ANA GROUP MODERN SLAVERY STATEMENT
(Year ended March 2025)

1. Introduction

This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 and discloses the steps taken during the year ending 31 March 2025 to prevent modern slavery and human trafficking in the ANA Group ("we") and our supply chains.

2. Business and Supply Chains

The ANA Group operates within the air transport sector and consists of ANA HOLDINGS INC., 57 subsidiaries, and 13 affiliated companies. We have a consolidated workforce of 44,019 employees and with the air transportation business as our core, we operate the airline-related business such as airport ground support services, travel services, and trade and retail. With regard to the air transportation business, we operate flights to a total of 102 destinations, including 61 domestic and 41 international destinations (all as of March 31, 2025). More detailed information on our organization is available at
https://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.
Centering on our air transportation business, we are engaged in global procurement activities with a focus on aircraft, fuel, and in-flight goods and have cultivated collaborative relationships with a large number of business partners, contractors, and suppliers across our supply chains to provide comfortable air services. We request all our partners and suppliers to appropriately address human rights issues in line with ANA Group policies described below.

3. Policies in Relation to Modern Slavery and Human Trafficking

In April 2016, the ANA Group established the ANA Group Policy on Human Rights, based on internationally recognized human rights as set out in the International Bill of Human Rights (the Universal Declaration of Human Rights and International Covenants), the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the UN Global Compact's Ten Principles, and the UN Guiding Principles on Business and Human Rights ("UNGPs"). In July 2023, the ANA Group revised and greatly expanded the content aiming to respond to changes in the environment surrounding business and human rights.

The policy covers all individuals and groups that may be affected by the ANA Group's business activities and business relationships. This commitment applies to all executives and employees of the ANA Group, and we will continue to encourage our contractors and suppliers to support this policy and adopt similar policies. The policy was drafted with input from external human rights experts including Caux Round Table Japan ("CRT Japan") and approved by the Board of Directors for its development and disclosure.
In the following policies, the ANA Group declares its commitment to prevent and eliminate any form of modern slavery and human trafficking in its business and supply chains.
ANA Group 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

  The ANA Group laid down the Social Responsibility Guidelines as a code of conduct for all of our Group executives and employees in 2014. In section 4 titled "Respect human rights and diversity," the Guidelines indicate "compliance with the International Covenants on Human Rights and other international human rights standards, as well as relevant laws, regulations, and social norms," and no tolerance for "child labor and forced labor within the Group and transaction with any company engaging in such labor." We provide e-learning programs available for all of our executives and employees to deepen their understanding of the contents covered by the Guidelines and training for new employees every year. ANA Social Responsibility Guideline is available at
  https://www.ana.co.jp/group/csr/basic_approach/pdf/responsible_guideline_eng.pdf

- Responsible Procurement

  The ANA Group will contribute to the creation of its social value not only by providing safe and secure services but also by taking initiative in local and global procurement activities with consideration for both the environment and society. In 2020, to promote sustainable procurement activities in our entire supply chains, we revised policies and newly established the ANA Group Procurement Policy. More detailed information on the Group Procurement Policy is available at
  https://www.ana.co.jp/group/en/csr/supply_chain_management/

  This policy consists of the Basic Procurement Policy and Supplier Code of Conduct and requires suppliers' "responsible procurement activity in consideration of its impact on human rights," including respect for human rights and elimination of discrimination, elimination of forced labor, and child labor, respect for freedom of association and rights to bargain collectively, respect for foreign nationals and migrant workers, avoidance of aiding in human rights violations, ensuring safe and sanitary work environment, and respect for the rights of

indigenous peoples. The policy is further used as a benchmark in the selection of business partners as well as a tool for periodic post-selection monitoring. When deviations are identified, we provide feedback, including confirmation of improvement plans, and when deemed necessary, we conduct investigations of Tier 2 and Tier 3 suppliers to ensure risk management throughout the supply chains. These policies are available at
https://www.ana.co.jp/group/en/csr/supply_chain_management/pdf/basic_procurement_policy_en.pdf
https://www.ana.co.jp/group/en/csr/supply_chain_management/pdf/supplier_code_of_cnduct_en.pdf

4. Governance Structure to Respect Human Rights

ANA HOLDINGS INC.'s Sustainability Promotion Department is dedicated to advance the ANA Group's initiatives to respect human rights, including modern slavery and human trafficking. Also, planning and deliberations on policies and measures for promoting ESG management, including "business and human rights," are conducted within the Group ESG Management Promotion Committee, the Group Management Committee, and other relevant bodies. Particularly important issues are further brought before the Board of Directors. Involving top management and gaining their commitment, we are promoting respect for human rights.
In FY 2021, ANA HOLDINGS INC. appointed Chikako Miyata as Executive Vice President and Group CSO (Chief Sustainability Officer), responsible for overseeing overall human rights initiatives throughout the ANA Group. In addition, each Group company has an ESG Promotion Officer (EPO: officers responsible for promoting ESG management) and each Group company and department has an ESG Promotion Leader (EPL: leaders for promoting ESG management) to promote initiatives across the ANA Group.

- Group ESG Management Promotion Committee

  ANA HOLDINGS INC. has established the Group ESG Management Promotion Committee, which is placed under the supervision of its President and CEO and presided over by the CEPO (Chief ESG Promotion Officer). The committee is comprised of full-time directors, senior vice presidents, full-time auditors of ANA HOLDINGS INC., and executive officers (EPOs) from all ANA Group companies.

  As per regulations, the committee meets at least twice a year for timely discussions not only on "business and human rights," but also on a comprehensive range of topics including environmental impact reduction initiatives, risk management based on risk mapping, and stakeholder dialogues. Important issues linked to management strategy are proposed to the Group Management Committee and brought before the Board of Directors to ensure smooth coordination for activity implementation. Group ESG Management Promotion Committee

convened four times in FY2024.

The EPOs of all Group companies, who are responsible for promoting ESG management, including business and human rights, attend the committee. Through the EPOs, the discussion contents at the committee are shared with the entire group, enabling each group company to implement necessary measures in close collaboration with the EPO and EPL.

Date	Agenda Items Related to "Business and Human Rights"	Main Comments (summary)	Attendance Ratio
July 18, 2024	• Publication of the Modern Slavery Act Statement	• The statement of the Modern Slavery Act should be reviewed by the attendees of this conference, as it is a well-described example of our initiatives. (Summary)	93% (65 out of 70)
October 18, 2024	• Activity Plan and Interim Report for FY2024 • Preliminary Results of the Employment Situation Survey in the Supply Chain • Report on Initiatives to Prevent human Trafficking	• The hearings in this survey on the employment situation of foreign workers are very good. It was a fair hearing with participants answering candidly. It was good that the partner companies were able to take advantage of this opportunity to make improvements, as there are some risks that they would like to eliminate as soon as possible while they are still small, but are unnoticed. (Committee member in charge of the case) • Education on prevention of human trafficking was conducted at the second group meeting for cabin crew this year. This education provided an opportunity to reaffirm their roles. (Committee member in charge of the matter) • We have previously talked about conducting employment situation surveys on a regular basis. It is important to continue the cycle of resolving issues raised in the	93% (65 out of 70)

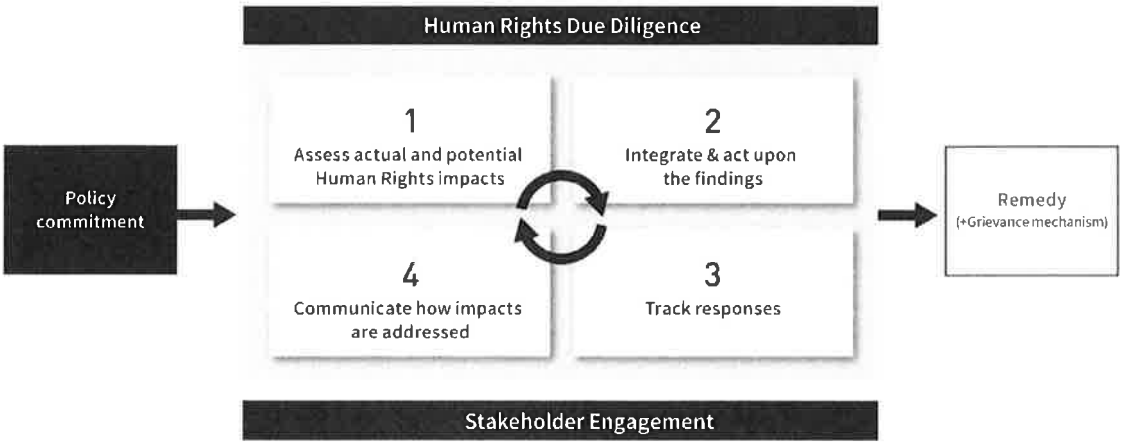
		surveys and interviews this year. (Summary)	
January 21, 2025	• Major ESG External Assessment Results • Dialogue with external experts	• The timeline for non-financial disclosure standards is very important. A company-wide response is needed. (Summary)	94% (66 out of 70)
March 14, 2025	• Summary of FY2024	• Regarding human rights initiatives, the survey on employment of foreign workers is progressing, but as the number of foreign workers will continue to increase, we would like to see the company continue to regularly survey the workplace environment and engage in direct dialogue with foreign workers. (Summary)	86% (60 out of 70)

In addition, the "FY2023-2025 ANA Group Corporate Strategy," formulated in 2023, includes "respect human rights across the supply chain" as an important ESG management initiative. We will continue to ensure respect for human rights in connection with our corporate activities in accordance with the UNGPs.

Based on the process of the UNGPs, in FY2024, the Management Committee approved and implemented the regularization of the annual improvement cycle for solving issues and following up based on the results of the survey on the employment status of foreign workers.

5. Due Diligence Process

In accordance with the procedures detailed in the UNGPs, we have established the following human rights due diligence mechanism and are promoting a management system and cycle 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.

  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. We also regularly approach our business partners (contractors and suppliers) based on these policies.

  At ANA Catering Service Co., Ltd. ("ANAC"), for suppliers identified as high-risk, ANAC employees conduct on-site visits each year alongside regular hygiene audits to verify compliance with the "ANA Supplier Code of Conduct."

- 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.

  We conduct an annual survey of the employment status of foreign workers in our group companies and suppliers. Based on the survey results, CRT Japan conducts an anonymous survey of foreign workers, verifies the responses, and identifies responses of concern, and if there are responses of great concern, conducts an interview survey at the company where the foreign worker works. In case of human rights violations, we have established a management system to take appropriate actions. 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

- 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.

- 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 the 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. 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 UNGPs called "Ninja," which is a contact point operated by CRT Japan, an independent, third-party organization.

6. Initiatives on Priority Human Rights Issues Identified from Human Rights Impact Assessments

In FY2016, ANA HOLDINGS INC. assessed the impact of potential human rights risks from ANA Group business activities across all ANA Group business segments and flight destination countries, using Verisk Maplecroft's social and environmental risk data to identify the human rights issues, in cooperation with CRT Japan. We conduct human rights impact assessments regularly. In FY2019 we confirmed new human rights issues by re-performing the same procedure and having dialogue with external experts.

In FY2022, given the ever-changing circumstances surrounding our business, we re-performed an impact assessment to identify potential human rights risks and environmental risks from the ANA Group's business activities with support from third-party organizations, CRT Japan and Conservation International Japan, to continue prioritizing our efforts to address human rights impacts, such as modern slavery. Building upon the result of the FY2016 assessment, we conducted the FY2022 impact assessment in the form of a collaborative workshop. This engaged more than 35 Group companies (air transportation, air transportation-related, trading, etc.) and ANA HOLDINGS INC.'s internal departments, to obtain insights closely aligned with the reality of the current environment surrounding the Group's businesses and operations. Through discussions, participants effectively identified human rights risks present within the Group's supply chains.

Please see page 18 of the Human Rights Report 2023 for the scope and process of the Human Rights Impact Assessment conducted in 2022. The potential risks identified for each value chain during this Human Rights Impact Assessment workshop are listed on the right.



Subsequently, we sought advice from CRT Japan and international experts, and their insights contributed to the identification of the following five human rights issues that the ANA Group will focus on to prevent risks.

- Priority human rights issues

  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 issues 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). In addition, our work on this topic is reviewed once a year in a dialogue with experts.

  <Issue 1> 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.
For more details, please see pages 21-28 of the Human Rights Report 2023.
In FY2024, in order to confirm that there are no human rights risks for foreign workers working at our outsourcing partners, CRT Japan, a third-party organization, conducted direct interviews in November 2024 and March 2025 with foreign workers at a total of four outsourcing partners in Japan. In order to address the recent shortage of aviation personnel, we hired Indian workers for the first time in April at two of our contractors at Haneda Airport, and in November, CRT Japan conducted face-to-face interviews with Indian workers to confirm their working conditions and human rights issues.
In addition, from December 2024 to January 2025, CRT Japan conducted a human rights questionnaire survey of 490 foreign workers employed by a total of 17 companies within our group and outsourcing partners. Based on the analysis of this survey and taking into account the workplace conditions, two subcontractors operating at Narita and Haneda airports were selected from among companies potentially facing human rights issues. In March, CRT Japan conducted face-to-face interviews with foreign workers employed by these two subcontractors. Although no serious human rights issues were identified among foreign workers at the four companies interviewed this time, we are working with the contractors to improve the issues identified from the perspective of respect for human rights.

<Issue 2> 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.
For more details, please see pages 29-32 of the Human Rights Report 2023.

<Issue 3> Prevent the Use of Airplanes in Human Trafficking
We will promote internal prevention efforts to ensure that services provided by airlines are not unintentionally used by third parties for human trafficking, and will also promote external awareness by strengthening communication as a sector through cooperation between the public and private sectors.
For more details, please see pages 33-34 of the Human Rights Report 2023.
In July 2024, we initiated the "Anti-human Trafficking Forum" with external experts, government officials, airline industry representatives, and CRT Japan. At the forum, participants were able to deepen their understanding of the importance of enhancing deterrence through collaboration among public and private sectors as well as various stakeholders, while also gaining up-to-date insights into the realities of human trafficking and the need to prevent the misuse of aviation services for such crimes.

In addition, in cooperation with the cabin department, recurrent education and discussions were held at a meeting attended by all cabin crew members to deepen understanding throughout the organization and promote action.

<Issue 4> 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 the platform business. In 2023, we established a dedicated team to promote action on specific matters.
For more details, please see page 35 of the Human Rights Report 2023.
https://www.ana.co.jp/group/en/csr/risk_management/privacy_governance/

<Issue 5> 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.
For more details, please see page 36 of the Human Rights Report 2023.
In May 2024, we held an online dialogue with two overseas experts and CRT Japan to obtain opinions on the latest global trends on "AI and Human Rights" and how we should promote respect for human rights. The dialogue confirmed that, because AI decisions are not always accurate, there is a risk of human rights violations when companies use AI.
Therefore, human intervention in decision-making is essential, and it is extremely important to conduct human rights due diligence in the use of AI in line with the UNGPs.
We have since established a task force on AI governance with relevant departments, and plan to release AI principles in the next fiscal year.

7. Grievance Mechanism

The ANA Group has set up multiple contact points accessible by all workers engaged in the business operations of the ANA Group, including those employed at our partner companies and contractors, to report, notify, or consult not only on compliance-related cases but also on human rights concerns. We reassure callers that their privacy as well as that of other parties concerned will be protected and that they will not be unfairly treated for reporting cases.
In FY2024, a total of 237 calls were made to a contact point, ANA Alert, for reporting or consultation.
In addition, in FY2020, we introduced a new grievance mechanism, "Ninja," developed in collaboration with CRT Japan to align with the requirements of the UNGPs. In FY2024, we received one report made from rights-holders via Ninja.
At the ANA Group, as part of the human rights due diligence impact assessment, the third-party

organization CRT Japan conducts direct dialogues to proactively hear from rights-holders working on the ground. The identified human rights issues are then addressed as part of the grievance mechanism. We strive to enhance the effectiveness of our human rights due diligence by raising awareness of Ninja during direct engagement with rights-holders.
Engaging with stakeholders, we will continue to improve the effectiveness of our grievance mechanisms and identify potential risk factors at an early stage to address them appropriately.

<Ninja> Reports related to whistleblowing
The one case we received through "Ninja" was not a complaint, but a notification from a foreign worker informing us that there were no particular issues, in response to the introduction and awareness-raising of "Ninja" conducted with the subcontracted company.

8. Dialogue with Experts

In October 2024, during a dialogue with the Institute for Human Rights and Business (IHRB) and World Benchmarking Alliance (WBA), we shared the progress of the ANA Group's ESG management initiatives. We also received valuable advice on the importance of senior management commitment as part of corporate governance in the process of identifying human rights issues along the value chain, as well as on the implementation of grievance mechanisms in human rights due diligence.
From November to December 2024, we also held discussions with ESG-focused investors and experts in France and the United Kingdom regarding the progress of the ANA Group's ESG management. Through this series of dialogues, the ANA Group's engagement with rights-holders—both through its human rights due diligence process and its grievance mechanism—was well received by many experts. In the dialogue held with World Benchmarking Alliance in May, we received endorsement from WBA for our approach to identifying human rights issues and establishing internal management systems through impact assessments.

9. Training

To ensure that all ANA Group employees respect human rights in their day-to-day business operations, we provided training to raise awareness of human rights risks, including slavery and human trafficking.
Since 2015, we have organized an annual e-learning program for all Group employees. From FY2020, the e-learning materials used for the Group's internal training are disclosed on our website. We encourage not only Group employees but also suppliers to take the training. In FY2024, 198 companies completed it. Moreover, the CSO provided a lecture to newly appointed directors and auditors of the ANA Group on global trends and issues related to human rights as well as examples

relevant to their daily operations.
We also use best practices from our own human rights due diligence process as educational material to share knowledge with our group companies and suppliers.

10. External Engagement Activities

Following the previous year, ANA HOLDINGS INC. participated in the Stakeholder Engagement Program (Human Rights Due Diligence Workshop) organized by the Nippon CSR Consortium, with CRT Japan serving as the secretariat, from June to July 2024. NGOs/NPOs and experts raised a wide range of issues, focusing on human rights issues drawing attention in Japan and abroad, which provided knowledge on human rights necessary for conducting human rights due diligence as required by the UN Guiding Principles on Business and Human Rights. We also discussed human rights issues in the transportation industry with other participating transportation and logistics companies. We are promoting human rights initiatives while utilizing opinions from external stakeholders obtained from the engagement.
In October 2024, ANA HOLDINGS INC. participated as a presenter at the Global Conference on Business and Human Rights hosted by CRT Japan, where we presented our implementation of human rights due diligence and remedial actions as a part of the grievance mechanism in FY2024. Furthermore, international human rights experts, representatives of human rights NGOs and NPOs, and other participating companies shared information on the latest global trends, views on business and human rights, and examples of human rights due diligence initiatives at a company level, which helped us deepen the understanding of global trends and business and human rights issues requiring urgent attention.

11. Plan for the next year and onward

In FY2019, the ANA Group established medium- to long-term goals to enable the systematic operation of a management cycle for "business and human rights." As continuous commitments to 2030, the goals set forth a responsibility to "respect human rights" and "promote responsible procurement and supply chain management." In FY2024, we operated and managed progress (follow-up assessments) toward achieving the goals.
In FY2025, we will pay closer attention to the human rights risks of rights-holders who are placed in vulnerable positions on the value chain, continue to identify the employment status of foreign workers in our Group and contractors, and strive to identify the actual situation and mitigate risks through dialogue with rights-holders. In addition, we will aim to develop safe recruitment routes for foreign workers and create a safe employment and working environment. With regard to the grievance mechanism, we will continue to address the voices of rights-holders appropriately.

A series of activities included in this statement was approved by the ANA HOLDINGS INC.'s Board of Directors and signed by:



Koji Shibata

President and CEO
ANA HOLDINGS INC.
June 27 , 2025