

Approval of FY24 UK Modern Slavery Act Statement

The following matter was approved by the board of directors of JALUX Inc..

1. JALUX Inc. (“JALUX”) is a consolidated subsidiary of Japan Airlines Co., Ltd., and it has adopted the attached statement as its modern slavery and human trafficking compliance statement for the fiscal year ending March 2025 pursuant to the reporting requirements in accordance with Section 54 of the Modern Slavery Act 2015 (the United Kingdom).

4 August, 2025

JALUX Inc.

FY2024 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., 135 subsidiaries, and 56 affiliated companies. The number of group employees is 38,433, and we operate air transport business and other businesses (as of 31st March 2025).

With regard to the air transport business, we operate air transport services between 395 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 JALs 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 the 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 Code of Conduct” requires suppliers to comply with the same content, and in order to prevent modern slavery and human trafficking in the JAL Group and its supply chain, the “JAL Group Supplier Code of Conduct” has been published in Japanese, English and Chinese. 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 [Responsible Procurement](#) 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 human rights risks in our company and the supply chain, assessing human rights risks, and taking measures against human rights risks, 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, or involvement in human trafficking associated with aircraft operations.

At this time, no cases requiring mitigation and remediation actions have been identified within the JAL Group or its supply chain, and therefore measures to remediate the loss of income for victims of forced labor or child labor or their families has 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 2023, 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, please check [JAL Supplier Hotline](#) for details of the reporting mechanism that are widely open to domestic and overseas suppliers.

Supply chain risk assessment and monitoring

The JAL Group promotes responsible procurement activities that consider sustainability throughout the entire supply chain. From the perspective of ESG, we identify and address significant risks and impacts by evaluating and assessing the ESG risks of our suppliers and the materials we procure.

We assess the inherent nature of human rights issues by considering factors such as high-risk regions, labor intensive sectors, industries that are considered to have a significant presence of foreign and/or migrant workers, as well as the suppliers' strength of ties to our company. In fiscal year 2024, we have identified 60 significant primary suppliers, focusing on in-flight meals, airports, and cargo, and are advancing activities

aimed at addressing human rights issues.

Specifically, we send our unique self-assessment questionnaire to significant primary suppliers and request their responses. Based on the results of the questionnaire, if there is the need for further review from a human rights perspective, we initiate on-site inspections focused on human rights risks. Our procurement staff conduct site visits to monitor for any concerning findings through on-site inspections, document reviews, and worker interviews. If improvements are necessary, we request the submission of an improvement plan and provide support to ensure corrective actions are taken, thereby working to prevent and mitigate negative impacts on human rights.

Furthermore, we are promoting respect for human rights to secondary suppliers through significant primary suppliers. Specifically, we request significant primary suppliers to understand the social trends related to human rights and our efforts towards respecting human rights, and we share our self-assessment questionnaires and support their initiatives. In response to this, significant primary suppliers conduct assessments and provide feedback based on the results to 23 significant secondary suppliers identified from the same perspective as mentioned above.

Report / cooperation system related to 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 setting up time for "human rights enlightenment" at various in-house training venues such as training for new managers.

In fiscal year 2024, 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 conducted education to all employees, formulated and implemented training programs related to respect for human rights, including prevention of human trafficking.

In July 2024, as part of our engagement with external stakeholders, we held a forum on "Combating human trafficking", focusing on strengthening prevention measures through multi-stakeholder collaboration. As international movement increases, the forum aimed to enhance deterrence against the rising risk of human trafficking through public-private collaboration. It included an introduction to our company's efforts in human trafficking prevention, and a panel discussion on "What can Japan's aviation industry, as a unified public-private effort, do to prevent human trafficking?" The event fostered lively exchanges among a wide range of stakeholders.

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 human rights risks in our company and the supply chain, assessing human rights risks, and taking measures against human rights risks.

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.

May 2nd, 2025



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

I have the authority to bind JAL Group.