ANA GROUP MODERN SLAVERY STATEMENT
(Year ended March 2017)

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 2017 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 transport sector, and consists of ANA Holdings., 63 consolidated subsidiaries and 17 equity-method subsidiaries and affiliates. We have 94 flight destinations, including 52 cities in Japan and 42 cities internationally, and the number of group employees is 39,243 (all as of 31 March 2017). Though our business is centred on air transport, we operate other related businesses, 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.

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 a large number of business partners, contractors and suppliers across our supply chains, and request all our partners (including our suppliers) 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 form of modern slavery in our Group and throughout 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 Labour Organization Declaration 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 similar policies. We also commit to cooperating 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. In the section titled ‘We will respect human rights and diversity’, the guidelines state that ANA Group employees are expected to ‘respect laws and social norms based on internationally recognized human rights’. In addition, they must ‘not only prevent employees from getting involved in child labour or forced labour, but also refrain from doing business with partners, contractors and suppliers where child labour or forced labour takes place’.

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. Apart from the internal system, we have also sourced an external contractor to receive and deal with any raised concerns.

ANA Group Purchasing Policy defines the minimum standards that ANA Group suppliers are required to adhere to. The Policy strictly prohibits child labour and forced labour, and requires suppliers 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 Process

Our human rights due diligence is guided by the following process, in accordance with the procedures outlined in the UN Guiding Principles for Business and Human Rights.
5. Our Human Rights Impact Assessment

In 2016, ANA Group analysed the human rights risks the Group’s businesses may face in all its countries of operation and identified priority human rights issues that require special focus. The scope of the assessment was the following:

Scope of the assessment

<table>
<thead>
<tr>
<th>Business activities</th>
<th>Air Transportation, Airline Related (Airport Ground Support, Aircraft Maintenance, Cargo and Logistics, Vehicle Maintenance, Catering etc), Trade and Retail, Travel Services</th>
</tr>
</thead>
<tbody>
<tr>
<td>Countries and areas (Flight Destinations)</td>
<td>Japan, UK, France, Germany, Belgium, China, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, Taiwan, Korea, Australia, Canada, USA</td>
</tr>
<tr>
<td>Issues assessed with the data of Verisk Maplecroft</td>
<td>Child labour, Decent Wages, Decent Working Time, Discrimination in the Workplace, Forced Labour, Freedom of Association, Collective Bargaining, Migrant Workers, Occupational Health and Safety, Trafficking in Persons, Total GHG Emissions, Air / Water Quality, Corruption</td>
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For the assessment, we used Verisk Maplecroft’s social and environmental data across 13 issues, and qualitative data, which was gathered by Caux Round Table Japan through interviews within ANA Group. Comments on the result of the assessment were collected from global experts on human rights (Danish Institute for Human Rights; a former member on the UN working group on Business and Human Rights; and ELEVATE), and those comments were reflected in the
identification of priority human rights issues for ANA Group.

**Risk Identification and Mitigation**

ANA puts the highest priority on ensuring safety and on its responsibility to respect the human rights of its customers and its staff. ANA Group is also mindful of the importance of tackling the human rights risks within its supply chain, and will continue its activities to mitigate risks in the following areas:

- Working conditions of foreign workers in Japan, especially in our partner companies
- Working conditions in our supply chain, especially in our suppliers in catering and trading business
- Prevention of the use of airplanes in human trafficking
- Eradication of corruption

We have held dialogues with external experts on human rights, and have implemented monitoring questionnaires to over 170 of our major suppliers. We have also conducted regular audits at the factories of contractors for our handling and catering businesses, to ensure there is no forced labour or human trafficking within our supply chains.

**6. Training to eradicate forced labour and human trafficking**

To ensure that each Group employee has an understanding of the importance of respect for human rights and the eradication of forced labour and human trafficking, and that s/he embeds that understanding into the Group’s day-to-day business operations, we provide training to raise awareness of human rights risks, including risks of forced labour and human trafficking, to all Group employees. Our eLearning was completed by 92.7% of Group employees in 2016. Additional trainings were provided to new employees and newly appointed managers at ANA Group, using actual cases to improve their understanding on newly recognised human rights risks (trends) and issues.

**7. Plan for the next year and onward**

Over the next 12 months, we will confirm whether the potential risks we identified in 2016 have negatively impacted any stakeholders. If any impact has been caused, we will ascertain how the situation can be rectified, and how we can prevent and mitigate those risks in the future. We will also develop Key Performance Indicators to monitor and measure the effectiveness of our actions. We understand our engagement with business partners, contractors and suppliers is essential to any of the above actions, and we will strengthen our activities based on shared understandings with them. With the above in mind, the nature and extent of our actions is not something we can or should define on our own. Rather, it should be defined through dialogues with a wide range of
stakeholders, including civil society. We understand that human rights situations are dynamic, and that we need to regularly review our human rights risks and priority issues through advice from experts on human rights.

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

Shinya Katanozaka
President and CEO
ANA Holdings Inc.
1 March 2018