

## FY2025 Modern Slavery Statement and Report

This statement and report have been published by Japan Airlines Co., Ltd. (hereinafter called "JAL") pursuant to reporting requirements in accordance with Section 54 of the Modern Slavery Act 2015 (the United Kingdom), Part 2-16 of the Modern Slavery Act 2018 (Australia), and Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada). JAL, representing the JAL Group, discloses the steps taken in order to prevent modern slavery, which includes forced labor and child labor, and human trafficking in the JAL Group and its supply chain.

### 1. JAL Group

#### Overview of organization and business

Founded in 1951, the JAL Group consists of Japan Airlines Co., Ltd., 139 subsidiaries, and 54 affiliated companies. The number of group employees is 39,076, and we operate air transport business and other businesses (as of 31 March 2026).

With regard to the air transport business, we operate air transport services between 413 airports (including codeshare flights), as well as airport passenger handling, ground handling, maintenance, cargo, passenger sales, and airport-related businesses.

In addition, as other businesses, we are engaged in travel planning, credit card business, etc.

In the United Kingdom, JAL, which operates an aviation business, operates flights to and from London Heathrow Airport, and its consolidated subsidiaries EURO-CREATIVE TOURS (U.K.) LTD, JALPAK INTERNATIONAL (EUROPE) B.V. and JALUX Inc. operates businesses. In Australia, JAL operates flights to and from Sydney and Melbourne Airport. In Canada, JAL, and its consolidated subsidiaries ZIPAIR Tokyo Inc. operates flights to and from Vancouver International Airport, and JAL's consolidated subsidiaries JALUX Inc. operates businesses.

Please check [Number of routes](#) and [Main Businesses Data](#) for details.

#### Supply chain

The JAL Group operates businesses centered on air transportation, and its supply chain covers route networking, procurement, system development and maintenance, public relations, advertising, passenger sales, airport passenger services, ground handling, cargo and logistics, airmail operation, retail and aircraft maintenance, etc. The procurement items are mainly aircraft, jet fuel and in-flight goods, including services outsourced.

#### JAL Group Corporate Policy/Philosophy

The JAL Group's corporate policy is to "increase corporate value and contribute to the betterment of society". In addition, we have formulated the "JAL Philosophy" as the mindset, values, and ways of thinking that JAL Group employees should have, and aim to realize our corporate philosophy through its practice.

Please check [JAL Philosophy](#) for details.

#### Sustainability Promotion Framework (Consultation Process in the JAL Group)

The JAL Group holds monthly meetings of the Sustainability Promotion Committee to review the progress of group-wide initiatives and engage in discussions among relevant executives. Additionally, the Sustainability Promotion Council, chaired by the President, focuses on key sustainability issues, including the monitoring and evaluation of human rights due diligence. These agenda items are reported and discussed at the Board of Directors meetings.

Please check [Promotion Organization](#) for details.

### 2. Policy on Prevention of Modern Slavery and Human Trafficking

Since December 2004, the JAL Group has participated in the "Global Compact" advocated by the United Nations, and has declared to the world "respect for human rights in each corporate activity".

We have established the "JAL Group Human Rights Policy" based on the idea that respect for human rights is a universal value and is consistent with the realization of our corporate policy. Based on these principles, we establish the following policies to fulfill our responsibility to respect human rights.

#### JAL Group Code of Conduct

In fiscal year 2019, we established the "JAL Group Code of Conduct". In the section of "Respect for human rights and job satisfaction (human rights and labor)" of this Code, it is stipulated that we will fulfill our responsibility to respect the human rights of all people and will not be involved in human rights abuses

through our own business activities.  
Please check [JAL Group Code of Conduct](#) for details.

### **JAL Group Human Rights Policy**

Based on "International Bill of Human Rights", the International Labour Organization (ILO) "Declaration on Fundamental Principles and Rights at Work", and the United Nations "Guiding Principles on Business and Human Rights", and the JAL Group Code of Conduct "Respect for human rights and job satisfaction (human rights and labor)", we set up the "JAL Group Human Rights Policy" in fiscal year 2019. Based on this policy, we have declared that we will take steps to prevent and mitigate the negative impacts on human rights of all stakeholders.

Please check [Respect for Human Rights](#) for details.

### **JAL Group Supplier Code of Conduct**

The JAL Group has established the "JAL Group Supplier Code of Conduct" in Japanese, English and Chinese in order to prevent modern slavery and human trafficking in the JAL Group and its supply chain. Based on the principles of the United Nations Global Compact, this Code consists of eight items (1) Quality Assurance, (2) Human Rights and Labor, (3) Safety and Sanitation of Work Environment, (4) Global Environment, (5) Business Management, (6) Expansion to Suppliers, (7) Contribution to Regions and Society, and (8) Establishment of Internal Promotion Systems. The JAL Group requires all suppliers to understand and comply with this Code.

Please check [JAL Group Supplier Code of Conduct](#) for details.

### **3. Processes for Preventing Modern Slavery and Human Trafficking in the Company and the Supply Chain**

Regarding respect for human rights, we have established "Human Rights Due Diligence" (hereinafter, "Human Rights DD") based on the "JAL Group Human Rights Policy".

By rotating the PDCA cycle, identifying, assessing, and taking measures against human rights risks in our company and the supply chain, we will constantly face issues, disclose the current situation to society, and continue to make improvements. In addition, through the following initiatives, we will prevent direct and indirect human rights violations associated with the provision of our products and services.

Up to now, no cases requiring mitigation and remediation actions regarding modern slavery and human trafficking have been identified within the JAL Group or its supply chain, and any measures to remediate the loss of income for victims of forced labor or child labor or their families have not been required.

### **Human Rights Due Diligence**

In fiscal year 2021, we have formulated internal rules regarding the mechanism and operation of Human Rights DD as a means of respecting human rights in accordance with the "JAL Group Human Rights Policy". The rules also provide for the establishment of mechanism for stakeholders, such as suppliers, customers and employees, who are or may be adversely affected by the JAL Group's business to directly express their concerns.

In fiscal year 2025, we conducted a human rights risk survey for all JAL Group companies and departments in accordance with the internal rules.

After that, with the advice of outside experts, based on the results, for each stakeholders "suppliers", "customers", and "employees", we have set priority issues and summarized our efforts to respect human rights through our business.

Human Rights DD process stipulated in the company rules and the content of priority issues and initiatives related to human rights can be seen from "[Respect for Human Rights](#)" on the corporate website.

Also, we have established the "JAL Supplier Hotline" as a grievance mechanism accessible to all business partners both in Japan and overseas. Information regarding operating policy and reports received through the system can be found at the "[JAL Supplier Hotline](#)".

### **Supply chain risk assessment and monitoring**

The JAL Group promotes responsible procurement activities that consider sustainability throughout the entire supply chain.

To build a sustainable supply chain, we identify and address significant risks and impacts by selecting suppliers with close business ties to us and who handle high-ESG-risk commodities as significant primary suppliers and conducting assessments.

As a specific initiative, we request our significant primary suppliers to complete Sedex and our own self-assessment questionnaires. In fiscal 2025, we conducted this survey among all 64 significant primary

suppliers and are providing feedback in sequence. For suppliers that do not meet our required standards, we request the submission of an improvement plan. Furthermore, leveraging risk assessment tools such as Sedex, we conduct on-site assessment focused on human rights risks for supplier sites in high-risk countries or industries; in fiscal 2025, these were carried out at 18 companies. Through these efforts, we are working to prevent and mitigate negative impacts on human rights.

Furthermore, we engage with our secondary suppliers through our significant primary suppliers to promote respect for human rights. To ensure that all stakeholders across the supply chain can advance sustainable procurement, we share information on global human rights trends and provide support for their initiatives. Specifically, we request that primary suppliers conduct assessments and provide feedback to their own suppliers (our secondary suppliers) using our self-assessment questionnaires or similar criteria, ensuring a consistent approach throughout the chain.

In addition, as part of our internal initiatives, we conduct an annual internal survey targeting our procurement department to ensure that our own purchasing practices do not hinder our suppliers' compliance with the 'JAL Group Supplier Code of Conduct.' This allows us to self-examine and monitor our purchasing practices on a regular basis.

#### Report / cooperation system related to prevention of human trafficking

To prevent human trafficking by air transportation, in fiscal year 2019, we have set up a mechanism (mainly in departments that can be the site of human trafficking) for reporting and cooperation with relevant authorities in case for suspected cases of human trafficking, referring to the measures being considered by international organizations, and started operation from fiscal year 2020.

#### **4. Training on Prevention of Modern Slavery and Human Trafficking**

We are working to instill awareness of respect for human rights among employees, by incorporating the theme of "Business and Human Rights" at various in-house training venues such as training for new managers.

In fiscal year 2025, we provided education on the "JAL Group Code of Conduct" for all employees, including the item "Respect for human rights and job satisfaction (human rights and labor)". In addition, to prevent human trafficking by air transportation, we have conducted training programs related to respect for human rights, including prevention of human trafficking to all employees.

Furthermore, in July 2025, as part of our collaboration with external stakeholders, we participated in a project to broadcast human trafficking prevention awareness videos at Narita Airport. This initiative, conducted in cooperation with airlines, airport operators, and relevant public agencies, served to demonstrate to the public that the entire industry and the public-private sectors are working together to combat human trafficking.

The JAL Group will further promote efforts to prevent human trafficking.

#### **5. Plans to Strengthen our Approach in the Future**

In accordance with the Human Rights DD system stipulated in the internal rules, we will work toward respect for human rights by rotating the PDCA cycle, identifying, assessing, and taking measures against human rights risks in our company and the supply chain.

Specifically, taking into account societal trends regarding respect for human rights in the supply chain, we enhance the effectiveness of our human rights initiatives and work to prevent and mitigate negative impacts on human rights by annually reflecting these trends in our self-assessment questionnaire and reviewing significant suppliers.

Additionally, we will implement training programs to all employees on respect for human rights, including the prevention of human trafficking. This will be an ongoing effort to raise awareness and promote a culture of respect for human rights within the company. We will also continue to carry out initiatives with external stakeholders.

Through these efforts, we will act appropriately to prevent modern slavery and human trafficking in the JAL Group and the supply chain.

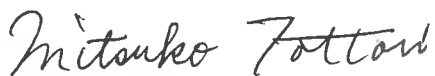
### Board Approval and Signing

This statement was approved by the JAL Group Board of Directors, the main governing body pursuant to Section 54 of the Modern Slavery Act 2015 (the United Kingdom), Part 2-14 of the Modern Slavery Act 2018 (Australia), and Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada), and signed on its behalf by the Representative Director, President, Mitsuko Tottori.

In accordance with the requirements of the Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada) thereof, I attest that I have reviewed the information contained in the report on behalf of the governing body of the entities listed above.

Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed within this report.

13 May 2026



Mitsuko Tottori  
Representative Director, President  
Japan Airlines Co., Ltd.

I have the authority to bind JAL Group.