

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.

1. Prohibited Actions

1) Bribery

The JAL Group, in its business activities both domestically and internationally, does not accept or offer any form of bribe, whether directly or indirectly, nor engage in corrupt practices such as money laundering. Additionally, employees and agents are prohibited from offering, promising, or providing improper hospitality, gifts, benefits, or other economic advantages to public officials or others, regardless of whether they are in Japan or in overseas countries. "Benefits or other economic advantages" include the provision of cash, goods, or other items of monetary value, as well as the provision of free services such as entertainment or gratuities, and any benefits or conveniences obtained by exploiting one's position. Furthermore, charitable donations, sponsorship funds, and political contributions must be made solely for lawful purposes and must undergo a pre-approval process as stipulated by internal regulations.

2) Acts that exceed the range recognized as appropriate by social conventions

Even if the provision of entertainment, gifts, benefits, or other economic advantages to business partners or their officers and employees who do not fall under the category of public officials or others, it must be done within a reasonable range according to social norms and in compliance with the laws of each country. Additionally, we do not accept excessive entertainment, gifts, or free services that exceed the scope of social courtesy from business partners.

3) Conflict of interest

Actions that compete with the business of the JAL Group, as well as situations where the interests of employees or related third parties conflict with the interests of the Group, are prohibited if they prioritize personal gain over the Group's interests or hinder the fairness and objective judgment of business operations.

2. Compliance with laws and regulations

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

3. Scope of application

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 contractors.

4. Development of a whistle blower system

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

5. Risk assessment and monitoring

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

6. Seminars and training

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, and the like, and this Policy.

This Policy takes effect on October 1, 2024.