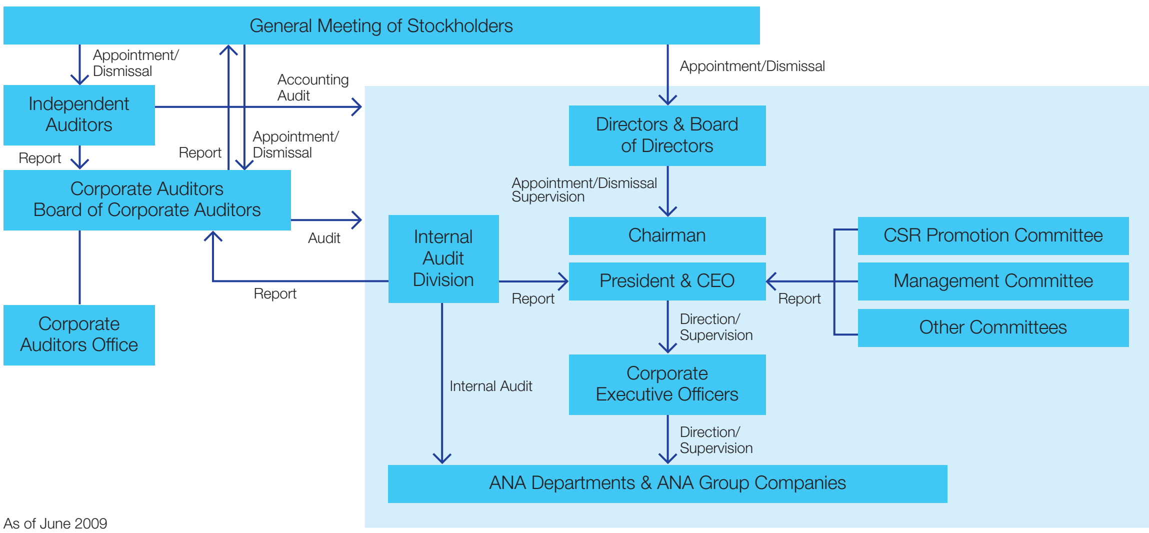
CSR Principles and Internal Control System

The ANA Group is working to develop management systems that will serve as a platform for CSR activities. In this section, we highlight the divisions responsible for core aspects of each system and the key points of each system.

Corporate Governance Structure



As of June 2009

Corporate Governance

The ANA Group strives to establish a system of corporate governance that promotes business transparency and accountability to stakeholders in order to continuously enhance its corporate value.

Structure for Business Decision-Making

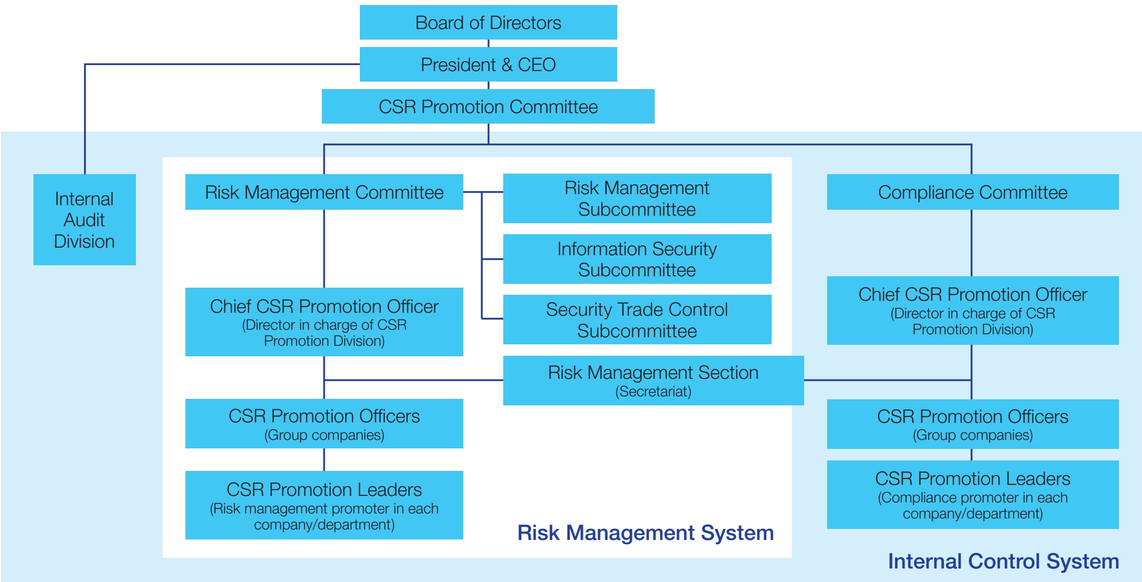
The Management Committee deliberates and decides on fundamental Group-wide management issues. This committee is chaired by the president and comprises executive officers, auditors and other members. The Board of Directors ultimately decides on important issues that, under the Companies Act of Japan, must be taken up at Board of Directors meetings.

The Board of Directors is led by the chairman. In addition to the directors (two of whom are external), five auditors (three of whom are external) attend the meetings. The Board of Directors held 12 meetings in fiscal 2008.

Internal Auditing

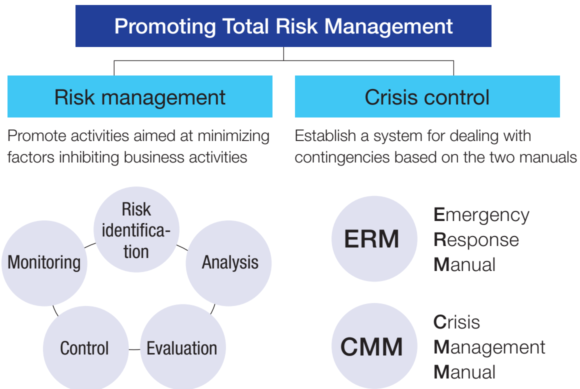
The Internal Audit Division, which reports directly to the president, implements operational and account auditing, and evaluations in accordance with the "Evaluation System for Internal Controls over Financial Reporting" under the Financial Instruments and Exchange Law of Japan, from an independent and impartial standpoint, for ANA and Group companies. The division conducts regularly scheduled audits according to the plan for the fiscal year based on risk analysis, and unscheduled audits mainly based on the intentions of senior management. Auditing results are reported to the president each month, and important items are reported to the corporate auditors quarterly. In fiscal 2008, the division conducted regularly scheduled audits of the Head Office, maintenance divisions, overseas offices and other locations. The division also evaluated the effectiveness of the financial reporting of ANA and Group companies in fiscal 2008, the first year of the "Evaluation System for Internal Controls over Financial Reporting."

Internal Control System and Risk Management System



Risk Management

To address the myriad risks faced by companies, the ANA Group has structured a total risk management system based on two approaches. One is the risk management approach, which seeks to prepare for and control risks from a preventive perspective. The other is the crisis control approach, which is for responding to risks that actually materialize.



ERM: Stipulates responses to ANA Group aircraft accidents and hijackings
CMM: Stipulates response to all other crises

Information Security

From the standpoint of enhancing information security, the ANA Group has developed a system for raising employee awareness, and controlling and using information properly by revising rules concerning overall information security in fiscal 2008. This follows a review of rules and guidelines concerning the handling of personal information of customers.

Compliance

ANA conducts inspections of compliance and business processes during CSR Promotion Month every October. In addition, ANA works to raise the awareness of each and every employee through compliance awareness surveys and training within the Group.

Help Line

We established the Help Line as a contact point for general consultations and internal reporting related to compliance. All ANA Group employees and contract staff members can engage in consultations or internal reporting via the Help Line.