

## JAL Group Anti-Corruption Policy

The JAL Group is committed to establishing an anti-corruption system and preventing corruption as a member of society under this Policy in order to avoid corruption in fair operating practices as stated in the JAL Group Code of Conduct “Commitment to Society” and to pursue profit in a fair and honest manner.

### < JAL Group Code of Conduct “Commitment to Society” Preventing corruption >

1. We do not give or accept bribes of any form, whether direct or indirect, in our business activities domestically or internationally. In addition, we do not give or accept undue cash, gifts or entertainment or any other benefits in excess of social norms.

### < Compliance with laws and regulations >

2. The JAL Group complies with laws and regulations concerning bribery, etc. of countries and regions where it conducts business <Unfair Competition Prevention Act (Japan), the Foreign Corrupt Practices Act (US), Bribery Act (UK) and Regulations on Prohibiting Commercial Bribery (China)> and international conventions.

### < Scope of application >

3. This Policy applies to Japan Airlines, Group companies and contractors which act on behalf of the JAL Group. The JAL Group complies with this Policy when hiring a contractor.

### < Development of a whistle blower system >

4. The JAL Group has in place a whistle blower system to receive consultation or reports from employees, etc. regarding breaches of this Policy or corruption with the risk of violating this Policy. Retaliation of the employee, etc. who reports or consults is prohibited.

### < Risk assessment • monitor >

5. The JAL Group assesses and monitors these risks regularly and takes corrective action to prevent bribery and corruption.

### < Seminars and training >

6. The JAL Group provides seminars and training to JAL Group officers and employees as necessary to raise and enhance awareness of laws and regulations concerning bribery, etc. and this Policy.

This Policy takes effect on August01, 2019.