

Anti-Bribery Initiatives

The ANA Group is committed to preventing bribery by establishing the "ANA Group Anti-Bribery Regulations" to comply with anti-bribery laws in various countries. We aim to minimize legal risks at a global level and prevent situations that could lead to a decline in corporate value.

1. Prohibition of Bribery

The ANA Group does not offer, promise, propose, or authorize benefits, including entertainment or gifts, to public officials, whether directly or indirectly, at the company's or individual's expense, in connection with obtaining or maintaining commercial transactions, regardless of location (domestic or international). Furthermore, in connection with ANA Group's business, we do not directly or indirectly offer, promise, propose, or authorize benefits, including entertainment or gifts, to third parties (other than public officials) to induce them to engage in improper official conduct, regardless of whether it's at the company's or individual's expense. Concurrently, the ANA Group does not solicit, receive, or promise to receive benefits in connection with its business.

2. Compliance with Laws and Regulations

The ANA Group complies with relevant anti-bribery laws and international treaties applicable in the countries and regions where it operates.

3. Scope of Application

These regulations apply to all officers and employees (including dispatched employees, contract employees, and seconded employees, etc.) of ANA Holdings Inc. and its Group companies.

4. Establishment of Consultation and Reporting System

The ANA Group has established contact points for consultation or reporting in cases where actions violating these regulations, or suspected violations, are discovered. We will promptly investigate any consultations or reports received from officers or employees and establish a system to take appropriate measures. There will be no disadvantageous treatment of officers or employees who consult or report.

5. Audits and Monitoring

The ANA Group confirms compliance with relevant laws and these initiatives through periodic or ad-hoc audits and monitoring, and takes necessary measures.

6. Implementation of Education and Training

The ANA Group provides necessary anti-bribery training as appropriate.

7. Other

The ANA Group stipulates anti-bribery and anti-corruption initiatives as a condition in contracts with business partners.