



NOBLE GROUP STATEMENT: MODERN SLAVERY ACT

NOBLE RESOURCES UK LTD, NOBLE CLEAN FUELS LTD, NOBLE EUROPE LTD, CAVENDISH MINING UK LIMITED, STAMPORTS UK LTD, NOBLE OCEAN LTD AND GENERAL ALUMINA HOLDINGS LIMITED

JUNE 2018

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 a Sustainability Report annually to illustrate our 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_Sustainability_Report_2018.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. 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.

In 2017, we made no significant transactions (above US\$5 million) that required enhance human right screening. 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. 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. In addition, all our receiving smelters meet the criteria of being conflict-free under the Responsible Minerals Initiatives. We support a joint industry approach to address concerns over mineral traceability and promote local economic development.

TRAINING

All relevant staff receive classroom training on an annual basis. Guidance's, Briefings, presentations and other appropriate media etc.

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This statement covers 1 January 2017 to 31 December 2017 and has been approved by the Group General Counsel.



**Jeffrey Alam
Group General Counsel
June 2018**