

Noble Group's Conflict Minerals Policy

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Noble Group manages a portfolio of global supply chains covering a range of industrial and energy products, as well as having a 49% interest in Noble Agri, its agricultural partnership with COFCO. Operating across a multitude of locations and customers, Noble facilitates the marketing, processing, financing and transportation of essential raw materials. Sourcing bulk commodities from low cost regions such as South America, South Africa, Australia and Indonesia, the Group supplies high growth demand markets, particularly in Asia and the Middle East.

As a signatory to the UN Global Compact it is Noble Group's policy to conduct its business in a responsible and ethical way and to cultivate transparency.

Conflict Minerals refers to minerals such as columbite-tantalite (coltan), cassiterite, gold, wolframite and their derivatives which are mined in regions where armed conflict, human rights abuses and environmental harm may exist.

Noble Group is committed to the highest standards of ethical conduct and full compliance with all applicable national and international laws. The company will not participate in any action which contributes to the financing of conflict and complies with all relevant United Nations sanctions resolutions or, where applicable, domestic laws implementing such resolutions relating to conflict.

Noble Group acknowledges the challenges in tracing the origin of Conflict Minerals, as the supply chain often includes amongst others, artisanal miners, local consolidators, smelters and refineries.

Noble Group participates in the iTSCi initiative that aims to advance traceability, transparency, validation or certification mechanisms, that together assure purchasers that their products are not contributing to conflict and come from sustainable sources.

In addition to complying with, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas, Noble:

- Imposes disclosure requirements into its purchase contracts to confirm the source of the Conflict Minerals. The documents which confirm the sourcing of the Conflict Minerals are eventually passed to the ultimate purchasing smelter.
- Only deals with entities that are iTSCi registered.
- Employees who are involved in the trading and administration of minerals from Conflict Minerals are aware of the contents of the OECD Due Diligence Guidance (Annex II) to ensure that the relevant guidance is complied with at all times.
- Reviews annually this policy and processes and procedures for sourcing minerals from Conflict-Affected and High-Risk Areas.

Enquiries in respect of this Policy can be made at enquiries@thisisnoble.com.