



## NOBLE GROUP HOLDINGS LIMITED STATEMENT: MODERN SLAVERY ACT

NOBLE RESOURCES UK LTD, NOBLE CLEAN FUELS LTD

JUNE 2019

Noble Group Holdings 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 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**

A strong integrity framework drives principles, processes and due diligence, we believe it is an essential component in tackling human rights issues, and a precursor to root out modern slavery. We were a signatory to the United Nations Global Compact in 2018 and, as such, we were 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.

On our website, we 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.

### **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 2018, we made no significant transactions (above US\$5 million) that required enhance human rights 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**

We know that through robust risk assessment and due diligence, we are able to tackle the issues in the most constructive way. 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.

### **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 2018 to 31 December 2018 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**  
**June 2019**