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We have one class of shares, and each holder of our shares is entitled to one vote per share. As the Alibaba Partnership’s director nomination rights are categorized as a weighted voting rights structure (the “**WVR structure**”) under the Rules Governing the Listing of Securities on the Hong Kong Stock Exchange (the “**Hong Kong Listing Rules**”), we are deemed as a company with a WVR structure. Shareholders and prospective investors should be aware of the potential risks of investing in a company with a WVR structure. Our American depositary shares, each representing eight of our shares, are listed on the New York Stock Exchange in the United States under the symbol BABA.



Alibaba

Alibaba Group Holding Limited

阿里巴巴集團控股有限公司

(Incorporated in the Cayman Islands with limited liability)

(Stock Code: 9988 (HKD Counter) and 89988 (RMB Counter))

OVERSEAS REGULATORY ANNOUNCEMENT

We are making this announcement pursuant to Rule 13.10B of the Hong Kong Listing Rules.

We filed a Form SD for the period from January 1, 2023 to December 31, 2023 with the U.S. Securities and Exchange Commission (“**SEC**”). Pursuant to Section 13(p) of the U.S. Securities Exchange Act of 1934, as amended (the “**Exchange Act**”) and Rule 13p-1 under the Exchange Act, U.S., public companies are required to file a Form SD with the SEC on an annual basis if they manufactured or contracted to manufacture products that include certain “conflict minerals” necessary to the functionality or production of such products. Conflict minerals include gold, tantalum, tin and tungsten. The Form SD includes information regarding the use and origin of conflict minerals. For details, please refer to the attached Form SD.

By order of the Board
Alibaba Group Holding Limited
Kevin Jinwei ZHANG
Secretary

Hong Kong, May 28, 2024

As at the date of this announcement, our board of directors comprises Mr. Joseph C. TSAI as the chairman, Mr. Eddie Yongming WU, Mr. J. Michael EVANS and Ms. Maggie Wei WU as directors, and Mr. Jerry YANG, Ms. Wan Ling MARTELLO, Mr. Weijian SHAN, Ms. Irene Yun-Lien LEE, Mr. Albert Kong Ping NG and Mr. Kabir MISRA as independent directors.

**UNITED STATES
SECURITIES AND EXCHANGE COMMISSION**
Washington, D.C. 20549

FORM SD
SPECIALIZED DISCLOSURE REPORT

Alibaba Group Holding Limited

(Exact name of the registrant as specified in its charter)

Cayman Islands
(State or other jurisdiction
of incorporation)

001-36614
(Commission File
Number)

**26/F Tower One, Times Square
1 Matheson Street
Causeway Bay
Hong Kong**
(Address of principal executive offices)

Not Applicable
(Zip Code)

Toby Hong Xu
Chief Financial Officer
Telephone: +852-2215-5100
(Name and telephone number, including area code, of the person to contact in
connection with this report.)

Check the appropriate box to indicate the rule pursuant to which this form is being filed, and provide the period to which the information in this form applies:

- Rule 13p-1 under the Securities Exchange Act (17 CFR 240.13p-1) for the reporting period from January 1, 2023 to December 31, 2023
- Rule 13q-1 under the Securities Exchange Act (17 CFR 240.13q-1) for the fiscal year ended _____.
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Section 1 Conflict Minerals Disclosure

Item 1.01 Conflict Minerals Disclosure and Report

Conflict Minerals Disclosure

This Form SD disclosure of Alibaba Group Holding Limited (the “Company”) is for the year ended December 31, 2023. Unless the context indicates otherwise, “the Company,” “we,” and “our” refer to Alibaba Group Holding Limited and its consolidated subsidiaries and its affiliated consolidated entities, including variable interest entities and their subsidiaries.

This disclosure is presented to comply with Rule 13p-1 under the Securities Exchange Act of 1934, as amended (“Rule 13p-1”). Pursuant to Rule 13p-1, the Company undertook to determine whether the products it manufactured or contracted to manufacture during the year ended December 31, 2023 contained conflict minerals necessary to the functionality or production of such products. “Conflict minerals” are defined as cassiterite, columbite-tantalite, gold, wolframite and their derivatives, which are limited to tin, tantalum and tungsten (“3TG”).

The Company evaluated its products to determine which of its products may contain 3TG. Based on this review, the Company determined that 3TG are necessary to the functionality or production of certain components in certain of its products, including but not limited to servers, networking and communication equipment and the components of these hardware and smart devices. We refer to the foregoing products as the “Covered Products.”

The Company conducted a reasonable country of origin inquiry to determine whether any of the 3TG contained in the Covered Products originated in the Democratic Republic of the Congo, Angola, Burundi, Central African Republic, the Republic of the Congo, Rwanda, South Sudan, Tanzania, Uganda, and Zambia (together, the “Covered Countries”) or from recycled or scrap sources. The Company’s primary means of determining the country of origin of the 3TG contained in the Covered Products was conducting (i) an internal supply-chain inquiry to identify products containing 3TG, and (ii) inquiring of the Company’s suppliers eliciting, as applicable, information regarding (a) the country of origin of the 3TG contained in the Covered Products, (b) whether the 3TG came from scrap or recycled sources, and (c) other relevant information regarding the suppliers’ (or their suppliers’) practices concerning 3TG.

Based on the reasonable country of origin inquiry described above, the Company has in good faith concluded that some of the Company’s products may contain 3TG originated in the Covered Countries, but there is nothing in the responses received to date by the Company to suggest that the Company’s products contain any 3TG that directly or indirectly finance or benefit armed groups in the Covered Countries. Among the suppliers who indicated that their products contain 3TG from the Covered Countries, all confirmed that the smelters from which they sourced minerals comply with certain responsible mineral sourcing validation programs, such as the Responsible Minerals Initiative, or the 3TG came from scrap or recycled sources.

In accordance with the requirements under Rule 13p-1, the above disclosure is also available on the Company’s website at <http://www.alibabagroup.com/en/ir/secfilings>.

Item 1.02 Exhibits

None.

Section 2 Exhibits

Item 2.01 Exhibits

None.

SIGNATURES

Pursuant to the requirements of the Securities Exchange Act of 1934, the registrant has duly caused this report to be signed on its behalf by the duly authorized undersigned.

ALIBABA GROUP HOLDING LIMITED

Date: May 28, 2024

By: /s/ Kevin Jinwei ZHANG

Kevin Jinwei ZHANG

Company Secretary