSR Promotion Officer to oversee the Group’s efforts in human
rights. The Chief CSR Promotion Officer ensures timely discussion of any issues regarding our human rights policy and measures at the CSR/ Risk Management/ Compliance Committee, and works together with the CSR Promotion Leaders in each Group company and department to further human rights within ANA Group.

Training Our Staff in Human Rights

During 2016, ANA Group has trained new staff and new managers on human rights. ANA Group's human rights training touches on both global trends and real-life examples closer to staff, and aims at ensuring that each staff understands the necessity of being fully cognizant of human rights while engaging in their daily duties.

To communicate on ANA Group Human Rights Policy with ANA Group employees and improve their understanding on human rights and ANA's business, in 2016, we provided them e-learning titled 'Corporate Social Responsibility and Human Rights' for a month, which 92.7% of the employees completed. ANA Group will continue to train our staff in human rights through 2017.

[Screen shots of our e-learning programme]
In addition, all staff, including staff contracted from temporary staffing agencies, can communicate concerns to "ANA Alert", our reporting procedure on non-compliance issues. ANA Group protects the privacy of any staff member who uses "ANA Alert", and ensures that neither s/he nor any other staff member faces any negative consequences as a result of reporting on instances of non-compliance. ANA Group also has procedure for the possibility to report non-compliance issues to an outside party commissioned by the Group, should a staff member wish.
Human Rights Due Diligence

ANA Group has established a framework for conducting human rights due diligence, in accordance with the procedures outlined in the UN Guiding Principles for Business and Human Rights. ANA Group understands due diligence to be an ongoing process whereby a company preventsively investigates and identifies issues, corrects these through appropriate procedures, and discloses externally progress and results of its activities in order to prevent or mitigate any negative impact on human rights the Group may have on society.

[Approach to human rights due diligence]

Source: Developed by ANA Group, guided by Verisk Maplecroft and Caux Round Table Japan

During 2016, ANA Group used the above process, and analysed the potential risks throughout all of its business operations (including all countries the Group operates in), and identified several human rights issues the Group will focus on to reduce the risk of any negative human rights impacts.

< Human Rights Impact Assessments >

ANA Group is conducting human rights impact assessments in collaboration with Verisk Maplecroft (1) and Caux Round Table Japan (CRT Japan - 2).

In 2016, ANA Group first analysed the potential human rights risks the Group’s activities may face, both by area of business and country of operation, using social and environmental data provided by Verisk Maplecroft. In collaboration with CRT Japan, the Group then identified human rights issues (including related business activities and countries/areas) which ANA Group needs to focus on to prevent and tackle, through interviews across Group and by receiving advices from global experts on
human rights. In the course of 2017, the Group will analyse the likelihood of any negative impacts, evaluate what severe impact there may be for stakeholders, develop measures to mitigate and prevent these negative impacts.

[A risk-based analysis using indices and scores of Verisk Maplecroft]

<table>
<thead>
<tr>
<th>Scope of the assessment</th>
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<tbody>
<tr>
<td><strong>Business activities</strong></td>
</tr>
<tr>
<td>Air Transportation, Airline Related (Airport Ground Support, Aircraft Maintenance, Cargo and Logistics, Vehicle Maintenance, Catering etc), Trade and Retail, Travel Services</td>
</tr>
<tr>
<td><strong>Countries and areas</strong></td>
</tr>
<tr>
<td>Japan, UK, France, Germany, Belgium, China, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, Taiwan, Korea, Australia, Canada, USA</td>
</tr>
<tr>
<td><strong>Indices used for the assessment</strong></td>
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<tr>
<td><em>Provided by Verisk Maplecroft</em></td>
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ANA Group understands it has an important responsibility to respect the human rights of its customers and its staff. ANA Group also understands the importance of ensuring an acceptable working environment for workers throughout the Group’s supply chain, and will continue to work in cooperation and collaboration with its partners towards this goal.

The working environment of foreign workers in Japan is an issue that has received much international attention. ANA Group understands the importance of this issue, and is working to understand the situation with regards to foreign workers in its partner companies. In particular, the Group is working with its partners in the "2 sites" of Haneda and Narita airports, conducting interviews of staff and aiming towards common policies and practices.

ANA Group also understands the need to focus on the working environment of workers in its supply chain. The Group is currently cooperating on this issue with its first tier suppliers, and will focus in particular on second and third tier suppliers in China.

Strengthening management of the supply chain for in-flight food is a particular issue for ANA Group. The Group is the first Japanese company to become a member of the Blue Number Initiative, an electronic system to ensure traceability and transparency throughout the food supply chain.

Working with partners

ANA Group also understands the need to promote respect for human rights not just in our own business activities, but throughout the entirety of our entire supply chain, including suppliers, manufacturers and contractors. The Group shares its Supplier Management Policy and CSR Guidelines with its business partners. In particular, the CSR Guidelines are based on ISO26000, a set of international CSR guidelines, and cover subjects including "Respect and compliance with international norms on human rights and labour". This policy plays an important role in choosing partners, and we work proactively to gain their understanding and cooperation through measures such as regular CSR monitoring surveys to follow up on initiatives.

For more details, please access to our page on 'Relationship with Business Partners'

Advice on Human Rights Measures

ANA Group regularly receives advice on its human rights measures from experts in the field of human rights. In September 2016, the Group invited four experts from overseas (a representative of the Danish Institute for Human Rights (3), a former member of the UN Working Group on Business
and Human Rights, and the human rights advisory firm ELEVATE (4), and discussed the Group’s human rights measures, its due diligence process, and progress with human rights impact assessments. The Group received valuable advice on the human rights issues it should focus on. ANA Group continue to solicit the views of human rights experts on its progress.

Some comments received from experts in the September 2016 session:

- ANA has made excellent progress, including with the adoption of the Human Rights Policy. Now comes the difficult part, as you will need to ensure adequate transparency on the concrete measures you take. In providing information to the outside world, it is important to be clear on what you can and can't do.

- As you expand further into Asia, your human rights performance will become more and more scrutinized.
- Take care of "indirect impacts" when you are shipping, both human beings and things.
- The environment should be recognised as an important human rights issue affecting coming generations.
- It's important to stress not only "what you are doing now" but also "what you plan to do".
- The grievance mechanism should be opened to the supply chain, and operated in cooperation...
with suppliers.

- There are strong concerns regarding the discriminatory treatment of foreign labourers in Japan. These issues will become even more important as the demand for labour becomes larger in the run-up to the Olympics.

3: The Danish Institute for Human Rights is an independent state-funded, originally established as the Danish Centre for Human Rights by a parliamentary decision. The organisation provides expertise on business and human rights, and develops tools to help companies assess the impact of their business on human rights. More than 200 global firms use the tools.

4: ELEVATE is one of the world’s leading social compliance assessment and improvement service providers operating in the rapidly growing market for supply chain sustainability and risk management services. The company provides customized global monitoring programme, advisory services on capacity building in supply chains.

Participation in Stakeholder Engagement Processes

In May 2017, we participated in stakeholder engagement programmes in both Thailand and Malaysia, both countries where ANA Group has operations, following with stakeholder dialogue in Japan in February and December 2015. These programmes included stakeholders from government, NGOs, and business, and discussed ways those stakeholders are addressing issues faced by workers (including migrant labourers) in those countries.
Stakeholder engagement workshop in Thailand
Stakeholder engagement workshop in Malaysia

ANA Group will continue to engage on a continuing basis with stakeholders through 2017, implementing its human rights due diligence framework and ensuring transparency throughout the process.