

ANA Group Code of Conduct (Responsibility to Society)

【Introduction】

Basic Philosophy

To pursue the third point in ANA's Way, "Social Responsibility: We are committed to contributing to a better, more sustainable society with honesty and integrity" (it is important to ensure compliance.

For the sustainable future of our company, compliance with applicable laws is irrelevant. ANA Group defines compliance as "observing laws and regulations, including its intent or purpose, together with any supporting official notices.

Laws are universal rules in any country and region, and violation of such rules will not only cause a loss of social credibility, but may also result in damage to the company or criminal penalties for ANA Group Members (including officers, full-time employees, contract employees, seconded employees, part-time employees, temporary employees, etc.). Therefore, strict compliance is an important part of ANA Groups' business.

As stated above, compliance with laws and regulations does not mean simply observing what is written in such documents is enough. Actions and conduct must be in line with the purpose and expectations of laws and regulations.

This ANA Group Code of Conduct sets forth the norms that ANA Group members must observe, by which the ANA Group aims to ensure thorough compliance and fulfill its "responsibility to society" through responsible conduct ANA Group Members.

Scope of the Code of Conduct

This ANA Group Code of Conduct applies to all ANA Group Members.

Violation of the Code of Conduct

Violations of the ANA Group Code of Conduct may result in disciplinary action in accordance with internal rules and relevant laws and regulations.

【Compliance】

1. To Our Customers

1.1. When providing information on services and products, we provide all necessary and accurate information in an appropriate manner to enable customers to make a balanced choice of services and products.

1.2 In accordance with the ANA Group's "Privacy Governance Policy and Principles of Conduct" and "Privacy Policies" of each ANA Group company, we will take the utmost care to properly collect, protect, manage, and dispose of our customers' personal information in compliance with the Personal Information Protection Law of Japan and other applicable laws and regulations. In addition, ANA Group will take thorough measures to protect, manage, and dispose of all personal information acquired. In addition, when utilizing personal data, we will protect the privacy of our customers, taking into consideration the ethical appropriateness of its use.

2. To Our Shareholders and Investors

2.1 In addition to accurate, timely, and appropriate disclosure to our shareholders and investors, we proactively disclose information of our business to a wide range of stakeholders, including consumers, business partners, employees, and local communities.

2.2 We will not engage in any act that could be construed as insider trading or any other act that would allow us to profit from undisclosed corporate information or raise suspicions of such an act.

3. To Our Business Partners and Competitors

3.1. We will not engage in illegal acts such as unfair bids, refusal to accept products, making unjustified returns, or delays in payment, which may arise from dominant position over our business partners.

3.2. We will not engage in "unfair trade practices" such as resale price restraints in our relationships with retailers, nor engage in "unfair restraint of trade" such as cartels in our relationships with competitors

3.3 We will enhance our efforts to create, properly protect, and actively utilize

intellectual property rights, and will not infringe intellectual property rights of others.

3.4. We will strictly refrain from giving and receiving entertainment and gifts to and from business partners, and from establishing personal relationships that deviate from business matters, such as exchange of personal favors, and follow internal rules within the scope of what is acceptable in light of socially accepted norms.

4. As a Member of the Global Community

4.1 We comply with international rules and local laws, together with the understanding and respect local cultures, customs, values and social norms.

4.2. We do not discriminate in any way on the basis of nationality, race, age, gender, gender identity, sexual orientation, creed, social status, disability, or any other factor in accordance with the "ANA Group Human Rights Policy".

4.3 We do not engage in corrupt practices such as bribery of public officials, nor do we engage in benefiting or any acts that could be mistaken for collusion or any other improper relationships with political organizations and local/national governments.

4.4 We take a firm stand against antisocial forces or any organized crime groups, and will not engage with them, following the principles of "do not fear", "do not transact" and "do not associate".

4.5 We will strive to ensure that the export of cargo and technology does not lead to the development or manufacture of conventional weapons or weapons of mass destruction (nuclear weapons, chemical weapons, biological weapons and missiles).

4.6 We will comply with all applicable local laws, regulations, treaties, internal accounting rules to properly process accounting, and file and pay taxes.

5. Within the Company

We do not engage in or tolerate sexual harassment, power harassment, or harassment related to pregnancy, childbirth, childcare leave, or nursing care leave, etc., that may damage the dignity of ANA Group Members or disrupt order in the workplace.

5.2 We will work to ensure occupational safety and health and maintain an appropriate working environment in accordance with the provisions of applicable

labor laws.

5.3 We do not engage in any conduct that would harm the interests of the ANA Group and never prioritize our own or a third party's interests.

5.4. We will not disclose, leak, lose or falsify confidential company information externally without permission

5.5. We will not only comply with laws, regulations, and company rules and regulations, but also act in accordance with generally accepted behavior and common sense as ANA Group Members, both publicly and privately, and not engage in any conduct that may bring the company's reputation into disrepute

5.6. We will without hesitation, report to the management, the compliance department or the internal reporting desk any conduct that violates or is suspected of violating laws, regulations, or the ANA Group Code of Conduct, including internal rules and regulations.