



## Noble Group Holdings Limited Conflict Minerals Policy

August 2019

Noble Group Holdings Limited (“Noble Holdings” or “the Company”) trades energy products and industrial raw materials and manages the global supply chains for these goods. Operating across numerous locations, predominantly in Asia, the Company services the needs of its customers by facilitating the marketing, processing, financing and transportation of essential raw materials such as special ores and industrial minerals, base metals and technology metals. Sourcing products from jurisdictions such as South America, Africa, Australia and Indonesia, the Company supplies high-growth demand markets across the world.

As a signatory to the United Nations Global Compact, the Company’s policy is to conduct its business in a responsible and ethical way that promotes transparency.

The Company 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 that 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.

The Company acknowledges the challenges in tracing the origin of Conflict Minerals because the supply chain often includes among others, artisanal miners, local consolidators, smelters and refineries. Conflict Minerals refers to minerals such as Columbite-Tantalite (Coltan), Cassiterite, Gold, Wolframite, and their derivatives, that are mined in regions where armed conflict, human rights abuses and environmental harm may exist.

The Company participates in traceability initiatives (such as ITSCI and BSP) that aim to advance traceability and 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 (CAHRA), the Company:

- ✓ Imposes disclosure requirements into its purchase contracts to confirm the source of the minerals. The documents which confirm the sourcing of such minerals are eventually passed to the ultimate purchasing smelters and processors.
- ✓ Only deals with entities that are registered with traceability schemes where these are available.
- ✓ Employees who are involved in the trading and administration of minerals from CAHRAs are aware of the contents of the OECD Due Diligence (Annex II) to ensure that the relevant guidance is complied with at all times.
- ✓ Annually reviews this policy, processes and procedures for sourcing minerals from CAHRAs.

Enquiries in respect of this policy should be made at [enquiries@noblegroup Holdings.com](mailto:enquiries@noblegroup Holdings.com)