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ALL NIPPON AIRWAYS CO., LTD.

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The following is an overview of Corporate Governance at All Nippon Airways Co., Ltd.

I. Fundamental Policy on Corporate Governance and Basic Information about Capital Structure, Corporate Attributes, etc.

1. Fundamental Policy

In sustaining the growth of our corporate value, we believe it is essential to establish sound corporate governance for maintaining management transparency (visibility) and fulfilling accountability to stakeholders (accountability).

We appoint as directors, experts thoroughly knowledgeable in both operations and management in general, which is crucial in building a competitive management structure fit for coping with a severe business environment. Issues fundamental to the operation of the ANA Group are discussed and decided upon at the Group Strategy Committee, which is chaired by the President and CEO, and includes full-time directors, full-time auditors, and others as its members. In compliance with the Companies Act, the Board of Directors discusses and makes final decisions on other matters on which they are required to be consulted. Furthermore, to each operation division, we appoint highly-skilled and experienced executive officers, who are authorized to make certain decisions about the division, for the purpose of achieving high performance and effective business operations.

The Company has introduced a corporate auditor system, whereby the Board of Directors and corporate auditors supervise and audit the execution of our corporate directors' duties. Furthermore, we are strengthening the supervisory function of the Board of Directors, including the appointment of external directors and the auditing function of the corporate auditors, which includes the appointment of full-time external auditors.

2. Capital Structure

Percentage of Shares Held by Foreign Investors

Less than 10%

[Overview of Major Shareholders]

Name of Shareholders	Number of Shares Held	Shareholding Ratio (%)
Japan Trustee Services Bank, Ltd. (Trust Account)	74,864,308	2.96
Nagoya Railroad Co., Ltd	71,982,278	2.85
The Master Trust Bank of Japan, Ltd.. (Trust Account)	56,437,000	2.24
Tokio Marine & Nichido Fire Insurance Co., Ltd.	40,397,158	1.60
Mitsui Sumitomo Insurance Company, Limited	34,770,000	1.38
All Nippon Airways Co., Ltd. Employee Stock Ownership	31,712,775	1.26
Nippon Life Insurance Company	30,681,000	1.22
NCT Trust and Banking Corporation	28,152,000	1.11
Sumitomo Mitsui Banking Corporation	26,820,800	1.06
Mizuho Corporate Bank, Ltd.	26,753,482	1.06

3. Corporate Attributes

Stock Exchange Listings and Market Section	Tokyo (1st Section), Osaka (1st Section)
Fiscal Year-end	March
Sector	Air Transportation Business
Number of Employees (Consolidated)	1,000 and above
Net Sales (Consolidated)	1 trillion yen and above
Parent Company	None
Number of Consolidated Subsidiaries	50 and above but less than 100

4. Other Special Circumstances that may have a Major Impact on Corporate Governance

There are no special circumstances that may have a major impact on corporate governance, such as a parent company or listed subsidiaries.

II. Overview of the Corporate Governance System in terms of the Organization of Management for Decision Making, Execution of Duty, Audit, and Other Matters

1. Matters pertaining to Institutional Structure, Organizational Operation, etc.

Organizational Form	Company with Corporate Auditors
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[Directors]

Chairman of the Board of Directors	Chairman (excluding the case where the Chairman concurrently serves as President)
Number of Directors	17
External Directors	Appointed
Number of External Directors	2

Relation with the Company (1)

Name	Attribution	Relation with the Company (*1)								
		a	b	c	d	e	f	g	h	i
Misao Kimura	Comes from another company					○			○	
Shosuke Mori	Comes from another company					○			○	

*1 Explanatory Note for “Relation with the Company”

- a Comes from a parent company
- b Comes from another affiliate company
- c Major shareholder of the company
- d Concurrently holds an office as an external director or external corporate auditor of another company
- e Holds an office such as managing director or executive officer of another company
- f Spouse, relative at most three times removed or any other equivalent person of an executive director, executive officer, etc. of the subject company or its specific affiliates
- g Receives remuneration, etc., or other financial profits as an officer of the parent company of the subject company or a subsidiary of the parent company
- h Subject to an agreement for Limitation of Liability between the subject person and the subject company
- i Other

Relation with the Company (2)

Name	Supplementary Information	Reason for Appointment as External Director
Misao Kimura	The director in question has been designated as an independent director. Director and Advisor of Nagoya Railroad Co., Ltd., with which ANA has transactions related with commission of sales of air tickets.	Reason for election as an external director: The experience and broad insight he gained from running a transportation company will be useful in further strengthening our management structure by offering appropriate advice on the

		<p>management of the company from a third-party perspective. We therefore elected him as an external director.</p> <p>Reason for designation as an independent director: The director in question is serving concurrently as an advisory director for Nagoya Railway. The company is one of the top shareholders of our company, but is not a primary shareholder, with an interest of less than 5%. There are also transactions between the company and our company for the consignment of airline ticket sales; however, our company is not a primary client so we are certain that no conflict of interest with general shareholders will arise.</p>
Shosuke Mori	<p>The director in question has been designated as an independent director.</p> <p>President and Director of Kansai Electric Power Co., Inc., with which ANA has no significant transactions.</p>	<p>Reasons for election as an external director:</p> <p>The experience and broad insight he gained from managing a utility company will be useful in further strengthening our management structure by offering appropriate advice on the management of the company from a third-party perspective. He has therefore been elected as an external director for the company.</p> <p>Reasons for designation as an independent director:</p> <p>The director in question is serving concurrently as a representative director of Kansai Electric Power Co., Ltd., but there are no transactions of significance between the Kansai Electric Power and our company. We are therefore certain</p>

		that no conflicts of interest with general shareholders will arise.
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Matters relating to Other Major Activities of External Directors

Mr. Kimura attended eight out of the 13 Board of Directors meetings held in FY2009. At these meetings, he made necessary contributions based on his rich experience and deep insight, mainly as a company manager in the transportation industry. Outside these meetings, too, he exchanged opinions with the President as needed and provided much-needed advice.

Mr. Mori attended five out of the 13 Board of Directors meetings held in FY2009. At these meetings, he made necessary contributions based on his rich experience and deep insight, mainly as a manager of a utility company. Outside these meetings, too, he exchanged opinions with the President as needed and provided much-needed advice.

On August 25, 2008, ANA received an order to eliminate the newspaper advertisement posted from February 2008 to March 2008, on the introduction of the Premium Class from the Japan Fair Trade Commission (JFTC), on the grounds that it contravened the stipulation of Article 4, Paragraph 1, Item 1 of the Act against Unjustifiable Premiums and Misleading Representations (hereafter referred to as the “Order of Elimination”).

Mr. Kimura and Mr. Mori have both been providing much-needed advice on the overall management of the company. Concerning the abovementioned Order of Elimination, they have been making proposals for preventing its reoccurrence, at the Board of Directors meetings, from the viewpoint of valuing our customers, and in the light of the importance of building trust.

[Corporate Auditors]

Board of Corporate Auditors	Established
Number of Corporate Auditors	5

Cooperation between Corporate Auditors and Accounting Auditors

The accounting auditors hold a meeting with the corporate auditors once every quarter, or as needed, to report on audit activities to each one of the offices and Group companies, and exchange opinions on them.

Cooperation between Corporate Auditors and Internal Audit Division

The Internal Audit Division holds a meeting with the corporate auditors once every quarter, or as needed, to report on audit activities to each of the offices and Group companies, and exchange opinions on them.

External Corporate Auditors	Appointed
Number of External Corporate Auditors	3

Relation with the Company (1)

Name	Attribution	Relation with the Company (*1)								
		a	b	c	d	e	f	g	h	i
Kunitaka Kajita	Comes from another company								○	○
Shingo Matsuo	Comes from another company					○			○	
Tatsuo Kondo	Comes from another company					○			○	

*1 Explanatory Note for “Relation with the Company”

- a Comes from a parent company
- b Comes from another affiliate company
- c Major shareholder of the company
- d Concurrently holds an office as an external director or external corporate auditor of another company
- e Holds an office such as managing director or executive officer of another company
- f Spouse, relative at most three times removed or any other equivalent person of an executive director, executive officer, etc. of the subject company or its specific affiliates
- g Receives remuneration, etc., or other financial profits as an officer of the parent company of the subject company or a subsidiary of the parent company
- h Subject to an agreement for Limitation of Liability between the subject person and the subject company
- i Other

Relation with the Company (2)

Name	Supplementary Information	Reason for Appointment as External Corporate Auditor
Kunitaka Kajita	The corporate auditor in question has been designated as an independent officer. Former officer of a financial institution	Reasons for election as an external corporate auditor: The experience and broad insight as a representative of a public financial institution will be useful in further strengthening our corporate audit structure. He has therefore been elected as an external corporate auditor. Reasons for designation as an independent officer:

		<p>A substantial amount of time has passed after resigning the position of advisor to the Development Bank of Japan, Inc. in April, 2003, so he will not be in the so-called position of representing a bank from which the company receives loans. We are therefore certain that no conflicts of interest with general shareholders will arise. Moreover, while the balance of loans from the Development Bank of Japan, as of the end of March this year, with which the director in question was affiliated in the past is higher than for other banks, this represents a temporary circumstance engendered by receiving an emergency loan under the Support System for Emergency Response, etc. in the past, and will not occur on a regular basis.</p>
Shingo Matsuo	<p>The corporate auditor in question has been designated as an independent officer.</p> <p>Concurrently serves as the Chairperson of Kyushu Electric Power Co., Inc., with which ANA has no transactions of significance.</p>	<p>Reasons for election as an external corporate auditor:</p> <p>The experience and broad insight he gained from managing a utility company will be useful in further strengthening our corporate audit structure.</p> <p>He has therefore been elected as an external corporate auditor.</p> <p>Reasons for designation as an independent officer:</p> <p>Corporate Auditor Matsuo is serving concurrently as a representative director for Kyushu Electric Power Co., Ltd., but there are no transactions of significance between Kyushu Electric Power and our company. We are therefore certain that no conflicts of interest with general shareholders will arise.</p>

Tatsuo Kondo	<p>The corporate auditor in question has been designated as an independent officer.</p> <p>Concurrently serves as the Chairman of the Board of Directors of Hokkaido Electric Power Co., Inc., with which ANA has no transactions of significance.</p>	<p>Reasons for election as an external corporate auditor:</p> <p>The experience and broad insight he gained from managing a utility company will be useful in further strengthening our corporate audit structure. He has therefore been elected as an external corporate auditor.</p> <p>Reasons for designation as an independent officer:</p> <p>Corporate Auditor Kondo is serving concurrently as director and chairman of Hokkaido Electric Power Co., Ltd., but there are no transactions of significance between Hokkaido Electric Power and our company. We are therefore certain that no conflicts of interest with general shareholders will arise.</p>
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Matters relating to Other Major Activities of External Corporate Auditors

Mr. Kajita attended thirteen out of the 13 Board of Directors meetings and all of the seven audit meetings held in FY2009. While he made no particular statements in the Board of Directors meetings, Mr. Kajita contributed to all of these meetings, based on his rich experience and deep insight mainly as a representative of a public financial institution. As a full-time auditor, he also attends Group Strategy Committee meetings, regular directors meetings and other meetings, and visits offices and divisions within and outside the company.

Mr. Matsuo attended three out of the 13 Board of Directors meetings and four out of the seven audit meetings held in FY2008. He has provided much-needed advice at both Board of Directors meetings and audit meetings, stemming from his extensive experience and knowledge as a manager in a business of a highly public nature. Mr. Matsuo also engages in exchanges of opinions with the President.

Mr. Kondo attended four out of 11 Board of Directors meetings and attended four out of six audit meetings held during FY2009. While he made no particular statements in the Board of Directors meetings, Mr. Kondo spoke from his extensive experience and knowledge as a manager in a business of a highly public nature during audit meetings. Mr. Kondo also engages in exchanges of opinion with the representative directors.

Mr. Kajita has been providing much-needed advice on the overall management of the company. Concerning the Order of Elimination, as a full-time auditor, he has been working to prevent its reoccurrence through such means as making proposals at the Board of Directors meetings, primarily with regard to the importance of compliance, and from the viewpoint of reinforcing checking systems. Mr. Matsuo has also been providing much-needed advice on the overall management of the company, and has been submitting written proposals on the Order of Elimination toward prevention of its reoccurrence, primarily with regard to compliance and valuing our customers.

[Incentives]

Measures to Grant Incentives to Directors	Not implemented
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Supplementary Information in regard to Relevant Items

Although the Company has not introduced stock options, it has developed a system to let directors purchase shares of ANA on a regular basis (directors are prohibited from selling these shares while in service). All directors excluding external directors are participating in this system.

Beneficiaries of Stock Options	
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Supplementary Information in regard to Relevant Items

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[Directors' Remuneration]

Disclosure Method	Securities Report and Financial Report (Business Report)
Disclosure Situation	Aggregate amount of all directors is disclosed

Supplementary Information in regard to Relevant Items

The aggregate amount of remuneration of 17 directors incumbent for FY2009 (ended March 2010) was 394 million yen, and the aggregate amount of remuneration of 7 corporate auditors was 78 million yen.

[Support System for External Directors and External Corporate Auditors]

External directors receive explanations on the status of the Company from the General Administration Department(secretariat of the Board of Directors), Executive Office, or Corporate Planning . External corporate auditors also receive explanations from the Corporate Auditors Office in a similar manner.

2. Matters pertaining to Functions relating to the Execution of Duties, Audit and Supervision, Appointment and Remuneration Decisions, etc.

A high degree of expertise is required in transport, maintenance, and the various divisions of the airline industry. We have therefore chosen a governance structure under which directors who are well versed in the business of the various divisions, execute the business, and the external directors exercise oversight.

We therefore view the role of the external director as one of strengthening the function of checking on management by offering advice and opinions on management of the company business from an independent perspective.

We have also established the Management Advisory Council as an independent legal entity to enable the company to receive freely-given frank opinions and advice, from experts in every sphere, regarding all aspects of managing the corporate group.

Issues fundamental to the operation of the ANA Group are discussed and decided upon at the Group Strategy Committee, which is chaired by the President and CEO, and includes full-time directors, full-time auditors and others as its members. In compliance with the Companies Act, the Board of Directors discusses and makes final decisions on other important issues on which they are required to be consulted.

The Operations Committee, chaired by the chief of the Operations and Airport Service Division, meets once every month to discuss structural issues concerning the operation of the entire ANA Group, and persons in charge of each operation division within which ANA and Group companies participate. The Committee formulates comprehensive solutions that cut across all divisions of ANA and the Group companies, taking into account the perspectives of organization, training, system, rules and authorities.

The Internal Audit Division (11 members), which reports directly to the President, audits operations and accounts of ANA and the Group companies, and conducts evaluations that correspond to the stipulation in the Financial Instruments and Exchange Act on the evaluation system for the internal control of financial reporting within the Group. Audits are comprised of regular audits, which are conducted in accordance with annual business plans, and non-regular audits conducted at the discretion of the management. Regular audits are conducted from a fair and objective stance based on risk analyses for each division and Group company. The results of audits are reported to the President every month and to the corporate auditors every quarter.

Moreover, the audits conducted by the corporate auditors are mainly conducted by full-time external corporate auditors who previously worked for financial institutions, and are conducted according to a structure which includes full-time corporate auditors, well versed in the internal company business

and external auditors with a high degree of independence. To strengthen the audit structure, a Corporate Audit Department has been established under the direct control of the corporate auditor to aid the corporate auditor in audits. The department will work in cooperation with the Corporate Audit Division under the direct control of the President and the external audit corporation.

Account auditing is entrusted to certified public accountants affiliated with Ernst & Young ShinNihon LLC.

III. Implementation of Measures Related to Shareholders and Other Stakeholders

1. Approach toward the vitalization of general shareholders meetings and the facilitation of the exercise of voting rights

	Supplementary Information
Early Notification of the General Shareholders Meeting	Notice of the General Shareholders Meeting is sent Three Weeks Prior to the Meeting, as a general rule.
Exercising of Voting Rights by Electronic Voting	The Company participates in the platform operated by ICJ.
Other	The Company posts notice of the general shareholders meeting on its website and prepares English translations.

2. IR Activities

	Supplementary Information	Explanation by the President in Person
Briefing for Individual Investors Held on a Regular Basis	Held several times a year with the assistance of a securities company.	None
Briefing for Overseas Investors on a Regular Basis	Briefings are held several times a year in America, Europe, and Asia.	Offered
Website Posting of the IR Data	The Company posts summaries of quarterly financial statements, annual securities reports, and quarterly reports, as well as stock information, financial data, monthly numbers of passengers, and other matters on its website. Videos of financial results meetings and the General Shareholders Meeting are transmitted through the website. (http://www.ana.co.jp/ir/index.html).	Offered
Establishment of an IR Section	The Company has established the IR	

or Manager	Promotion Office as a full-time organization, and has been working to raise transparency of management and communication.
Other	A bulletin containing the latest business information and topics is sent to all shareholders on a quarterly basis.

3. Activities for Respecting the Position of Stakeholders

	Supplementary Information
Implementation of Environmental Conservation Activities, CSR Activities, etc.	<p>The Company established the Corporate Social Responsibility (CSR) Promotion Office as the section controlling all CSR activities of the ANA Group. A Risk Management Committee, Compliance Committee, and Global Environment Committee have also been established under the CSR Promotion Committee, which service as the highest decision-making body on matters of corporate social responsibility. The executive officers in charge of each of these committees exercise oversight. A CSR Report is compiled once a year regarding the details of efforts made and disclosed publicly on the web site and in pamphlet form.</p> <p>(https://www.ana.co.jp/ana-info/ana/csr/index.html).</p>

IV. Basic Policy on Internal Control Systems and Overview of their Implementation

1. System for Ensuring Directors' and Employees' Compliance with Laws and Articles of Incorporation in the Execution of Duties

- (1) Under the ANA Group Compliance Rules, the Company has established the CSR Promotion Committee, composed of full-time directors, and its subordinate organization, the Compliance Committee, comprised mainly of executive officers and other persons in charge of executing duties in each operation, which are both supervised by the President. Essential policies and issues of significance related to compliance are discussed and proposed in these two committees. The Company has been developing systematic compliance structures through such efforts as formulating and distributing the company-wide ANA Group Code of Conduct for all executives and employees, and establishing both the help line for consultation and reporting within the ANA Group and the Internal Audit Division responsible for internal auditing.
- (2) We appoint a CSR Promotion Leader for each operation division and Group company to implement activities for raising awareness on compliance among executives and employees. The Company has also launched a CSR website on the Group Intranet to further spread compliance

awareness.

2. System for Storing and Managing Information Related to the Execution of Duties by Directors

- (1) Information related to the execution of duties by directors, including important decision making at the Board of Directors, reporting to the directors, etc., are managed in accordance with the law and the document rules concerning preparation, organization, storage and disposal of documents, irrespective of recording media. Such information is stored in such a way that directors and employees can retrieve and view it at any time.
- (2) Important documents are circulated among the directors, who can access them at any time.
- (3) The Internal Audit Division conducts internal audits concerning storage and management of documents to ensure effective management.

3. Rules and Other Systems Regarding Management of Risk of Loss

- (1) In accordance with the Total Risk Management Rules, which stipulate basic rules for total risk management at the ANA Group, the Company has established the CSR Promotion Committee (composed of full-time directors) and its subordinate organization, the Risk Management Committee (comprised mainly of executive officers and other persons in charge of executing duties in each operation) to discuss, propose and promote important policies and issues concerning total risk management under the supervision of the President. Subcommittees specialized in certain kinds of risks, such as the Air Transportation Safety and Crisis Management Subcommittee, the Information Security Subcommittee, and the Security Trade Control Subcommittee, are established within the Risk Management Committee. In addition, ad-hoc subcommittees are established when individual risk cases arise in order to come up with cross-sectional responses.
- (2) We appoint a CSR Promotion Leader for each operation division and Group company to promote risk management activities within the Group.

4. System for Ensuring Efficient Execution of Duties by Directors

- (1) By establishing the Group's corporate philosophy, the Company clarifies the identity and role of the Group and shares the Group's future goals with all employees through the Corporate Vision.
- (2) For achieving the goals set in our Group Corporate Vision, we establish a Medium-term Management Strategy, an Annual Management Plan, and Operation Plans, based on which each and every director and employee sets individual performance targets. By such means, we clarify the goals to be achieved and link together individual targets. In addition, we step up our efforts for more appropriate and efficient performance of operations through regular reviews of each plan and target.
- (3) The range of authority and discretion of executive officers is clarified in the Regulation of

Segregation of Duties, Regulation of Authority of Management, among other documents, which stipulate the division of roles, authority and responsibility on the execution of duties, as well as the chain of command.

- (4) We aim for swift decision making by adopting the Corporate Executive Officer System. Important matters concerning the execution of duties are discussed at the Group Strategy Committee and are decided upon based on a collegial system.

5. System for Ensuring Appropriateness of the Business Operations of the Group, Comprised of the Company, and its Parent Company and Subsidiaries

- (1) Based on the Group's corporate philosophy, the Company clarifies the identity and role of the Group, and shares its future goals with all employees through the Corporate Vision.
- (2) By establishing the Group Corporate Governance Rules, we clarify the role of each company and designate a section that oversees corporate governance at each Group company. Executives are sent to each Group company as needed in order to build appropriate structures for Group business management.
- (3) The company has established the Internal Audit Division to conduct internal audits within the Group. The Division conducts audits on operations and accounts at ANA and the Group companies to ensure appropriate operation, and to establish a system for preventing unfair dealings among the Group companies.
- (4) Based on the ANA Group Compliance Rules, the Company is promoting compliance education and publicity, as well as building the group-wide compliance system.
- (5) In accordance with the Total Risk Management Rules, the Company is working to achieve higher standards of stability and efficiency in group management through efforts to build a comprehensive, group-wide risk and crisis management system.

6. Matters Regarding Employees Who Assist Corporate Auditors in their Duties in Cases Where the Corporate Auditors Request Appointment of such Employees

- (1) Directors establish a Corporate Auditors Office upon request of corporate auditors as a body particularly committed to supporting their duties, and dispatch appropriate personnel.

7. Matters regarding Independence from Directors of the Employees Described in the Preceding Item

- (1) Persons working at the Corporate Auditors Office shall comply with the instructions and orders of corporate auditors, and directors shall decide on the treatment of such persons through consultation with corporate auditors.

8. System of Reporting from Directors and Employees to Corporate Auditors, and Other Systems of Reporting to Corporate Auditors

- (1) Directors and employees report to corporate auditors on important matters concerning the management and business operations of the Company, including issues related to compliance, risk management and internal control, as well as on performance of duties, etc., through Board of Directors meetings, the Group Strategy Committee, and other important internal meetings.
- (2) Employees report on the execution of duties to corporate auditors through circulation of internal documents sent around for managerial approval, in accordance with the Rules for Request for Decision.
- (3) The Internal Audit Division and the Independent Auditor meet with corporate auditors once every quarter to report and exchange information on the auditing results of each office and Group company.

9. Other Systems for Ensuring Effectiveness of Auditing by Corporate Auditors

- (1) Directors and corporate auditors hold regular meetings to ensure sufficient communication. Corporate auditors attend Board of Directors meetings, the Group Strategy Committee and other important meetings, and directly comment on the execution of duties by directors. Directors cooperate in building a system for more efficient auditing through the joint efforts of corporate auditors and the Internal Audit Division.

10. Basic Policy on Eliminating Anti-social Forces and Development of a System for that Purpose

- (1) From the standpoint of the corporate social responsibility of the ANA Group and of protecting our corporate body, the Company has established the following basic policy, which says, “We stand firmly against any anti-social force or organization that poses a threat to the safety and order of civil society. We shall not commit any act that could further the activities of anti-social forces and organizations.”
- (2) The Company has specifically stipulated the basic policy of eliminating anti-social forces and organizations in the Group’s code of ethics, known as the “ANA Group Code of Conduct.” Under this code, executives are made aware of their responsibilities for crisis management. The subordinate rule of the Code, “ANA Group Code of Conduct -- Case Books” & “Questions and Answers Regarding the ANA Group Code of Conduct” are made public on the internal group Intranet in order to ensure group-wide awareness.
- (3) On the structural side, the Company has been developing an internal system against anti-social forces in accordance with the “Guidelines for Companies to Prevent Damage from Anti-Social Forces,” which was formulated at the administrative meeting of the Government’s Ministerial Meeting Concerning Measures Against Crime and with the provision to “exclude antisocial elements such as organized crime from any business activities” in the Keidanren Charter for Good Corporate Behavior. While establishing the Corporate Response Section for the entire group within the head office, the Company appoints a range of “persons in charge of undue claims” mainly in the sections and Group companies responsible for front office operations. By

such means, the Company takes systematic action against undue claims and avoids leaving a certain section or individual alone in facing the problem.

- (4) For the collection and management of information in order to fight anti-social forces, the aforementioned Corporate Response Section will contact the anti-violence sections of the police station, prefectural centers for the elimination of criminal organizations and the Special Anti-Crime Association affiliated with the Metropolitan Police Department on a regular basis for effective exchange of information, and will store the data thus obtained. For systematic information sharing, the Corporate Response Section will also report on the risks surrounding the company and any other problems to executives and other persons concerned in a timely and swift manner.
- (5) Undue claims from anti-social forces are immediately reported to the Corporate Response Section, which will take a systematic and uniform response as a Group, while soliciting cooperation from outside experts. The company is working to strengthen our ability to take action under a structure for response in accordance with the “ANA Group Rules on Responding to Antisocial Forces” and the “Manual on Response to Undue Claims.”
- (6) The Company is taking enhanced efforts to entirely shut down relations with anti-social forces by introducing the “Article on the Elimination of Criminal Organizations” and the “Special Agreement on the Prohibition of Transfer of Claims” in each Group company for their agreements, etc. on transactions with outside entities.
- (7) The Company conducts presentations on recent trends of anti-social forces and case studies of undue claims in the Seminar for CSR Promotion Leaders held twice a year, targeting persons in charge of responding to undue claims. We continually remind people of the mechanism of systematic response against undue claims and keep up our efforts on training activities within the Group.

V. Others

1. Matters regarding Takeover Defense

Not introduced.

2. Other Items regarding Corporate Governance Systems, etc.

None in particular.

