

## 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 (hereinafter referred to as “rights-holders”). In order to safeguard their dignity and show them respect, the ANA Group hereby establishes the “ANA Group Policy on Human Rights” (hereinafter referred to as “the Policy”), based on the Guiding Principles on Business and Human Rights adopted by the United Nations Human Rights Council in June 2011, and will promote every effort to respect human rights.

### 1. Basic Stance on Human Rights

The ANA Group supports and respects the United Nations International Bill of Human Rights (consisting of the Universal Declaration of Human Rights, International Covenant on Civil and Political Rights, and International Covenant on Economic, Social, and Cultural Rights), which stipulates the fundamental human rights of all persons and the International Labour Organization’s Declaration on Fundamental Principles and Rights at Work (\*), as well as other international treaties and declarations related to the protection of human rights, including conventions on workers’ human rights such as wages and working hours, the OECD Guidelines for Multinational Enterprises and the United Nations Declaration on the Rights of Indigenous Peoples. As a signatory to it, we also support and respect the Ten Principles of the United Nations Global Compact.

(\*) This includes support and respect for the International Labour Organization’s Core Labour Standards: the effective abolition of child labour, the elimination of all forms of forced or compulsory labour, the elimination of discrimination in respect of employment and occupation, freedom of association and the effective recognition of the right to collective bargaining, and a safe and healthy working environment.

The Policy is a commitment by the ANA Group to respect human rights based on its Mission Statement, Management Vision, ANA’s Way and other internal policies in order to fulfill its responsibility to respect the human rights of its rights-holders.

It also promises the ANA Group does not allow or contribute to any threat, intimidation, or attack against human rights defenders.

### 2. Scope

The Policy applies to all executives 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 understands that its business activities may directly or indirectly cause adverse human rights impacts. We will fulfill our responsibility to respect human rights by not violating the human rights of our rights-holders, and by taking appropriate steps to implement remedies where our business activities may cause or contribute to any adverse impacts on human rights. Although we recognize that we cannot completely ascertain all the ways in which the ANA Group's operations, products, and services are used, we do not intend for any of them to be used in any way that violates human rights. In the case where an adverse impact on human rights caused by our business partners and suppliers is suspected to be linked to our operations, products, or services, we will ask them to respect human rights and not violate them.

### 4. Human Rights Due Diligence

To fulfil its responsibilities in regard to respect for human rights in accordance with procedures described in the Guiding Principles on Business and Human Rights, the ANA Group will establish and continuously implement a system of human rights due diligence. Human rights due diligence is an ongoing process of preventively investigating and identifying issues, correcting these through appropriate procedures, and externally disclosing progress and results of its activities in order to prevent or mitigate any adverse impacts on human rights the ANA Group may have on society.

### 5. Dialogue and Consultation

In the process of implementing the Policy, the ANA Group will apply the expertise of independent third parties on human rights, and will sincerely engage in dialogue and consultation with its rights-holders.

### 6. Education and Training

The ANA Group will provide appropriate education and training to its executives, employees, and as necessary business partners and suppliers to ensure that the Policy is integrated into its business activities and is implemented effectively.

## 7. Remedy

If it becomes clear that the ANA Group's business activities have caused or contributed to adverse human rights impacts, whether directly or through its involvement with business partners or suppliers, we will work to remedy such impacts through dialogue and appropriate procedures in accordance with international standards.

## 8. Responsible Executive Officer

The ANA Group will entrust a Chief Sustainability Officer (CSO) with the responsibilities of implementing the Policy and supervising compliance with the Policy.

## 9. Information Disclosure

The ANA Group will disclose the progress and results of its efforts to respect human rights on its website and through other media.

## 10. Compliance with Applicable Laws and Regulations

The ANA Group will comply with applicable laws and regulations of each country and region in which it operates. Where there is a conflict between internationally recognized human rights principles and the laws and regulations of a country, we will seek ways to respect internationally recognized human rights principles to the maximum extent possible.

The Policy has been approved by the Board of Directors of ANA Holdings Inc. and signed by the Representative Director, President, and CEO.

July 28, 2023



Koji Shibata

President, and CEO  
ANA Holdings Inc.

Established on April 1, 2016

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