

## 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 The JAL Group does not accept or provide any form of bribes, direct or indirect, or commit any form of corruption, such as money laundering, in its business activities in Japan or overseas.

We will not accept or provide unjust money, gifts, entertainment or other benefits beyond what is recognized as appropriate by social customs.

Charitable donations, sponsorship funds, political donations, etc. must be made only for legitimate purposes and subject to the pre-approval procedures set out in the company regulations.

We do not conduct transactions that may cause conflicts of interest so that interests may not be unreasonably harmed.

### <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 Aug01, 2019.