

ANA Trading Policy on Customer Harassment

1. Introduction

ANA Trading aims to broaden the capabilities of our employees, customers, and society by working closely with customers and business partners while delivering new value across a wide range of business areas, including aviation-related businesses, the electronics business, and digital-related businesses. To ensure that our employees, customers, and business partners mutually respect human rights and to provide a safe, comfortable environment for transactions and services, we have established a “Policy on Customer Harassment” and are committed to implementing it.

2. Fundamental Mindset

We always strive to work closely with our customers and business partners to provide value and services that exceed their expectations. We will sincerely and respectfully address feedback, comments, and requests from our customers and business partners, and strive to improve the value, services, and quality of our business. At the same time, regarding disruptive behavior (customer harassment) that significantly infringes upon employees’ human rights or harms their work environment, we will take a firm and resolute stance as a company and organization against it, without leaving the burden of response to individual employees.

3. Definition and Determination Criteria Regarding Customer Harassment

(1) Definition

ANA Trading defines customer harassment as behavior by customers (including business partners and partner companies) or third parties that meets any of the following criteria.

- Behavior that takes advantage of a position of superiority
- Acts that constitute illegal activities or may lead to such activities (hereinafter referred to as "unfair acts"), or acts that demand actions beyond obligations or societal norms (hereinafter referred to as "unreasonable demands")
- Actions that harm the working environment of employees

(2) Determination Criteria

In accordance with the Ministry of Health, Labour and Welfare's "Corporate Manual for Customer Harassment Countermeasures," we will make our determination as to whether an act constitutes harassment by comprehensively considering the following two main points.

- Appropriateness of the request: Whether the request has reasonable grounds, a legal basis, or is due to a fault attributable to the company
- Reasonableness of the methods and manner: Whether the means, behavior, duration, and frequency used to pursue the request fall within the appropriate range according to societal norms

4. Examples of Applicable Behavior

Specifically, the following behaviors are included. (The examples are illustrative but not exhaustive.)

Inappropriate conduct and human rights violations • Verbal abuse, yelling, insults, intimidating or threatening behavior, discriminatory remarks, defamation, etc. • Physical violence, property damage, or other aggressive behavior • Acts of voyeurism, stalking, indecent behavior, obscene remarks, or sexual harassment	Unreasonable and excessive demands • Demands for unreasonable monetary compensation or free provision of goods/services in cases where the company is not at fault • Demands for dismissal or punishment of employees; demands for excessive apologies, such as forced prostration • Coercion to perform acts not required by obligation; demands for unfair contract modifications or transaction terms
Interference with business operations and unlawful detention • Prolonged restraint, excessively long phone calls, and repeated, persistent inquiries • Unauthorized entry into and lingering on business premises (offices, stores, etc.) • Acts of deceiving employees and making false reports	Reputational damage and dissemination via social media, etc. • Actions that damage the company's or employees' credibility • Posting or disseminating unauthorized audio or video recordings on the internet or social media for the purpose of defamation

5. Policy and Measures Regarding Customer Harassment

(1) Termination of services and refusal to respond or provide services

If customer harassment occurs, we clearly but politely ask the perpetrator to refrain from continuing the problematic behavior once it has been recognized as customer harassment. We are committed to strictly following our response policy and will not make hasty concessions to unreasonable demands. If the situation does not improve, we will implement the following measures.

- Termination of telephone calls, discontinuation of face-to-face interactions, and requesting to leave the store
- Suspension of access to our e-commerce site and membership services
- Termination of future transactions and contracts, and refusal to enter into new transactions or provide services

(2) Legal action and cooperation with external agencies

If we determine that behavior constitutes malicious conduct or criminal activity, such as threats, assault, interference with business operations, or refusal to leave the premises, we will consult with and report the matter to the appropriate authorities, such as the police. We will take strict action from both civil and criminal perspectives in cooperation with attorneys and other professionals.

6. Internal Systems and Initiatives at ANA Trading

(1) Building systems and manuals

We will develop a response manual outlining specific response procedures and escalation flows to establish an organizational response system.

(2) Implementing education and training

We will regularly provide education and training to ensure employees properly understand customer harassment and improve their ability to respond in the initial stages of such harassment.

(3) Setting up a consultation service and caring for employees

We will establish an in-house consultation service for employees who have experienced customer harassment, promptly verify the facts, and implement a thorough follow-up system, including mental health care.

Date of Establishment: October 1, 2026