

———— Social Bond Evaluation by Japan Credit Rating Agency, Ltd. ————

Japan Credit Rating Agency, Ltd. (JCR) announces the following preliminary Social Bond Evaluation Results.

JCR assigned preliminary Social 1 to the Bonds of ANA HOLDINGS INC. (ANA HOLDINGS INC. SOCIAL BOND)

Subject	:	ANA HOLDINGS INC. 37th unsecured yen bonds (Social Bond)
Type	:	Bonds
Issue Amount	:	¥5 billion
Interest Rate	:	To be determined
Date of Issuance	:	To be determined
Redemption Date	:	To be determined
Method of Repayment	:	Bullet
Use of Proceeds	:	(1) Renovation of airport facilities, facilities, and websites for universal services for passengers (2) Renovation of facilities and equipment for universal support for employees

<Social Bond Preliminary Evaluation Results>

Overall evaluation	Social 1
Social Impact Evaluation (Use of Proceeds)	s1
Evaluation on Management, Operation and Transparency	m1

Chapter 1: Evaluation Overview

ANA HOLDINGS INC. (hereinafter referred to as "ANA Holdings") is a holding company that owns ALL NIPPON AIRWAYS CO., LTD., one of Japan's leading airlines. The ANA Group's annual passenger traffic on domestic and international routes totaled 53.89 million (FY18/3 results, excluding LCC). On April 1, 2013, the company changed its name from All Nippon Airways to ANA Holdings, shifting to a holding company system.

Thanks to the high market share in the domestic passenger business, which is a mainstay of ANA group, its business foundation is stable. On international routes, it has joined the Star Alliance, the world's largest airline alliance, and has built an efficient network by utilizing ATI (antitrust exemption) on European and U.S. routes, etc. In addition, for the seven consecutive years, the Company has been certified by SkyTrucks Ltd. of the United Kingdom as a 5 STAR, the highest service quality rating.

Based on the Group's mission statement, "Built on a foundation of security and trust, "the wings within ourselves" help to fulfill the hopes and dreams of an interconnected world," it identifies "the environment," "human rights," "diversity and inclusion (D & I)," and "regional revitalization" as its material management priorities and are actively engaged in the activities which will contribute to these issues. The medium-term management strategy identifies the social and economic values of each of these material issues, and by linking them with the SDGs (Sustainable Development Goals) that each of them contributes, it clarifies the degree of contributions to the SDGs.

The subject of this evaluation is the Bonds that ANA Holdings plans to issue. JCR evaluates whether the Bonds is in line with the Social Bond Principles (SBP) (2018 edition) and SDGs targets. The principles of social bonds are the "principles" voluntarily published by the International Capital Markets Association and are not regulations, and therefore are not binding, but are widely referenced globally at this time. Therefore, JCR confirms their conformity with these principles. In addition, the social bond principles emphasize the use of funds and their impacts, as well as the alignment of international sustainability objectives and national policies. Therefore, the SDGs and social project categorization mappings developed by the Society are used as reference indicators for evaluations.¹

The use of proceeds can be broadly divided into two categories. One is the renovation of airport facilities and websites to improve accessibility of the passengers (it is named as "universal services" that will ease the use of airport facilities and websites for people with disabilities and the elderly). The second is the renovation of business facilities and equipment to ensure universal support for employees. JCR recognizes that the use of proceeds contributes to the realization of an "inclusive society" in which everyone respects and supports each other's personalities and individuality. JCR believes that the proceeds will contribute to the SDGs goals and Japan's policy targets for contributing to SDGs goals, and that social benefits are high. Among social projects for which funds are used, the former is considered to be "improved access to essential services" for the "disabled" and the "elderly" as socially vulnerable in the ICMA social bond principles, and the latter to be "socioeconomic empowerment" for the "disabled" and "LGBT" as socially vulnerable. In addition, the former is a project that will contribute to SDGs Goal 11 "Sustainable cities and communities," and the latter is a project that will contribute to SDGs Goal 10 "Reduced inequalities."

Regarding the management, operation and transparency system, JCR confirmed that (i) selection criteria have been properly established; (ii) funds are to be used for new investments and refinancing, whose ratio is to be disclosed; and (iii) the management of proceeds is to be reported to the director in charge of finance on an annual basis after confirming the allocation status. (iv) It also plans to disclose the allocation status and impacts of proceeds (social improvement effects) on its website once a year until the redemption. Based on the above, JCR evaluates that it has secured a high degree of transparency in its capital procurement.

As a result, based on the JCR Social Finance Evaluation Methodology, JCR assigned "s1" for the preliminary evaluation of "Social Impact Evaluation (Use of Proceeds)" and "m1" for the preliminary evaluation of "Evaluation on Management, Operation and Transparency." Consequently, JCR assigned "Social 1" for the overall "JCR preliminary Social Bond Evaluation." Detailed evaluation results are discussed in the next chapter. The bonds also fully meet the standards for the requirements of the Social Bond Principles and are consistent with the SDGs Objectives and concrete measures for the SDGs Goals of the Government.

¹ ICMA(International Capital Market Association) Social Bond Principles 2018.

Chapter 2: Current Status of the project on each evaluation factor and JCR's evaluations

Evaluation Phase 1: Social Impact Evaluation

JCR assigns "s1", the highest grade, to "Evaluation Phase 1: Social Impact Evaluation".

Rationale: 100% of the proceeds are eligible as social projects.

(1) JCR's key consideration in this factor

In this section, we first confirm that the proceeds are used for social projects that have clear social improvement effects. Next, JCR assesses whether an internal department/division which is exclusively in charge of environment issues or a third party agency prove it sufficiently and have taken necessarily workaround or mitigation measures, in case of possibility on use of proceeds have negative Society and environment impact on the environment. Finally, JCR confirms consistency with the Sustainable Development Goals (SDGs).

(2) Current status of evaluation targets and JCR's evaluation

<Overview of Use of Proceeds>

ANA Holdings identified eligible project categories and target population as follows:

1. Services for Passengers (ANA Brand)

ANA is committed to providing universal services so that all passengers, regardless of culture, language, age, gender, or disability, can use flights safely and comfortably.

i. Renovation of website to improve accessibility for people with disabilities (allocation ratio: approx. 40%)
(Conformance with W3C Accessibility Guidelines)

ii. Rehabilitation of airport facilities and equipment to improve accessibility for people with disabilities (allocation ratio: approx. 40%)

(1) A check-in counter (low counter) will be set up at all domestic airports for passengers who need help.

(2) Low counters are set for domestic main airport lounges and international lounges. In addition, in the lounge, in consideration of the use of wheelchairs, a certain level of door width (80 cm or more) and aisle width (1.5 m shall be used as the standard except in cases where physical restrictions are imposed) shall be ensured, and priority areas for wheelchairs shall be established. For lounges equipped with shower rooms, at least one shower room should be handled in consideration of the convenience of wheelchair users. However, it may not be a uniform modification due to the characteristics of each airport.

(3) Renovate the width of at least one ticket gate to 90 cm for boarding gates at all domestic airports. However, this shall not apply to the cases where the repair cannot be made due to reasons other than the ANA Group.

[Target population] Persons with disabilities and the elderly

These renovations are implemented to improve visual and auditory information, movement, and human support, and it also improves accessibility for people with disabilities and the elderly, pregnant women, baby strollers, and travelers with injuries and illnesses.

2. Universal support for employees (appropriation ratio: approx. 20%)

In order to promote the success of diverse human resources, we are working to improve the environment for our facilities and equipment.

i. Renovation of Facilities and Equipment

- (1) Door widths of 120 cm or more (automatic doors for entrances), 90 cm or more (trips for offices) and 80 cm or more for conference rooms) and corridor widths (1.5 m or more for live activity lines and at least one location) shall be secured for all ANA Group business establishments in Japan. Point blocks shall be installed on handrails of easy-to-grasp shape and landing at the upper and lower ends of tilted parts with a width of 120 cm or more and a slope of 1/12 or less.
 - (2) Domestic ANA Group offices will be equipped with handrails on both sides of stairs and dotted blocks on the landing at the upper and lower ends of stairs. Stairway evacuation vehicles shall be installed on each staircase near the emergency staircase. For elevators, elevators with handrails and mirrors shall be installed in at least one place in the car, and the doors shall be equipped with glass windows.
 - (3) At least one multi-purpose toilet with ostomate shall be installed on each floor at all ANA Group offices in Japan using pictograms with consideration for the LGBT. For general toilets, handrails shall be provided on the wash surface of one toilet chamber.
 - (4) The ANA Group works in Japan shall be provided with guidance facilities such as palpable guides or voice guidance devices, or guided centers in front entrance areas and in the vicinity of elevator halls on each floor.
 - (5) As for the passages on the premises of the ANA Group's domestic offices, at least one route to the building shall be provided with a width of 150 cm or more, and linear and dotted blocks shall be installed. In addition, handrails of easy-to-grip shape shall be installed on the steps and inclined roads. The parking lot shall be equipped with a parking lot exclusively for wheelchair users (with a roof for outdoor use).
- * Facilities and equipment improvements described above are examples of standard responses, and are not limited to these. In addition, renovation measures may not meet the above criteria due to the characteristics of each facility.

[Target populations] Persons with disabilities and LGBT

We believe that the establishment of a safe and secure working environment for all employees, including the disabled and LGBT, will lead to the securing of human resources with diverse abilities and enabling everyone to exercise their full potential and motivation.

a. On the social benefits of the project

- i. **The use of proceeds is largely intended to achieve two objectives. One is the renovation of airport facilities and websites to improve accessibility by providing universal services to its passengers (services that are easy to use for people with disabilities or elderly people). Another is the renovation of business facilities and equipment to ensure universal support for its employees. These two projects have high social benefits and will contribute to SDGs and Japan's policy objectives for achieving SDGs goals through realizing an "inclusive society" where every citizen mutually respect and support other's personalities and individuality.**

Uses of proceeds 1: the social benefits from providing "universal services" to its passengers

Regarding the importance of providing universal services in public transportation, in the "Basic Policy for the Promotion of Facilitation of Movement, etc. (hereinafter referred to as the "Basic Policy"), which was established based on the "Law on Facilitation of Movement, etc. of the Elderly, Persons with Disabilities, etc.," the significance of facilitation of mobility, etc. is stated as follows;²

² On March 31, 2011, the National Public Safety Commission, the Ministry of Internal Affairs and Communications, and the Ministry of Land, Infrastructure, Transport and Tourism announcement No. 1 to revise all the basic policies for promoting smooth movement, etc. based on the

"(Excerpts from the Basic Policy) Japan is expected to become an aging society in which no country in the world has ever experienced, and further aging is expected in the future. The realization of a healthy and vibrant society through the independence of the elderly and social participation of the elderly is required. Today, the realization of a "inclusive society" in which all citizens respect and support each other's personalities and individuality under the principle of independence and coexistence with disabilities is required, as a society in which persons with disabilities live and work in the same way as persons without disabilities, and the spread of the principle of normalization is advanced in society.

In order to realize such a society, it is important to build a society in which the elderly, persons with disabilities, and others can live independent daily lives and social lives. Therefore, it is necessary to promote the development of an environment for this purpose as soon as possible. Since the use of transportation and facilities is an important means for the elderly, persons with disabilities, etc. to participate in society, promoting the facilitation of transportation, etc. is of great significance for the realization of such a society.

Furthermore, the promotion of facilitation of mobility, etc. will not only promote social participation of the elderly, the disabled, etc. but also contribute to the maintenance of a vibrant society in which the people can live lively and safely through the development of facilities and rolling stocks that are easy for all users based on the universal design concept of "anyone, anywhere, freely, and easy to use." (End of excerpt)"

The use of proceeds is a project with high social benefits, which can be said to be an initiative consistent with the basic policy described above. In order to provide universal services, The Group believes that it is necessary to maintain hardware and give consideration to software. Since it takes time to develop hardware, ANA Holdings is working to upgrade the hardware first. It aims to become an airline which provides the world's top-level universal services by carrying out a renovation project that focuses on the items listed in the framework. Below, the effects of social improvement and contribution to the above policy are described by major renovation work categories.

i. Renovation of the website

The group makes modifications to our website in accordance with the global guidelines, Web Content Accessibility Guideline (WCAG). The WCAG is a standard that can improve accessibility to content for people with various disabilities, including, but not limited to, blindness or low vision, hearing or hearing loss, learning impairment, cognitive impairment, motor limitations, speech difficulties, photosensitivity seizures, and combinations thereof. It is a project that can be expected to improve society as a soft infrastructure that supports smooth access to public transportation by making it easier for anyone to access websites that provide information and emergency information necessary for flight use of reservations and cancellations, route guides, fare guides, and transportation information. The provision of information for facilitating mobility is one of the targets to be achieved in the Basic Policy, and can be said to be one of the important measures.

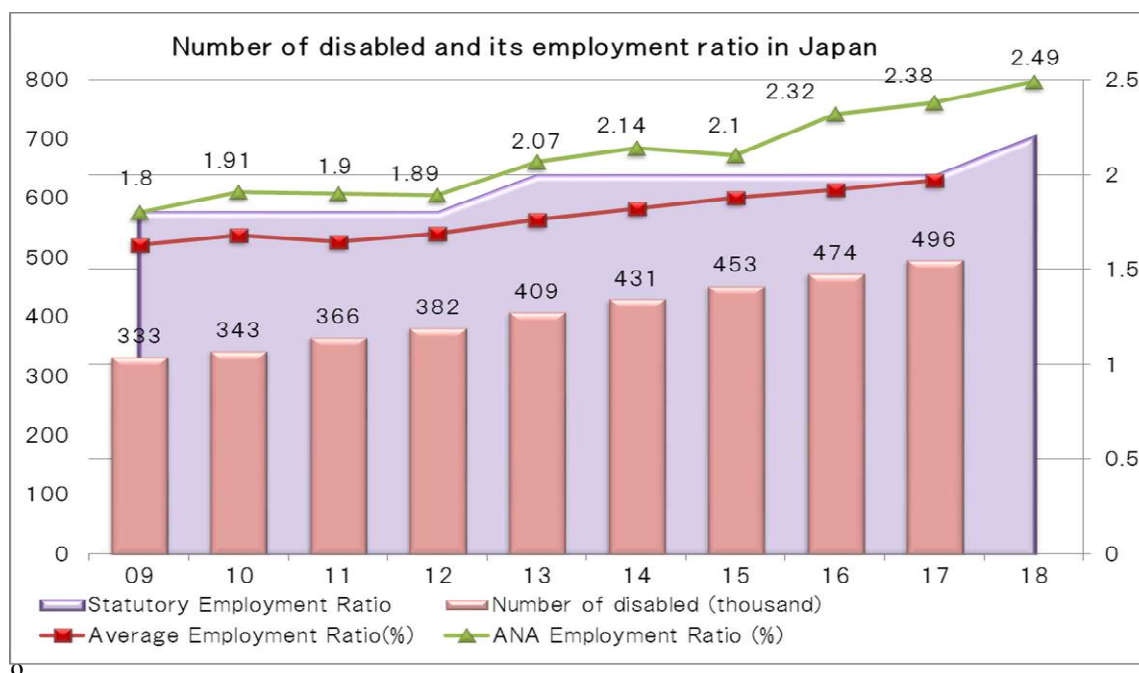
ii. Renovation of Airport Facilities and Equipment

It plans to renovate to provide universal services at all airports by 2020, except where such work cannot be repaired due to reasons other than the Group. Item 2 of the Goals of the Basic Policy states that "the facilities should be improved as much as possible to receive assistance, such as assistance for boarding and disembarking, guidance at passenger facilities, and other support necessary for transportation, when passengers use public transportation". This project will contribute to the policy Item 2. This policy also requests the airport facilities to make airport passenger facilities with more than 3,000 passengers per day to barrier free. The Group does not set a restriction based on the number of passengers, and in

principle covers all passenger facilities where the Group's aircraft arrive and depart (limited to locations where the Group can perform renovation work, etc.).

Use of proceeds 2: Universal support for employees

The employment rate of persons with disabilities in Japan is steadily increasing, as shown in the table below.



Source: Ministry of Health, Labor and Welfare, ANA Group (The ratio is as of June 1 every year))

The statutory employment rate was set at 2.2% by FY2018 to FY2020, while the Group's disabled's employment ratio exceeded this target by 2.45% in 2018. Considering that the average actual employment rate in FY2017 was 1.97% and the statutory employment rate was 2.0%, it can be seen that the Group is actively working on the employment of people with disabilities. The Group regards the employment of people with disabilities as a natural responsibility of public institutions and as a valuable means of supporting the Group. To ensure that all employees are working comfortably, the ANA Group has distributed a Code of Conduct titled "The Start of 36,000 Employees," and is aiming to become a foundation for each employee by knowing that the employment of people with disabilities is not special. The company plans to install a variety of facilities for universal employee use in all of its workplaces with disabilities and LGBT employees. In addition, even if the universal facilities are not planned to be installed at present, a system has been established to consider the establishment of universal response facilities when it is found that the persons with disabilities or LGBT are to be employed.

JCR evaluates that these initiatives will significantly contribute to the first goal of Japan's SDGs Implementation Guidelines for "Promoting the Active Activities of All People" in Japan, which is facing a declining birthrate and an aging society. It is also consistent with the SDGs's core objective of inclusive development, which is not left behind by anyone on the planet.

From the above, JCR evaluates the use of proceeds for this bond as a social project with a high social contribution effect.

- ii. Among the uses of proceeds, the provision of "universal services" to passengers falls under the category of "improvement of access to essential services" for "persons with disabilities" and "elderly" among the qualified social project business categories in the social bond principle. Universal employee support falls under the category of "socio-economic empowerment" for the "disabled" and "LGBT".

b. Consistency with SDGs goals and Targets

i. Consistency with ICMA SDGs Mapping

With reference to ICMA's SDGs mappings, JCR assessed that JCR would contribute to the following SDGs targets and targets.... It was also confirmed that it is consistent with the SDGs Action Plan 2018, which the Government of Japan has set as its SDGs targets.

(1) Provide Services for Passengers (ANA Brand)



Goal 11: Sustainable cities and communities.

Target 11.2. By 2030, with particular attention to the needs of vulnerable people, women, children, persons with disabilities and the elderly, providing access to safe, inexpensive and easy-to-use, sustainable transport systems for all by improving the safety of transport through such means as expanding public transport.

Target 11.7. Provide universal access to safe, inclusive and easy-to-use green spaces and public spaces for people, including women, children, the elderly and persons with disabilities, by 2030.

(2) Universal Response to Employees



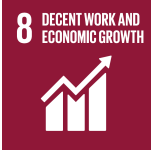




Target 10: Reduced inequalities

Target 10.2. By 2030, empower and promote the social, economic and political inclusion of all, irrespective of age, sex, disability, race, ethnicity, origin, religion or economic or other status.

ii. Consistency with measures for achieving Japan SDGs

In addition, it was confirmed that the Social Project is consistent with the following items in the "Specific Measures for Achieving SDGs" set forth by the Government of Japan as the SDGs Achieve Goals.3.

Implementation Guidelines 1 Promoting the Success of All People

SDGs that appears to be particularly relevant: 8 (Economic Growth and Employment), 10 (Elimination of Discrimination), 11 (Universal Design), 16 (Peace and Justice for All)			
Domestic measures			
	Outline of Measures	Target	Indicator
Promotion of measures stipulated in the Third Basic Plan for Persons with Disabilities	Regardless of the presence or absence of disabilities, the government will further promote the following measures to support the independence of persons with disabilities and their participation in society, with the aim of realizing a society in which all citizens mutually respect and support their personalities and individuality. (Excerpts from Policies Related to Use of Capital) (1) Support for employment, employment and economic independence (2) Measures Concerning the Living Environment (3) Measures for Information Accessibility (4) Measures for Safety and Security	   	Achievement Status of Performance Targets Related to the Basic Plan for Persons with Disabilities
Promoting Barrier-Free Public Transportation	Based on the concept of universal design that "anyone, anywhere, freely, and easy to use," the "Law on Promotion of Smooth Movement, etc. of the Elderly and Persons with Disabilities (Barrier-free Law)" the promotion of barrier-free access will be promoted in accordance with the "Act on Promotion of Smooth Movement, etc. of the Elderly and Persons with Disabilities."		Follow-up Status Based on the "Basic Policy for Facilitating Movement"

c. Response to Environmental and Social Risks

This case basically involves the installation of indoor facilities and equipment, and is unlikely to have a serious adverse effect on the environment. In addition, JCR confirmed through interviews with us that there are no factors that seem to be particularly negative for social risks. In addition, we give the following consideration to installation work.

i. Assumed risks

Generation of noise and accidents at the time of construction work as negative environmental impacts

ii. Risk mitigation measures

³ Specific measures for the implementation of the Sustainable Development Goals (SDGs) established by the Headquarters for the Promotion of Sustainable Development Goals (SDGs), composed of the State Ministers.

Construction contracts shall be concluded with contractors on the premise that measures necessary for noise, safety, and health shall be taken in compliance with the Building Standards Law and related laws and ordinances.

Based on the above, JCR believes that environmental and social risks are appropriately avoided.

Evaluation Phase 2: Evaluation on Management, Operation and Transparency

JCR evaluated this social bond based on the current situation described below and JCR's evaluation on each item. JCR evaluated that the management and operation systems were well established, and that the implementation of the planned projects and the appropriation of funds to be procured would be sufficient. As results, JCR concluded that the evaluation phase 2: the management and operation systems and transparency assessments were designated as "m1," which is the top level of this phase.

1. Appropriateness and Transparency concerning selection standard and processes of the use of proceeds

(1) JCR's key consideration in this factor

In this section, JCR confirms that the objectives to be achieved through the social bond, the criteria for selecting social projects, the appropriateness of the process, and the series of processes are appropriately disclosed to investors.

(2) Current status of evaluation targets and JCR's evaluation

a. Goal

ANA Group's management philosophy is to "Build on a foundation of security and trust, "the wings within ourselves" help to fulfill the hopes and dreams of an interconnected world." This philosophy is to contribute to the development of society in the future on a sustainable basis, with "peace of mind and trust" as the foundation of its management.

To achieve sustainable growth and value creation, the ANA group medium-term management strategy for FY2018-2022 formulated in February 2018 identifies ESG management as its core, and identifies the four key management issues (materiality) as "environment," "human rights," "diversity and inclusion," and "regional revitalization." By responding appropriately to these four issues, the Group aims to simultaneously create social and economic value and increase corporate value.

The proceeds are used for projects that contribute to "diversity and inclusion" among the four key issues. In particular, the concept of inclusion, which recognizes diversity and does not leave anyone on the planet, is a fundamental goal of SDGs, and it can be said that it is a goal that is highly socially significant. The ANA Group has also established a policy of "universal services" with the aim of realizing "a sky that is friendly to all people," and it has set forth a policy of strengthening these services as one of the pillars of the ANA brand's medium-term management strategy.⁴

The Group listened to the opinions of experts (university professors, NGOs, NPOs, industry group, public organizations, etc.) regarding management goals that contribute to these social issues, and confirmed through interviews with the Company and disclosure materials that the Group ensures objectivity and diversity by reflecting such opinions.

b. Selection standard

- (1) Provide Services for Passengers (ANA Brand)
Initiatives for all passengers to use airplanes safer and more comfortable
- (2) Universal Response to Employees
Creating facilities that enable employees of various groups, including persons with disabilities and LGBT, to work independently and safely

⁴ ANA NEWS (Press Release) <https://www.ana.co.jp/group/pr/201805/20180525.html>

JCR evaluates all of the above selection criteria as social projects that contribute to the resolution of the Group's key issues.

c. Process

The Group Accounting & Finance Planning Department, Finance & Investor Relations Department, and CSR Promotion Department of ANA Holdings collaborated with the Group Human Resources Strategy Department, Facilities Planning Department, and its subsidiaries, the CS Promotion Department (Universal Promotion Team), Human Resources Strategy Department (Group Employment Promotion Office for Persons with Disabilities), Facilities Department, and the Service Platform Department of the Digital Transformation Office to select this project that meets the eligibility criteria. The final confirmation of project selection was carried out by the Group CSR, Risk and Compliance Committee, which is composed of full-time directors and statutory auditors of ANA Holdings, Inc. and All Nippon Airways Co., Ltd., under the supervision of the President of ANA Holdings.

JCR confirms through interview with the group that each department has a clear expertise and a sense of responsibility for their work, and is engaged in the selection, planning, and implementation of this project. In addition, the final confirmation was made at the CSR, Risk and Compliance Conference of the Group and the management team was proactively involved in the selection process.

These selection criteria and selection and evaluation processes will be disclosed in the Shelf Registration Supplement.

2. Appropriateness and Transparency of management of the proceeds

(1) JCR's key consideration in this factor

While it is usually assumed that management of proceeds methods vary widely by borrower, JCR confirms that the proceeds are used for social projects and that arrangements and internal arrangements are in place to facilitate tracking and management of the availability of funds.

JCR also attaches importance to assessing whether the proceeds are expected to be used for social projects at an early stage and how funds are managed.

(2) Current status of evaluation targets and JCR's evaluation

- a The company plans to use 18% of the proceeds from this bond to refinance existing capital investments, and 82% to fund new capital expenditures.
- b The proceeds will be delivered to a checking account in the name of ANA Holdings under the Fiscal Agency Agreement managed by a bank entrusted with the issuing agent and paying agent services of the Social Bonds.
- c Payments related to the implementation of the subject project, which is used for the funds of the Bonds, shall be made by the Finance Planning and Investor Relations Department of ANA Groups, Finance and Accounting Department of ANA Holdings, or by the Accounting and Finance Department of All Nippon Airways, based on the confirmation and request of the department that receives payment vouchers (invoices, etc.) for each project. Since the person in charge of payment work and the person in charge also serve as both companies' businesses, it is possible for the Financial Planning and Investor Relations Department of the Group Accounting and Finance Office of ANA Holdings to confirm all payments related to the implementation of the target project. Transfers from the above accounts of ANA Holdings and transfers from bank accounts under the name of All Nippon Airways Co., Ltd. will be managed as funds for the project.

- d The allocation and management of proceeds shall be undertaken by the Financial Planning and Investor Relations Department of the Group Accounting and Finance Office of ANA Holdings. This department provides a system to internally manage budgets and expenditures for eligible projects to ensure that allocated and unallocated amounts of proceeds. The director in charge of finance checks the allocation status on an annual basis.
- e Evidence documents are prepared to confirm the payment of funds.
- f We plan to use the refinancing until March 2019 and new investments by March 2022. Unallocated proceeds will be kept in safe and liquid assets such as certificates of deposit until appropriated.

JCR evaluates cash management to be appropriate given that the bonds are expected to be used for social projects, that the proceeds are managed internally by an appropriate method, that the internal control system is in place, and that there are no particular concerns about the management of the proceeds that have not been allocated.

3. Reporting

(1) JCR's key consideration in this factor

In this section, JCR evaluates whether the reporting system to investors before and after the issuance is planned in a detailed and effective manner at the time of the issuance of the notes.

(2) Current status of evaluation targets and JCR's evaluation

a. Reporting on the allocation of proceeds

The Company will annually publish on its website an explanation of the allocation status of the proceeds and the project until the full amount of the proceeds will be allocated to the eligible projects. It will also be included in the annual report published by ANA Group.

b. Reporting on society improvement effects

ANA Holdings will publish the following information annually on its website and annually in its annual Integrated Report, to the extent reasonably practicable and within the confidentiality of the period until the Social Bond is redeemed:

Output indicators⁵

- (1) Functions (Outlines) of the website where the Universal Compliance Renovation was Completed
- (2) Number of airports where universal facilities and equipment renovations have been completed
- (3) Number of office buildings where universal works and equipment renovations have been completed

Outcomes measure⁶

- (1) Number of passengers with disabilities who use ANA brand flights (YoY)
- (2) Employment Ratio of Persons with Disabilities (Total for All Nippon Airways and Group Companies Approved)

Impact⁷

Respecting the Diversity of Our Passengers and Employees and Contributing to the Realization of a

⁵ Specific products, facilities, and services brought about by investments

⁶ Outcomes (benefits and positive changes) from outputs

⁷ Long-term benefits to society as a whole. Complete implementation on a project basis is difficult, and in many cases qualitative expressions are appropriate.

(See ICMA Working Towards a Harmonized Framework for Impact Reporting Social Bonds (2018) for footnote 5-7 and prepared by JCR.)

The output indicators are appropriate and represent an increase in equipment that enhances accessibility to public transportation provided by the funding of the Bonds. Outcome measures are also indicators that represent the number of beneficiaries by equipment and facilities provided and are appropriately set as performance indicators. In the case of social projects, the expected impact often takes a long time before the effects are realized, and it is not expected to be fully realized at the time of completion of a single project or by the redemption period. However, from the perspective of contributing to the realization of an inclusive society, it can be said that the project is highly consistent with our management philosophy and is likely to contribute to the established impact.

Based on the above, JCR evaluates that reporting on the status of funds appropriated and environmental improvement effects set by us is appropriate in terms of the period and frequency of disclosure.

4. Organization's environmental activities

(1) JCR's key consideration in this factor

In this section, we evaluate whether the management of the issuer regards environmental issues as a high priority issue for management, whether the issuer's issuing policies and processes for corporate bonds and criteria for the selection of social projects are clearly positioned by establishing a department specializing in environmental issues or collaborating with external organizations, and so on.

(2) Current status of evaluation targets and JCR's evaluation

ANA group sustainability and ESG-related Initiatives

As a globally operating group, the ANA Group is committed to contributing to the achievement of the United Nations Sustainable Development Goals (SDGs).

The Group identifies the four key management issues (materiality) as "environment," "human rights," "diversity and inclusion," and "regional revitalization." By responding appropriately to these four issues, the Group aims to simultaneously create social and economic value and increase corporate value. As for "Environmental" consideration, it issued "Green Bond" in October 2018, which is the first green bond issued by airline company globally. In addition, it positively tries to reduce CO2 emissions per revenue ton-kilometers; it targets to decrease CO2 emissions by 20% by 2020 from 2005. Regarding "Regional revitalization", it promotes tourism through cooperation with regional governments and through its flight services. In addition, it implements disaster recovery supports, environmental and biodiversity conservation and next generation education program as social contribution activities. Regarding "human rights", the Group stipulates "ANA Group Human Rights Policy" and promotes respecting human rights through dialogue and engagement with various stakeholders, such as human right experts, global NPO, etc.

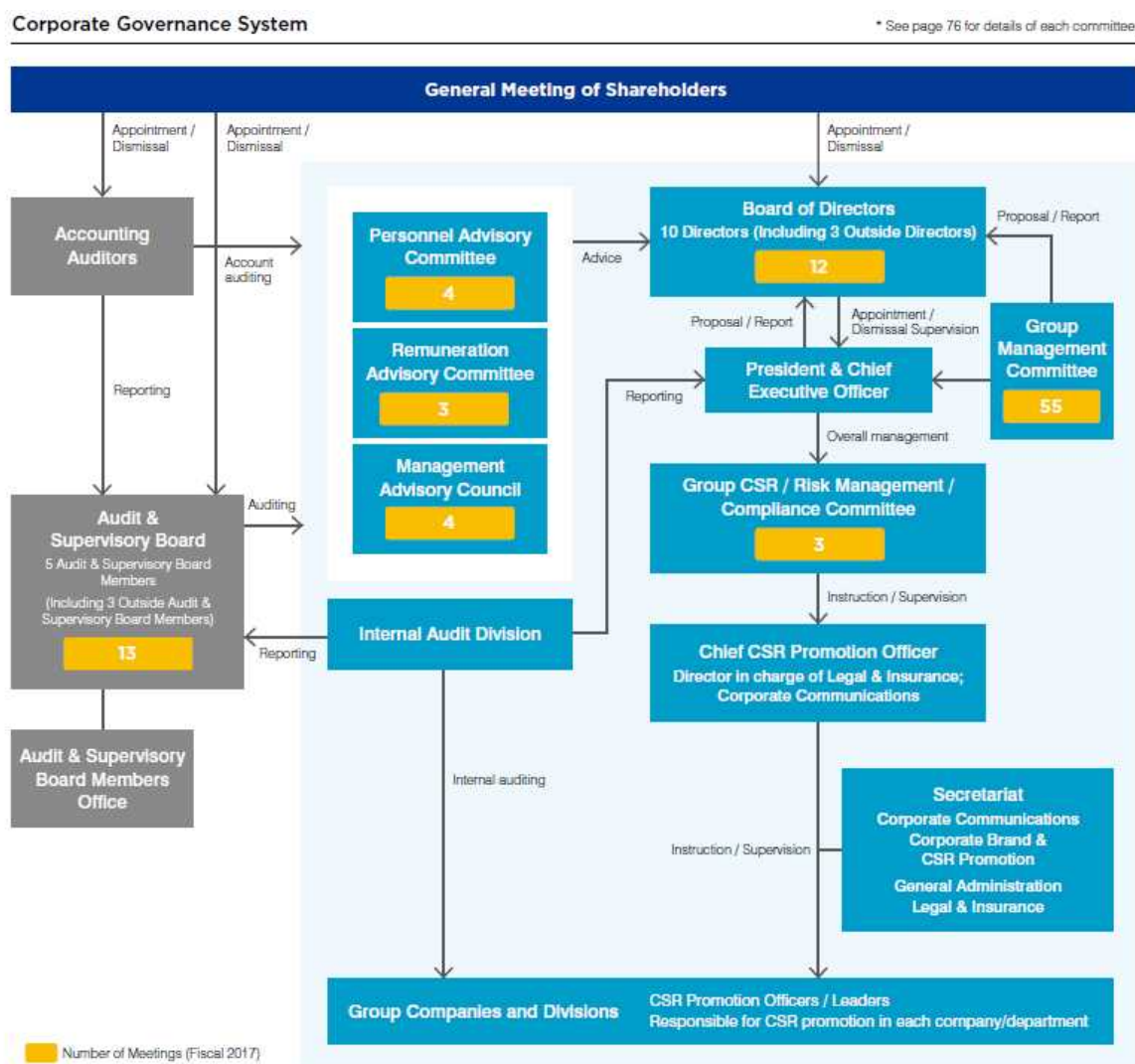
The promotion of diversity within the ANA Group has received a certain degree of appraisal from external parties, such as being certified by the Ministry of Economy, Trade and Industry as "New Diversity Management Selection 100". ANA/ANA Wings was awarded the Prime Minister's Award for Excellence in Promoting Barrier-Free Universal Design and the 10th Ministry of Land, Infrastructure, Transport and Tourism's Award for Excellence in Promoting Barrier-free Design.

In accordance with the Guidelines for Social Responsibility⁸, which all Group employees must observe, the Group is committed to contributing to the realization of a harmonious society that is "friendly to all people" by

⁸ https://www.ana.co.jp/group/csr/basic_approach/ of "Social Responsibilities Guidelines"

implementing this project. In addition, the ANA Group D & I Declaration (April 2015) ⁹ and the Universal Service Policy (April 2017) ¹⁰ were formulated to increase the effectiveness and transparency of these initiatives year by year.

The Group CSR, Risk, and Compliance Committee meets several times a year, attended by the directors, including the president, and executive officers. In addition, the management teams of Group companies participate in these meetings, and the Group as a whole is engaged in CSR activities.



(Source: ANA Annual Report 2018)

In addition, when promoting important CSR issues, it actively and responsibly engages in dialogue with the following stakeholders and makes efforts to incorporate them into its corporate activities.

- Dialogue with shareholders and Investors
 - Information disclosure and dialogue for stable and continuous interest generation
- Dialogue with employees
 - Direct dialogue between management and employees through top caravan to share management strategy and management's will and mutual understanding

⁹ANA Group D & I Declaration https://www.ana.co.jp/group/csr/human_resources/promotion_diversity/

¹⁰"Universal services" policy <https://www.ana.co.jp/group/pr/pdf/20180525-1.pdf>

- Dialogue with the international community
 - Active dialogue with business associations and NGO/NPO on key management strategic issues. Enhance awareness of the ANA Group's initiatives and reflect changes in the global environment in our business activities.
- Dialogue with business partners
 - Questionnaires to suppliers to promote CSR throughout the entire supply chain, and on-flight meal improvement tours

JCR affirmed that the ANA Group, as one of the key initiatives for business development, is implementing barrier-free air transportation, which is the core business of the ANA Group, as part of various initiatives aimed at realizing a "harmonious society."

Based on the above, JCR believes that the Group as a whole is actively tackling social issues.

■ Evaluation result

Based on JCR Social Finance Evaluation Methodology, JCR assigned "s1" for the preliminary evaluation of "Social Impact Evaluation (Use of Proceeds)" and "m1" for the preliminary evaluation of "Evaluation on Management, Operation and Transparency." Consequently, JCR assigned "Social 1" for the overall "JCR preliminary Social Bond Evaluation." The bonds also meet the standards for the requirements of the Social Bond Principles and the SDGs Objectives and specific measures for the SDGs Goals of the Government.

[JCR Social Bond Evaluation Matrix]

		Evaluation on Management, Operation and Transparency				
		m1	m2	m3	m4	m5
Social Impact Evaluation	s1	Social 1	Social 2	Social 3	Social 4	Social 5
	s2	Social 2	Social 2	Social 3	Social 4	Social 5
	s3	Social 3	Social 3	Social 4	Social 5	Not qualified
	s4	Social 4	Social 4	Social 5	Not qualified	Not qualified
	s5	Social 5	Social 5	Not qualified	Not qualified	Not qualified

■ Subject

Issuer: ANA HOLDINGS INC. (Securities Code: 9202)

[Assignment]

Target	Issue amount	Date of issuance	Redemption date	Interest rate	Preliminary evaluation
37th unsecured corporate bonds	¥5 billion	To be determined	To be determined	To be determined	JCR Social Bond Evaluation : Social 1 Social Impact Evaluation : s1 Evaluation on Management, Operations and Transparency: m1

(Responsible analyst for this evaluation) Atsuko Kajiwara and Rieko Kikuchi

Important explanation of the Social Bond Evaluation

1. Assumptions, Significance, and Limitations of JCR Social Bond Evaluation

JCR Social Bond Evaluation assigned and provided by Japan Credit Rating Agency, Ltd. (JCR) is the expression of a comprehensive opinion of JCR at this moment concerning both the degree of the proceeds allocated to social projects defined by JCR, and the extent to which management, operation, and transparency initiatives relating to the use of proceeds. This evaluation is JCR's overall opinion at this moment, and it does not perfectly disclose all the efforts taken by the issuer/borrower to ensure the use of proceeds, administration, management of the proceeds and the transparency.

JCR Social Bond Evaluation is to evaluate the allocation plan of the proceeds to social projects at the time of issuing social bonds or planning to issue social bonds and does not guarantee the future actual allocation of the proceeds. JCR does not guarantee the positive impacts on social issues by the social bond nor is liable for the expected impacts. JCR affirms that the social impacts, which will be realized by the allocated proceeds, are calculated quantitatively or qualitatively by the third parties, but in principle, JCR will not calculate them by itself.

2. Methodologies used in the conduct of this evaluation

The methodologies used in this evaluation are disseminated on JCR website (Sustainable Finance and ESG in <https://www.jcr.co.jp/en>) as JCR Social Finance Evaluation Methodology.

3. Relationship with Acts Related to Credit Rating Business

JCR Social Bond Evaluation is determined and provided by JCR as an ancillary service, which is independent from the activities related to the credit rating business.

4. Relationship with Credit Ratings

This evaluation is not a credit rating, nor promising to provide and disclose a predetermined credit rating.

5. Third Party in Evaluating JCR Social Bond

There is no conflict of interest related to capital or human resources relationships between the subject of this evaluation and JCR.

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■ Glossary

JCR Social Bond Evaluation: JCR Social Bond Evaluation evaluates the extent to which funds procured through social bonds are allocated to social projects as defined by JCR, as well as the level of management, operation, and transparency efforts related to the use of funds for the relevant social bonds. Evaluations are performed on a five-point scale, from top to top, using the Social1, the Social2, the Social3, the Social4, and the Social5 valuation symbols.

■ Status of registration as an external evaluator for sustainable finance, etc.

- Environment Ministry's Green Bond Issuance Registration
- Members of the Working Group on Social Bonds (ICMA)
- Members of the Working Group on UNEP FI Positive Impact Finance Principles

■ Status of registration as a credit rating agency, etc.

- Credit Rating Agency: the Commissioner of the Financial Services Agency (Rating) No.1
- EU Certified Credit Rating Agency
- NRSRO: JCR has registered with the following four of the five credit rating classes of the Securities and Exchange Commission's NRSRO (Nationally Recognized Statistical Rating Organization). (1) Financial institutions, broker dealers, (2) insurance companies, (3) general business corporations, and (4) government and local governments. If we are subject to disclosures under Rule 17g-7(a) of the U.S. Securities and Exchange Commission, such disclosures are attached to JCR's website (the news releases appearing on the <https://www.jcr.co.jp/en>).

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