



2012 communication on progress



human rights



labour

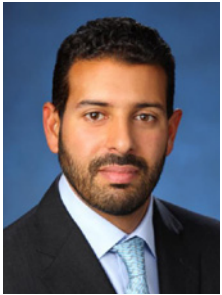


environment



anti-corruption

ceo's message



Dear Stakeholders,

As the new Chief Executive Officer of Noble Group, I am pleased to confirm Noble's continued support of the UN Global Compact and its ten principles in respect to human rights, labour, environment and anti-corruption.

Over the past two years these principles have started to become part of Noble's way of conducting business. As examples of this commitment an increasing number of Noble businesses have undertaken initiatives to support local communities in a range of ways, with special emphasis on education. An increasing number of our supply chains have developed customized products that are certified carbon neutral. These actions demonstrate that the principles that form the basis of the UN Global Compact are not simply mission statements but are put into action by Noble.

I feel it is important to stress that as a participant in the markets for numerous natural resources, we are conscious of the need to carefully develop and maintain sustainable supply chains. Many of the industries we are involved in require care and attention to ensure they will be productive for Noble, our stakeholders and the communities in which we operate in the long run.

At a time of heightened social and economic instability, environmental challenges and climate change all companies must endeavor to do their best to try and create a business environment that is sustainable to all stakeholders. This is in many respects what we believe the UN Global Compact aims to encourage and at Noble we are fully committed to this goal.

Yusuf Alireza
Chief Executive Officer

introduction

Who we are and what we do

Noble Group manages a global supply chain of agricultural, energy, metals and mineral resources. Noble operates from over 140 locations, employing more than 70 nationalities. Noble manages a diversified portfolio of essential raw materials, integrating the sourcing, marketing, processing, financing and transportation of these products. The Group also owns and manages a number of strategic assets which assist in sourcing resources from low cost producers, such as Brazil, Argentina, Australia and Indonesia. These are supplied to high demand and growth markets, including China, India and the Middle East. Today, Noble has interests in grain crushing facilities, coal and iron ore mines, fuel terminals and storage facilities, sugar and ethanol plants, ports, vessels and other key infrastructure, ensuring that high quality products are delivered to our customers in the most efficient and timely manner.

Implementation of the 10 principles into company life

This issue of Communication on Progress (COP) marks the second year of Noble Group's commitment to the UN Global Compact. In the past 12 months, we have continued implementing the 10 universal principles of the UN Global Compact into our commodity supply chain business. We have engaged and invested in various community projects and initiatives to foster our relationship in the locations from which we operate. We have aligned the eligibility criteria for our Noble Group's Charity Foundation at the Group level and many of our local operations have continued to establish initiatives to support those in need.

Noble advocates policies and actions to advance broader UN goals and issues both internally and externally. In January, Mr. Richard Elman, Executive Chairman, took

part in a discussion panel on sustainable growth at the annual Asian Financial Forum. The discussion shed light on the challenges associated with anticipated growth in demand for energy and raw materials, and the opportunities to adopt eco-friendly technologies and solutions early in development. Our actions and approach towards sustainability are reflected in the following passage from the introductory speech delivered by Mr. Elman: "Prevention is easier than a cure. It will be far more expensive to try and adapt to serious climate change than to reduce our impact in the first place. We can't control nature, but we can control our impact on it."

At a regional level, our engagement with the Global Compact Local Network aspires to make progress in addressing critical issues within the region.

Noble Group's Global Strategy Meeting in 2011 continued to stimulate strategic discussion among Noble's senior management of ways in which to further promote the UN Global Compact's principles.

Our commitment to the UN Global Compact Principles assists us in bringing focus to crucial CSR standards and provide a guideline for their integration into Noble's business operations. This Communication on Progress (COP) describes the progress we have made implementing these 10 principles in the areas of human rights, labour, the environment and anti-corruption. The document also provides an overview of our commitment to the UN Global Compact and the relevance of the specific principles for Noble. This is accompanied by a brief description of our policies and systems, as well as our activities and their outcome and impact on our day-to-day business.



human rights



labour



environment



anti-corruption

human rights

Principle 1

Businesses should support and respect the protection of internationally proclaimed human rights; and

Principle 2

make sure that they are not complicit in human rights abuses.

Our Commitment

Noble is committed to the United Nations Universal Declaration of Human Rights.

Our Code of Conduct – and other Group Policies - demand that all Noble employees comply with the law in every jurisdiction in which we operate and apply to all employees of the Group and each of its subsidiaries’ directors, officers and employees. The Code and other Policies set out principles to guide employees in carrying out their duties and responsibilities. These principles require the highest standards of personal and corporate integrity when dealing on behalf of the Group with its customers, suppliers, competitors and the community.

Human rights are high on our agenda; we uphold them always and often go beyond the legislative requirements. We invest in real actions to address issues such as education, health and safety, water and sanitation in communities in need. We do not tolerate human rights abuses within the scope of our business operations.

Supporting Human Rights in Noble’s policies and actions

At Noble, every new employee attends an induction workshop to learn about our company culture, rules and regulations, as well as our company principles. Hence, all employees are informed about their rights as reflected under existing policies, which are updated on a regular basis. In our offices, education on business ethics and conduct are regularly held in order to affirm the procedures for reporting any such violations in the workplace.

At the Group level, we have a dedicated team conducting systematic internal audits across all our operations and assets. In addition to ensuring compliance with national requirements, the team also makes certain that all locations are adhering to the 10 principles of the UN Global Compact. Any risks identified are included in a review report and presented to the Operations Head for further action.

When we acquire a new asset, any past, current or potential future liabilities and breaches of human rights are investigated as part of the legal due diligence we conduct.

We address basic needs such as health and education, while always encouraging our local employees to engage and contribute.

YCAB Foundation – Hands-on Operation for Entrepreneurship (HOpE)

This non-profit organization based in Jakarta, Indonesia focuses in youth development by supporting access to education and economic assistance. The HOpE program provides micro loans to female micro entrepreneurs on the condition that they put their children in school. The project aims to create a stable income to the families of these students so they can focus on their studies. Noble has committed to supporting the micro loan program for three years.

When we expand our supply chains into new territories, valuable investments are also made in infrastructure improvements which often bring economic and social wellbeing in impoverished regions within countries such as in Argentina, Brazil, China, India and Indonesia. Furthermore, across all locations Noble remunerates employees at least at the level of the minimum wage.

We are fully aware that we operate in some regions that have a history of difficult relations between resource extraction, farming industries and indigenous peoples. However we endeavor to address these issues and concerns by building relationships with local communities. We are pleased to report that in 2011/2012 we received no formal complaints of any violations of the rights of indigenous peoples.

Furthermore, with many of our community investment projects, which are often initiated by our local operations, we address basic needs such as health and education, while always encouraging our local employees to engage and contribute. An example of a community project to empower women is illustrated below.



Building on Noble's Group-wide health and safety assessment conducted in 2011, we maintain our ongoing commitment to control risks and improve safety performance in all of our assets and operations. One of our largest assets, the oilseed processing facility and port terminal in Timbúes, Argentina, was recently certified for compliance with OHSAS 18000 Standard, a management system that ensures high levels of occupational health and safety. Globally, we have a good safety record and in most locations we have had no reported injuries or workplace illnesses. An example of our safety achievements is illustrated below.

Occupational safety at Noble's Chinese soybean processing plants

Safety is our top priority. Noble Group focuses on creating a work environment with zero accidents. By coaching and improving employee engagement, Noble has transformed the view of workplace safety from being simply a compliance regulation to safety being an integral part of the company culture.

In Noble's Chinese processing plants in Qinzhou and Longkou, we have recently reached a milestone in safety: operating for more than one million safe working hours. Furthermore, Noble's other plants in China are not far behind. One million is the interim target and sustained effort is put into safeguarding the health and wellbeing of our workforce.



human rights



labour



environment



anti-corruption

labour

Principle 3

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;

Principle 5

the effective abolition of child labour; and

Principle 4

the elimination of all forms of forced and compulsory labour;

Principle 6

the elimination of discrimination in respect of employment and occupation.

Our Commitment

Noble's Code of Conduct sets forth the requirements for compliance as well as the guidelines on the key labour issues, which are an integral part of the principles advocated in the UN Global Compact.

We support the freedom of association and collective bargaining for our employees in the countries we operate in and diligently comply with local labour laws and regulations.

At Noble, any kind of forced or compulsory labour is not tolerated and we do not exploit child labour in any of our global operations.

We value diversity at every level of our organization and respect the rights of our 14,000 employees of more than 70 nationalities in almost 40 countries around the world. Our Equal Opportunities Policy applies to every employee in the Group and commits Noble to eliminating discrimination, harassment and victimization at the workplace.

Implementation of Labour Standards in Noble's policies and actions

We have clear policies and training practices to combat discrimination. In our offices, education on business ethics and conduct is undertaken. Our employees receive mandatory training on workplace conduct on a regular basis. No forms of

discrimination are tolerated and we encourage and promote procedures for reporting any unwelcome attitudes in the workplace. In 2011/2012 we received no credible complaints of discrimination in any of our locations.

The Group is committed to a high standard of ethical conduct and our managers are responsible for ensuring that the Equal Opportunities Policy and other labour principles are adhered to in their departments. Noble has adopted and implemented a whistle-blowing policy where employees may, in confidence, raise concerns on possible corporate improprieties in matters of unlawful activity, policy or practices, suspected fraud, corruption, dishonest practices or other similar matters. There are also arrangements in place for an independent investigation of such issues and for appropriate follow up action where necessary. Moreover, appraisal procedures are in place that focus on employees' development and succession planning and ensure management engagement.

Many Noble employees, especially in countries such as Brazil, Argentina and China where key installations are located, are represented by trade unions. Our employees are represented by a number of different trade unions or similar bodies, and we respect and cooperate with these bodies.



286,822 hours of technical, safety, and leadership training were provided to employees in the first half of 2012 alone.

In some countries in which we operate, we are under collective agreements with unions, which stipulate labour conditions and eliminate any kind of forced or compulsory labour. 63% of our employees are covered by such collective bargaining agreements.

When we undertake investments in new assets, labour-related risks and compliance with local labour laws and regulations form part of our due diligence and risk analysis.

At Noble, we recognize the strong correlation between poverty and child labour. Limited access to quality education for minors jeopardizes the children's future and hence Noble invests and supports initiatives in regions at risk.

In line with our business growth, we have continued to expand our trainee programmes, building on the structured apprenticeship approach in three areas: product trainees, corporate and industrial trainees. Through last year's office-wide initiative, working with managers to identify high potential individuals in their teams, more than 120 employees worldwide were identified as having high potential, leading to more than 30 job promotions and additional training and coaching. We also increased the hours of training for Noble's employees in our sugar mills in Brazil. 286,822 hours of technical, safety, and leadership training were provided to employees in the first half of 2012 alone.

Responsible Cocoa Sourcing

Noble Cocoa believes that integrating sustainability into business practices is essential to secure the long term supply of cocoa and to maintain a profitable cocoa business. Helping farmers to improve their livelihoods through increased revenue from better crop yields and quality will ensure that cocoa is grown in sustainable ways that safeguard the environment and build long term value throughout the supply chain.

Our Code for Responsible Sourcing aims to achieve the highest possible social and environmental standards in all our operations and also our suppliers' business operations. This guarantees compliance with international labour regulations and addresses key issues facing cocoa farming communities.

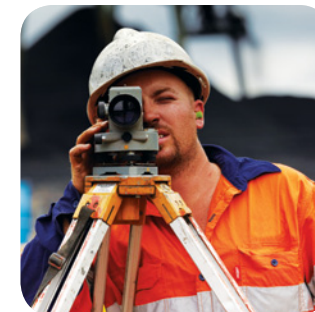
To date, we have empowered over 2500 farmers in Côte d'Ivoire, training them in good agricultural practices and the UTZ CERTIFIED Code of Conduct – the leading certification programme for sustainable cocoa production – to improve the overall productivity and quality of their cocoa, enabling them to increase their incomes and improve their standard of living.

Noble's sugar mills awarded for Labour Conditions

Initiated by the President of Brazil in 2008, the National Commitment to Labour Conditions in the sugarcane industry seeks to guarantee new rights and better quality of life for its workers.

The Commitment serves as the basis for initiating public and private actions to improve working conditions. It includes public programmes and policies to protect workers; models of good business practice in sugar and ethanol production units, as well as an emphasis on workers' remuneration, health and safety and union activities.

Noble's commitment to offer competitive products while ensuring workers' rights has earned its four



sugar mills – Meridiano, Catanduva, Potirendaba and Sebastianopolis – certifications for recognizing the National Commitment.

We seek to play a positive role in this region and support local community projects. Last year Noble Bioenergia partnered with the Votuporanga municipality to upgrade a health clinic in Vila América, and constructed two new health clinics in the Canaã and Cecap II neighbourhoods. Every year, Noble offers horticulture lessons and literacy classes for rural workers and through various partnership programs, we provide financial support to help children to meet their nutritional needs and develop knowledge and skills.



environment

Principle 7

Businesses should support a precautionary approach to environmental challenges;

Principle 8

undertake initiatives to promote greater environmental responsibility; and

Principle 9

encourage the development and diffusion of environmentally friendly technologies.

Our Commitment

As our business relies on the availability of natural resources, Noble promotes environmental responsibility. We are committed to protecting sensitive and important areas of the world's ecosystems, despite our business being confronted by an array of environmental challenges, including water and air pollution, biodiversity and resource depletion amongst others. In particular, the company

supports a precautionary approach to the environmental challenge posed by climate change. Furthermore, Noble Group supports the development and diffusion of environmentally friendly technologies in various areas of its business.

Implementing measures to protect the environment

All Noble employees are encouraged to reduce the environmental footprint of the company by controlling their resource usage, including energy, water and paper. In addition, environmental performance data with regards to CO2 emissions in our offices are collected and assessed for our Group-wide carbon neutral project. These results are certified independently.

At the asset level, environmental impact assessments are conducted according to legal regulations and principles before we purchase new installations. Various environmental policies exist onsite at our assets. For example, our Australian coal mines, Timbúes oilseed processing complex and our Chinese crushing mills operate based on the principles of the environmental management system ISO14001; monitoring systems are in place for water, air quality, biodiversity, soil, and noise management.

At various assets, Noble has invested in climate-friendly renewable energy technology. A key investment realized this year was a bio-diesel plant Noble procured for one of its crushing plants in Argentina. Soybean oil produced onsite will provide the



Since the inception of Noble Group's Carbon Neutral Project, more than 735,000 tonnes of CO₂ have been offset with carbon credits generated from renewable energy and energy efficiency projects.

energy feedstock for the plant. Several investments kick-started last year for example, biomass-fired cogeneration units in Argentina, Brazil and the Ukraine have been continued.

In expanding its owned fleet of ships to meet the growing demands of its integrated supply chain strategy, Noble is acquiring and building ships that are more energy efficient. Noble has also adopted a Vessel/Barge Chartering and Vetting Policy, the purpose of which is to ensure that all vessels chartered for the transportation of petroleum, petroleum products, chemicals and LPG meet certain specified criteria and undergo screening by external vetting experts. Noble has also adopted an Emergency Oil Spill Response Plan to ensure that, in the unfortunate event of an oil spill involving one of its vessels or terminals, it is able to respond in an immediate, effective and responsible manner.

Our state-of-the-art liquid bulk storage terminal at Botlek Tank Terminal in the Netherlands operates virtually emission free - vapours from loading are recovered to protect both product value and environmental impact.

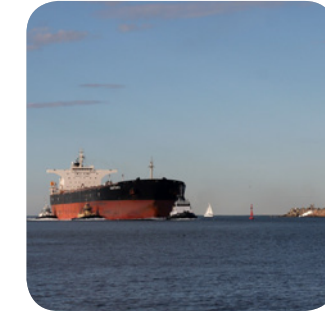
In addition, Noble Group's Clean Fuels Division is dedicated to provide solutions to alternative fuel sources while reducing environmental impacts. Noble is active in distributing bio-fuels and diversifying our energy assets in the clean fuels sector. Noble's integrated supply chain strategy capitalizes on the rising regional demand and shifts in consumption patterns to clean fuels.

Noble also partners with NGOs, for example, Civic Exchange in Hong Kong, to draw in scientific expertise in researching risks and potential adaptation measures to environmental issues. Since 2007 Noble Group has supported the efforts of the World Wildlife Fund (WWF). WWF Hong Kong engages in the preservation of nature reserves in Hong Kong and the Pearl River Delta regions.

We have also expanded our activities in the area of climate change mitigation. Noble's Carbon Neutral project was initiated in 2007 with the aim of driving the company step-by-step towards carbon neutrality. In 2011, Noble's beneficiary ships, all Noble offices worldwide, Noble's publications and top management events again achieved carbon neutrality. After carrying out a similar exercise for our coffee supply chain in Brazil, we calculated the lifecycle greenhouse gas emissions of our cocoa supply

chain from Côte d'Ivoire last year to create a new product: Carbon Neutral Cocoa from Côte d'Ivoire. Since the inception of Noble Group's Carbon Neutral Project, more than 735,000 tonnes of CO₂ have been offset with carbon credits generated from renewable energy and energy efficiency projects in India, China and America.

Furthermore, for its first response to the Carbon Disclosure Project (CDP) in 2011, Noble achieved the second highest score for carbon emissions disclosure in Asia (ex-Japan). In our submission, we reported on the Noble Group's greenhouse gas emissions and all risks and opportunities related to climate change. The total Scope 1 and 2 emissions combined amounted to 2,765,523 metric tonnes CO₂e, an increase of 9.5% compared to the base year. The overall increase in absolute emissions for scope 1 and scope 2 reflects the growth of the company and its expansion in asset investments. It is worthy to note that our scope 1 and scope 2 emissions figures were verified to confirm their completeness and accuracy. Noble's signing and participation in the CDP has brought a fresh focus to managing the risks and opportunities presented by climate change to our operations, leading to the incorporation of new initiatives to reduce greenhouse gas emissions into our overall business strategy.



El Carmen - Transboundary Biodiversity Conservation Initiative

El Carmen, a private trans-boundary nature reserve along the border between Mexico and the United States, is considered one of the five great wilderness ecosystems of the world. It is home to more than 500 species of plants, over 200 species of birds, 80 species of mammals, and 65 species of reptiles and amphibians. In an effort to protect this ecosystem and restore natural habitats, Noble Group entered an agreement in February 2012 with Cemex, a building materials company, to collaborate in biodiversity and conservation efforts at El Carmen Mountains.



anti-corruption

Principle 10

Businesses should work against corruption in all its forms, including extortion and bribery.

Our Commitment

Noble is against any form of corruption. It is our policy not to engage in any form of corruption, bribery or anti-trust behavior, nor to violate fair competition. We acknowledge our actions are constantly under scrutiny. Our core values of being accountable and responsible extend to our shared commitment to prevent fraud and corruption.

Precautionary measures to prevent corruption

Noble has an experienced Compliance Team which is dedicated to ensuring that Noble's business is undertaken in conformity with applicable laws and regulations. Compliance Team personnel are based in our largest trading offices.

Our Group-wide policies with respect to anti-corruption, anti-trust, anti-money laundering, combating financial crime, terrorist financing, sanctions and fraud are outlined in detail in Noble's Code of Conduct. Specific rules on security trading when in possession of internal, confidential information are circulated among our employees regularly and set out in a separate policy.

All Noble employees worldwide are given explicit guidance on ethical business practices, such as conflicts of interest, entertainment and gifts. Their acknowledgment is part of the induction process mandatory for every new employee joining the company.

Noble's Code of Conduct contains a procedure for the good faith reporting of any violation of the Code or other Noble Policies.

Additionally, Noble has appropriate systems and controls in place, such as regular check procedures conducted by our internal audit team, to ensure compliance with respect to anti-bribery and anti-corruption measures.

Noble's Compliance Team conducts regular training for staff on a wide variety of issues, including anti-bribery, anti-money laundering, competition, sanctions and environmental compliance.

Global Training on commodity market abuse compliance

As part of our global compliance training to enforce ethical behavior, in 2012 Noble is organizing seminars on commodity market abuse compliance across our main trading centres. The training was/is held by our compliance officers for traders and managers exposed to such risks - already more than 800 employees have attended the course. The trainings refresh legal guidance in both the EU and the US, including an introduction to specific EU Gas & Power sector requirements and regulatory obligations when engaging in futures commodity trading in the US.



outlook

Noble emphasizes its strong support for policies and actions to continue to implement the 10 principles of the UN Global Compact.

As we operate within or enter new communities, we will continue to ensure that our initiatives are driven by the greatest local needs.

In the coming year, we will maintain close contact with those impacted by our activities and ensure they are aware and involved in our initiatives. We aim to continue the work we have already started and will review our existing and new initiatives and community involvement.

Management is committed to working towards increasing staff and community engagement and awareness of the UN Global Compact principles to ensure the organization is well-placed to meet its obligations into the future.



We will maintain close contact with those impacted by our activities and ensure they are aware and involved in our initiatives.

