

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.