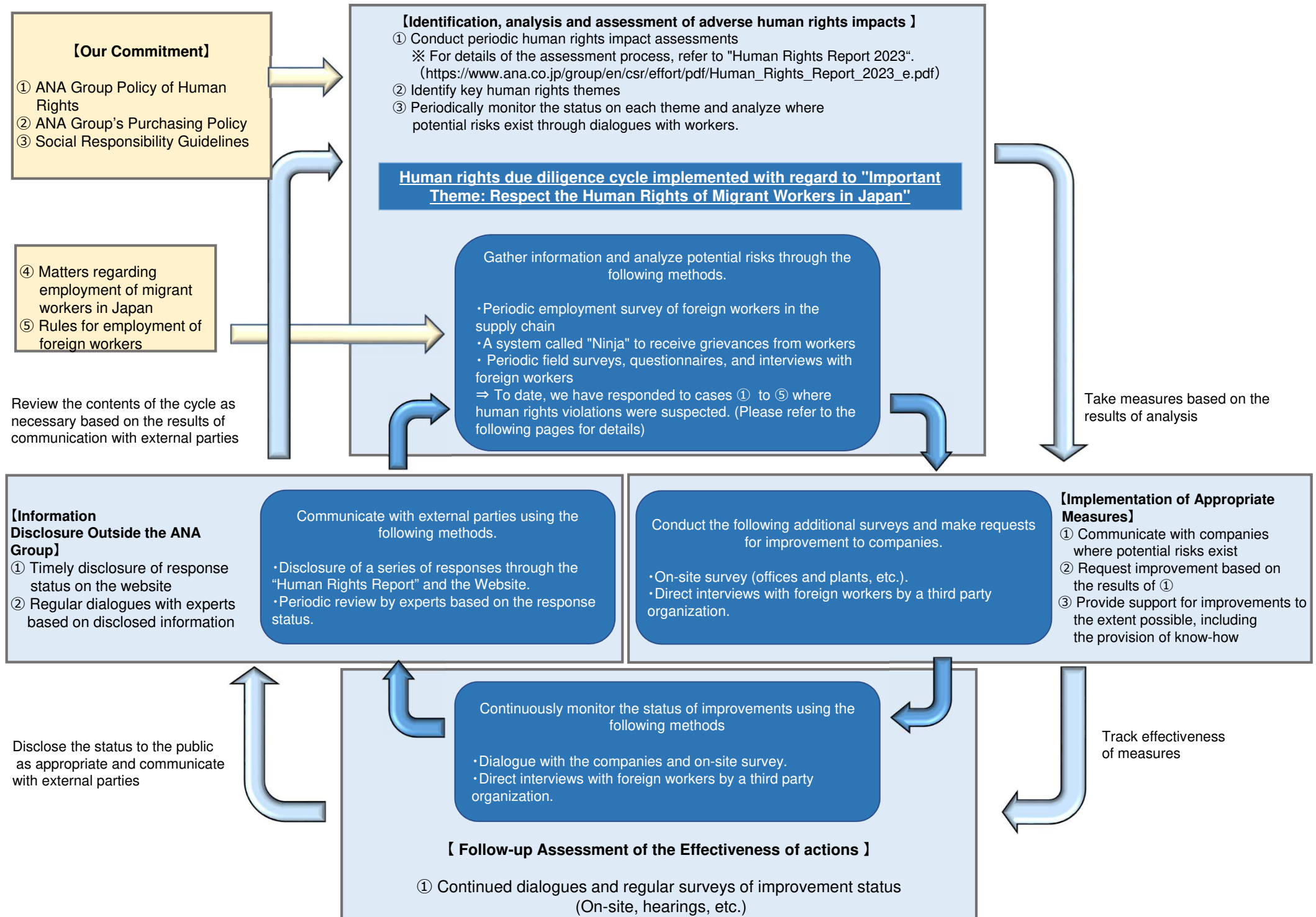


Human Rights Due Diligence Cycle



Case (1) Request for Work Environment Improvements at a Partner Firm Made by Foreign Workers During Interviews

<Summary> In interviews with foreign workers at a major partner firm conducted in 2019, it was confirmed that there was a generally good relationship with the firm, but there was also some mention of dissatisfaction with the work environment. In cooperation with the partner firm, we have been implementing prompt corrective measures. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

December 2019 Third-party organization CRT Japan conducted interviews with foreign workers at Partner Firm A as described below.

Target: 11 foreign workers of Partner Firm A (persons holding visas in the category of Engineer/Specialist in Humanities/International Services, Permanent Resident, or Spouse of a Japanese National/Permanent Resident)

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: While the working environment was generally satisfactory, there were requests for spaces for breaks and naps, as the workers' work hours were affected by flight delays and equipment changes.

December 2019 Partner Firm A renovated its facilities and added a room for resting with a 50-person capacity.

March 2020 Partner Firm A conducted further facility renovations, converting a goods warehouse into a rest area with a 100-person capacity.

March 2021 A third-party interview was conducted again for follow-up purposes.

Target: 4 foreign workers of Partner Firm A (persons holding visas in the category of Engineer/Specialist in Humanities/International Services, Permanent Resident, or Spouse of a Japanese National/Permanent Resident)

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: A lounge room was also added to the facilities, and it was confirmed that an environment where employees can take a safe, comfortable rest had been secured. Workers commented that the addition of more rest space had improved their work performance.

Haneda Airport Terminal 3 standby area (former warehouse)



Before



After

Case (2) Claim of a Human Rights Violation Involving the Forced Return (Forced Repatriation) of Technical Interns at a Supplier

<Summary> We received a report from an external NPO concerning a human rights violation involving the forced return of technical interns by an ANA Group supplier. We arranged a meeting for face-to-face dialogue with the NPO and others in the presence of third-party organization CRT Japan, and we exchanged opinions on the role that the ANA Group should play while striving to understand the true intentions of the claimant, and we took necessary measures. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

April 2021	The NPO indicated that there was a human rights violation by an ANA Group supplier. We received a letter from the NPO asking the ANA Group's view of this action and what measures it intended to take.	July 2021	We asked CRT Japan to confirm the status of human rights initiatives at Factory B. CRT conducted an interview survey. Target: Factory supervisor and foreign workers (nationalities of the foreign workers differed from the nationalities at Factory A) Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan Results: We confirmed that there were no cases of forced repatriation at Factory B, nor were there any human rights violations of particular concern. We also checked Company X's labor-related regulations and documents, on-site management system, recruitment system, etc., and determined that there were no problems with the company's current management structure.
May 2021	In the presence of CRT Japan, we held face-to-face talks with the NPO and the workers claiming damages. In addition, together with a representative from the group company, we visited the headquarters of the supplier (Company X) indicated by the NPO as where the problem occurred, and shared information. In the course of our talks, we confirmed that the incident occurred at the supplier's Factory A (Kanagawa Prefecture) prior to the ANA Group's commencement of trade with the supplier concerned. Furthermore, we also confirmed that the group company had completed a quality check of Company X's Factory B in Gunma Prefecture in the lead up to commencement of trade with the factory. Although the factory was a different entity, we decided that we needed to confirm that no human rights violations were occurring at Factory B, with which we plan to commence trade.	July 2021	We shared the results with the NPO. In light of the above, the ANA Group determined that there were no problems at Factory B, and began new transactions.
		May 2022	We again held talks with Company X to do a follow-up survey, and we confirmed that there were no problems.

Case (3) Claim of Human Rights Violations Involving the Forced Return (Forced Repatriation) of Technical Interns at Partner Firms

<Summary> We received an anonymous letter addressed to the president of ANAHD stating, "We request an investigation into possible human rights violations involving technical interns at Narita Airport." In cooperation with third-party organization CRT Japan, we conducted a direct questionnaire survey of technical interns working at contractors. In addition to determining the actual situation based on responses from rights-holders, we identified contractors where it was believed further face-to-face dialogue was necessary and we conducted face-to-face interviews with their workers. While confirming that problems cited in the letter did not occur, we worked with the contractors concerned to take corrective measures in response to dissatisfaction and complaints expressed by technical interns during the interviews. A summary of the main actions taken in relation to this case is described below.



Interviews with foreign workers

<Actions in Chronological Order>

January 2022	We received an anonymous letter stating, "We request an investigation as we are concerned about the illegal employment of technical interns working at Narita International Airport and their subsequent unfair dismissal."
February 2022	Since there are no technical interns employed by ANA Group companies in the Narita Airport area, we asked our partner firms (contractors) to confirm whether any technical interns were working illegally, by investigating whether their actual work was consistent with their qualifications. Results of the investigation concluded that there was no inconsistency between the technical intern training plan certified by the Organization for Technical Intern Training and the actual work content of the technical interns. Focusing on face-to-face dialogue with the work site, we cooperated with third-party organization CRT Japan in conducting a direct questionnaire survey of 124 technical interns working at five partner firms (contractors). Target: 124 foreign workers employed at five contractors in the Narita Airport area Method of Implementation: Anonymous questionnaire survey accessed via a QR code Results: We checked a small number of responses stating the respondents had experienced unfair employment-related treatment or threats of dismissal. There were also responses indicating that respondents were "anxious or dissatisfied" with their current work and life in Japan. Because we were able to confirm cases in which the rights of workers (which are stated in employment contracts and are to be respected) were not being fully respected, we will ensure that these workers' rights are respected. On the other hand, the survey was unable to confirm what the parties concerned considered to be "unfair treatment in employment" or the "threat of dismissal."
April-May 2022	Results of the above questionnaire survey identified two firms where it was determined that further face-to-face dialogue was necessary, and we conducted face-to-face interviews with their workers.

Target: 33 foreign workers working at two partner firms (contractors) where responses of concern were confirmed in a questionnaire survey

Method of Implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: It was confirmed that there was no discrepancy between the content of the work explained to the foreign workers by the sending organization and the actual content of their work, and that there were no "threats of dismissal." On the other hand, it was confirmed that there were some deficiencies in workload management, appropriate management and supervision of employees, and communication with Japanese employees. Furthermore, because of this, some respondents indicated that they felt "unfair treatment related to employment." It was also confirmed that some employees were "anxious and dissatisfied" in regard to working hours, paid leave, wages, and living in dormitories.

June-July 2022	Through interviews conducted, we were able to confirm what the parties concerned considered to be "unfair employment-related treatment" and where they felt "anxiety and dissatisfaction" in their current work and life. Through our group companies, we held talks with the two firms, which agreed to increase opportunities for dialogue with workers and improve explanations of regulations and rules regarding work. In addition, improvements were promptly made in the living environment of the dormitories, which had been the subject of complaints from workers, with arrangements for single rooms for all those who requested one.
October 2022	To monitor the progress of the initiatives described above, we conducted face-to-face interviews with workers again and confirmed that satisfaction with the workplace and living environment had improved and that the improvement measures had been widely introduced. Therefore, we have decided to close this case.

Case (4) Internal Report Regarding Salary and Work Environment from Technical Interns at a Partner Firm

<Summary> A post from foreign workers working at a partner firm appeared on “Ninja”, the ANA Group’s grievance mechanism. In cooperation with third-party organization CRT Japan, we conducted face-to-face interviews with the workers concerned. We also worked with the firm concerned to take corrective action in response to dissatisfaction and other issues identified at that time. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

July 2022 We received a post on “Ninja” from foreign workers at a partner firm stating that wages at the firm were lower than those at other airports and that overtime wages were not being paid.

We immediately asked the group company associated with the partner firm to investigate whether the partner firm had policies in place and what the actual work situation was.

July 2022 We received a reply from the partner firm via the group company stating that wages were being paid in accordance with contracts. Then we responded to the workers’ post, saying, “The firm is paying wages in accordance with contracts. We would like to conduct a more accurate investigation of this matter.” In addition, third-party organization CRT Japan conducted a face-to-face interview survey with the foreign workers at the partner firm as described below.

Target: 5 foreign workers (technical interns) working at the partner firm that was the subject of the complaint posted on “Ninja”

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: In regard to wages being “too low” someone made the comment, “It would be nice to receive more.” However, it was confirmed that there was no actual situation that would constitute violation of a contract. Nevertheless, all of the foreign workers send remittances back to their home country of the Philippines, and it was confirmed that the effects of the weaker yen had increased the burden of sending remittances. Furthermore, some workers did not have an accurate understanding of the details of deductions from their paychecks. There were also some complaints about the living conditions in the dormitory and the working attitude of Japanese employees.

August 2022 We received a report from the partner firm concerning the implementation of corrective measures in response to worker dissatisfaction, which was mainly confirmed through interviews. Measures such as making pay slips available in multiple languages and improving the living environment in the dormitory by installing lock boxes for storing valuables, etc. were promptly implemented.

September 2022 We communicated details of the complaint that had been posted as well as details of their corrective measures in three languages (Japanese, English, and Tagalog). At the same time, we once again informed all technical interns of the partner firm about the grievance mechanism “Ninja”. No new posts have been received as of the present.



Lock boxes for storing valuables installed in the dormitory as a corrective measure



Information sheet for foreign workers

Case (5) Risk Concerns at a Partner Firm Revealed During a Direct Questionnaire Survey of Technical Interns

<Summary> A direct questionnaire survey of technical interns in the supply chain identified a partner firm that posed concerns about the existence of risks. However, results of face-to-face interviews with workers subsequently conducted with the cooperation of third-party organization CRT Japan found no evidence of any problematic situations. A summary of the main actions taken in relation to this case is described below.



<Actions in Chronological Order>

June 2023 In a direct questionnaire survey of technical interns, some workers indicated that at the time of the signing of their employment contracts there was insufficient explanation about the overall rights of workers including paid vacations, and that the briefing on occupational health and safety was not in a language they could understand.

September 2023 In light of these responses, we requested the partner firm where the workers concerned work to conduct a face-to-face interview survey with the foreign workers to further check the location of risk. Third-party CRT Japan conducted the interview survey with the foreign workers at the partner firm as described below.

Target: 6 foreign workers working at a partner firm where there were expressions of dissatisfaction (technical interns: 4, specified skilled workers: 2)

Method of implementation: Face-to-face interviews conducted by third-party organization CRT Japan

Results: No problems of concern regarding contracts were detected. All interviewees responded that their contracts were written in their native language and that they were able to understand the content. In regard to occupational health and safety, no particular problems were found in the work operations of the workers. Although workers indicated that some notices on bulletin boards at the workplace were in Japanese only, workers checked with their senior colleagues if they had any questions. No other events that could particularly result in human rights risks were confirmed. On the other hand, some positive aspects were apparent. A framework for facilitating daily communication between foreigners and Japanese supervisors had been established.

In view of the results of the interviews, we have asked the partner firm to take various measures such as measures for ensuring that all workers accurately understand safety-related notices and measures for carefully explaining correct information on how to read pay slips, etc. We will strengthen collaboration and cooperation to create a more conducive work environment for foreign workers.



Interviews with foreign workers