

Anti-slavery and human trafficking statement

Hankyu Travel International Europe UK Ltd

1: Opening statement from senior management

Hankyu Travel International Europe UK Ltd and the Hankyu Travel Group (together, these are referred to as “Hankyu Travel”) are committed to preventing acts of modern slavery and human trafficking from occurring within its business and supply chain. We impose the same high standards on our suppliers.

This statement is made in line with the anti-slavery statement of the Hankyu Travel Group.

The Hankyu Travel Group is within the Hankyu Hanshin Holdings Group, a group of companies with Hankyu Hansin Holdings, Inc, whose registered head office is in Osaka, Japan.

The Hankyu Hanshin Holdings Group has its “Sustainability Declaration” released in May 2020, outlining its commitment to addressing various challenges in order to help realise a sustainable society. The Sustainability Declaration aims to resolve social issues, in pursuant to the United Nation Sustainable Development Goals (SDGs).

Amongst the Sustainability Declaration we have our basic philosophy and policies on human rights, under which there are various educational activities to raise our individual employees’ awareness of respect for human rights.

We continue to contribute to the establishment of a fair and abundant society in which all people’s human rights are respected and in which no person is discriminated against because of their birth, nationality, beliefs, gender, race, age, or disability. Respecting the human rights of customers, trading partners, shareholders, local communities, employees, and all other people is a vital part of every company’s social responsibilities.

Please see https://www.hankyu-hanshin.co.jp/docs/databook_en.pdf for further details of our group management philosophy.

2: Structure of the organisation

Hankyu Travel International Europe UK Ltd is a limited company in the UK. It is a subsidiary of Hankyu Travel International Co., Ltd, which is a travel company incorporated in Japan in 1948. Hankyu Travel International Co., Ltd is the headquarters of Hankyu Travel Group.

The Hankyu Hanshin Holdings Group is a group of companies operating in the sectors of transportation, real estate, entertainment, information and communication technology, travel, international transportation and hotels. Its holding company, Hankyu Hanshin Holdings, Inc., is based in Japan.

Hankyu Travel employs more than 4000 people worldwide, and has business operations in seven countries in addition to its headquarters in Japan.

Within the Hankyu Travel Group, there are following corporate entities:-

1. Hankyu Travel International Co., Ltd;
2. Hankyu Travel International Europe UK Ltd ;
3. Hankyu Travel International Europe SRL;
4. Hankyu Travel International Singapore Pte Ltd ;
5. Hankyu International Travel China Co Ltd’

6. Hankyu Hanshin Business Travel Co Ltd ;
7. Hankyu Travel Support Co Ltd;
8. Airserve Co Ltd;
9. Hanshin Travel International Co Ltd;
10. Hops Co Ltd;
11. Tabicoffret Co Ltd; and
12. Nikkei Culture Inc

Hankyu Travel has a global annual turnover of JPY584,000,000 (about £40.8M) as at the end of March 2021. To find out more about the nature of our business, please click <https://www.hankyu-travel.com/english/>.

In order to fulfill our services in the travel sector, we work with a range of suppliers, trading partners, shareholders, and local communities in Japan.

3: Policies

As part of our commitment to combating modern slavery, we have implemented the following policies:

- Anti-slavery Policy;
- Compliance Handbook;
- Basic Policy on Respect for Human Rights;
- Empowering Individuals policies;
- Robust Governance policies; and
- Safety policies (including but not limited to prevent crime and terrorism).

We also have our Corporate Ethics Consultation Desk, which comprises an in-house section and an external section, which is staffed by outside lawyers, for all Hankyu Hanshin Holdings Group officers and employees, as well as the group's business partners, to report anonymously any behavior that violates (or may violate) laws or regulations, or is otherwise unethical.

We also make sure our suppliers are aware of our policies, and adhere to the same high standards.

The Hankyu Hanshin Holdings Group aims to achieve the United Nation Sustainable Development Goals (SDGs) through our Group-wide corporate social responsibility (CSR) project "the Hankyu Hanshin Dreams and Communities of the Future Project" which was established in 2009. Under this project, we work on two priority areas: "environment-friendly community development," which improves the environment of communities; and "human capital development," which shoulders the task of building communities for future generations.

4: Due diligence

Hankyu Travel's principal role is to supervise and oversee the entire Hankyu Travel Group and to ensure compliance with the philosophy and policies set out in the Hankyu Hanshin Holdings Group.

Hankyu Travel is under obligation to report its affairs and compliance issues to the Hankyu Hanshin Holdings Group and to adhere to the decisions made by the same Group. This system enhances the overall governance of the Group, and serves to monitor and to reduce any risk of slavery and human trafficking occurring within our supply chains of the Group.

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted the following due diligence procedures:-

- (a) Compliance Code of Conduct, setting out our Group's code of conduct in dealing with our customers, suppliers, employees/workers, shareholders and in the society in general.
- (b) Corporate Governance Committee (comprising three representative directors, one full-time Audit & Supervisory Committee member, and five independent directors) to ensure transparency and to facilitate coordination with outside directors;
- (c) Group Management Committee to undertake preliminary reviews; and
- (d) Corporate Ethics Consultation Desk to deal with individual issues/queries.

Our procedures are designed to:

- establish and assess areas of potential risk in our business and supply chains
- monitor potential risk areas in our business and supply chains
- reduce the risk of slavery and human trafficking occurring in our business and supply chains
- provide adequate protection for whistleblowers

5: Risk assessment and compliance

Hankyu Travel regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain.

Pursuant to the compliance measures of the Hankyu Hanshin Holdings Group, Hankyu Travel has a clear policy of thorough rejection of any involvement with organised crime groups, companies connected with organised crime groups, or other "antisocial forces" that threaten the order and safety of civic society, and firm refusal of their unreasonable demands.

We ensure all our suppliers adhere to our anti-slavery policy. We enforce a strict code of compliance and do not tolerate slavery and human trafficking within our supply chains.

To ensure full awareness of this policy throughout the entire Group and within our supply chains, it is instituted in the Basic Policy on the Establishment of the Internal Control System and clearly set forth in the Hankyu Hanshin Holdings Group Compliance Handbook distributed to all Group directors and employees.

In practice, we cooperate closely with lawyers, police, and other organisations, and all Hankyu Hanshin Holdings Group contracts contain clauses banning involvement with antisocial forces and/or any

organised crime group. We also share relevant information between Group companies, maintain high awareness of issues through employee training, and participate proactively in community meetings and activities pertaining to the elimination of organized crime and other antisocial forces. Please see <https://www.hankyu-hanshin.co.jp/en/corporate/compliance.html> for our compliance measures.

We do not operate in high risk sectors or locations.

If an incident occurs, we take a pan-organisation approach in response, bringing in the relevant in-house departments and teaming up with outside experts.

6: Effectiveness and KPIs

Hankyu Travel uses key performance indicators (KPIs) to measure how successful we have been in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are as follows: -

- Safety KPIs; and
- Employee Satisfaction KPIs.

7: Training

We invest in educating our staff to recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

Examples of our training activities within the Hankyu Hanshin Holdings Group include:-

- We hold human rights training once a year for the top management of each Group company and all employees in managerial positions at the Company. We also continuously educate employees about respect for human rights and prevention of harassment by implementing human rights training for promoted employees at each level, including new directors, new managers, and new employees, of each Group company.
- We have a human resource development plan with the basic policy of promoting the creation of new value from a long-term perspective through support for the independent career development and capacity building of employees and training in the workplace.
- Hankyu Corporation has a training institute to train motive power engineers (train drivers), conductors and assistants (approved by the Ministry of Land, Transport and Tourism) and a human resources development center to train station staff. We hold workshops and seminars on the safety of transportation, inviting instructors from outside the Company, with the aim of raising the safety awareness of employees.
- the Group has a robust structure for compliance-focused management, including a dedicated compliance office, a Compliance Manual, and compliance training, all aimed at raising awareness of compliance issues throughout the entire Group.

8: Further actions and sign-off

Following our review of our actions the last financial year 2020/2021 to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Regular reviews of our current policies; and
- Introduction of new policies and procedures to promote awareness on the human right issues globally and to further prevent any slavery and human trafficking occurring in our business and our supply chains

This statement is made in accordance with section 54(1) of the Modern Slavery Act 2015 and constitutes Hankyu Travel's slavery and human trafficking statement for the financial year commencing on 1 April 2021 and ending on 31 March 2022.

This statement was approved by the Board of Hankyu Travel International Europe UK Ltd on the 29th of July 2021.

Signature:

A handwritten signature in black ink, appearing to read 'H. Ishida', with a stylized flourish at the end.

HIROMICHI ISHIDA

Managing Director

Hankyu Travel International Europe UK Ltd

Date: 29th July 2021