



HUMAN RIGHTS REPORT 2019





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■ In accordance with the Modern Slavery Act 2015, ANA Holdings Inc. discloses the steps taken by ANA group during the year ending 31 March 2019 to prevent modern slavery and human trafficking in our business and supply chains. 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 etc. in support of this route.

■ These series of steps taken was approved by the Board of ANA Group.



Shinya Katanozaka

President and Chief Executive Officer

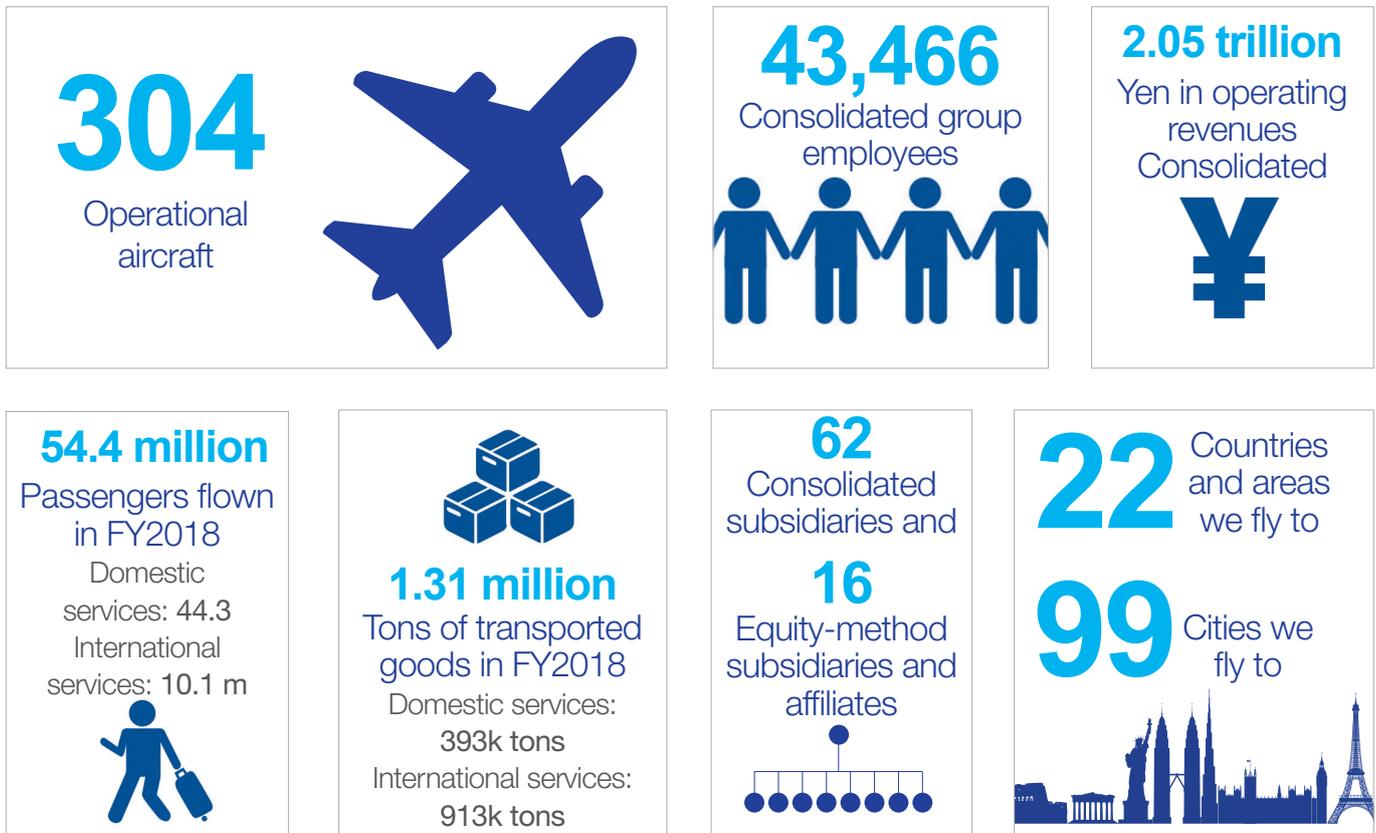
Last year, the ANA Group published the group's first Human Rights Report to articulate our future resolve and determination to ensure respect for human rights. For us, the publication of that report was a new endeavor. At the same time, the feedback it generated from many stakeholders made us realize again the importance of corporate accountability.

The United Nations endorsed the Guiding Principles on Business and Human Rights (UNGPs) in 2011, and companies around the world are increasingly called upon to make earnest efforts towards ensuring respect for human rights. In April 2016, the ANA Group began by setting down the Policy on Human Rights. We have since been initiating various activities to fulfill our responsibility to ensure respect for human rights, including analysis and assessment of potential risks that our group's business activities may have on human rights, implementation of measures to address important identified human rights themes, continued dialogue with stakeholders, and employee education. We have been making a steady progress, one step at a time.

In my message in our last year's report, I likened our human-rights efforts to a "life-long journey" that required a "continuous approach." In this spirit, we will continue to move forward to further deepen our activities. We will, moreover, fulfill our accountability by explaining clearly the path we have taken and the path we will travel in the future.

Safety is of the utmost importance to the ANA Group, and is the very foundation of our business management. Based on this foundation, the ANA Group aims to be the world's leading airline group, both by generating social and economic value from the strengths of our business activities and by creating sustainable growth in our society. We believe it is our mission to contribute to the Sustainable Development Goals (SDGs) adopted by the United Nations in 2015, while taking on the challenge of sustainably increasing corporate value.

The underlying principle of the SDGs is the pledge that "no one will be left behind." The "respect for human rights" is a core concept of that pledge. All of the SDGs are related to people's lives. In fulfilling our mission of contributing to the SDGs, it is essential that we earnestly respect human rights. We would appreciate any comments and feedback on our activities, and would like to learn from you in order to further our progress on human rights. This will serve towards "fulfilling the hopes and dreams of current and future generations," as stated in our group mission statement.



Our numbers as of 31 March 2019

Business activities

Air Transportation

Airline-Related Businesses:

- Airport Ground Support
- Aircraft Maintenance
- Vehicle Maintenance
- Cargo and Logistics
- Catering
- Call/Contact Center etc.

Travel Services

Trade and Retail etc.

Major Group Companies

ANA Holdings Inc.

Shiodome City Center
1-5-2 Higashi-Shimbashi Minato-ku
Tokyo 105-7140, Japan

Air Transportation

All Nippon Airways Co., Ltd.

Shiodome City Center
1-5-2 Higashi-Shimbashi
Minato-ku Tokyo 105-7140, Japan

ANA WINGS Co., Ltd.

3-3-2 Haneda Airport, Ota-ku, Tokyo, Japan

Air Japan Co., Ltd.

ANA Narita Sky Center,
Narita International Airport, Narita City, Chiba
Prefecture, Japan

Peach Aviation Ltd.

1 Senshu-kuko-naka
Tajiri-cho, Sennan-gun
Osaka 549-0011, Japan

Vanilla Air Inc.

Inside Narita International Airport Terminal 2

Airline-Related Businesses

ANA Cargo Inc.

Shiodome City Center
1-5-2 Higashi-Shimbashi
Minato-ku
Tokyo 105-7140, Japan

ANA Airport Services Co., Ltd.

3-4-2 Haneda Airport, Ota-ku
Tokyo 144-0041, Japan

ANA Catering Service Co., Ltd.

3-2-8 Haneda Airport
Ota-ku Tokyo 144-0041, Japan

Travel Services

ANA Sales Co., Ltd.

2-14-1 Nihonbashi
Chuo-ku
Tokyo 103-0024, Japan

Trade and Retail

All Nippon Airways

Trading Co., Ltd.

Shiodome City Center
1-5-2 Higashi-Shimbashi
Minato-ku
Tokyo 105-7140, Japan

ANA Group's Main Activities on Human Rights

	2015-2016	2017-2018	2019
Policies	<ul style="list-style-type: none"> ANA Group published its Diversity & Inclusion Declaration ANA Group established its Code of Conduct for the Employment of People with Disabilities ANA Group launched its Group Policy on Human Rights 		<ul style="list-style-type: none"> Drafting of KPIs on "business and human rights" (planned)
Dialogue	<ul style="list-style-type: none"> Dialogue with human rights experts in Japan (communication with the experts has since been ongoing) Human rights e-learning for all ANA Group employees (conducted annually thereafter) Dialogue with human rights experts from abroad (dialogue has since been continued each year as a periodic review) 	<ul style="list-style-type: none"> Interview with victims of human trafficking in Thailand 	<ul style="list-style-type: none"> Interview in Vietnam to understand the situation in countries sending workers to Japan (planned)
Assessment and Measures	<ul style="list-style-type: none"> Conducted human rights impact assessment and identified four areas of focus 	<ul style="list-style-type: none"> Participated in Bluenumber Initiative for a transparent food supply chain Conducted interviews on foreign workers employed by partner firms (conducted every year thereafter) Organized workshops on prevention of human trafficking 	<ul style="list-style-type: none"> Began implementation of an anti-human trafficking program Conduct human rights impact assessment for the second time (planned)
Information Disclosure	<ul style="list-style-type: none"> Issued a group statement under the UK Modern Slavery Act 2015 (a statement issued each year thereafter) 	<ul style="list-style-type: none"> Published ANA Group Human Rights Report (published annually thereafter) 	

Four Areas of Focus

ANA Group is promoting activities for ensuring respect for human rights by focusing mainly on four human rights themes that have been identified through the human rights impact assessment conducted in 2016. The four themes are as follows:

Theme 1: Respect the Human Rights of Migrant Workers in Japan

Theme 2: Strengthening Supply Chain Management of In-flight Meals

Theme 3: Prevent the Use of Airplanes in Human Trafficking

Theme 4: Eradicate Corruption

Links to the Mid-Term Corporate Strategy

In the Mid-Term Corporate Strategy FY2018-2022, announced in February 2018, ANA Group identified "Creation of Social Value" as one of three core foundations supporting our business strategy. One of the priority areas in ANA Group's effort to create social value is a proactive and positive "human rights response." We will set concrete targets on a set of "human rights responses" and key performance indicators (KPIs) for each of the targets.



Policies for Human Rights

ANA Group Policy on Human Rights

The ANA Group Policy on Human Rights is based on internationally recognized human rights, as set out in the International Bill of Human Rights (the Universal Declaration of Human Rights and the two International Covenants), the International Labour Organization Declaration on Fundamental Principles and Rights at Work, and the UN Global Compact Ten Principles (of which ANA is a member). Our Policy is fully in line with the UN Guiding Principles on Business and Human Rights.

This policy covers all individuals and groups that may be affected through the ANA Group's business activities and business relationships.

This commitment applies to all executives and employees of the ANA Group, including permanent staff and contract staff.

The ANA Group makes a clear commitment in the Policy to encourage its business partners, contractors and suppliers to support the Policy, and to adopt similar policies. We are also committed to cooperating with them in promoting respect for human rights.

The Policy, drafted with input from external human rights organizations, was approved by the management at the Group CSR/Risk Management/Compliance Committee.

Statement under the UK Modern Slavery Act 2015

The ANA Group published a statement under the UK Modern Slavery Act 2015.

ANA Group's Social Responsibility Guidelines

The ANA Group's Social Responsibility Guidelines provide a code of conduct for all executives and group employees.

In the section titled "We will respect human rights and diversity", the Guidelines state that ANA Group employees are expected to "respect laws and social norms based on internationally recognized human rights". In addition, they must "not only prevent employees from getting involved in child labour or forced labour, but also refrain from doing business with partners, contractors and suppliers where child labour or forced labour takes place".

ANA Group's Purchasing Policy

The ANA Group's Purchasing Policy defines the minimum standards to which ANA Group suppliers are required to adhere. The Policy strictly prohibits child labour and forced labour, and requires suppliers to comply with internationally recognized human rights. It consists of Basic Policies, Purchasing Principles, and a Supplier

Management Policy, and is an integral part of our qualification process for new supplier selection, as well as a tool used to periodically monitor existing suppliers. In FY2017, we implemented monitoring questionnaires for 201 of our major suppliers. We also conducted regular audits at the factories of contractors for our handling and catering businesses, to ensure there is no forced labour or human trafficking within our supply chains.

Other Policies

In addition to the above, the ANA Group has drawn up various policies related to human rights to create a conducive working environment.

ANA Group Diversity & Inclusion Declaration

In April 2015, President and CEO of ANA Holdings Inc. issued the ANA Group Diversity & Inclusion Declaration. A special organization has also been set up dedicated to bringing out the full potential of a diverse workforce, including women, employees with disability, older employees, and non-Japanese employees, and to promoting working-style reform and creating a better working environment.

ANA Group Code of Conduct for the Employment of People with Disabilities

Staff members in charge of personnel at ANA Group companies and employees with disability, numbering more than 50, after participating in discussions in meetings and overnight workshops, drew up the "36K-Employee Kickoff" ANA Group Code of Conduct for the Employment of People with Disabilities in September 2015. We are working to create a working environment conducive to all, regardless of disability, and to systematically expand employment of employees with disability.

ANA Group Health Frontier Declaration

Based on the belief that "ensuring safety and health of our employees and creating a pleasant working environment is fundamental to our corporate activities," the ANA Group proclaimed the ANA Health Frontier Declaration in April 2016. Chief Wellness Officer (ANA Director for Group Human Resources), appointed as the chief officer responsible for promoting the Declaration, and Wellness Leaders from ANA Group companies play a central role in bringing together ANA Group employees, companies, and health insurance associations for better management of employees' health.

Governance Structure for Ensuring Respect for Human Rights

At the ANA Group, the Chief CSR Promotion Officer is appointed in charge of human rights, and the Group CSR/Risk Management/Compliance Committee holds timely discussions on the ANA Group’s policies on “business

and human rights” and on progress made in our initiatives. Our policies are implemented in close coordination with the CSR Promotion Officers and CSR Promotion Leaders appointed at each ANA Group company and department.





Group CSR/Risk Management/Compliance Committee

Under the supervision of President and CEO of ANA Holdings Inc., the ANA Group has established the Group CSR/Risk Management/Compliance Committee comprised of full-time directors, senior vice presidents, and auditors of ANA Holdings Inc., and executive officers from all ANA Group companies. The Chief CSR Promotion Officer (a Director of ANA Holdings Inc.) has responsibility over group-wide efforts on human rights, and the Group CSR/Risk Management/Compliance Committee holds timely discussions and deliberations on important policies and agenda items.

CSR Promotion Officers (CPOs) and CSR Promotion Leaders (CPLs)

At the ANA Group, CSR Promotion Officers (CPOs), appointed in each ANA Group company, and CSR Promotion Leaders (CPLs), appointed in each ANA Group company and department, promote CSR activities.

Decisions made at the Group CSR/Risk Management/Compliance Committee are implemented in close coordination with the CPOs and CPLs. Depending on the human rights issue, we hold separate discussions with relevant ANA Group companies as well as with their business partners and suppliers. We try to enhance the effectiveness of our human rights measures through information sharing of the ANA Group’s policies and the importance of implementing measures in accordance with those policies.

Meetings of the Group CSR/Risk Management/Compliance Committee in 2018

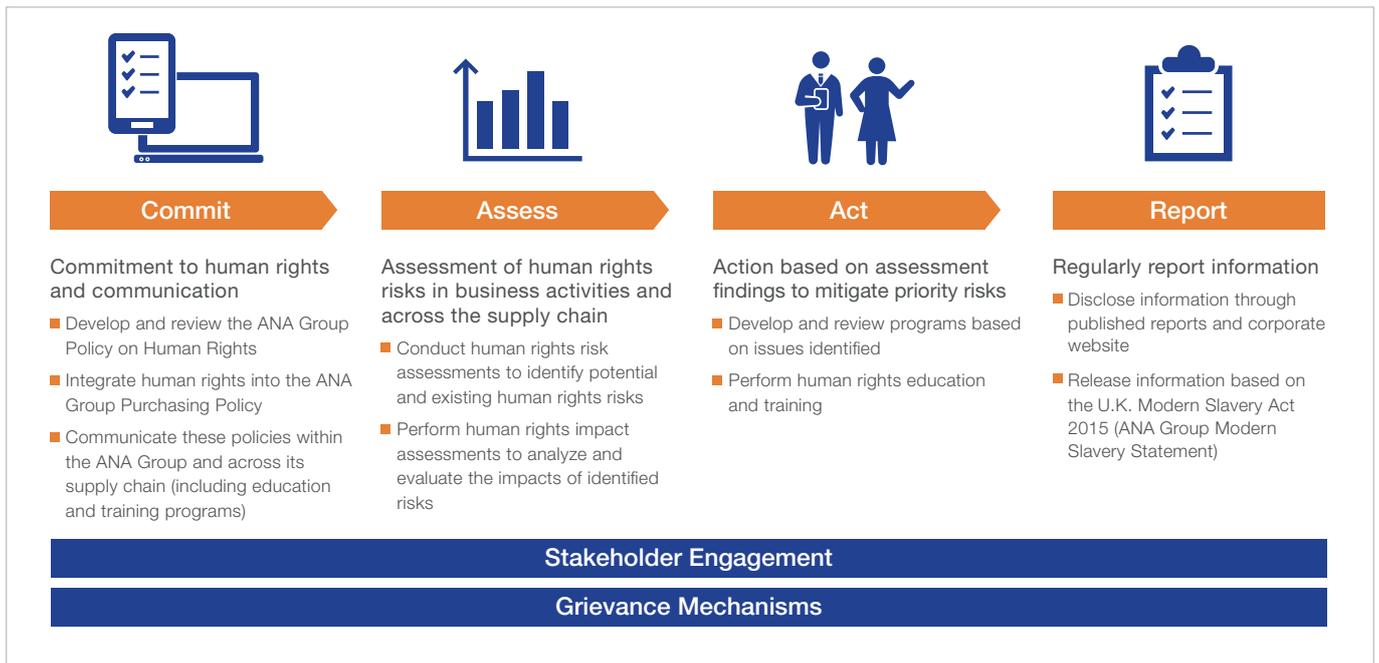
Group CSR/Risk Management/Compliance Committee convened three times in 2018.

Date	Report and Deliberation on Human Rights
March 20, 2018	<ul style="list-style-type: none"> ■ Overview of FY 2017 and plans for FY 2018 ■ Progress made in relation to the Blunumber Initiative
August 28, 2018	<ul style="list-style-type: none"> ■ Contribution to the SDGs <p>General supervisor’s main comments: “SDGs are a major global issue, and we have dedicated several pages on SDGs in our management plan. It is imperative that we encourage our employees to have better understanding of SDGs.”</p>
October 15, 2018	<ul style="list-style-type: none"> ■ Effort to prevent human trafficking <p>General supervisor’s main comments: “Our anti-human trafficking activities have been highly praised overseas and by those from outside ANA Group. We need to continue to pour efforts into prevention of human trafficking.”</p>

Human Rights Due Diligence

The ANA Group has established a mechanism for human rights due diligence, in accordance with the processes detailed in the United Nations Guiding Principles on Business and Human Rights. Human rights due diligence is an ongoing process of conducting preventive surveys

and investigations, implementing appropriate measures to address adverse impact, and disclosing progress and results of such measures, in order to prevent and mitigate a company's adverse human rights impacts in society.



Human Rights Impact Assessment

In 2016, the ANA Group assessed the impact of potential human rights risks that our business activities may have in each of our business segments and destination countries (human rights impact assessment), and identified specific

priority human rights themes for reducing such human rights risks. The assessment was carried out with the support of Verisk Maplecroft and Caux Round Table Japan and in accordance with the following processes:



Process of Human Rights Impact Assessment

- 1 Identification of potential human rights risks that our business activities may have in each of the countries we operate in and our business segments. For this risk assessment, social and environmental risk data provided by Verisk Maplecroft were used to comprehensively identify risks (analysis based on 13 indices).
- 2 After identifying the risks, interviews were conducted within the ANA Group, with the cooperation of CRT Japan, to ascertain how those risks were managed, based on which we selected human rights themes for which there was a lack of proper management structure within the ANA Group. (For instance, we lowered the priority level of certain themes, even if such themes are important for the ANA Group’s business, if sufficient management structure is already in place for that theme and potential risks are small.)
- 3 Canvassing the advice of human rights experts on the human rights themes selected above. After listening to expert advice, we narrowed down the human rights themes and countries that the ANA Group will address to reduce human rights risks.

Since 2017, we have been addressing and reducing risks associated with the human rights themes identified through the above processes.

The situation surrounding human rights, however, is constantly changing. Therefore, in addition to ongoing efforts to obtain the latest information and human rights standards, we have been conducting, since 2017, annual reviews with experts on procedures and priority human rights themes. Specifically, at an annual review in September 2017, human rights experts pointed out that the ANA Group should address the issue of “human trafficking” as a priority human rights theme. After discussions at the Group CSR/Risk Management/ Compliance Committee in October of the same year, we concluded that there was lack of awareness within the ANA Group despite the risk of human trafficking increasing globally, and set human trafficking as an important human rights theme.

As the last human rights impact assessment was conducted three years ago in 2016, we are planning to conduct another round of assessment in 2019.

Verisk Maplecroft

Verisk Maplecroft is a leading global risk analytics, research and strategic forecasting company. It provides databased solutions and advice on political, human rights, economic and environmental risks to organizational resilience and sustainable procurement.

Caux Round Table

Caux Round Table is a global network of business leaders aimed at ensuring business contributes to a more free, fair and transparent society. Caux Round Table Japan assists companies to promote their human rights activities.

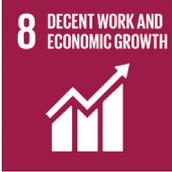
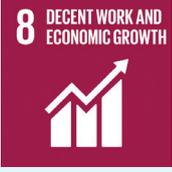
Scope of the Assessment

Business activities	Air Transportation, Airline Related (Airport Ground Support, Aircraft Maintenance, Cargo and Logistics, Vehicle Maintenance, Catering etc), Trade and Retail, Travel Services
Countries and areas	Japan, UK, France, Germany, Belgium, China, India, Vietnam, Thailand, Myanmar, Malaysia, Singapore, Indonesia, Philippines, Taiwan, Korea, Australia, Canada, USA
Issues assessed (using Verisk Maplecroft data)	Child Labour, Decent Wages, Decent Working Time, Discrimination in the Workplace, Forced Labour, Freedom of Association, Collective Bargaining, Migrant Workers, Occupational Health and Safety, Trafficking in Persons, Total GHG Emissions, Air / Water Quality, Corruption

Identified Human Rights Themes

The paramount human rights theme for an airline is “safety.” We also have important responsibility in “respecting and paying due consideration to the human rights of our customers and employees.” We have established organizations dedicated to addressing these themes as a priority issue within the ANA Group on an ongoing basis.

In addition, the human rights impact assessment of 2016 and subsequent reviews have identified, in light of existing response level in the ANA Group, priority human rights themes as shown below. While promoting collaboration with our business partners, including service providers and suppliers, we will work on preventing potential risks from materializing into incidents.

<p>Theme 1</p> 	<p>Respect the Human Rights of Migrant Workers in Japan</p>  
<p>Theme 2</p> 	<p>Strengthening supply chain management of in-flight meals</p>  
<p>Theme 3</p> 	<p>Prevent the Use of Airplanes in Human Trafficking</p>   
<p>Theme 4</p> 	<p>Eradicate Corruption</p> 

The countries shown below will require particular attention to prevent potential risks from materializing into incidents.

- Japan
- Malaysia
- Thailand
- Myanmar
- China



Theme 1: Respect the Human Rights of Migrant Workers in Japan

Why We Consider This Theme To Be Important

Employees and workers from a wide range of nationalities support the ANA Group's business activities. In Japan, many partner companies, including service providers, employ many foreign workers to carry out our aircraft operations.

On the other hand, recent media reports have uncovered human rights abuses of foreign technical interns and students from abroad in Japan. Problems in the system for accepting foreign workers in Japan and a chronic labor shortage caused by Japan's declining birth rates, it has been explained, are some of the underlying conditions contributing to these abuses.

Considered in this light, we believe that there are potential human rights risks involving foreign workers in the ANA Group's value chain. The ANA Group, as an airline group with global business operations, will take steps in accordance with international standards.

Activities to Date

Survey on employment conditions

In 2017, we conducted a survey on the employment conditions of foreign workers in our airport ground handling and catering operations (nine ANA Group companies and partner companies we outsource services to). The results showed that some 1,370 foreign nationals*¹ are employed mostly at our partner companies.

*¹ The number employed include those with residence status in Japan of "permanent or long-term residents," "engineers, specialists in humanities, workers in international service, or technical interns," and students from abroad. The number includes full-time employees as well as limited-term contract employees, technical interns, part-time workers, and temporary employees.

Sharing information about the ANA Group's policies

From 2017, we have consistently shared information with our partner firms on the ANA Group's policies for ensuring respect for human rights and on matters for consideration when employing foreign workers.



Meeting with partner companies

Interviews on foreign workers

We conducted interviews on foreign workers*² and their supervisors*³ employed by our partner companies engaged in our airport ground handling and catering operations in 2017 and 2018, respectively. We had the support of a third-party organization (CRT Japan) to ensure that the interviews are conducted objectively and impartially.*⁴ The interviews were included job descriptions, working hours and wages, health and safety, communication, and any comments they had about their companies.

*² Foreign workers engaging in the operations for a continuous period of six months or longer

*³ Japanese employees from departments with responsibility to supervise foreign workers

*⁴ Interviews on foreign workers and those on the Japanese supervisors are always conducted separately.

HUMAN RIGHTS DUE DILIGENCE

Housing and Working Environment

We took this opportunity of an interview to check where they lived, if there were rest areas in their workplaces, and other aspects of their working environment.

Issues Identified through Interviews

Results of the interviews showed that the relations among the foreign workers, the Japanese staff, and their companies were favorable. The interviews did not find any adverse impact on human rights. There were no instances of forcing employees to work long hours, unpaid wages, unreasonable deductions from salaries, or having workers work under hazardous conditions.

We did find, however, that in workplaces with foreign workers with difficulty communicating effectively in Japanese, there was some stress caused by language and cultural differences as well as difficulty

communicating matters of occupational safety and health. Even though the companies were trying to create an environment to enable foreign workers to freely communicate their opinions, further efforts are needed in creating a better system for listening to the candid views of foreign workers.

Main opinions

- I think it would be good if there are contact persons who we can talk to for advice and consultation in my language.
- Due to the language barrier, I sometimes misunderstand and do things that are different from what I have been instructed to do.
- With good teamwork, work can be done well and is enjoyable. And for good teamwork, communication is essential.

Interview Status

		Nationality and Number of Interviewees	Residence Status of Foreign Workers
2017	Company A (ground handling operations)	Two Nepalese Two Filipinos Two Vietnamese Two Chinese One Japanese supervisor	Part-time workers (overseas students)
	Company B (ground handling operations)	Four Filipinos One Japanese supervisor	Technical interns
2018	Company C (catering operations)	Five Nepalese Three Vietnamese Two Japanese supervisors	Part-time workers (overseas students)



Future Direction

We will continue to conduct interviews on foreign workers and inquire about their working environment onsite, and swiftly address problems identified. Wider measures will also need to be implemented.

Specifically, we will clearly set out the ANA Group's policies on recruitment and employment of foreign workers, expand the scope of our surveys on the employment and working environment of foreign workers, and establish a grievance mechanism.



Factory tour by human rights experts

© Caux Round Table Japan



Interview with workers

© Caux Round Table Japan

Activities of ANA Catering Service Co., Ltd.

In September 2018, nine human rights experts, on a visit to Japan for an international conference hosted by CRT Japan in Tokyo, toured the factory of ANA Catering Service Co., Ltd. (ANAC) engaged in the ANA Group's catering operations.

On the day of the tour, the experts exchanged views with foreign workers and their supervisors at the factory, and inspected their working environment. The interview with workers extended over a meal. The experts commended ANAC for opening the factory for such dialogue and inspection.

Theme 2: Strengthening Supply Chain Management of In-flight Meals

Why We Consider This Theme To Be Important

As a result of globalization in recent years, companies' supply chains are spreading across the world. Therefore, governments and private companies must address the pervasive global issue of forced labor and child labor. In this regard, companies must take responsibility and appropriately exercise influence over their entire supply chains. Numerous companies have had their brand value substantially diminished because of human rights incidents that came to light at suppliers within their supply chains. Increasingly, countries are laying down laws requiring companies to monitor and report human right issues in their supply chains. Failure to address human right issues can become a major business management risk.

The ANA Group's core business is aviation. One of our missions is to provide safe, ethical in-flight meals and comfortable in-flight environment to customers who fly with us. Building a transparent, traceable supply chain, particularly for our in-flight meals and items, not only reduces business management risk, but is also essential in fulfilling our responsibility to our customers.

Activities to Date

Participation in the Blunumber Initiative

In 2017, to reinforce management of our supply chain for in-flight meals, we became the first Japanese company to participate in the Blunumber Initiative, a global platform for food supply chain management. Through this initiative, we build a transparent food supply chain to ensure human rights are respected and the environment protected in the food production processes.

Registration of information on in-flight meals

We have registered information on more than 200 business partners and producers with the Blunumber Initiative, and the test registered more than 2,000 product codes. For some of the raw materials used in our in-flight meals, we have registered information on producers in the upstream supply chain. (Please see figure 1)



The Blunumber management site screen



Future Direction

We will register more information on our business partners in our in-flight meal supply chain with the Blunumber, including producers in the upstream supply chain. We will also consider expanding registration to business partners who produce our in-flight articles and items.

Direct talks will be held with our suppliers' suppliers in order to register their information, and a system will be built for collecting information about products and raw materials, which will be tested upon completion with the cooperation of business partners.

Miho Okada, Managing Director, TraceBlue Japan

Blunumber is excited to be working with the ANA Group in an effort to realize 100-percent transparency of the in-flight meal supply chain. So far, we have registered information on more than 200 business partners and producers, and for a number of ingredients, we have registered information on producers in the upstream supply chain. We are also in the process of developing a new system. We will continue to support the ANA Group's efforts in building a mechanism for providing safe, ethical in-flight meals and giving information to travelers about where the ingredients are produced and what ingredients are used.

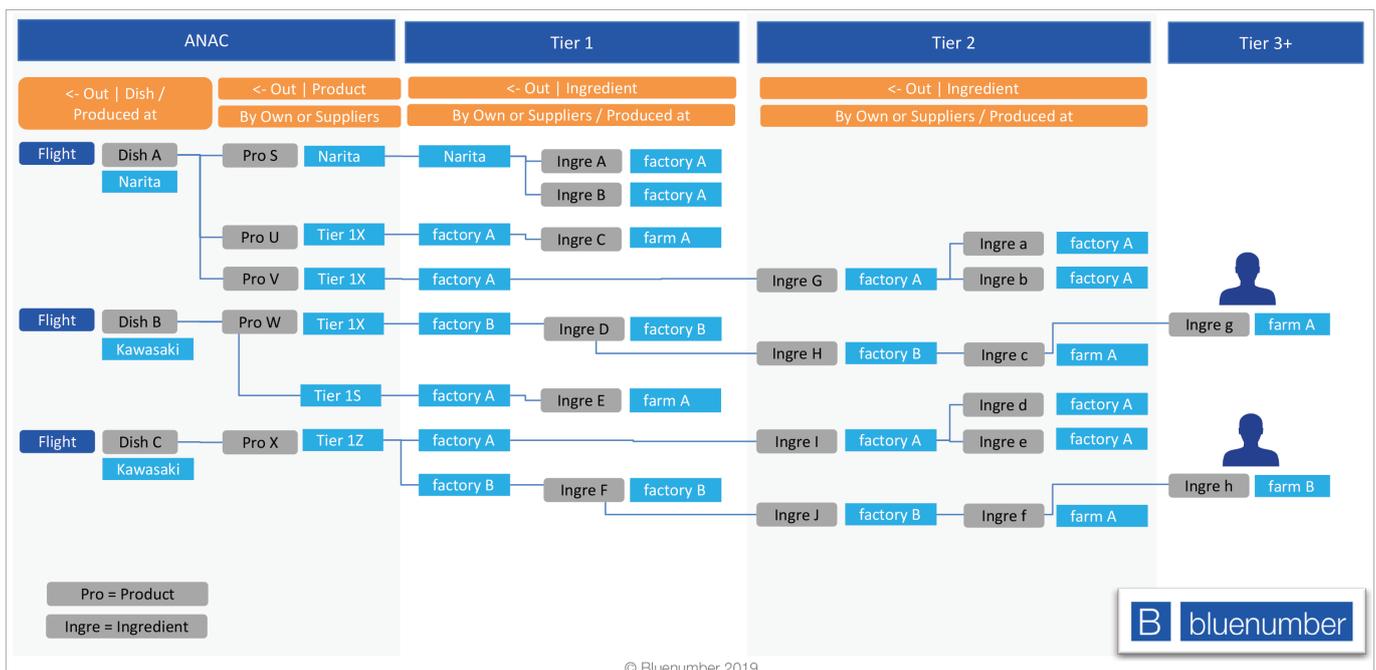


※What is Blunumber?
<https://www.blunumber.com>

Blunumber is an individual ID number for people, organisations, places or objects, which are managed neutrally by the Blunumber Foundation. TraceBlue Japan, a wholly owned subsidiary of Blunumber Holdings,

assists Japanese companies and organizations, focusing particularly on transparency of supply chains. Blunumber Holdings has subsidiaries in Japan, Malaysia, Bangladesh, Indonesia, and Europe.

Figure1 High Level Overview of Data Linkage at ANAC Supplier Tracing System



Theme 3: Prevent the Use of Airplanes in Human Trafficking

Why We Consider This Theme To Be Important

The ANA Group is a global airline group connecting Japan and the world, flying to 99 cities globally. This means there is a risk that airline services may be surreptitiously used by a third party to engage in human rights violations. A good example is human trafficking, a profitable criminal business expanding rapidly around the world. It is our responsibility to work towards preventing human trafficking.

The International Civil Aviation Organization (ICAO), an international specialized agency, and International Air Transport Association (IATA), a trade association for the world’s airlines, have started to take action against human trafficking. The U.S. already has anti-human trafficking training programs for front line airline workers. The ANA Group will work with other airlines, trade associations, related government agencies, and the civil society to take against human trafficking.

Activities to Date

Workshop

Human trafficking was discussed at IATA’s annual general meeting in Cancun, Mexico, in June 2017. At an annual review of the ANA Group in September 2017, human rights experts recommended the group to address the

issue of “human trafficking” as a priority human rights theme. In response, we held a workshop in Haneda Airport in April 2018, inviting experts from the Airline Ambassadors International, an NGO that supports airlines’ anti-human trafficking programs, to learn from the experience of the more advanced U.S. on what we can do as the ANA Group. The workshop, attended by government agencies, other airlines, and civil-society organizations, was organized with the support of CRT Japan, the International Organization for Migration (IOM), and Not For Sale Japan, the Japanese branch of the U.S. NGO Not For Sale.



The workshop in Haneda Airport

© Caux Round Table Japan

Nancy Rivard, President and Founder, Airline Ambassadors International (AAI)

Traffickers often use the speed and convenience of commercial air travel to move their victims to keep them powerless and airline staff has an opportunity to detect and discern the indicators in a way that no one else does. There’s a chance here for us to make a real difference - one flight attendant sees 500 people a week to twenty-four thousand people a year. One hundred trainees can provide scanning of about 2.4 million people definitely saving lives.

No airline is exempt. I’m asking for ANA to take a lead in the fight and the most important human rights issue of our time stopping human trafficking.





Cooperation with related organizations

At the Contact-Point Liaison Meeting on Human Trafficking Cases, organized annually by the National Police Agency with other related government agencies and embassies, in May 2018, we presented the ANA Group's views on human trafficking and what we are doing to address challenges. It was confirmed at the meeting that the participating organizations will work together in actively preventing human trafficking.

In-house education

Human trafficking can only be prevented and victims protected if the issue of human trafficking is correctly understood and action taken accordingly by all of our cabin attendants, ground staff, and employees regularly attending our customers. The e-learning program "We Prevent Human Trafficking!" was launched in December 2018 for all employees of the ANA Group to show that our business is not unrelated to human trafficking. As many as 94% of our employees participated in the e-learning program from then until the end of the program in February 2019.

Launch of in-flight reporting of human trafficking cases

After discussions at the Group CSR/Risk Management/Compliance Committee it was decided that the ANA Group will implement concrete anti-human trafficking measures. Specifically, we will report any suspected case of in-flight human trafficking to the immigration office. These measures started in April 2019, after providing training to all cabin attendants.

Preventing Human Trafficking

“Today, human trafficking is the fastest growing crime.”

“The airline industry has the potential to prevent a lot of human trafficking.”

The graphic features a central illustration of a woman in a blue shirt, surrounded by four circular icons: a globe with an airplane, a scale of justice, a globe with latitude/longitude lines, and crossed rifles. The entire graphic is presented as a screen with a white border and rounded corners.

e-learning screen

Future Direction

The first step will be to ensure smooth implementation of the reporting process in April with the advice of experts from outside of the ANA Group through regular dialogue. For the long term, we will examine if the reporting process can be expanded to include

reporting of non-aircraft operations, such as ground staff activities.

We will also work with government agencies and other airlines to consider the use of public relations activities as a means of deterring human trafficking.



Noriko Kiyotani, Programme Manager, International Organization for Migration (IOM)

IOM is a UN agency specializing in the issues related to international movement and migration of people.

We have long-standing cooperation with the aviation industry. In 2018, moreover, we began working with ANA on the issues of human trafficking, and as part of that effort, we provided video contents for employee training, which was a new experience for us too.

Air travel is normally used for transportation for human trafficking that occurs in Japan, particularly when the victims are non-Japanese. ANA is conducting employee training to build a system of reporting human trafficking incidents. We believe that continuing these efforts will contribute significantly to eradicating human trafficking. We hope that the

proactive stance adopted by ANA will prompt many people in Japan to take interest in the harm caused by human trafficking and lead to expanding the efforts to spot and protect the victims.

International Organization for Migration (IOM): IOM is a UN agency specializing in the issues related to international movement and migration of people. It addresses migration issues by directly supporting individual migrants, providing technical assistance to related countries, promoting regional cooperation, and conducting research and surveys.

Mariko Yamaoka, Director of Not For Sale Japan

In recent years, perpetrators are going more and more online to solicit victims and to communicate with each other. Instead of confining victims physically, they keep victims captive through psychological means, by use of threats and demand for repayment of debts. These trends increasingly make human trafficking cases hidden. Against this backdrop, we have considerable expectations on the aviation industry's valuable effort to rescue victims by detecting signs of human-trafficking victims during their "movement" in public space. We would like to commend ANA for having quickly joined this international effort, starting in-house training and operationalizing the in-flight reporting system in a short period of time.

For the future, we hope ANA will extend the reporting system to domestic flights in light of the rapid increase in Japanese victims, prevent human trafficking through PR activities in in-flight magazines, in-flight announcements, and at airport counters, and exercise its leadership not only in the aviation industry, but also in the passenger transport industry as a whole.

Not For Sale Japan (NFSJ): NFSJ was established in 2011 as the Japan branch of the international NGO Not For Sale (headquartered in San Francisco, USA). Through dissemination of information on human-trafficking issues and advocacy on society and governments, it is working on the eradication of human trafficking, which is considered as modern-day slavery.





Theme 4: Eradicate Corruption

Why We Consider This Theme To Be Important

In countries where the rule of law is insufficiently established, corruption and bribery brings degradation to society at large and exacerbates the impact of human rights abuses.

The ANA Group, which flies to 99 cities and links 22 countries and areas, recognizes that eradicating corruption is essential in fulfilling our responsibility to ensuring respect for human rights, and is taking various steps in this regard.

Activities to Date

Laying down rules

We have established the ANA Group Anti-Bribery Rules and the ANA Group Anti-Bribery Handbook, which provide guidance for employees on anti-bribery protocols and give specific examples of corruption. The rules and handbooks are distributed to related departments within the ANA Group.

Sharing information about the ANA Group’s policies

We provide education on corruption to employees stationed abroad, conduct employee e-learning programs, and organize anti-bribery seminars at our overseas branches. In 2018, seminars were held in Mexico, Singapore, and Hong Kong. As explained in the ANA Group Anti-Bribery Handbook, we also teach real life case studies and practice scenarios.

Surveys

Each year, we conduct a survey on compliance at each ANA Group company. The survey includes questions on “prohibition of corruption.” Results show that compliance to anti-bribery rules is generally satisfactory.

Future Direction

We will continue to improve on our education programs in the ANA Group and periodically monitor compliance. We will also put efforts into quickly providing solutions to problems as necessary.



A seminar at an overseas branch

Examples of Responses to Other Human Rights Issues

Decent work

The ANA Group is making efforts to increase productivity and implement various other measures to create an environment in which our diverse workforce can work with vigor and improve their respective capacities so that they can realize their full potential.

Childcare leave, shorter working hours system, and teleworking remove constraints regarding where and when we work. We use IT tools and digital devices to increase work efficiency. Seminars, started in 2015,

encourage supervisors to consider the work-life balance of their staff while enjoying their own work and personal life. Some 300 supervisors, mainly at the general manager level, have participated in the seminar. In April 2018, we also established a nursery within our company, open every day of the year from 7 a.m. to 10 p.m., to allow employees to focus on work with the assurance that their children will be properly taken care of.



Work-life balance seminar for male supervisors

Understanding LGBT

In April 2015, the ANA Group announced the ANA Group Diversity & Inclusion Declaration. As a group, we aim to respect the diversity of different people – our customers, business partners and employees - and create new business value. We are making effort to provide universal services so that diversity is respected and to make our society more sustainable.

We are also addressing issues faced by the LGBT community*¹ In 2016, we changed the restroom labels at ANA lounges in Haneda and Narita Airports, and began registration of same-sex partners for ANA mileage services. To deepen understanding of our employees on LGBT, we distributed the ANA Group handbook titled, “Understanding LGBT,” to all of our employees in 2018.

*¹: LGBT is an initialism that stands for lesbian, gay, bisexual, and transgender.



Cover of the handbook



Grievance Mechanism

The ANA Group recognizes the need to have in place a grievance mechanism for enabling us to quickly collect information about latent and manifest human rights risks and effectively deal with adverse impact that has been identified.

The ANA Group has a number of mechanisms for listening to concerns or complaints from customers, employees, shareholders, and other stakeholders. For example, our internal contact point for whistleblowers is accessible by any worker engaged in the ANA Group's operations, including workers employed by our service providers. We ensure that the privacy of the whistleblower and other parties concerned is protected and that they are not disadvantaged in any way. We have also established whistleblower contact points at law firms outside the company. Complaints can also be filed in English.

Moreover, at ANA Catering Service Co., Ltd., which carries out the ANA Group's catering operation, for

instance, social events are held regularly to promote communication between foreign workers and Japanese staff (including at our partner service providers).

On the other hand, we recognize that from the perspective of effectiveness of grievance mechanism, as mentioned in the United Nations Guiding Principles on Business and Human Rights, there is a need to continue to review existing mechanisms. As the ANA Group, we will draw up policies and processes for dealing with grievances, and realign existing mechanisms from the perspective of human rights. We will then examine how the existing mechanisms are being implemented and whether they are being implemented effectively. We are now in the process of discussing with independent third-party organizations on the possible use of mechanisms outside of our company. We will continue to improve on our grievance mechanisms while ensuring effective engagement with stakeholders we should be having dialogue with.



Social events held regularly

Stakeholder Engagement

The stakeholders we should be having dialogue with and the method of dialogue will differ depending on the human rights theme. At the ANA Group, we seek to understand the views and wishes of each of our stakeholders and use their feedback to improve our initiatives and make our engagement more effective. We also periodically report the results of our initiatives to stakeholders, and adjust our initiatives as necessary in response to their feedback. The ANA Group believes that building good relations with stakeholders will result in appropriate risk management.

Communication with Employees

We provide human rights education in training programs for new employees and new managers. In 2015, we launched an annual e-learning program for all employees of the ANA Group companies to deepen their understanding on human rights. For three months starting in December 2018, we conducted an e-learning program titled, “We Prevent Human Trafficking!” for all employees of the ANA Group. The percentage of employees attending the program was 94%.

Service providers and suppliers

We communicate the ANA Group Policy on Human Rights, ANA Group Purchasing Policy, and our various other policies to service providers and suppliers, and have discussions with them on how we can cooperate in creating a working environment that ensures respect for human rights. In 2017, we conducted a questionnaire survey on 201 business partners. We also hold discussions with individual firms on the themes identified through human rights impact assessment.

Overseas Dialogue

In succession of the dialogue we had with governments and NGOs in Thailand and Malaysia in May 2017, we had another round of exchange of views, in May 2018 in Thailand, with government agencies and NGOs on human rights challenges that Thailand faces. We also conducted interviews on the actual victims of human trafficking in Thailand, and deepened understanding on the situation surrounding human trafficking.



Dialogue in Thailand

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Communicating the ANA Group's Efforts

The ANA Group makes a point of actively communicating our efforts to ensure respect for human rights. In 2018, we had the opportunity to present the ANA Group's efforts in human rights fifteen times at seminars inside and outside of Japan. We seek to make the best use of the feedback obtained from such seminars to improve our efforts in human rights.

Dialogue with ESG Investors

In July 2018, we held a dialogue with experts resident in London with the purpose of listening to the advice of ESG investors and institutional investors on the ANA Group's ESG activities, with a special focus on human rights. Additionally, we visited Aviva Investors to deepen understanding on the views of institutional investors on Corporate Human Rights Benchmark (CHRB)* and future direction of CHRB activities.

(ESG investors, experts, and institutional investors who participated in the dialogue)

Colin Melvin

Founder and Managing Partner, Arkadiko Partners

Sachi Suzuki

Associate Director-Engagement, Hermes EOS

Dr. Steve Waygood

Chief Responsible Investment Officer,

AVIVA INVESTORS



Second Sustainability Forum jointly organized by the Tokyo Organising Committee of the Olympic and Paralympic Games (Tokyo 2020) and the International Labour Organization (ILO).

*Corporate Human Rights Benchmark (CHRB):

CHRB is an international initiative on business and human rights that evaluates and ranks companies from the perspective of human rights, and uses the results to promote ESG investment and particularly the social and human rights aspects of ESG investment. After releasing a pilot version in 2016, it announced the results of its ranking of some 100 companies in agricultural products (including retail), apparel, and extractive industries around the world in 2017.



Dialogue at AVIVA INVESTORS

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Periodic Advice Session for ANA's Human Rights Activities

Since 2016, the ANA Group has been organizing annual dialogue with international human rights experts to listen to their views on the ANA Group's activities for ensuring respect for human rights.

Outlines of the Review

In September 2018, we invited two human rights experts from two organizations from abroad to the dialogue, and reported on the progress made by the ANA Group since the last review in September 2017. The experts provided us with advice on our group's overall efforts made in the area of human rights as well as recommendations and examples of various practices for our future undertakings on our priority human rights themes.

(Human rights experts who participated in the review)

William Rook

Regional Manager, Middle East, Institute for Human Rights and Business

Tulika Bansal

Senior Adviser, Human Rights and Development, The Danish Institute for Human Rights

The Institute for Human Rights and Business is the leading international think tank on business and human rights, founded in 2009. The IHRB's mission is to shape policy, advance practice and strengthen accountability in order to make respect for human rights part of everyday business.

The Danish Institute for Human Rights is an independent, state-funded human rights institution, originally established in 1987 by a parliamentary decision as the Danish Centre for Human Rights. The organisation provides expertise on business and human rights, and develops tools to help companies assess the impact of their business on human rights. More than 200 global firms use the tools.



Dialogue with human rights experts



Comments from the Review in 2018

On human rights due diligence

As for human rights due diligence, there is a need to include a wide range of groups and stakeholders who may be affected by corporate activities. These groups and stakeholders, or rights-holders*, are wide-ranging and may include workers in supply chains and socially vulnerable populations in a specific community or group. In human rights impact assessment, it is essential to have a process for identifying “impact to rights-holders” rather than “corporate risks,” in a discussion with rights-holders themselves and third parties.

Reports should be made on progress in how human rights due diligence has been translated into action. This will help other Japanese companies to learn from the experience of ANA.

*Rights-holders, meaning holders of rights (human rights), are those groups and stakeholders who may be affected by corporate activities.

On employment of foreign workers

The issue of foreign workers, or migrant workers, could pose a serious risk to companies. If an unlawful broker is exploiting foreign workers by forcing them to work to repay debt and this problem is happening in the sending country, response to such problems becomes difficult. It is important for companies to set down standards on recruitment of foreign workers, including standards

on selection of brokers, by drawing up policies on employment of foreign workers and sharing those policies with suppliers and business partners. Since it is difficult for a single company alone to deal with this kind of problems, it would be more effective to work with other companies and government agencies.

On grievance mechanism

Many foreign workers are not fluent in Japanese, and this could become a risk in relation to security and safety concerns and for them to acquire technical skills. In such a workplace, it is important that there is a mechanism (grievance mechanism) set up where foreign workers can access information and file complaints in their native language.

A grievance mechanism will need to meet the eight criteria for ensuring its effectiveness, as outlined in the United Nations Guiding Principles on Business and Human Rights. For it to function effectively, a grievance mechanism should be set up in a way that is open to all who want to make use of it. It will be important, at first, to win trust in the system by listening to users’ complaints and concerns. Listening to relatively minor complaints and concerns will give insight into larger, more fundamental problems.



Dialogue with human rights experts

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UN Guiding Principles Reporting Framework

This report aims to align with the UN Guiding Principles Reporting Framework. The index below is designed to help you identify how and where the framework disclosures are addressed. For full details on the framework, please visit <https://www.ungpreporting.org/>

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ANA Group Policy on Human Rights

At the ANA Group, we understand that we must respect the human rights of all persons affected by our business activities, and we will make every effort to safeguard their dignity and to show them respect.

1. Stance

The ANA Group hereby establishes a Human Rights Policy (“the Policy”) based on the International Bill of Rights (the Universal Declaration of Human Rights and the two International Covenants), the International Labor Organization Declaration on Fundamental Principles and Rights at Work, the Ten Principles of the United Nations Global Compact, and the United Nations Guiding Principles on Business and Human Rights, and will promote efforts for the respect of human rights. The Policy also articulates ANA’s commitment to respect human rights in accordance with ANA’s Mission Statement, Management Vision, and Code of Conduct (ANA’s Way).

2. Scope of Application

The Policy will apply to all officers and employees of the ANA Group (all staff including executives, permanent staff and contract staff). The ANA Group will also continuously encourage its business partners and suppliers not only to support the Policy but also to adopt a similar policy, and will cooperate with its business partners and suppliers in promoting respect for human rights.

3. Responsibility to Respect Human Rights

The ANA Group will fulfil its responsibility to respect human rights by ensuring that its business activities do not result in violations of human rights, and by responding appropriately to correct any adverse impact our business activities may have on human rights. In the event our business partners or suppliers have a adverse impact on human rights, we will use our influence to encourage them to take appropriate measures. The ANA Group will name one person responsible (Chief CSR Promotion Officer) for overseeing implementation of, and monitoring adherence to, this Policy.

4. Compliance with Applicable Laws and Regulations

The ANA Group will comply with the laws and regulations of all countries where it conducts its business activities. It will also respect international human rights standards to the maximum extent possible, and actively promote these standards.

5. Training and Education

The ANA Group will provide appropriate training and education for its executives and employees.

6. Human Rights Due Diligence

To fulfil our responsibilities in regard to respect for human rights in accordance with procedures described in the Guiding Principles on Business and Human Rights mentioned above, the ANA Group will establish a system of human rights due diligence and implement this in an ongoing manner. Due diligence is an ongoing process whereby a company preventively investigates and identifies issues, corrects these through appropriate procedures, and discloses externally progress and results of its activities in order to prevent or mitigate any negative impact on human rights the ANA Group may have on society.

7. Dialogue and Consultation

In various efforts under the Policy, we of the ANA Group will make use of independent expert external knowledge concerning human rights, and will engage sincerely in meaningful consultation with people who are affected by our business.

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