



NOBLE GROUP STATEMENT: MODERN SLAVERY ACT

**NOBLE RESOURCES UK LTD, NOBLE CLEAN FUELS LTD, NOBLE EUROPE LTD,
WORLDWIDE WAREHOUSE SOLUTIONS LTD, CAVENDISH MINING UK LIMITED,
STAMPORPTS UK LTD, NOBLE OCEAN LTD, XENA INVESTMENTS LTD, CROSS
CONTINENTAL TRADING LTD AND GENERAL ALUMINA HOLDINGS LIMITED**

MAY 2017

Noble Group manages a portfolio of global supply chains across a range of industrial and energy products. We acknowledge the provisions of the UK Modern Slavery Act 2015, and will continue to ensure that when purchasing commodities from counterparties we vet and understand their businesses and the sources of these commodities.

The measures we depict below are effective, we believe, in ensuring that we do not participate in any supply chains that involve modern slavery or human trafficking.

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Policy on Slavery and Human Trafficking

We have been a signatory to the United Nations Global Compact since 2010 and, as such, we continue to be committed to aligning our strategies and operations with the universal principles of human rights, labour standards, environmental protection and anti-corruption as required by the Compact.

We publish annually the comprehensive “Communication on Progress” in order to meet our Global Compact obligations. The report illustrates the implementation of responsible management practices across our global supply chains, and how we strive to align our entrepreneurial culture with the highest standards of integrity.

A copy of this report is available at

http://www.thisisnoble.com/images/responsibility/Noble_COP2016.pdf



MONITORING

We typically work in partnership with market-leading asset managers and owners, who originate product for us. The vast majority of whom are public companies, this of itself provides an additional important source of transparency. We also will typically have Board representation to help our oversight and, where necessary, we commission further external industry experts to conduct detailed assessments on the health and safety, and the social and environmental performance of our potential investments and origination sources. Following these assessments, we collaborate with our partners to implement recommended policies or processes. It should also be noted that, of our almost 1,000 staff, the vast majority are office based, principally in developed cities in the likes of USA, Europe and Asia.

In 2016, we closed two transactions (above US\$5 million), neither of which required enhanced human rights screening as, in one case, it was a continuation of an existing contract while, for the other transaction, it was a greenfield project. The screening process we adopt is aimed at ensuring that we meet our commitment to acting not only legally, but also ethically, in all our business relationships and to implementing and enforcing effective systems and controls to address the risks of modern slavery and human trafficking.

As part of the company's annual review of compliance with the Modern Slavery Act, our Compliance function produces an assessment as to whether the company is continuing to meet its obligations, and whether there are areas for improvement. In addition, Compliance also advises management, as and when necessary, whether any special / additional procedures are required for any new business being proposed or undertaken.

Mitigation

If we were to expand our supply chains into an area which could possibly involve heightened risk of inadvertent noncompliance, our counterparty investigations and understanding of their supply chains would be increased commensurately.



For instance, we currently do originate minerals from the Democratic Republic of Congo, and adjoining countries, and we ensure that Noble complies with the ITRI Tin Supply Chain Initiative (iTSCi) Programme and is a member of the International Tungsten Industry Association. Under the iTSCi chain of custody system, programme compliance requires that all the minerals we handle are tagged at both points of extraction and processing, with detailed information on their production profile. We support a joint industry approach to address concerns over mineral traceability and promote local economic development.

TRAINING

All relevant staff receive training on an annual basis in the form of e-Learning. Guidance's, Briefings, presentations and other appropriate media etc.

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This statement covers 1 January 2016 to 31 December 2016 and has been approved by the Group General Counsel.

A handwritten signature in blue ink, appearing to be 'Jeffrey Alam'.

**Jeffrey Alam
Group General Counsel
May 2017**