

# Human Rights Report 2020



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- In accordance with the UK Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018, 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., a group company that provides air transportation services, 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.

Please note that the majority of photographs used in this report were taken before the spread of COVID-19, and as such, you may find photographs that show people without masks or not exercising social distancing or other infection-control practices.

## Message from Our CEO

I would like to send my sincere well-wishes to those around the world who have contracted COVID-19.

Confirmed cases of novel coronavirus began to emerge worldwide in late January this year. WHO declared COVID-19 as a Public Health Emergency of International Concern on January 30. The infection continued to spread, bringing the number of those infected worldwide to more than 70 million. International travel restrictions have been rigorously implemented in many countries around the world, severely constraining the ANA Group's core aviation business, particularly the operation of our international flights. It is under these difficult circumstances that we are publishing our third ANA Group Human Rights Report. We believe nonetheless that these very circumstances have increased, rather than diminished, the importance of ensuring respect for "human rights."

The COVID-19 pandemic allegedly will put those most vulnerable in society in an even more precarious state. It is also true that for this reason, the pandemic has redirected people's attention to human rights. There have been talks of a "new normal" in the economy, society, and people's lifestyles in the post-COVID-19 world. Respect for human rights, in my view, should also make up the foundation of this "new normal." The COVID-19 pandemic has further highlighted the importance of the ANA Group's existing ESG management strategy (a management strategy focused on environmental, social, and governance issues). We believe we can strengthen our corporate resilience by earnestly promoting our ESG management strategy, while putting respect for human rights at the center of that strategy and adapting to changes in society as needed.

The shift from "shareholder capitalism" to "stakeholder capitalism" is beginning to be embraced in the minds of the world's senior business executives. The ANA Group's broad range of "stakeholders" includes shareholders, customers, employees, local communities, and the global environment, among which employees are particularly important. From such

a perspective, I declared in my message to all employees of the ANA Group in March, when there was a growing uncertainty about the future, that their "employment will be protected." I felt that it was paramount to create a sense of security within the ANA Group, without which we would not be able to fulfill our single most important mission to ensure "safety in air travel."

We have also taken every step to provide a safe environment for both customers and employees through the implementation of the ANA Care Promise, a set of infection control measures, on June 1. This is our promise to travelers to provide a clean, hygienic environment in airports, lounges, and aircraft cabins, and keep the aircraft cabins properly ventilated. We will continue to make efforts to mitigate concerns of our customers so that they can feel safe in traveling with us.

We will, moreover, steadily advance many of the themes we had been working on before the COVID-19 pandemic to fulfill our responsibility to ensure respect for human rights across the ANA Group. In the first Human Rights Report published in 2018, I likened our human-rights efforts to "a life-long journey" that required "a continuous approach." We will further promote our activities and ensure that the unexpected events of the pandemic do not derail our progress.

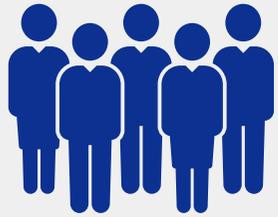
Publication of the Human Rights Report is an expression of our resolve to ensure respect for human rights and our ambitions for the future. Underpinning all our activities is stakeholder dialogue. In this rapidly changing world, it is essential to have continuous stakeholder dialogue to keep track of social trends and understand what society requires from us. After the publication of the Human Rights Report in 2018, we have had increased feedback from people outside the ANA Group. This has resulted in strengthening our activities as well as increasing the amount of information we provide; the number of pages in this report is more than double that of the 2018 report. In that respect, the Human Rights Report is a useful communication tool developed jointly with our stakeholders. We will continue to



engage in "continuous dialogue," "strengthening of activities," and "information disclosure" and promote the ESG management strategy across the ANA Group.

In the face of the current predicament, we reflected on the strength that originates from our group's founding principles. One such principle is "integrity." Even though the company started with next to nothing—we only had two helicopters in the beginning—our predecessors firmly believed that our business was for "the public good" and were convinced that our mission was to "contribute to society." The company overcame numerous challenges, bouncing back stronger each time. This resilience is embedded deep in our DNA that we inherited from our predecessors. The ANA Group will overcome the current difficulties to emerge as a stronger airline serving to connect people globally. All of this must be founded on respect for human rights. We will continue to work on ensuring respect for human rights and contribute to "fulfilling the hopes and dreams of current and future generations" as stated in the ANA Group's Mission Statement.

President and Chief Executive Officer



45,849

Consolidated group employees



307

Operational aircraft



52.3

million Passengers flown in FY2019

Domestic services: 42.9 million

International services: 9.4 million



62

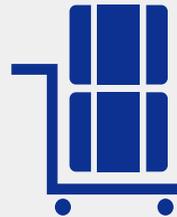
Consolidated subsidiaries

16

Equity-method subsidiaries and affiliates

1.97

trillion Yen in operating revenues (consolidated)



1.23

million Tons of transported goods in FY2019

Domestic services: 373 k tons

International services: 866 k tons

23

Countries and areas we fly to

100

Cities we fly to



## Major Group Companies





## Policies and Structure for Human Rights



### ■ ANA Group Policy of Human Rights

In April 2016, the ANA Group inaugurated the ANA Group Policy on Human Rights, 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, the UN Global Compact's Ten Principles, and the UN Guiding Principles on Business and Human Rights. Based on this policy, the ANA Group has been working to ensure that human rights are respected.

The 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. The ANA Group, moreover, encourages its contractors and suppliers to support the Policy, and to adopt similar policies. A growing concern for the ANA Group in recent years is the rampant threats and violence against human rights activists around the

world. To ensure that we do not lend support to such human rights violations in the ANA Group's business activities and relationships, the ANA Group fully upholds the "right to freedom of opinion and expression" and the "right to freedom of peaceful assembly," as enshrined in Articles 19 and 20 of the Universal Declaration of Human Rights, respectively. This commitment is also embodied in the Policy.

The Policy was drafted with input from three external human rights organizations and approved by the Board of Directors for its inception and disclosure.

### ■ Modern Slavery Statements

Each year the ANA Group issues the ANA Group Modern Slavery Statement in accordance with the United Kingdom's Modern Slavery Act 2015. We will, moreover, ensure proper reporting under the Modern Slavery Act that came into effect in January 2019 in Australia.

### ■ ANA Group's Social Responsibility Guidelines

The ANA Group has laid down the Social Responsibility Guidelines as a code of conduct for all executives and employees of the ANA Group. In the section titled "We will respect human rights and diversity," the Guidelines specify "compliance with the International Covenants on Human Rights and other international human rights standards, as well as relevant laws, regulations, and social norms," and disavow "child labor and forced labor within the Group" and "transaction with any company engaging in such labor." An e-learning program is available to deepen the understanding of all executives and employees of the ANA Group in the materials covered by the Guidelines. Education and training, moreover, is provided to new employees every year.

### ■ ANA Group's Purchasing Policy

The ANA Group has published its Purchasing Policy, consisting of the Basic Policies, Purchasing Principles, and Supplier Management Policy. It requires suppliers to respect and comply with international norms in human rights and labor, including prohibition of child labor and forced labor. The Policy, moreover, is used as a benchmark in the selection of business partners as well as a tool for periodic post-selection monitoring. Through these measures, the ANA Group works actively to gain the understanding and cooperation of partner firms. The Policy is up for a review this year.

In 2016 and 2017, the ANA Group conducted questionnaire surveys on 170 business partners and 201 business partners, respectively. In 2018, the ANA Group introduced a new procurement system. At the moment, we are reorganizing our supplier management system, including deliberations on the use of an external platform. Consequently, in lieu of a questionnaire survey, we conducted checks on suppliers using external databases in 2019. On the other hand, the regular on-site auditing has continued for contractors engaged in our ground handling services and catering services.



## ■ Other Policies

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

### ANA Group Diversity & Inclusion Declaration

In April 2015, the President and CEO of ANA Holdings Inc. announced the ANA Group Diversity & Inclusion Declaration. A specialized unit has been set up to support our diverse workforce, including women, employees with disability, older employees, and non-Japanese employees, to realize their full potential, and to promote working-style reform and create a better working environment. Starting in 2015, the ANA Group has been organizing the ANA Group D&I Forum annually to deepen and promote understanding on diversity and inclusion. In December 2019, some 200 executives and employees tasked with promoting diversity and inclusion in the ANA Group participated in the forum.

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

In September 2015, 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. The ANA Group is working to create a working environment conducive to all, regardless of disability, and to systematically expand employment of employees with disability. The combined employment rate of persons with disability at ANA Holdings Inc., All Nippon Airways Co., Ltd., and qualified ANA Group companies (a total of 12 companies) was 2.68% as of June 2019, higher than the statutory requirement.

### ANA Health Frontier Declaration

In April 2016, 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. 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. Specifically, we use the PDCA cycle to improve employees’ health management indicators, such as on body mass index (BMI), smoking prevalence, and metabolic syndrome.

### Universal Service Policy

The ANA Group believes that our mission includes offering universal services that cater to the individual needs of different passengers regardless of their age, sex, nationality, culture, and disability, as well as providing a sense of security and comfort to all passengers until they reach their destinations. For this reason, the ANA Group drew up the Universal Service Policy in May 2018. We will further enhance our services in terms of equipment, hardware, and hospitality in our pursuit to provide “the world’s top-level universal services” that constantly win the favor of customers around the world.



At the ANA Group, planning and deliberations on policies and measures for promoting ESG management, including “business and human rights,” are conducted within the Group ESG Management Promotion Committee, the Group Management Committee, and other bodies. Particularly important issues are brought before the Board of Directors.

The Chief ESG Promotion Officer (CEPO) is responsible for the ANA Group’s activities related to human rights. To promote the activities across the ANA Group, each Group company is assigned the ESG Promotion Officer (EPO, responsible for promoting ESG management), and each Group company and department is assigned the ESG Promotion Leaders (EPLs, leaders in promoting ESG management).

**■ Group ESG Management Promotion Committee (formerly the Group CSR/Risk Management/Compliance Committee)**

The ANA Group has established the Group ESG Management Promotion Committee, which is placed under the supervision of President and CEO of ANA Holdings Inc. and presided by the CEPO (Senior Executive Vice President of ANA Holdings Inc.). The committee is comprised of full-time directors, senior vice presidents, and full-time auditors of ANA Holdings Inc., and executive officers (EPOs) from all ANA Group companies.

As per regulations, the committee meets at least twice each year for timely discussions not only on “business and human rights,” but also on a comprehensive range of topics, including “efforts in reducing environmental impact,” “risk management based on risk mapping,” “compliance,” and “stakeholder dialogue.” The important issues linked to management strategy are proposed to the Group Management Committee and brought before the Board of Directors to ensure smooth coordination in the implementation of activities.

As officers responsible for promoting ESG management, including “business and human rights,” the EPOs from all Group companies participate in the meetings of the Group ESG Management Promotion Committee. Through their participation, the discussions at the meetings are shared across all Group companies. The EPOs and EPLs work in close coordination to properly implement necessary measures.

**Governance Structure**



**■ Meetings of the Group CSR/Risk Management/Compliance Committee (now called Group ESG Management Promotion Committee) in FY2019**

The Group CSR/Risk Management/Compliance Committee convened four times in FY2019.

Date	Agenda Items Related to “Business and Human Rights”	Main Comments (summary)	Attendance Ratio
July 23, 2019	<ul style="list-style-type: none"> <li>Introduction of a reporting system to “prevent the use of airplanes in human trafficking”</li> </ul>	<p>[President] We have taken leadership in a series of moves involving government agencies. It has significance in spreading Japan’s standard to the rest of the world.</p> <p>[Member] We should actively communicate our achievements inside and outside the company.</p>	90% (52 out of 58)
October 30, 2019	<ul style="list-style-type: none"> <li>Interim activities report for FY2019</li> </ul>	<p>[Member] There should be an objective assessment of our reporting system, including the level of the system and its shortcomings, and disclose the information to outside of the company as well.</p>	88% (53 out of 60)
January 16, 2020	<ul style="list-style-type: none"> <li>Matters regarding employment of migrant workers in Japan, a survey on employment situation</li> </ul>	<p>[President] Should strategically address this issue.</p> <p>[Member] There is a need in the future to actively develop reliable employment channels where we can secure quality labor.</p>	92% (58 out of 63)
March 18, 2020	<ul style="list-style-type: none"> <li>Summary for FY2019 and activities planning for FY2020</li> </ul>	<p>[Chair] We should strengthen efforts in responding to migrant workers in Japan and reinforce supply chain management. We will also put further efforts in building a grievance mechanism.</p>	89% (56 out of 63)

**■ ESG Promotion Officer (EPO) and ESG Promotion Leader (EPL)**

At the ANA Group, the ESG Promotion Officer (EPO) is assigned at each Group company to be responsible for ESG management at the assigned company. The ESG Promotion Leader (EPL) is appointed in each ANA Group company and department to play a leadership role in promoting ESG management.

Decisions made at the Group ESG Management Promotion Committee and the Group Management Committee are implemented across the ANA Group as a whole in close coordination with the EPOs and EPLs. Depending on the human rights issue, we also hold separate discussions with relevant contractors 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 taking actions in accordance with those policies.

As mentioned above, the EPOs are members of the Group ESG Management Promotion Committee, and as such, information is shared with the EPOs on policies and challenges discussed at the meetings of the committee. On the other hand, the EPLs also meet twice a year in the ESG Promotion Leader Meeting where they share information not only on “business and human rights,” but also on a comprehensive range of topics, including the “environment,” “risk management,” and “compliance,” to ensure activities are properly implemented.

**■ Group Management Committee**

The Group Management Committee, chaired by the President and attended by full-time directors and auditors, has been established to play a complementary role to the Board of Directors. Substantial transfer of decision-making authority over operational matters to the Group Management Committee (with decisions made reported to the Board of Directors) means that management issues can be discussed more speedily and more in detail and that management process can be expedited.

To further promote ESG management, the ANA Group has recently set down medium- to long-term goals on ESG. Specifically, we organized stakeholder dialogue to identify their expectations of the ANA Group. We then drew up by linking them to the management plan, during FY2019, the medium- to

long-term goals on ESG, which include “business and human rights” (see P.9 for more detail). These goals were approved at the Group Management Committee. In the area of “business and human rights,” the goals confirmed our commitment to ensure respect for human rights in our corporate activities in line with the UN Guiding Principles on Business and Human Rights. Next steps will include laying down more concrete key performance indicators (KPIs) and monitoring progress towards achieving the medium- to long-term goals.

**■ Commitment from the Senior Management**

To clarify the responsibility of the senior management over corporate business performance, the ANA Group has introduced performance-based executive compensation. In addition, the ANA Group will, in the future, objectively assess progress made in ESG management using benchmarks established by four external ESG rating organizations, and reflect this assessment on executive compensation.

The benchmarks established by four external rating organizations are, namely, Dow Jones Sustainability Index (DJSI), FTSE4Good, MSCI, and Carbon Disclosure Project (CDP). We believe that these benchmarks sufficiently encompass the latest global trends and social needs, and can be used to rate the ANA Group’s ESG management relative to other companies. ANA Holdings Inc. has been selected for inclusion in DJSI World Index for three years in a row since 2017, and obtained the highest score in the industry for 2017 and 2018. In the field of human rights, the ANA Group had the industry-best scores in 2016, 2017, and 2019.

Externally, the President has indicated in interviews for newspapers the ANA Group’s continuing resolve in putting efforts into prevention of human trafficking and in executing other measures in the area of “business and human rights.”

- September 1, 2018, “Change with 2030 SDGs: Interview with Leaders” (The Asahi Shimbun)
- April 23, 2020, “Think Together, Build Together: Interview” (The Asahi Shimbun)

■ Four Areas of Focus

The 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.\* The four themes are as follows:

\* The assessment was conducted in 2016 and 2019. For more details on the process of the assessment, see P.15.

	<p><b>Theme 1</b>  <b>Respect the Human Rights of Migrant Workers in Japan</b>                  → see P.18 for details</p>
	<p><b>Theme 2</b>  <b>Strengthen Supply Chain Management of In-flight Meals</b>                  → see P.21 for details</p>
	<p><b>Theme 3</b>  <b>Prevent the Use of Airplanes in Human Trafficking</b>                  → see P.24 for details</p>
	<p><b>Theme 4</b>  <b>Eradicate Corruption</b>                  → see P.27 for details</p>

■ Links to the Mid-Term Corporate Strategy

In formulating the FY2016-2020 Mid-Term Corporate Strategy, the ANA Group conducted, partly in response to external stakeholders, “materiality assessment” using the two axes of “impact on the ANA Group’s business operations” and “impact on stakeholder interest, society, and environment” to identify key issues. “Human rights” was one of the key issues identified. In the FY2018-2022 Mid-Term Corporate Strategy, moreover, the ANA Group identified “Creation of Social Value” as one of three core foundations supporting our business strategy, and included

“mitigating human rights risks” as one of the key issues we should address.

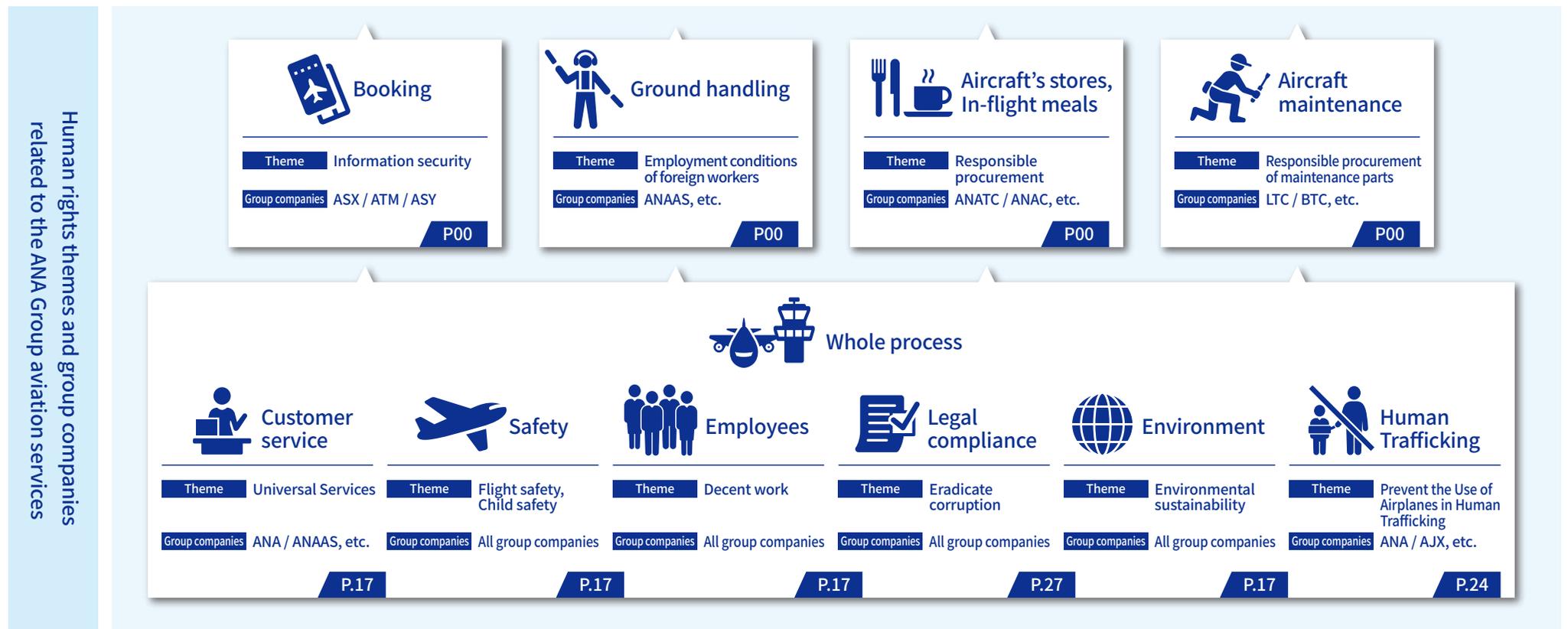
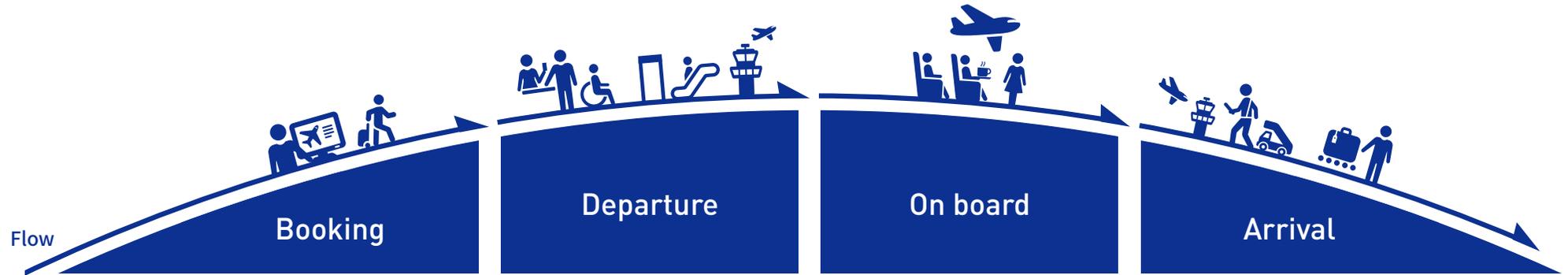
In FY2019, we organized stakeholder dialogue to identify their expectations of the ANA Group, and drew up by linking such expectations to the management plan, the medium- to long-term goals on ESG, which include “business and human rights” (see below). Next steps will include laying down concrete key performance indicators (KPIs) and monitoring progress towards achieving the medium- to long-term goals on ESG.

<p><b>ESG-Related Goals to 2050</b></p> <ol style="list-style-type: none"> <li>1. Reduce CO2 emissions from airline operations by 50% in 2050 compared to 2005 levels                         <ul style="list-style-type: none"> <li>• Leverage aircraft technology innovation for higher fuel-efficiency and improved engines</li> <li>• Boost the efficiency of operations in flights and engine cleaning</li> <li>• Introduce Sustainable Aviation Fuel (SAF)</li> <li>• Utilize the carbon credit trading scheme</li> </ul> </li> <li>2. Reduce CO2 emissions from all non-airline operations to zero                         <ul style="list-style-type: none"> <li>• Replace airport vehicles with hybrid cars, electric cars, and fuel-cell cars</li> <li>• Upgrade ANA Group’s facilities and infrastructure to more efficient solutions</li> <li>• Look for opportunities for energy saving and utilize renewable energy sources</li> </ul> </li> <li>3. Reduce waste of resources to zero                         <ul style="list-style-type: none"> <li>• Cut the overall usage of resources, such as plastic and paper, through actively promoting a 3R waste management system (Reduce, Reuse, Recycle)</li> </ul> </li> <li>4. Reduce food waste by 50%, including food waste from in-flight meals                         <ul style="list-style-type: none"> <li>• Raise efforts to eliminate waste in the procurement, preparation, delivery and disposal process of food products throughout their life cycle</li> </ul> </li> </ol> <p>* SAF: Alternative jet fuel produced from sustainable sources with low CO2 emissions in the process from raw material production / procurement to combustion</p>	<p><b>SDG-related Commitments to 2030</b></p> <ol style="list-style-type: none"> <li>1. <b>Responsibility to respect human rights</b> <ul style="list-style-type: none"> <li>• <u>Based on the UN Guiding Principles on Business and Human Rights, the ANA Group will make every effort to promote the respect of human rights in our corporate activities</u></li> </ul> </li> <li>2. <b>Promote responsible procurement and supply-chain management</b> <ul style="list-style-type: none"> <li>• <u>Manage procurement in consideration of its impact on the environment and human rights</u></li> <li>• <u>Build and manage a fair and transparent supply chain</u></li> </ul> </li> <li>3. <b>Use innovation to solve social issues</b> <ul style="list-style-type: none"> <li>• Provide new value through utilizing avatars, drones, MaaS, etc. and through working in partnership with other industries</li> </ul> </li> <li>4. <b>Create personnel to support sustainable growth</b> <ul style="list-style-type: none"> <li>• Develop a personnel force and a sustainable work environment in which employees can raise their productivity and contribute to sustainable corporate growth</li> </ul> </li> <li>5. <b>Respond to the diversity of our customers</b> <ul style="list-style-type: none"> <li>• Respect the needs and diversity of each customer and promote universal services in both products and services</li> </ul> </li> <li>6. <b>Conservation of biodiversity</b> <ul style="list-style-type: none"> <li>• Promote measures to stop illegal wildlife trade</li> </ul> </li> <li>7. <b>Regional revitalization</b> <ul style="list-style-type: none"> <li>• Address various social issues in contributing to society and regional revitalization</li> </ul> </li> </ol>
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ANA Group’s Main Activities on Human Rights

	2015	2016	2017	2018	2019	2020 (planned)	
<b>Policies</b>	<ul style="list-style-type: none"> <li>• ANA Group published its Diversity &amp; Inclusion Declaration</li> <li>• ANA Group established its Code of Conduct for the Employment of People with Disabilities</li> </ul>	<ul style="list-style-type: none"> <li>• ANA Group launched its Group Policy on Human Rights</li> <li>• ANA Group announced its ANA Health Frontier Declaration</li> </ul>		<ul style="list-style-type: none"> <li>• Establishment of the Universal Service Policy</li> </ul>	<ul style="list-style-type: none"> <li>• Establishment of medium- and long-term goals on ESG</li> </ul>	<ul style="list-style-type: none"> <li>• Establishment of KPI related to “business and human rights”</li> <li>• Revision of the ANA Group Purchasing Policy</li> </ul>	
<b>Dialogue</b>	<ul style="list-style-type: none"> <li>• Dialogue with human rights experts in Japan (communication with the experts has since been ongoing)</li> </ul>	<ul style="list-style-type: none"> <li>• Dialogue with human rights experts from abroad (dialogue has since continued each year as a periodic review)</li> </ul>	<ul style="list-style-type: none"> <li>• Interview with victims of human trafficking in Thailand (conducted every year until 2019)</li> </ul>	<ul style="list-style-type: none"> <li>• Dialogue with ESG investors in relation to human rights activities (dialogue has since continued each year)</li> </ul>	<ul style="list-style-type: none"> <li>• Participated in drawing up the Engagement and Remedy Guidelines through multi-stakeholder involvement</li> </ul>	<ul style="list-style-type: none"> <li>• Dialogue in countries in Southeast Asia and other regions that send workers to Japan</li> </ul>	
<b>Education and Training</b>	<ul style="list-style-type: none"> <li>• Human rights e-learning for all ANA Group employees (conducted annually thereafter) and Stratified training</li> </ul>						
<b>Assessment and Measures</b>	<b>General</b>		<ul style="list-style-type: none"> <li>• Conducted human rights impact assessment and identified three areas of focus</li> </ul>	<ul style="list-style-type: none"> <li>• Addition of the fourth area of focus (prevention of human trafficking) through dialogue</li> </ul>	<ul style="list-style-type: none"> <li>• Conducted human rights impact assessment for the second time</li> </ul>	<ul style="list-style-type: none"> <li>• Begin operationalizing the grievance mechanism</li> </ul>	
	<b>Foreign workers</b>		<ul style="list-style-type: none"> <li>• Conducted interviews on foreign workers employed by partner firms (conducted every year thereafter)</li> </ul>		<ul style="list-style-type: none"> <li>• Clarification of “matters for consideration when employing foreign workers” and information sharing across the ANA Group as a whole</li> </ul>	<ul style="list-style-type: none"> <li>• Begin operationalizing the Global Supply-Chain Worker Information System</li> </ul>	
	<b>Supply-chain management</b>	<ul style="list-style-type: none"> <li>• A questionnaire survey conducted on 136 business partner firms for monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• A questionnaire survey conducted on 170 business partner firms for monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Participated in Bluenumber Initiative for a transparent food supply chain</li> <li>• A questionnaire survey conducted on 201 business partner firms for monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Introduced the ANA Group’s new purchasing system</li> <li>• Registered approximately 200 food ingredient suppliers in Bluenumber</li> </ul>		<ul style="list-style-type: none"> <li>• Link between in-flight meal system and Blue Number</li> </ul>
	<b>Prevention of human trafficking</b>			<ul style="list-style-type: none"> <li>• Organized workshops on prevention of human trafficking</li> </ul>	<ul style="list-style-type: none"> <li>• Launched in-flight reporting of human trafficking cases</li> </ul>		<ul style="list-style-type: none"> <li>• Organize events to raise awareness about prevention of human trafficking</li> </ul>
	<b>Eradication of corruption</b>		<ul style="list-style-type: none"> <li>• Establishment of the ANA Group Anti-Bribery Handbook</li> </ul>	<ul style="list-style-type: none"> <li>• Seminar on eradication of corruption (conducted every year thereafter)</li> </ul>			
	<b>Others</b>	<ul style="list-style-type: none"> <li>• ANA Group D&amp;I Forum (conducted every year thereafter)</li> </ul>			<ul style="list-style-type: none"> <li>• Distributed the ANA Group’s handbook, “Understanding LGBT,” to all employees</li> </ul>		<ul style="list-style-type: none"> <li>• Organize a workshop on “human rights of children”</li> </ul>
	<b>Information Disclosure</b>		<ul style="list-style-type: none"> <li>• Issued a group statement under the UK Modern Slavery Act 2015 (a statement issued each year thereafter)</li> </ul>		<ul style="list-style-type: none"> <li>• Published ANA Group Human Rights Report (published annually thereafter)</li> </ul>		<ul style="list-style-type: none"> <li>• Issue a statement based on the Australian Modern Slavery Act</li> </ul>

Flowchart of aviation services of the ANA Group



\* ASX : ANA Sales Co., Ltd. ATM : ANA Telemart Co., Ltd. ASY : ANA Systems Co., Ltd. ANAAS : ANA Airport Services Co., Ltd. ANATC : ALL Nippon Airways Trading Co., Ltd. ANAC : ANA Catering Service Co., Ltd. LTC : ANA Line Maintenance Technics Co., Ltd. BTC : ANA Base Maintenance Technics Co., Ltd. AJX : Air Japan Co., Ltd.

**Management Cycle**

In accordance with the UN Guiding Principles on Business and Human Rights, the ANA Group has established a management system and cycle, as described below, to ensure human rights are respected.



**Policy Commitment and Communication**

The ANA Group has formulated the ANA Group Policy on Human Rights and various other policies related to human rights (see P.5 for details).

Information about those policies and the ANA Group’s efforts in relation to human rights is communicated to all executives and employees of the ANA Group. Specifically, education and training on “business and human rights” is provided each year to new employees and new managers. From 2015, an e-learning program has been installed for all executives and employees of the ANA Group (see P.32 for details).

We also work on our business partners (contractors and suppliers) based on the above policies (see P.32 for details).

**Identification, Analysis, and Assessment of Adverse Human Rights Impact**

In 2016 and 2019, we conducted human rights impact assessment to identify important human rights themes in the supply chain and to address each of the identified themes (see P.15, 16 for details).

The ANA Group has annual dialogue with international human rights experts, who provide objective assessment and advice on the ANA Group’s activities (see P.35 for details).

**Implementation of Appropriate Measures**

The ANA Group addresses important human rights themes in an appropriate manner by integrating the results of the human rights impact assessment into a process of action (see P.18 to 30 for details).

**Follow-Up Assessment on the Effectiveness of Actions**

In FY2019, the ANA Group established medium- to long-term goals for “business and human rights” to enable systematic operation of a management cycle. We will additionally set down concrete key performance indicators (KPIs) and monitor progress in the form of follow-up assessment (see P.9 for details).

**Information Disclosure Outside the ANA Group**

In 2018, the ANA Group became the first Japanese company to publish a “human rights report,” and has been publishing the report each year thereafter. The ANA Group, moreover, issues a statement under the UK Modern Slavery Act 2015, and will also ensure proper reporting under the Australian Modern Slavery Act.

**Access to Remedy**

The ANA Group has set up the ANA Alert, a contact point accessible by all workers engaged in the business operations of the ANA Group, including those working for our partner firms and contractors, to report, notify, or consult not only on compliance-related cases, but also on any human rights concerns. We reassure callers that their privacy as well as that of other parties concerned will be protected and that they will not be unfairly treated for reporting cases. In FY2019, there were 189 calls made to the ANA Alert for reporting or consultation.

In addition to the ANA Alert, we have started to introduce a new “grievance mechanism (NINJA)” in 2020 for access to remedy (see P.31 for details).

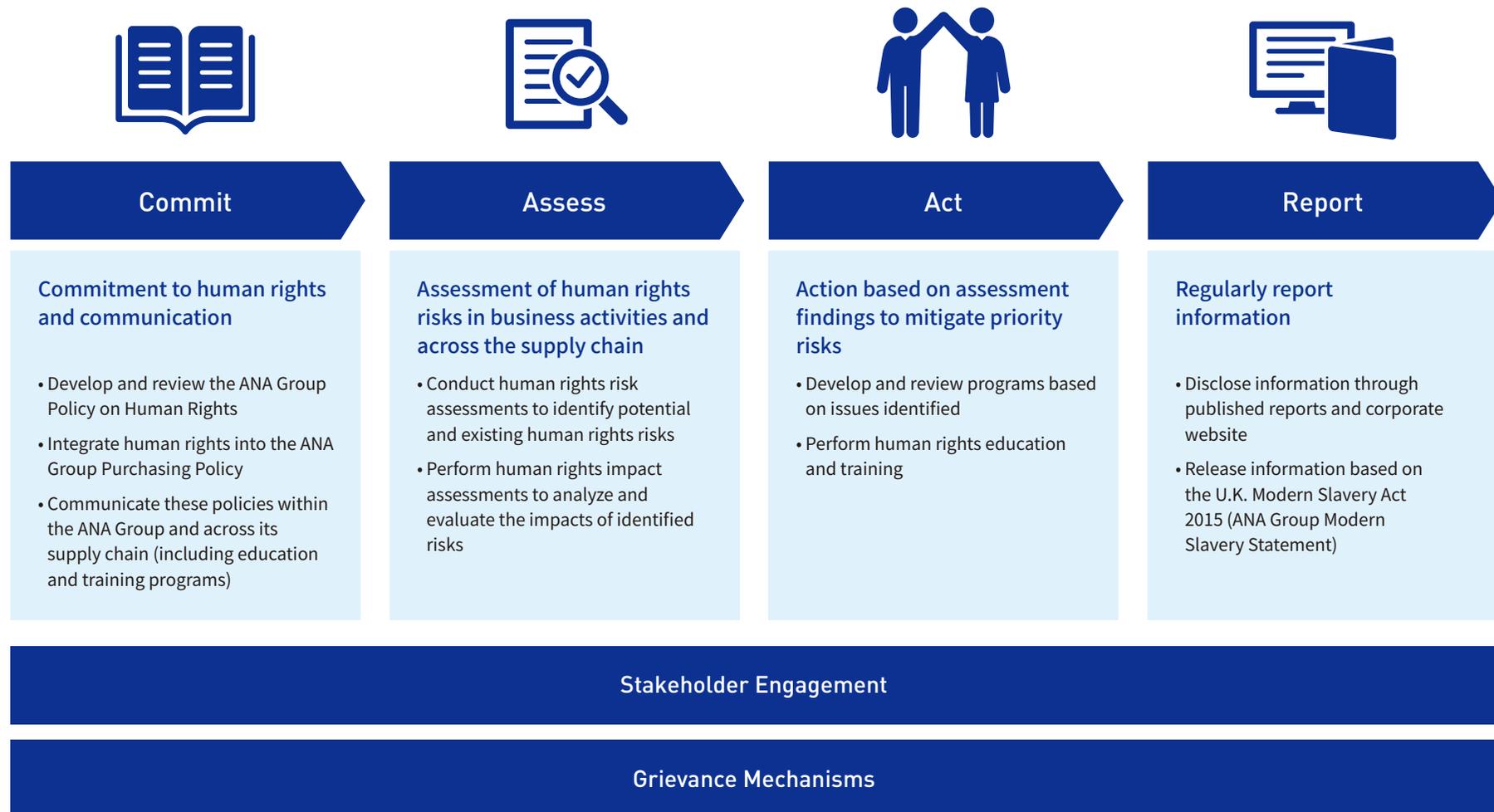


## Human Rights Due Diligence



# 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 risks. The assessment was

carried out with the support of Verisk Maplecroft and Caux Round Table Japan (CRT Japan) and in accordance with the processes described below.

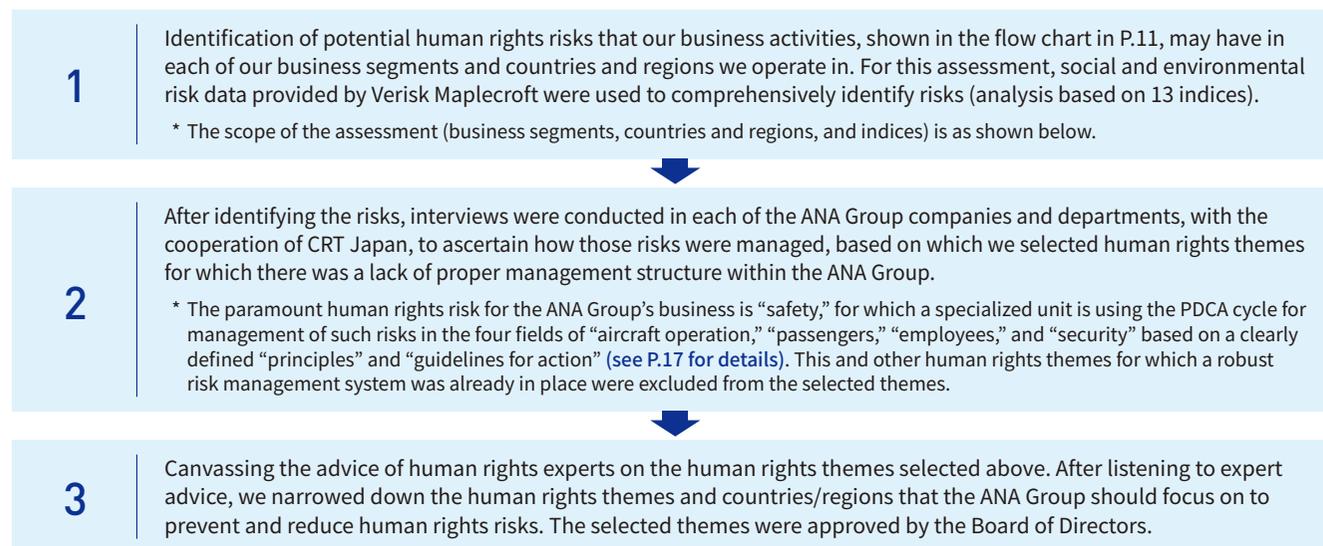
Since 2017, we have been working on risk prevention/mitigation associated with the human rights themes identified

through the above process.

The situation surrounding human rights, however, is constantly changing. Therefore, in addition to ongoing efforts to obtain the latest information and changes in human rights standards, we have been conducting, since 2017, annual reviews with experts on procedures or priority human rights themes as appropriate. 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 approval by 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 added human trafficking as one of the four important human rights themes.

The above set of processes for human rights impact assessment is repeated periodically, the most recent one being in 2019 which identified “AI and human rights” and “human rights of children” as new issues. External human rights experts, however, confirmed in a dialogue in 2019, conducted as part of the discussions to set the middle- and long-term ESG goals, including “business and human rights,” that there was no need to change the existing four focus areas. Therefore, the handling on the human rights issues of “AI” and “human rights of children” and their inclusion in the focus areas will be decided after discussion at the Group ESG Management Promotion Committee from this year onward.

## Process of Human Rights Impact Assessment Conducted in 2016



## 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

### 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 Japan (CRT Japan)

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.

■ Priority 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 on an ongoing basis as a priority issue within the ANA Group. These organizations use appropriate management cycles in the handling of risk.

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.

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

- Japan
- Malaysia
- Thailand
- Myanmar
- China

	<p><b>Theme 1</b></p> <p>→ see P.18 for details</p>	<p><b>Respect the Human Rights of Migrant Workers in Japan</b></p> <p>We need to understand the working environment of foreign workers working in the ANA Group’s supply chains, and promptly address any identified issues.</p>	 
	<p><b>Theme 2</b></p> <p>→ see P.21 for details</p>	<p><b>Strengthen Supply Chain Management of In-flight Meals</b></p> <p>To fulfill our accountability to passengers, we need to create a transparent, traceable supply chain for in-flight meals and items.</p>	 
	<p><b>Theme 3</b></p> <p>→ see P.24 for details</p>	<p><b>Prevent the Use of Airplanes in Human Trafficking</b></p> <p>We need to promote efforts to prevent third parties from surreptitiously using airline services to perpetrate human trafficking.</p>	  
	<p><b>Theme 4</b></p> <p>→ see P.27 for details</p>	<p><b>Eradicate Corruption</b></p> <p>We need to promote efforts to prevent our involvement in corruption and bribery, which tend to intensify human rights abuses in countries.</p>	

The destination countries with particular attention to prevent the emergence of risks



(For details of each activity.)

## ■ Management Systems Related to Other Human Rights Themes

The human rights themes shown below were identified through the process of human rights impact assessment (see P.15 for details) but were not counted as priority human rights themes because sufficient management systems are already in place for these themes.

### Flight safety

“Safety” is the overriding value and foundation underlying the ANA Group’s corporate activities. At the ANA Group, a specialized safety promotion unit is using the PDCA cycle for risk management in the four fields of “aircraft operation,” “passengers,” “employees,” and “security” based on the ANA Group Safety Principles and the Course of ANA Group Safety Action. Each year, numerical targets are set for safety incidents in the above four fields. The Group Safety Promotion Committee (under the general supervision of the President of All Nippon Airways Co., Ltd. and chaired by the Senior Executive Vice President of All Nippon Airways Co., Ltd.), as the highest decision-making body in the ANA Group’s safety promotion system, convenes monthly to report high-risk incidents and issues and to deliberate on risk mitigation and other measures. The safety targets and achievements are reviewed every fiscal year.

### Providing value to customers (safe, comfortable travel, universal services, etc.)

As a company “attentive to the voices of our customers,” the ANA Group has instituted a specialized unit for improving customer satisfaction (CS), which systematically reviews our services and products from the customers’ standpoint for improvement. Specifically, we gather abundant information from online CS surveys, quality monitoring, analysis of “customers’ voices,” and reports from employees to properly assess the quality of our services and implement concrete steps for improvement. The progress made from this cyclical process is periodically monitored by the Customer Experience (CE) Strategy Committee (under the general supervision of the President of All Nippon Airways Co., Ltd. and chaired by the Chairman of the Board of Directors of All Nippon Airways Co., Ltd.) For eight consecutive

years from 2013, we have been awarded five stars in the World Airline Star Rating conducted by Skytrax of the U.K.

### Information security

As a corporate group responsible for maintaining an important social infrastructure for air transportation, the ANA Group has laid down the ANA Group Information Security Management Regulations. Based on these regulations, we have implemented an information security management system through close coordination between specialized risk management units and the ANA Group’s IT companies. Based on discussions at the Group ESG Management Promotion Committee (under the general supervision of the President of ANA Holdings Inc. and chaired by the Senior Executive Vice President of ANA Holdings Inc.), we improve the functionality of the information system on a daily basis and implement multilayered defense mechanisms. For all executives and employees of the ANA Group, we distribute handbooks and regularly run e-learning programs to raise awareness about the importance of information security.

### Responsible procurement of maintenance parts

In accordance with approved maintenance manuals provided by aircraft manufacturers, such as Boeing and Airbus, the ANA Group purchases official aircraft parts from designated manufacturers. The design of aircraft must be approved by the aviation regulatory body in the country of manufacture (the Federal Aviation Administration in the case of the U.S.) as well as Japan Civil Aviation Bureau (JCAB). Aircraft parts are manufactured by designated manufacturers in accordance with this design, and are regularly audited. The parts to be used are inspected by aviation authorities or by manufacturers approved by aviation authorities. The approved parts come with a certificate signed by the inspector. On the receiving end, a qualified inspector from the ANA Group’s aircraft maintenance company must examine the papers and the parts prior to receipt.

### Protection of the environment

Environmental destruction may lead to violation of the “right to an adequate standard of living” and other basic human rights. To meet our responsibility as an airline group operating a large

fleet of aircraft, the ANA Group is engaged in an ongoing effort to mitigate environmental impact based on the ANA Group Environmental Policies. In FY2019, after discussions at the Group Management Committee (chaired by the President of ANA Holdings Inc.), we drew up our long-term goals for 2050, as shown below.

- Reduce CO<sub>2</sub> emissions from airline operations by 50% in 2050 compared to 2005 levels
- Reduce CO<sub>2</sub> emissions from all non-airline operations to zero
- Reduce waste of resources to zero
- Reduce food waste by 50%, including food waste from in-flight meals

As for the future, we will formulate our medium-term environmental plan for 2030, and work towards achieving the goals through operational improvement and purchase of Sustainable Environmental Fuel (SAF), among other measures, while monitoring progress at the Group ESG Management Promotion Committee.

### Protecting the human rights of employees

The ANA Group believes that human resources are our greatest asset and source of strength to remain competitive globally. For this reason, we have established a specialized unit for human resources strategy. With a focus on the “ANA Group’s Guidelines for Action: ANA’s Way,” “work style reforms,” and “health management,” we aim to leverage the combined strengths of the ANA Group and improve productivity both quantitatively and qualitatively. As for promoting diversity and inclusion (D&I), the ANA Group issued the ANA Group Diversity & Inclusion Declaration in 2015. A specialized unit for promoting D&I was also set up in 2020 to buttress the framework for promoting D&I. In addition, a specialized unit for labor policy planning is there to assist other departments as well as to organize sessions with the labor union to foster common awareness on such topics as “improvement of employee job satisfaction” and on other management issues and the competitive environment. Joint labor-management family events and social contribution activities are organized to nurture trust between the labor and management.



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

<p><b>Why We Consider This Theme To Be Important</b></p>	<p>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.</p> <p>On the other hand, recent media reports have uncovered various 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 birthrates, it has been explained, are some of the underlying conditions contributing to these abuses.</p> <p>Considered in this light, we believe that there are potential human rights risks involving foreign workers in the ANA Group’s supply chain. The ANA Group, as an airline group with global business operations, will take steps in accordance with international standards.</p>
<p><b>Relevant Stakeholders</b></p>	<ul style="list-style-type: none"> <li>• ANA Group companies</li> <li>• Partner firms and contractors</li> <li>• Foreign workers employed by ANA Group companies, partner firms, and contractors, etc.</li> </ul>

■ 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 totally employed mostly at our partner companies.

In 2020, we have operationalized the Global Supply Chain Worker Data Management System. In 2020 and thereafter, the ANA Group will use this system to timely grasp the employment situation of foreign workers at the ANA Group companies and partner contractors not only in the airport ground handling and catering operations, but also in other operations. The system works as a knowledge base for all companies who can access to the system, including group companies and partner companies, to be informed about ANA Group activities on respecting human rights.

\*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.



The Global Supply Chain Worker Data Management System site screen

**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.

In 2019, all ANA Group companies were again updated on matters for consideration when employing foreign workers in a meeting of the Group CSR/Risk Management/Compliance Committee (now Group ESG Management Promotion Committee). The companies were additionally asked to share that information with their partner firms.

The ANA Group Purchasing Policy is scheduled to be revised in 2020, and the revised policy will be shared with ANA Group companies and partner firms.

**Interviews with foreign workers**

In each year after 2017, we have been conducting interviews with foreign workers\*2 and their supervisors\*3 employed by our partner companies engaged in our airport ground handling and catering operations. We had the support of a third-party organization (CRT Japan) to ensure that the interviews are conducted objectively and impartially.

The interviews cover job descriptions, working hours and wages, health and safety, communication, and any comments they had about their companies. The interviews on foreign workers and those on the Japanese supervisors are always conducted separately.

\*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.

**Interview Status**

		Location	Nationality and Number of Interviewees	Residence Status of Foreign Workers
June 7-19, 2017	Company A (ground handling operations)	Haneda	Two Nepalese Two Filipinos Two Vietnamese Two Chinese One Japanese supervisor	Part-time workers (overseas students) Full-time regular workers
July 20, 2017	Company B (ground handling operations)	Narita	Four Filipinos One Japanese supervisor	Technical interns
September 20, 2018	Company C (catering operations)	Haneda	Three Nepalese One Japanese supervisor	Part-time workers (overseas students)
September 25, 2018		Kawasaki	Two Nepalese Three Vietnamese One Japanese supervisor	
December 5, 2019	Company D (ground handling operations)	Haneda	Four Nepalese Three Vietnamese Three Mongolians One Japanese	Part-time workers (overseas students) Full-time regular workers

**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 Conducted in 2019**

**Summary**

Results of the interviews showed that the relations among the foreign workers, the Japanese staff, and their companies were generally 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 found that a mechanism was in place to support foreign workers, especially those who did not have sufficient Japanese language skills: leaders speaking the same mother tongue as those workers attended to them individually at the site and provided them detailed guidance. There was also a mechanism where consultation could be provided to foreign workers in their native language. Regular meetings were organized among supervisors from different sites.

On the other hand, one of our interviewees requested rest and napping space they could use when there was a change in their working hours due to delayed flights or replacement of scheduled aircraft. It reconfirmed the need for us to be sufficiently attentive to the workers’ health, including the effect of early-morning and late-night work on their physical and mental health.

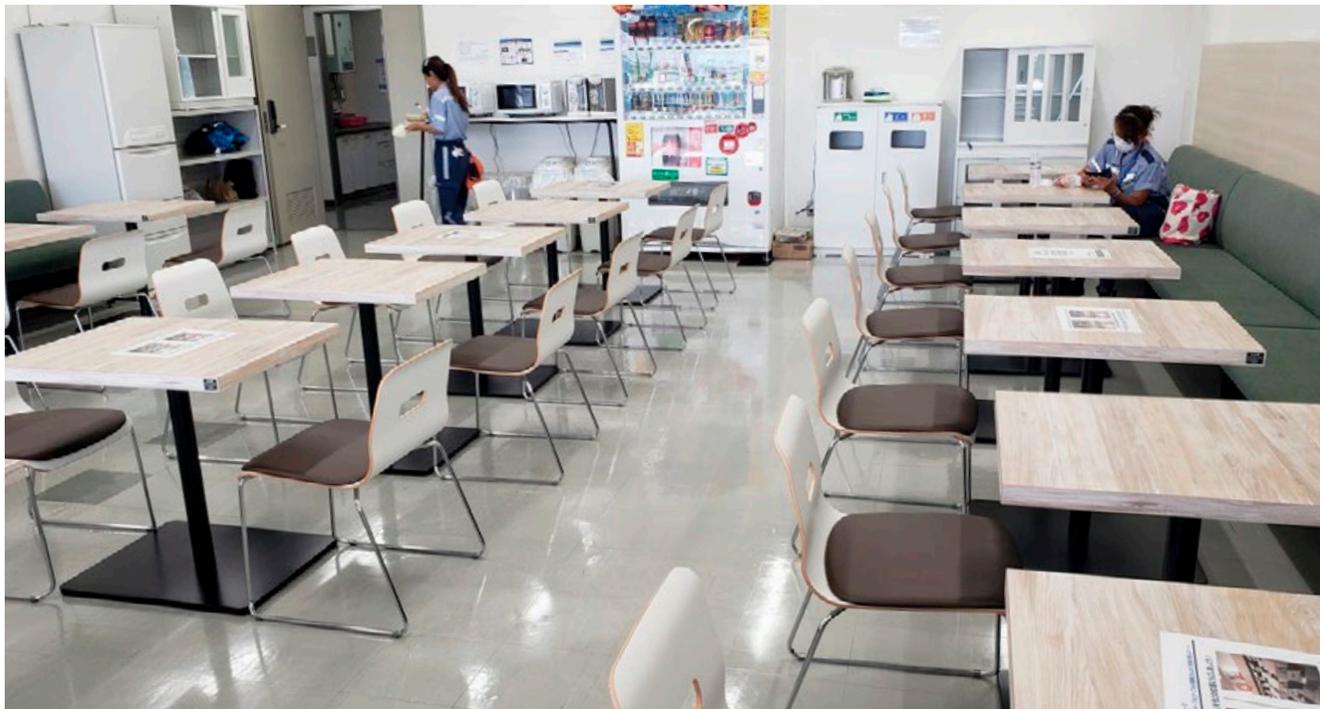
It should be mentioned that Company D is aware of such requirements and has taken steps to address them. In 2019, they revamped the changing room to create an employee lounge with eating space for 50 persons. In 2020, they rearranged the storeroom to create a standby area with rest space for 100 persons. The ANA Group will continue to monitor the situation.



Haneda Airport Terminal 3 Standby Area, before renovation (Former storehouse)



Haneda Airport Terminal 3 Standby Area, after renovation (Rest space for 100 persons)



West Cargo Rest Area (Rest space for 50 persons)

### Some of the comments from foreign workers

- There is a shortage of rest or napping space, necessary particularly for late-night work.
- In our working environment, we are encouraged to speak to Japanese staff and senior supervisors from my own country for advice.
- It was tough at first because there was so much to learn, but everybody is very supportive.
- Because I arrive directly from my school, I feel hungry even before the rest break.

### Future Direction

We will continue to disseminate the ANA Group's policies, including the ANA Group Policy on Human Rights and the ANA Group Purchasing Policy, and other relevant information, including matters for consideration when employing foreign workers, within the ANA Group as well as to our partner companies. We will promote discussion on how we can cooperate in making further improvements in ensuring respect for human rights in our working environment. At the same time, we will employ the Global Supply-Chain Worker Information System, which began operating in 2020, in an effort to grasp the employment situation of foreign workers in the ANA Group and at our partner companies. In addition, interviews with foreign workers will continue to inquire about their working environment onsite, and we will promptly address any issues identified for improvement.

Meanwhile, we will accelerate steps to further expand the scope of the ANA Group's policies and to create new mechanisms. Specifically, this will include making the necessary preparations for broadening the scope of the survey on the employment situation of foreign workers, introducing a mechanism for monitoring compliance with the list of matters for consideration when employing foreign workers, and establishing a grievance mechanism.



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

<p><b>Why We Consider This Theme To Be Important</b></p>	<p>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 tarnished 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.</p> <p>A single aircraft is made up of some three million parts delivered from extensive, complex supply chains. 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 transparent, traceable supply chains for aircraft parts as well as our in-flight meals and items not only reduces business management risk, but is also essential in fulfilling our responsibility to our customers.</p>
<p><b>Relevant Stakeholders</b></p>	<ul style="list-style-type: none"> <li>• ANA Group companies</li> <li>• Partner companies</li> <li>• Business partners</li> <li>• Workers and other individuals employed at the above companies and partners, etc.</li> </ul>

■ Activities to Date

Participation in the Bluenumber Initiative

In 2017, to reinforce management of our supply chain for in-flight meals, we became the first Japanese company to participate in the Bluenumber 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.

What is Bluenumber?

Bluenumber is a digital ID for people, and also for organisations, places and things, which are managed by the Bluenumber Foundation located in NY. TraceBlue Japan is a company who provide services and products using Bluenumber aiming to assist Japanese companies and organizations, focusing particularly on transparency of their supply chains. Bluenumber Holdings has subsidiaries in Japan, Malaysia, Bangladesh, Indonesia, and Europe.

<https://www.bluenumber.com>



The Bluenumber management site screen



### ■ Future Direction

The ANA Group Purchasing Policy, comprised of the Basic Policies, Purchasing Principles, and Supplier Management Policy, is due for a revision. In finalizing its contents, we will seek advice from experts from outside the ANA Group to ensure that it is in compliance with the latest international standards and is responsive to the requirements of today's world. Briefing sessions on the revised policy will inform suppliers. We will,

moreover, identify "items" and "suppliers" requiring particular attention in reinforcing risk management.

As for ingredients used in our in-flight meals, we will continue to promote registration of supplier information in Blunumber, and consider the possibility of linking our in-flight meal system and the Blunumber system.

To attain the ideals we should aspire towards 2030 (see [P.9 for details](#)), we will fortify our measures, including by active disclosure of information and dialogue with stakeholders, to ensure "responsible procurement."





Theme 3: Prevent the Use of Airplanes in Human Trafficking

<p><b>Why We Consider This Theme To Be Important</b></p>	<p>The ANA Group is a global airline group connecting Japan and the world, flying to 100 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 towards eliminating human trafficking. The U.S. has been an early adopter of 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 prevent human trafficking.</p>
<p><b>Relevant Stakeholders</b></p>	<ul style="list-style-type: none"> <li>• ANA Group companies</li> <li>• Immigration Services Agency of Japan and other government agencies</li> <li>• Trade associations, etc.</li> </ul>

**Activities to Date**

The issue of human trafficking was raised 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 also recommended the group to address the issue of “human trafficking” as a priority human rights theme. In response, we established “prevention of human trafficking” as one of our priority human rights themes, and have been implementing a variety of measures.

**Workshop**

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 (NFSJ), the Japanese branch of the U.S. NGO Not For Sale.



The workshop in Haneda Airport

© Caux Round Table Japan

## 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.

Discussions on airlines' efforts to prevent human trafficking are ongoing at ICAO and IATA. The ANA Group will continue to actively participate in and contribute to those discussions.

In March 2020, the ANA Group had planned to organize the seminar for all staff working at Narita Airport to kick-start an industry-wide effort to prevent human trafficking, but it was postponed due to the spread of COVID-19. It is scheduled to be held online again in December 2020, co-hosted with Narita International Airport Corporation with the cooperation of the National Police Agency, the International Organization for Migration (IOM), IATA, and Japan Airlines Co., Ltd.



Meeting with ICAO

## 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.

The contents of the e-learning program are accessible any time by all executives and employees of the ANA Group. The program, furthermore, is compulsory for all new cabin attendants.

<セミナー&パネルディスカッション>

**航空業界全体で、飛行機を利用した人身取引を防ぐ！**  
～深刻な犯罪である人身取引を防ぐために、航空業界で働く私たちができること～

人身取引は現在、世界でも急速に規模を拡大している犯罪ビジネスです。国際労働機関（ILO）のレポートでは、人身取引によって強制労働の被害にあっている人は世界で毎年約2,500万人にのぼるとされ、実際に保護された被害者の約30%が18歳未満の子供とされています。一方で、航空機は、被害者が逃げ出すことが出来ない環境で長距離の輸送を可能にするため、人身取引における主要な輸送手段の一つとなっています。世界中で航空業界に対し、人身取引防止のために重要な役割を果たすことが求められています。本業に本業では、取組がなかなか進まず、2011年から取組を進めています。

日本でも、航空業界が一体となり、人身取引の防止に向けて動く必要があります。今回、人身取引の実態について講演を兼ねたとして、パネルディスカッションを通じて業界全体として出来ることについて考えることで、今後の具体的な行動につなげていく契機としたいと思います。是非、お誘い合わせのうえ、ご参加ください。

**日時： 令和2年3月11日（水）14:30～16:30（14:00開場）**  
**会場： 成田国際空港（株）本社1階S会議室**

**【第1部】 基調講演 14:30～**  
(調整中) 警察庁生活安全所保安課 清谷 典子 氏 国際移住機関（IOM）駐日事務所 プログラム・マネージャー **参加費無料**

**【第2部】 パネルディスカッション 15:20～**  
(予定) 宮本 秀晴 氏 成田国際空港株式会社 上席執行役員  
藤原 勇二 氏 国際航空運送協会（IATA） 日本代表  
(調整中) 日本航空株式会社 恒川 久美 氏 全日本空輸株式会社 オペレーション・サポートセンター OSC 品質企画部 担当部長  
(コーディネーター) 石田 寛 氏 経済人コーポレーション 日本委員会 事務局長

※主催 ANA ANAホールディングス（株） 共催 成田国際空港（株）

※お問い合わせ先 成田国際空港（株）

Flyer for the seminar scheduled to be held in March 2020

## Preventing Human Trafficking



"Today, human trafficking is the fastest growing crime."



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



e-learning screen

## In-flight reporting of human trafficking cases

After discussions at the Group CSR/Risk Management/Compliance Committee in October 2018, it was decided that the ANA Group will implement concrete anti-human trafficking measures. Specifically, we will report any suspected cases of in-flight human trafficking to the immigration office. These measures started in April 2019, after providing training to all cabin attendants.



- A person traveling with the suspected victim interferes and does not allow the suspected victim to answer questions



- The person traveling with the suspected victim cannot spontaneously answer basic question about the suspected victim (such as age, name, etc.)



- The suspected victim does not know his/her destination or what he/she will be doing or where doing so after arrival

When there are indications of a suspected case of human trafficking during a flight, the airline staff will make a comprehensive assessment of the situation on whether to report the incident. The ANA Group has established reporting procedures and channels when a decision is made to report an incident. Signs of human trafficking may include the following:

In July 2020, contents about the United Nations Convention against Transnational Organized Crime (Palermo Convention) were added to the cabin attendants' manual to further bring to mind the importance of this issue among all cabin attendants.

### Future Direction

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

We will also work with government agencies and other airlines to prepare the ground for implementing actions against human trafficking across the entire airline industry and raising deterrent effects.

## Comments from experts



**Mr. Yuji Fujiwara,**

Country Manager Japan to the International Air Transport Association (IATA)

As a trade association of some 300 member airlines that together make up 83% of the world's air transportation volume, IATA provides policy support to the airline industry and assists its members in a variety of areas. After IATA adopted actions related to anti-human trafficking initiatives during its annual general meeting in June 2018, member airlines have been promoting efforts to establish reporting procedures and educate staff. The ANA Group is working to eliminate human trafficking through the concerted

efforts of its executives and employees. It has illustrated to its staff how to look for signs of human trafficking in airports and flights, and has laid out clear reporting procedures when those signs are detected. When there is a suspected case during a flight, the captain will use the ACARS\* to request ground support from government agencies. We hope that these measures will prove effective in reducing and eliminating human trafficking.

\* ACARS (Automatic Communications Addressing and Reporting System): A system for aircraft operations data transmission between the aircraft and the ground station.





Theme 4: Eradicate Corruption

<p><b>Why We Consider This Theme To Be Important</b></p>	<p>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.</p> <p>The ANA Group, which flies to 100 cities and links 23 countries and regions, recognizes that eradicating corruption is essential in fulfilling our responsibility to ensuring respect for human rights, and is taking various steps in this regard.</p>
<p><b>Relevant Stakeholders</b></p>	<ul style="list-style-type: none"> <li>• ANA Group companies</li> <li>• Partner firms and contractors</li> <li>• Government agencies in destination countries</li> <li>• Business partners, etc.</li> </ul>

**Activities to Date**

The ANA Group has set down the ANA Group Anti-Bribery Rules, and promotes employee education to widely disseminate the rules and raise awareness. We have instituted systems for in-house anti-corruption investigation and whistleblowing to deter and detect corruption. Since the establishment of the rules, no criminal bribery cases have been reported.

**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 Mexico and Singapore in 2018 and again in China in 2019, we ran seminars on anti-competition and anti-corruption laws for employees of the ANA Group employed locally or stationed from Japan. As explained in the ANA Group Anti-Bribery Handbook, we also conduct real-life case studies and practice scenarios.

**Surveys**

Each year, we run 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.



Seminar in China

### ■ Decent work

The ANA Group has introduced childcare leave, shorter working hours system, and teleworking to remove constraints regarding where and when we work. We use IT tools and digital devices to increase work efficiency. For example, teleworking was introduced in 2009. As only about 10% of those eligible were using the system at first, we started making improvements to the system in 2015 and introduced new systems, including Tele-Sato Work (teleworking while vacationing at parents' home), in 2019. As a result, 75% of those eligible used teleworking in FY2019.

Various types of seminar are organized regularly. One such seminar encourages supervisors to consider the work-life balance of their staff while enjoying their own work and personal life. Another, open to employees and their families, provides guidance for families to balance work and child care. In April 2018, we 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. In addition, we are trying to establish “kaizen” as a standard practice within the ANA Group to encourage voluntary actions of employees to increase their work efficiency. Already, more than 3,000 cases of “kaizen” have been reported.

While adapting to changes in the business environment, including the spread of COVID-19, we will promote reform of standard practices for better work efficiency.

### ■ Understanding LGBT

In April 2015, the ANA Group announced the ANA Group Diversity & Inclusion Declaration. We aspire to respect and leverage diversity in the ANA Group's organizations and create new business value. Our universal services are also designed to promote respect for diversity and make our society more sustainable.

We are, moreover, addressing issues faced by the LGBT community.\*<sup>1</sup> 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. We also invited LGBT lecturers to speak at the small-group seminar “LGBT Salon,” which had more than 300 participants over the course of ten seminars. In 2019, the ANA Group was given the “gold award” for four consecutive years from work with Pride, a voluntary organization set up to establish and promote diversity management of LGBT and other sexual minorities. The award is decided based on the organization's PRIDE Index.

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



Seminar to support balancing work and childcare, held 4 times in FY2019



“Understanding LGBT” handbook

## ■ Commitment to Safety

For the ANA Group, safety forms the core of our business. Ensuring safety is our paramount mission in all of our businesses, regardless of our business segments or brands. To this end, all executives and employees of the ANA Group have made a common oath in the form of the ANA Group Safety Principles and the Course of ANA Group Safety Action. We use the PDCA cycle to continuously make improvements and ensure that we prioritize safety above all else in our corporate culture, whether in the nurture of human talents or creation of new systems to which safety is fundamental.

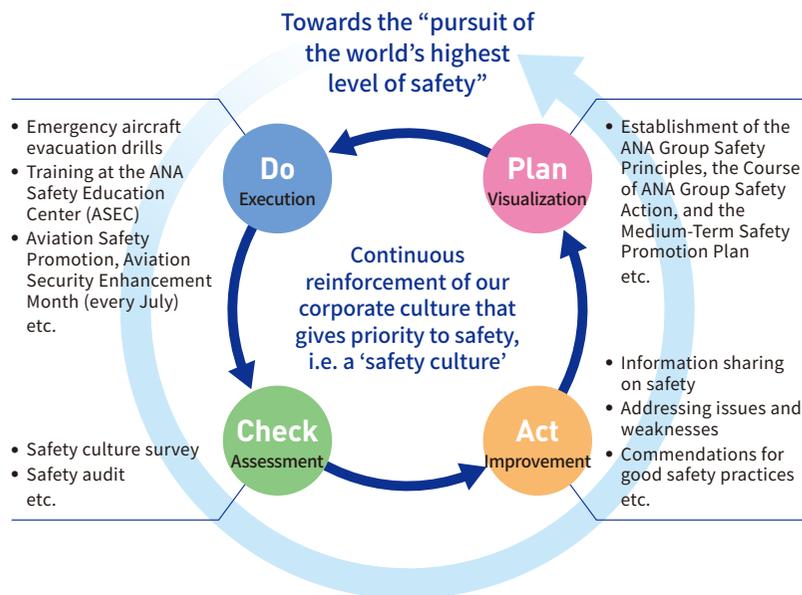
## ■ Information security

Personal information that our customers entrust with us is a valuable asset in the ANA Group’s businesses without which we cannot provide our services, and we exercise utmost care in the handling of such information. Various in-house systems have been introduced to enhance information security, including self-inspection of compliance to information security rules across all ANA Group companies, knowledge sharing among all executives and employees of the group companies on the latest cases, onsite visits and interviews by a team of experts to identify and address issues from a third-party perspective, and establishment of the “information security desk” within respective group companies with their accumulated skills and technical knowledge on information security. We will do our best to ensure appropriate management and use of personal information.

## ■ Human rights of children

The impact assessment in 2019 identified new issues, such as “AI and human rights” and “human rights of children.” In response, the ANA Group is planning to organize, with the cooperation of Save the Children Japan, a workshop to better understand the ANA Group’s potential risks associated with “human rights of children.”

The reduction in the number of flights from the effect of COVID-19 had given rise to unused in-flight meals. Through Save the Children Japan, the ANA Group donated rice crackers, apple juice, etc. to children from single-parent households in May 2020. To keep children’s spirits up while they had to stay out of school due to COVID-19, the ANA Group also donated some 20,000 chocolates to municipalities in the environs of Narita Airport.



### Comments from experts



**Ms. Yumiko Horie,**  
Advocacy Manager, Save the Children Japan

As a Japanese corporation, the ANA Group has been exemplary in taking the initiative to ensure respect for human rights by establishing in-house systems, conducting assessment, promoting dialogue with various stakeholders, and providing employee education. The ANA Group could serve as an example for an even greater number of companies if they can share, in greater detail, the specific human rights risks they have identified through the assessment and the progress made in addressing those issues. Children are also stakeholders impacted by companies, and we have had dialogue with the

ANA Group on how the perspective of human rights of children can be integrated across the board in the company’s business operations. Through these and other activities, we hope that the ANA Group will play a leading role for other Japanese companies.

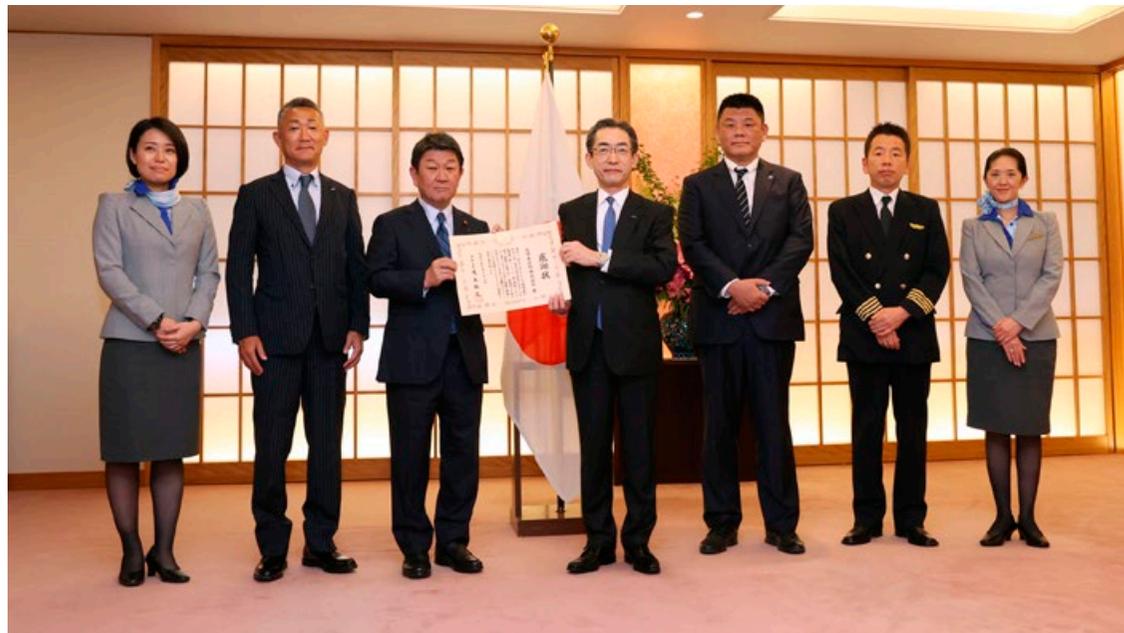
#### ● Save the Children Japan

Established in 1919, Save the Children, an international NGO, has been supporting children for over a century. Save the Children Japan was established in 1986 as a member of Save the Children. In partnership with governments and local communities in and outside of Japan, Save the Children Japan works to protect children’s rights.

## Response to the Spread of COVID-19

## Charter flights to Wuhan

On January 29, 2020, the ANA Group made a charter flight between Wuhan, which was under a lockdown in the wake of COVID-19 in China, and Haneda for those people wishing to return to Japan. At that time, conflicting information was being reported regarding COVID-19. We made preparations for the flight in a short period of time in the hope of providing services to those having difficulty returning to Japan. On a total of five charter flights, we were able to transport to Japan all 828 Japanese residents of Hubei Province, China, who wanted to return to Japan. Some were traveling with families. For our contribution to protecting the lives and health of Japanese residents abroad and many others, ANA Group received a letter of appreciation from Foreign Minister MOTEGI Toshimitsu on June 23, 2020. It was the first time that a Japanese airline was given a letter of appreciation from a Japanese Foreign Minister.



## Support for foreign students in Japan

In the wake of the spread of COVID-19, the ANA Group substantially cut back the number of its flights. In May 2020, the ANA Group donated some 45,000 items of unused in-flight meals, such as instant noodles, fruit juice, and chocolates, to a non-profit organization supporting Vietnamese students and trainees living in Japan under difficult circumstances due to the spread of COVID-19.



## Creating a new standard for air travel

In June 2020, ANA Group launched the “ANA Care Promise” as a shared commitment to our customers to protect the health of our passengers and staff, creating a carefully detailed environment emphasizing measures to prevent disease infection.

We offer even greater peace of mind to our customers by creating a hygienic and clean environment at all times, disinfecting all aircraft on a regular basis, and ensuring thorough ventilation inside the aircraft.



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

## ■ Current Status of Implementation

The ANA Group has a number of mechanisms for listening to concerns or complaints from customers, employees, shareholders, and other stakeholders.

Employees	Our internal whistleblower contact point is accessible by any worker engaged in the ANA Group's operations, including workers employed by our partner companies. 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.
Customers	We have set up the ANA Desk for Comments and Requests to respond not only to inquiries about ANA's services, but also to concerns and comments about human rights issues. Inquiries can be made either by telephone, e-mail, or mail, in Japanese or English.
Shareholders	We have a contact point, accessible by telephone, for inquiries about company shares and investment.

In addition to the above, a number of ANA Group companies and partner companies have established their own mechanisms for listening to the voices of their employees.

For instance, ANA Catering Service Co., Ltd. (ANAC), which carries out the ANA Group's catering operation, has been operating a mechanism called the ANAC Direct Mail since 2014. Full-time employees as well as contract employees can directly report concerns or complaints with the assurance that their privacy will be protected. At ANAC, moreover, social events

are held regularly to promote communication between foreign workers, including those working for ANAC's partner companies, and Japanese staff.

Another partner company engaging in the ANA Group's ground handling operation at Haneda Airport has implemented a system where foreign part-time workers can casually consult with their compatriots working for the same company. In fact, a part-time worker made a use of this system when he requested a rest space where employees could take a break or a nap. The company noted the physical and mental effect of early-morning and late-night work on employees, and the rest space was installed to solve this issue (see P.20 for details).

## ■ Multi-Stakeholder Activities

The ANA Group participated as a member in the Japan Responsible Supply Chains Committee, comprised of Global Compact Network Japan, the Business and Human Rights Lawyers Network Japan, and other stakeholders. The committee drafted and published, in December 2019, "Engagement" and "Remedy" Guidelines for Promotion of Responsible Business Conduct and Responsible Supply Chains, which set out practical guidance on the requirements and basic actions for establishing a grievance mechanism in accordance with international norms. Participation in the committee helped the ANA Group to deepen its understanding on standard requirements for a grievance mechanism.

## ■ Future Plans

The ANA Group recognizes the need to inspect our existing grievance mechanism from the perspective of "effectiveness" as detailed in the UN Guiding Principles on Business and Human Rights.

Our existing whistleblower contact point, for example, does not fully meet the eight criteria set out in the

Guiding Principle 31. We fall short in satisfying the criterion for the mechanism to be "accessible," as not all stakeholder groups including suppliers are aware of the existence of our mechanism. The mechanism is not "predictable" in that it does not provide an indicative time frame for the procedure of our grievance mechanism. It is not "transparent" as we are not providing sufficient information about the mechanism's performance.

Considering the above, we have started an ongoing discussion with an independent, third-party organization with an aim to implementing a new grievance mechanism (Ninja) that meets the requirements of the Guiding Principles. We will continue to improve on our grievance mechanism while ensuring effective engagement and dialogue with relevant stakeholders

Considering the above, we have started to implement a new grievance mechanism that meets the requirements of the Guiding Principles with the cooperation of an independent, third-party organization. We will continue to improve the effectiveness of our grievance mechanism while ensuring effective engagement and dialogue with relevant stakeholders.



Social event at ANA CATERING SERVICE, January 2020

# Stakeholder Engagement

Stakeholders we have dialogue with and the method of dialogue will differ depending on the human rights theme. At the ANA Group, we consider how best to approach our stakeholders in order to understand their views and wishes, 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. The stakeholder groups we have dialogue with are selected with the advice of CRT Japan and other expert organizations from outside the ANA Group.

## Implementation status of e-learning program

	Title	Attendance	No. of Persons Eligible to Attend
FY2015	What are Human Rights? (PDF)	91.1%	33,569
	Respecting Human Rights of Our Customers (PDF)	92.0%	34,067
FY2016	Corporate Social Responsibility and Human Rights (PDF)	92.7%	38,296
FY2017	Corporate Social Responsibility and Human Rights (animation)	87.0%	40,009
FY2018	We Prevent Human Trafficking! (animation)	94.2%	42,909
FY2019	Leaving No One Behind! Respecting Human Rights as the World's Leading Airline Group (animation)	92.4%	43,535

## ■ Communication with Employees

In FY2019, we continued to provide human rights education in face-to-face training programs for new employees and new managers. We have also been organizing an annual e-learning program since 2015 for all employees of the ANA Group companies to deepen their understanding on human rights. For three months starting in January 2019, we conducted an e-learning program titled, "Leaving No One Behind!" open to all 40,000-plus employees of the ANA Group. The ratio of employees attending this program was 92.4%.

In accordance with the Ten Principles of the UN Global Compact, labor unions have been organized at many ANA Group companies. Labor-management consultation and joint events are organized to nurture trust between labor and management.

## ■ Communication with Contractors, Suppliers, and Other Business Partners

To implement efforts to ensure respect for human rights throughout our supply chains in accordance with the UN Guiding Principles on Business and Human Rights, we communicate the ANA Group Policy on Human Rights, the ANA Group Purchasing Policy, and our various other policies to contractors and suppliers, request compliance with those policies, and cooperate with them in creating a working environment that ensures increased respect for human rights.

For example, with regard to one of the four priority human rights themes, "Respect the Human Rights of Migrant Workers in Japan," we have communicated our policies to our business partners engaged in airport ground handling and catering operations, and has regularly conducted interviews directly with foreign workers since 2017. In 2020, we will encourage our business partners to participate in the launch of a new system for collecting information on workers, and continue to have dialogue with our partners on this priority human rights theme.



e-learning screen of FY 2019



## Overseas Dialogue

The ANA Group's global business activities can potentially have an impact on human rights situation in local communities abroad. We are regularly holding dialogue in local communities abroad particularly on issues related to the ANA Group's priority human rights themes (see P.16).

Following on our visits to Thailand and Malaysia in 2017 and again to Thailand in 2018, we made a tour of Thailand in 2019 to hold dialogue with government agencies, NGOs, and other organizations, focusing mainly on issues surrounding traceability of in-flight meals.

For 2019, we visited, in June, the Labor Rights Promotion Network Foundation, an NGO working to protect the basic rights of migrant workers in Thailand, to learn about the day-to-day issues facing local fishermen. We also called on a fishing port in Samut Sakhon Province to talk to the people there. In addition,

we attended a workshop on "business and human rights" hosted by Chulalongkorn University to deepen our understanding on activities carried out by Thailand's fishing industry in the area of human rights.

We returned to Thailand in October to visit Thai Airways and Thai Catering, which manufacture in-flight meals on ANA flights departing from Thailand, and Thai Union, which provides ingredients for the in-flight meals, to conduct interviews on traceability. (Thai Union's transaction volumes for farmed shrimp and other seafood are some of the largest in the world.) We confirmed that Thai Union has partnered with Issara Institute in the area of grievance mechanism and has implemented programs to support migrant workers' families.

## Communicating the ANA Group's Efforts

The ANA Group makes a point of actively communicating our efforts to ensure respect for human rights. In FY2019, we had opportunity to present the ANA Group's efforts in human rights eleven times at seminars inside and outside of Japan. ("Human Rights Symposium in Tokyo", "Business and Human Rights Conference in Tokyo", etc.) We seek to make the best use of the feedback obtained from such seminars to improve our efforts in human rights.

In an interview with Asahi Shimbun in March 2020, President of the ANA Group indicated the group's continuing resolve in putting efforts into prevention of human trafficking and executing other measures in the area of "business and human rights."



Dialogue in Thailand

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## ■ Dialogue with ESG Investors

In July and November 2019, we visited ESG investors and experts, shown below, in London to have dialogue and seek their advice on the ANA Group's ESG activities.

### Investors and experts who participated in the dialogue

#### ● Insight Investment

##### Joshua Kendall

Senior ESG Analyst, Fixed Income

##### Time Benjamin

Deputy Head of Client Relationship Management, Client Solutions Group

##### Alex Krinks

Client Director, Client Solutions Group

##### Robert O'Riordan

Institutional Business Development Director

##### Emelina Hill

Client Service Specialist, Client Management

#### ● Hermes EOS

##### Sachi Suzuki

Engagement Manager

#### ● Aviva Investors

##### Steve Waygood

Chief Responsible Investment Officer

#### ● World Benchmarking Alliance (WBA)

##### Camille Le Pors

Lead Corporate Human Rights Benchmark

##### Daniel Neale

Lead Social Transformation

##### Pauliina Murphy

Engagement Director

#### ● Insight Investment

One of the largest global asset management companies, headquartered in London. A subsidiary of BNY Mellon, a US financial holding company.

#### ● Hermes EOS

A British leading stewardship service provider with a wide range of asset owners as clients, mainly European and US pension funds.

#### ● Aviva Investors

An asset management company of the AVIVA Group, the largest insurance company in the UK, actively promoting responsible investment, including investment strategies related to climate change

#### ● World Benchmarking Alliance (WBA)

Launched by the United Nations Foundation, the British insurance company Aviva, and the Index Initiative, WBA develops benchmarks to rank companies on their contribution to achieving a more sustainable world.



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## ■ Comments on the activities of the ANA Group (excerpts)

- We have dialogue with various companies, but only a few have prepared human rights reports like the ANA Group. It is wonderful that the ANA Group has published the report for two consecutive years. The indicators on the UN Guiding Principles shown at the end of the report are good because you can see immediately that the ANA Group's activities are based on the Guiding Principles.
- Information disclosure shouldn't be all about showing data. Use narratives to gain a better understanding of stakeholders.
- The discussion surrounding the living wage is not limited to the minimum wage today but has expanded to include the issue of what companies can do in their supply chains. The treatment of foreign workers in Japan, particularly international students and trainees, is something we are watching.
- The ANA Group should also keep an eye on the benefits and risks that the advent of AI will have on its business.
- We encourage the ANA Group to put efforts into building mutual trust through regularly disclosing information and continuing to create opportunities for direct dialogue.

# Review of the ANA Group'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 October 2019, we invited four human rights experts from three organizations from abroad to the dialogue, and reported on the progress made by the ANA Group since the last review in September 2018. The experts gave us advice on our group's overall efforts in the area of human rights as well as recommendations and examples of various practices for our future undertakings in relation to our priority human rights themes. Based on the advice we received during this review, we will continue to promote efforts to ensure respect for human rights.

In response to advice from the review in 2018, we shared our policy on the employment of foreign workers ("matters for consideration when employing foreign workers") with all ANA Group companies, and requested them to pass on the information to their respective partner companies (see P.19 for details). In addition, we are actively promoting collaboration with other firms and government agencies.

## Human rights experts who participated in the review in 2019

### Neill Wilkins

Head of Migrant Worker Programme, Institute for Human Rights and Business (IHRB)

### Dirk Hoffmann

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

### Camille Le Pors

Lead Corporate Human Rights Benchmark, WBA (World Benchmarking Alliance)

### Pauliina Murphy

Engagement Director, WBA (World Benchmarking Alliance)

## ● Institute for Human Rights and Business (IHRB)

IHRB is a leading international think tank on business and human rights. 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

Originally established by a decision of the Danish parliament, the Danish Institute for Human Rights does research on business and human rights and develops tools that are used by more than 200 global companies and networks.

## ● World Benchmarking Alliance (WBA)

Launched by the United Nations Foundation, the British insurance company Aviva, and the Index Initiative, WBA develops benchmarks to rank companies on their contribution to achieving a more sustainable world.



## ■ Comments from the Review in 2019

### On the governance and management system for ensuring respect for human rights

- The management system for human rights can get tricky because not everything is clearcut. Key performance indicators (KPIs) help to put things in black and white, but you will need to gather all the information, including minor details.
- The key will be involving senior management and other departments and functions within the organization's management system. It would be good to have KPIs that link human rights efforts with individual executives' performance review.
- As for e-learning, many people will listen to the contents without the knowledge actually taking hold. In addition to raising the overall attendance rate, the quality of training should be improved so that the knowledge takes hold in participants' minds.

### On linking efforts with SDGs

- About 90% of human rights issues are related to the SDGs, and both the negative and positive impacts need to be considered.
- In ESG assessment, we are looking not only at how a company is managing risk, but also at the bigger picture of what impact the company's activities is having on the planet.
- In promoting activities linked with the SDGs, companies need to take leadership in involving industries and governments, and expand their activities and best practices globally.

### On human rights due diligence

- As for the human rights impact assessment, better to disclose more detailed information on the assessment process and involvement of third parties from outside the company. The information that has been disclosed does not tell us about the process by which the four priority themes were identified. For example, did you consider the issues of harassment and gender balance?
- It is difficult for a single company alone to deal with the issue of migrant workers. It would be better to promote industry-wide collaboration and implement programs based on the Dhaka Principles for Migration with Dignity. The same applies to the supply chain of in-flight meals. It is difficult for a single company alone to manage commodity products like coffee. It would be better to do it through industry-wide collaboration.
- Meticulous attention should also be given to new issues related to human rights, such as the risk of unknowingly assisting in human rights violations by transporting products and raw materials that were produced by labor exploitation and the risk of violation of privacy from the use of AI-based facial recognition technology.

### On grievance mechanism

- An important point is that the grievance mechanism should capture the voices not only of the workers but also of the community. Other key points are ease of access, assurance of protection from reprisals, and transparency of the system.
- There should be discussions with labor unions and other parties before the problem gets out of hand. Disclosure of a sequence of events, such as who made the report and how the incident was handled, will also be necessary.



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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/>

Section of the Framework		Pages
<b>Part A</b>	<b>Governance of Respect for Human Rights</b>	
<b>A1</b>	<b>Policy Commitment</b>	
A1.1	How has the public commitment been developed?	P.5
A1.2	Whose human rights does the public commitment address?	P.5, P.39
A1.3	How is the public commitment disseminated?	P.12
<b>A2</b>	<b>Embedding Respect for Human Rights</b>	
A2.1	How is day-to-day responsibility for human rights performance organized within the company, and why?	P.7-8
A2.2	What kinds of human rights issues are discussed by senior management and by the Board, and why?	P.7-8
A2.3	How are employees and contract workers made aware of the ways in which respect for human rights should inform their decisions and actions?	P.5, P.12, P.25, P.27, P.28, P.32
A2.4	How does the company make clear in its business relationships the importance it places on respect for human rights?	P.5, P.12, P.19, P.22, P.32
A2.5	What lessons has the company learned during the reporting period about achieving respect for human rights, and what has changed as a result?	P.35-36
<b>Part B</b>	<b>Defining the Focus of Reporting</b>	
B1	Statement of salient issues	P.16, P.18-27
B2	Determination of salient issues	P.14-P.15
B3	Choice of focal geographies	P.16
B4	Additional serve impacts	P.17, P.28-30
<b>Part C</b>	<b>Management of Salient Human Rights Issues</b>	
<b>C1</b>	<b>Specific Policies</b>	
C1.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	P.5-6, P.12
<b>C2</b>	<b>Stakeholder Engagement</b>	
C2.1	How does the company make clear the relevance and significance of such policies to those who need to implement them?	P.18-27, P.31, P.32-34
C2.2	During the reporting period, which stakeholders has the company engaged with regarding each salient issue, and why?	P.18-27, P.31, P.32-34

Section of the Framework		Pages
C2.3	During the reporting period, how have the views of stakeholders influenced the company's understanding of each salient issue and/or its approach to addressing it?	P.18-27, P.31, P.32-34
<b>C3</b>	<b>Assessing Impacts</b>	
C3.1	During the reporting period, were there any notable trends or patterns in impacts related to a salient issue and, if so, what were they?	P.12, P.18-27
C3.2	During the reporting period, did any severe impacts occur that were related to a salient issue and, if so, what were they?	P.18-27
<b>C4</b>	<b>Integrating Findings and Taking Action</b>	
C4.1	How are those parts of the company whose decisions and actions can affect the management of salient issues, involved in finding and implementing solutions?	P.18-27
C4.2	When tensions arise between the prevention or mitigation of impacts related to a salient issue and other business objectives, how are these tensions addressed?	
C4.3	During the reporting period, what action has the company taken to prevent or mitigate potential impacts related to each salient issue?	P.18-27
<b>C5</b>	<b>Tracking Performance</b>	
C5.1	What specific examples from the reporting period illustrate whether each salient issue is being managed effectively?	
<b>C6</b>	<b>Remediation</b>	
C6.1	Through what means can the company receive complaints or concerns related to each salient issue?	P.31
C6.2	How does the company know if people feel able and empowered to raise complaints or concerns?	P.31
C6.3	How does the company process complaints and assess the effectiveness of outcomes?	P.31
C6.4	During the reporting period, what were the trends and patterns in complaints or concerns and their outcomes regarding each salient issue, and what lessons has the company learned?	
C6.5	During the reporting period, did the company provide or enable remedy for any actual impacts related to a salient issue and, if so, what are typical or significant examples?	P.31, P.18-20

## CHRB (Corporate Human Rights Benchmark) indicators

The ANA Group refers to the indicators of the CHRB (Corporate Human Rights Benchmark) in promoting activities for ensuring respect for human rights. The index below shows informations in this report related the CHRB themes and indicators (limited to themes A to C common to all industries).

For more information on the CHRB, please visit <https://www.corporatebenchmark.org/>

Themes and Indicators		Pages
<b>A</b>	<b>Governance and Policy Commitments</b>	
<b>A.1</b>	<b>Policy Commitments</b>	
A.1.1	Commitment to respect human rights	P.5, P.39
A.1.2	Commitment to respect the human rights of workers	P.5, P.39
A.1.3	Commitment to respect human rights particularly relevant to the industry	N/A
A.1.4	Commitment to engage with stakeholders	P.35-36, P.39
A.1.5	Commitment to remedy	P.31, P.39
A.1.6	Commitment to respect the rights of human rights defenders	P.5
<b>A.2</b>	<b>Board Level Accountability</b>	
A.2.1	Commitment from the top	P.5, P.7-8
A.2.2	Board discussions	P.7-8
A.2.3	Incentives and performance management	P.8
<b>B</b>	<b>Embedding Respect and Human Rights Due Diligence</b>	
<b>B.1</b>	<b>Embedding Respect for Human Rights in Company Culture and Management Systems</b>	
B.1.1	Responsibility and resources for day-to-day human rights functions	P.7-8
B.1.2	Incentives and performance management	P.8
B.1.3	Integration with enterprise risk management	P.7-8
B.1.4.a	Communication/dissemination of policy commitment(s) within Company's own operations	P.5, P.12, P.25, P.27, P.28, P.32
B.1.4.b	Communication/dissemination of policy commitment(s) to business relationships	P.5, P.12, P.19, P.22, P.32
B.1.5	Training on human rights	P.12, P.25, P.27, P.32

Themes and Indicators		Pages
B.1.6	Monitoring and corrective actions	P.11-P.12
B.1.7	Engaging business relationships	P.22, P.32
B.1.8	Framework for engagement with potentially affected stakeholders	P.19, P.32-34
<b>B.2</b>	<b>Human Rights Due Diligence</b>	
B.2.1	Identifying: Process and triggers for identifying human rights risks and impacts	P.14-15
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	P.14-17
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	P.18-27
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	P.18-27
B.2.5	Communicating: Accounting for how human rights impacts are addressed	P.18-27
<b>C</b>	<b>Remedies and Grievance Mechanisms</b>	
C.1	Grievance channels/mechanisms to receive complaints or concerns from workers	P.31
C.2	Grievance channels/mechanisms to receive complaints or concerns from external individuals and communities	
C.3	Users are involved in the design and performance of the channel(s)/ mechanism(s)	P.31
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	
C.5	Commitment to non-retaliation over concerns/complaints made	P.31
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	
C.7	Remediating adverse impacts and incorporating lessons learned	

## 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.

Date of Establishment: April 1, 2016

**Shinya Katanozaka**  
President and CEO  
ANA Holdings Inc.



**ANA Holdings Inc.**

Sustainability Promotion Dept.

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

E-mail : [csr@anahd.co.jp](mailto:csr@anahd.co.jp)