

ANA GROUP MODERN SLAVERY STATEMENT

(Year ended March 2026)

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 2026 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., 59 subsidiaries, and 13 affiliated companies. We have a consolidated workforce of 47,826 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, 2026). 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. We will also continue to take the lead in preventing human trafficking involving aircraft, working in collaboration with the government and the private sector as an industry.

The policy was drafted with input from independent third-party organizations, including Caux Round Table Japan ("CRT Japan") as well as other external human rights experts, and was 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 Code of Conduct (Responsibility to Society)

In October 2025, we reviewed its "Social Responsibility Guidelines" and established the "ANA Group Code of Conduct (Responsibility to Society)" as the standards to be observed by all Group employees (including contract employees, seconded employees, part-time and temporary staff, and temporary agency workers).

Section 4.1 of this Code states: "We will comply with international rules and local laws, and understand and respect local cultures, customs, values, and social norms."

And in Section 4.2, in accordance with the "ANA Group Human Rights Policy," we will not engage in any form of discrimination based on nationality, race, age, gender, gender identity, sexual orientation, beliefs, social status, disability, or any other grounds.

Furthermore, in Section 1, "Basic Approach to Human Rights," of the "ANA Group Human Rights Policy," we "support and respect international standards of conduct regarding human rights" and "pledge not to tolerate or participate in threats, intimidation, or attacks against human rights defenders."

The ANA Group will work to instill the "ANA Group Code of Conduct (Responsibility to Society)" throughout the organization through employee training and other initiatives.

ANA Group Code of Conduct (Responsibility to Society) is available at

https://www.ana.co.jp/group/csr/basic_approach/pdf/responsible_guideline_eng_202509.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_conduct_en.pdf

As a specific example, 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."

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 fiscal year 2025, ANA Holdings appointed Tomoko Hoya 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.

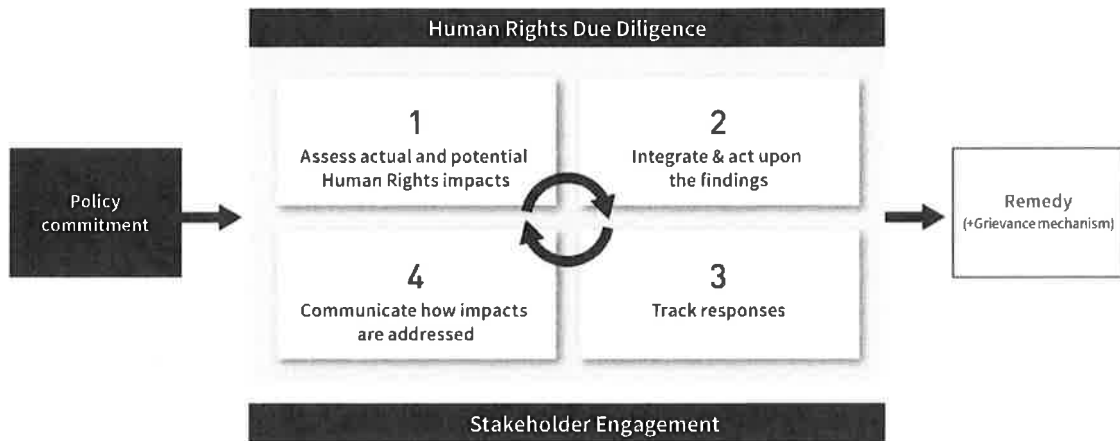
Date	Agenda Items Related to “Business and Human Rights”	Main Comments (summary)	Attendance Ratio
May 28, 2025	• Activities planning for FY2025 • Results of the Employment Situation Survey and improvement cycle in the supply chain • Publication of the Modern Slavery Act Statement	• [President and CEO] Regarding human rights initiatives, it is important to conduct the survey on employment of migrant workers. The number of foreign employees may continue to grow, which necessitates consistent monitoring for understanding and improving their working conditions. We will strive to enhance the work environment based on these findings.	94% (66 out of 70)
October 14, 2025	• Utilization of third-party evaluation organizations to promote	• [President and CEO] We should respond to the human rights risks and impact assessments regarding the new uniforms.	97% (68 out of 70)

	"Responsible Procurement"		
December 10, 2025	• Review and recreate of Priority Human Rights Themes	• [President and CEO] Each of the recreated four themes is vital. Specifically, we believe that promoting the ANA Group's commitment to organizational education and training will serve as a deterrent against human trafficking by raising public awareness.	93% (65 out of 70)
March 9, 2026	• Summary of FY2025 Activities	• [President and CEO] We look forward to the ongoing assessments of migrant workers' labor conditions. By promoting data-driven visualization and closely monitoring potential new risks, we can further strengthen our oversight.	91% (64 out of 70)

In addition, in the "ANA Group Mid-Term Management Strategy for Fiscal Years 2026–2028" formulated in 2025, we view "human rights" as a fundamental pillar of our management and have identified it as one of eight main material issues. We have reaffirmed our commitment to thoroughly ensuring respect for human rights in our business activities in accordance with the United Nations "Guiding Principles on Business and Human Rights."

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. In FY2025, we held two seminars on the employment of migrant workers, open not only to Group companies but also to business partners, with 113 participants. These seminars covered not only the migrant worker employment system but also key considerations regarding business and human rights, thereby encouraging efforts to promote respect for human rights throughout the entire supply chain.

- Identification, analysis, and assessment of adverse human rights impacts

In 2016, 2019, 2022, and 2025, 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 migrant workers in our group companies and suppliers. Based on the survey results, CRT Japan conducts an anonymous survey of migrant 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 migrant 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 "ANA Group Mid-Term Management Strategy for FY2026–28," "human rights" are regarded as a fundamental pillar of management and identified as one of eight main materiality issues, 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) and disclose them during FY2026.

- 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 grievance channels 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 platform operated by CRT Japan.

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 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.

Examples of Main Potential Risks Identified in Step 1		Human Rights Environment
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.	

- 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 migrant 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 FY2025, to verify whether there were any human rights risks for migrant workers employed by our subcontractors, we collaborated with CRT Japan to conduct an employment status survey of 193 companies in our supply chain from July to August. From among these, we conducted direct human rights surveys from September to October with 1,011 migrant workers at a total of 32 companies, including both group companies and subcontractors. Based on the analysis of this survey, we selected one subcontractor operating at Haneda Airport from among the companies where potential human rights risks were identified given their workplace conditions. In December, CRT Japan conducted face-to-face interviews with migrant workers at this site. While no serious human rights issues were identified among the migrant workers interviewed this time, we will take measures—such as conducting on-site inspections of employee dormitories—regarding the points raised from the perspective of respect for human rights, and will work with the contractor to strive for improvement.

<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 FY2025, to raise awareness of the current state of human trafficking and strengthen deterrence through collaboration with relevant agencies, we displayed an awareness video on digital signage throughout Narita International Airport. In conjunction with this, we organized a direct dialogue between cabin crew members and representatives from the National Police Agency. By obtaining direct advice from the National Police Agency in response to feedback raised during the previous year's cabin crew training, we fostered greater situational awareness among frontline staff. Furthermore, we received a presentation from the Representative of the International Organization for Migration (IOM) in Japan titled "The Role

of IOM in Preventing Human Trafficking, Latest Information, and a Message to ANA Employees.” We integrated this with the outcomes of the dialogue and shared the information with the entire Group via the intranet. Through multi-layered collaboration with public and private sectors as well as international organizations, we continue to build an effective prevention system 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.

<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 2024, we held a dialogue with international experts on the use and governance of AI based on the theme of “AI and Human Rights.” Drawing on the advice received during that dialogue, we formulated the “ANA Group AI Principles” in 2025, established an “AI Governance Framework,” and are promoting the appropriate use of AI.

- Reframing priority human rights issues

In FY2025, considering social demands, stakeholder expectations, and changes in the business environment, we conducted a reassessment and review of our “Key Human Rights Themes” for the first time in three years. We held workshops on human rights impact assessments and sought advice through dialogues with external experts, resulting in the selection of the following four themes as our new key themes:

- (1) Addressing human rights issues concerning migrant workers
- (2) Addressing human rights issues within the supply chain
- (3) Preventing human trafficking involving aircraft
- (4) Respecting human rights in the use and application of AI

In FY2026, we will move forward with initiatives addressing these new key themes.

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 FY2025, a total of 277 calls were made to a contact point, ANAAlert, 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 FY2025, we received 25 reports made from rights-holders via Ninja.

At the ANA Group, as part of the human rights due diligence impact assessment, 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.

As a specific example, in April 2025, we received a complaint regarding harassment by a supervisor from a migrant worker employed by a contractor at Kansai International Airport. We verified the facts with the company in question and conducted an interview with the employee through CRT Japan. Based on an analysis of the causes, we implemented corrective measures that included human rights training for the company's management, as well as a restorative dialogue program involving both the supervisor and the employee, which led to a reconciliation between the two parties. We continue to directly monitor the situation on-site and assess the effectiveness of these measures.

8. Dialogue with Experts

Continuing from the previous fiscal year, we held a dialogue with international experts as part of our efforts to verify the effectiveness of the ANA Group's human rights due diligence methods, grievance mechanisms, and outcomes, and to consider future initiatives.

In October 2025, during a dialogue with the Institute for Human Rights and Business (IHRB) and the World Benchmarking Alliance (WBA), we presented the progress of the ANA Group's ESG management. Experts provided advice on topics such as the operation of grievance mechanisms in human rights due diligence, as well as the importance of the process for identifying human rights issues.

Through this series of dialogues, the ANA Group's engagement with rights holders—covering both its human rights due diligence process and its grievance mechanism—was highly praised by many experts.

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 FY2025, 193 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 incorporate best practices identified through our human rights due diligence process into our training materials to share knowledge across the group and with our suppliers. Furthermore, we held a seminar for our business partners (contractors and suppliers) on the employment of migrant workers (attended by 113 participants) and encouraged them to promote initiatives that respect human rights. In addition, we distributed a newsletter to the 193 companies (including group companies) that cooperated with our internal survey to inform them of our business and human rights initiatives and raise awareness through the supply chain.

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 2025. 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 2025, we participated as a presenter at an international conference on business and human rights organized by CRT Japan, where we presented case studies on the implementation of human rights due diligence and corrective measures for grievance mechanisms in FY2025.

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 FY2025, we operated and managed progress (follow-up assessments) toward achieving the goals.

In FY2026, we will pay closer attention to the human rights risks of rights-holders in vulnerable positions within our domestic value chain, particularly regarding Priority Human Rights Issue 1 (Addressing human rights issues concerning migrant workers), for which we are institutionalizing our efforts. We will continue to monitor the employment status of migrant workers within the ANA Group and its contractors and suppliers, while striving to understand the actual situation and mitigate risks through dialogue with rights-holders.

In addition, we will monitor developments in the new migrant worker employment system while working to establish safe recruitment channels and improve the employment environment for migrant workers.

Furthermore, regarding Priority Human Rights Issue 2 (Addressing human rights issues within the supply chain), we will launch new initiatives to identify human rights issues in our supply chain. Specifically, we will expand the scope of our human rights due diligence by conducting interviews with workers at overseas garment factories that currently supply or are scheduled to supply our uniforms.

Finally, regarding the grievance mechanism, we will expand the scope of participating companies and eligible qualifications, while continuing to respond appropriately to feedback from rights-holders.

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 26, 2026