



Code of Conduct and Integrity



Thriving communities | Global force

Thriving communities Global force

Our Values

Safety
Family
Empowerment
Frugality
Stretch targets
Integrity
Enthusiasm
Courage and determination
Generating ideas
Humility

Fortescue's unique Values drive our performance in a way that sets us apart from others

Culture

Fortescue is a values-based business with a strong, differentiated culture. We believe that by leveraging the unique culture of our greatest asset, our people, we will achieve our stretch targets



Contents

1. About the Code of Conduct and Integrity	5	6. Business integrity	15
1.1 About	5	6.1 Anti-Bribery and Corruption	15
1.2 Complying with the Code of Conduct and Integrity	5	6.2 Gifts, Entertainment and Sponsored Travel	16
1.3 Who should follow the Code of Conduct and Integrity?	6	6.3 Sanctions Compliance	17
1.4 What if I have concerns or someone does not follow the Code of Conduct and Integrity?	6	6.4 Trading in Fortescue Securities	17
1.5 Whistleblower Hotline	6	6.5 Conflicts of Interest	17
2. What Fortescue expects from you	8	6.6 Competition Law	19
2.1 Health and safety	8	6.7 Continuous disclosure	19
2.2 Fitness for work	8	6.8 Privacy	19
2.3 Equal opportunity and employee discrimination	9	7. Using Fortescue resources and technology	20
2.4 Honesty, integrity and respect for others	9	7.1 Use of Fortescue's information systems	20
2.5 Prevention of violence in our home, workplace and community	9	7.2 Cybersecurity	20
3. Working within communities	10	7.3 Fraud and theft	21
3.1 Commitment to Indigenous employment	10	7.4 Accurate and auditable records	21
3.2 Community Engagement	10	8. Governance and media relations	22
3.3 Native Title and Heritage	10	8.1 Government relations	22
3.4 Philanthropic donations and non-commercial sponsorship	11	8.2 Public policy debate	22
4. Safeguarding the environment	12	8.3 Communicating with media and investors	22
4.1 Climate change	12	8.4 Representing Fortescue	23
5. Human rights	14		
5.1 Protecting human rights	14		
5.2 Security and human rights	14		
5.3 Development of Traditional Lands	14		



Chief Executive Officer's message



Elizabeth Gaines
CEO

At Fortescue, our Values are at the heart of everything we do. We have a strong and respectful culture that is underpinned by our Values, and everyone plays a role in making Fortescue a great place to work.

Since our Chairman, Dr Andrew Forrest AO, founded Fortescue in 2003, integrity and respect have been critical to our success.

We have 10 Values which should guide all of our decision making, how we behave and how we represent our great company externally.

All our Values are critical and must be accepted wholeheartedly. They are not a smorgasbord. Have the courage to speak up when you see others behaving in a way that is not in line with our Values or our Code of Conduct and Integrity.

Our Code of Conduct and Integrity outlines what is expected of the Fortescue family, which includes all who work for, on behalf of or in connection with us. This includes Directors, employees, contractors, suppliers, business partners, subsidiaries and related companies, consultants and agents.

It is important we all hold each other to account and use the reporting channels available, including our Whistleblower Hotline.

The Whistleblower Hotline, operated externally, is available for anyone to confidentially raise genuine concerns, seek further assistance and report potential conduct breaches.

Please take the time to ensure you read and understand our Code of Conduct and Integrity, and support and encourage your team mates to do the same.

Thank you for your support and commitment to demonstrating the Fortescue Values which is what makes our organisation so unique and special. There has never been a more exciting time to be part of the Fortescue family as we position ourselves for future growth and success in global green energy and resources.



01

About the Code of Conduct and Integrity

1.1 About

Fortescue's Code of Conduct and Integrity (the Code) is one of the ways Fortescue applies its Values and guides you in upholding the highest ethical practices as a member of the Fortescue family. The Code outlines how Fortescue expects you to conduct yourself at all times where that conduct could affect Fortescue and its business.

Integrity is fundamental to Fortescue - it means doing what is right. By always acting with integrity, we ensure we are upholding Fortescue's Values and protecting its reputation.

This Code lets you know how you should conduct yourself when representing Fortescue and addresses your responsibilities to Fortescue, each other, its customers, suppliers, business partners and government.

The Code applies to all activities and operations undertaken by Fortescue and its subsidiaries including Fortescue Future Industries (FFI). All references to 'Fortescue', the 'Group' and the 'Company' refer to Fortescue Metals Group Ltd and its subsidiaries.

Links to websites within this document will be directed to either the Fortescue Intranet (internal website) or the Fortescue internet site (public website) unless otherwise stated.

1.2 Complying with the Code

Compliance with the Code is a term and condition of working for or with Fortescue.

This means you must:

- Understand and behave in line with the Code
- Speak up about the behaviour of others which goes against the Code or Fortescue policies
- Cooperate as directed by Fortescue with any investigation, inquiry, examination or litigation related to Fortescue business.

The Code does not stand alone. It incorporates key elements of Fortescue's extensive framework of policies and standards.



The Code cannot provide advice relating to unique situations or describe every law, policy or standard with which you need to comply. It is important to use your own common sense and understand where to go for further support and information.

You must follow the law, act with integrity and honesty in all matters, and be accountable for your actions.

You must be familiar with and comply with not only the Code, but all supporting Fortescue policies and standards relevant to your particular area of work.

You must also comply with all applicable laws, standards or policies, however, where the Code sets a higher standard – then you must follow the Code.

If you are experiencing or witnessing behaviour which you don't think aligns with the Code, have the courage to speak up.



Leaders

Leaders are expected to lead with integrity and be familiar with the Code in order to guide others, answer their questions or direct them to someone who can.

If an ethical issue or a suspected violation is brought to your attention, you must report it through the proper channels and ensure the reporting person is protected from any form of retaliation.

Directors should also refer to the [Directors Code of Conduct](#) (Policy 160413).

1.3 Who should follow the Code of Conduct and Integrity?

All Fortescue employees, suppliers, contractors, consultants and business partners are expected to read, understand and adhere to this Code and all related standards, guidelines and procedures.

1.4 What if I have concerns or someone does not follow the Code?

If you are experiencing or witnessing behaviour which you don't think aligns with the Code, have the courage to speak up.

There are a number of ways you can ask questions, raise concerns or report unethical or illegal business conduct, including behaviour which goes against Fortescue's Values, this Code or related policies and standards. Any concerns you report will be kept confidential.

As an employee, you can:

- Talk to your Leader
- Speak with a Fortescue People representative at your site or via speakup@fmgl.com.au
- Speak to someone outside Fortescue as outlined in section 1.5.

Fortescue has a dedicated Corporate Governance and Compliance team to serve as the primary point of contact for guidance and assistance.

You can confidentially raise any questions or concerns to the Corporate Governance and Compliance team via these channels:

E: business.conduct@fmgl.com.au

E: FFI.Governance@fmgl.com.au

W: Search Reporting Violations on the Hub

Protection from retaliation

The Corporate Governance and Compliance team has the full support of the Fortescue Board to protect your identity and ensure there is no retaliation against you, or you are not disadvantaged in any way for making a disclosure in good faith.

1.5 Whistleblower Hotline

If you do not want to raise your concerns via the internal channels as listed in section 1.4, you may instead use the Whistleblower Hotline. This is a secure, confidential and independent channel, operated externally by Deloitte, for anyone to raise genuine concerns, seek further assistance and report potential conduct breaches.

The Whistleblower Hotline offers:

- Confidential reporting and the choice to remain anonymous
- Telephone and online reporting options
- 24 hour access, seven days a week
- Ability to follow up on your concern, even if you choose to remain anonymous.

The information you submit will be treated confidentially. Following each call or online contact, the Whistleblower Hotline operator will provide a report to the Corporate Governance and Compliance team to action.

[Fortescue's Whistleblower Hotline Policy](#) (100-PO-GO-0002_0) and details on how to access the hotline are available on the Company's website.

**BULLYING
HARASSMENT OR
DISCRIMINATION
DRUG AND
ALCOHOL USE**

SPEAK UP

(08) 6218 8277

**SUSPECTED THEFT, FRAUD,
CORRUPTION OR BRIBERY**

CONFLICT OF INTEREST

**SUSPECTED SERIOUS
MISCONDUCT AND DISHONESTY**

WHISTLEBLOWER HOTLINE

1800 976 100

What do I use the Speak Up service for?

If you are experiencing or witnessing any form of behaviour which you don't think fits into our Fortescue Family, have the courage to speak up

Harassment, bullying and unlawful discrimination are not tolerated at Fortescue.

Speak with your Leader or site Fortescue People Representative and share your concerns or email speakup@fmgl.com.au



What do I use the Whistleblower service for?

If you suspect theft, fraud, corruption, bribery, serious misconduct and dishonesty or a conflict of interest call the confidential Whistleblower hotline **1800 976 100** or email fortescue@deloitte.com.au

02

What Fortescue expects from you



2.1 Health and safety

Safety is at the core of Fortescue's Values and is our number one priority. Fortescue's focus on safety empowers everyone to take whatever action is required to ensure safe operations, such as pausing and taking time to assess a task to ensure it is safe before proceeding. You must take care of your own health and safety at work as well as the health and safety of your team members and other people you encounter in the course of your work.

To ensure the health and safety of yourself and others, you must:

- Be aware of the health and safety requirements of your role.
- Comply with all health and safety policies, rules, procedures and instructions.
- Comply with all applicable health and safety laws as well as government-issued directives, guidance and requirements.
- Immediately take action if you become aware of a hazard. Fix the hazard if safe to do so, or report the hazard to your supervisor.
- Immediately report any workplace incidents, including injuries to yourself or others.
- Proactively participate in health and safety activities and consultation processes in the workplace.
- Be aware of the requirements of your role and not undertake duties which you are not qualified or authorised to perform.
- Be responsible for your own health and safety at work and exercise your duty of care obligations to others by ensuring their actions do not put the health and safety of themselves or others at risk.

▪ Satisfy your specific health and safety obligations to Fortescue including:

- Complying with Fortescue's instructions and directives about health and safety in the workplace.
- Using personal protective clothing and equipment (PPE) as instructed.
- Taking good care of equipment provided by Fortescue.
- Cooperating with others in relation to health and safety instructions.

More information

[Health and Safety policy](#) (100-PO-SA-0010)
Search [Health and Safety](#) on the Hub.

2.2 Fitness for work

Fortescue employees are responsible for looking after their mates and themselves, and for making sure they don't put the health and safety of others at risk.

It is important to come to work free of illness, fatigue, alcohol and/or performance impairing drugs, and any other cause of impairment which could affect your ability to work safely or cause harm to others.

You also have a duty to ensure your personal behaviour within the workplace and elsewhere does not adversely affect:

- Your work.
- Your safety or the safety of your co-workers.
- Your reputation or the reputation of your team mates.
- Fortescue in any way.

This duty extends to any situation where your conduct could be connected to your work with Fortescue, including on social media.

Drugs and alcohol

Fortescue has a zero tolerance to alcohol and other drugs and is committed to reducing the risk of alcohol and other drug related incidents. We do this to ensure workers are fit for work and are able to work safely.

While working at any Fortescue location you must:

- Have a 0.00% Blood Alcohol Concentration (BAC).
- Have a drug test result below the cut off levels specified by the relevant Australian Standard AS/NZS 4308:2008 or as determined by a Fortescue medical or other advisor.
- Not be in possession of drug paraphernalia.
- Participate in the company's Fitness for Work monitoring programs as directed.

All prescription and any over the counter medications which may interfere with your ability to perform your duties must be reported and managed in accordance with the Fortescue Alcohol and Other Drugs Procedure (100-PR-SA-0013).

If you believe you are, or may be, impaired for any reason, and therefore may not be fit for work, you must cease working and promptly notify your Leader so that appropriate action can be undertaken to manage the associated risks.

More information

Search [Fortescue People](#) on the Hub.

2.3 Equal opportunity and employee discrimination

Fortescue values diversity and inclusivity and is committed to ensuring all its people are treated with dignity, courtesy and respect at all times, irrespective of age, gender, race, sexual orientation, political or religious belief, culture, marital status, family commitments, physical or mental ability.

Unlawful discrimination must not influence any business decision, including those regarding:

- Recruitment
- Procurement
- Promotion
- Training opportunities
- Work task allocation
- Salary and benefits
- Performance management
- Disciplinary action
- Termination.

Fortescue will not tolerate any form of unlawful discrimination, harassment or bullying. This includes at work related functions, through the use of work-related resources and technology, in work-related accommodation, online or via social media platforms or during work-related travel. Appropriate disciplinary action, up to, and including, dismissal, will be taken by Fortescue where any complaint of unlawful discrimination, harassment or bullying is substantiated.

All employees should be familiar with Fortescue's policy and procedures on managing discrimination, harassment and bullying.

More information

[Equal Opportunity, Harassment and Bullying Policy](#)
(100-PO-HR-0002)
[Diversity Policy](#) (100-PO-AD-0014_Rev 0)

Fortescue values diversity and inclusivity and is committed to ensuring all its people are treated with dignity, courtesy and respect

2.4 Honesty, integrity and respect for others

Honesty, integrity and respect for others are essential to Fortescue's operations and how we do business. You should ensure you act with honesty, integrity and respect at all times.

This means you should always:

- Whether at home or overseas, follow the applicable laws, particularly those relating to matters covered by this Code, including equal opportunity and anti-discrimination laws.
- Act with courtesy.
- Act with fairness and respect.
- Encourage cooperation.
- Foster a collaborative and respectful environment where rational debate is encouraged, with a view to achieving shared goals.
- Conduct yourself in accordance with the Code when using social media, particularly where your social media use could affect Fortescue.
- Understand relevant rules and regulations which may be contained within Fortescue policies, standards and manuals
- Understand and respond positively to the needs of Fortescue's broader stakeholder group, including the community.

2.5 Prevention of violence in our home, workplace and community

Fortescue has a zero tolerance approach to violence in all its forms, and encourages all team members to take appropriate action when an issue of violence occurs or is suspected, including in the home, workplace or community.

Fortescue defines violence as abuse and intimidation between people. The perpetrator may use violence to control and dominate the other person causing fear, physical harm and/or psychological harm. Violence can include:

- Emotional abuse
- Physical assault
- Sexual assault
- Verbal abuse
- Financial abuse
- Psychological abuse
- Isolating a person from their friends and family
- Stopping a person from practicing their religion.

Violence can affect anyone; men, women, children and communities. By fostering a safe and respectful workplace culture that champions family values, Fortescue can ensure it positively contributes to social change in our community.



03

Working within communities

Fortescue is committed to empowering communities by providing opportunities that create prosperity and deliver positive economic, social and environmental benefits, within the communities in which we work. Fortescue achieves this by:

- Creating economic opportunities for Aboriginal people through education, training, employment and business development.
- Actively encouraging feedback, consultation and engagement with communities to inform decision-making processes.
- Engaging with local businesses, employing local people and building a residential workforce.
- Investment in projects which deliver the greatest benefits to the community.

Fortescue encourages you to be alert to such opportunities and to raise them for consideration by the business.

3.1 Commitment to Indigenous employment

Fortescue is committed to providing opportunities to Indigenous people and has dedicated programs which address barriers to employment and provide training, education and business opportunities.

Fortescue also requires its contractors, suppliers and business partners to support these efforts to end Indigenous disparity through the provision of skills, employment and business opportunities.

3.2 Community engagement

Fortescue fosters a culture of meaningful engagement with the communities in which it works, based on open, transparent, continuous and inclusive communication.

Fortescue's Communities teams, which include staff with specialised skills in community engagement, including with Indigenous communities, should be consulted before any engagement is undertaken and where relevant, should be directly involved. Consultation should also be undertaken with the Corporate Affairs team.

3.3 Native Title and Heritage

Fortescue recognises the interests of native title holders and the proximity of the company's operations to places of high cultural significance. The Company respects the rights and interests of native title holders and Traditional Custodian groups including rights to protect and promote Indigenous history and culture.

Employees and contractors are required to participate in an induction program in relation to local traditions and culture. You are required to ensure you:

- Do not improperly or unlawfully enter onto or otherwise damage or interfere with any Indigenous cultural heritage.
- Do not behave in a manner which is disrespectful to culture or tradition or offensive to communities with which you interact.

More information

[Guideline for the management of Aboriginal Cultural Heritage \(100-GU-HE-0003\)](#)



Our social investment focuses on bespoke programs delivered in partnership with local communities

3.4 Philanthropic donations and non-commercial sponsorship

Fortescue is committed to ensuring the opportunities arising from its operations create value for stakeholders and lead to positive social change.

The Company has a rich history of leadership in philanthropic giving and social investment, including philanthropic donations and non-commercial sponsorship which is targeted to ensure the delivery of long-term meaningful benefits.

Voluntary social investment programs form a critical part of our commitment to build vibrant and thriving communities. Our programs are guided by our Social Investment Framework which ensures investment is aligned with business objectives, our Sustainability Strategy and the United Nations Sustainable Development Goals. Social Investment occurs across four themes:

- Health and wellness
- Education and development
- Environmental responsibility
- Arts and culture.

Requests for donations, sponsorships and support should be directed to the Community team for assessment against the Social Investment Framework.



04

Safeguarding the environment

Fortescue is committed to safeguarding the environment and takes a precautionary approach to environmental management

Compliance with all relevant environmental laws and obligations is the absolute minimum standard to which Fortescue complies and it respects legally designated protected areas and conservation listed species.

Fortescue invests in initiatives and technologies which allow it to operate sustainably and contribute to an overall environmental benefit and implements the mitigation hierarchy of avoid, minimise, rehabilitate and offset throughout all our activities.

Specialists within our Environment team are responsible for protecting biodiversity with all who work on our sites being empowered to act as environmental stewards by identifying exposures and opportunities for continuous improvement and share environmental management across the business.

More information

[Environment policy](#) (100-PO-EN-0001_REV 3)



4.1 Climate change

Fortescue is committed to contributing to global efforts to combat climate change and has an emissions reduction goal to achieve carbon neutrality by 2030 for its operational emissions and net zero Scope 3 emissions by 2040.

Fortescue expects its employees, contractors, partners and suppliers to be undertaking actions to evaluate the risks and opportunities of climate change to their business and work towards reducing greenhouse gas emissions in line with these targets.



**Fortescue is
committed to taking a
leadership position on
climate change**

05

Human rights



Fortescue is committed to respecting and supporting the human rights of all people including our employees, the communities in which we operate, those within our supply chains and those who may be impacted by our activities.

We conduct business in a manner consistent with the International Bill on Human Rights, the United Nations Guiding Principles on Business and Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work. We are also a signatory to the UN Global Compact.

5.1 Protecting human rights

We respect and acknowledge the UN Declaration on the Rights of Indigenous Peoples and the human rights principles it embodies including the principle of Free, Prior and Informed Consent (FPIC). In alignment with the principles of the International Council on Mining and Metals (ICMM), we work to obtain the consent of traditional indigenous landowners for projects located on their traditional lands, with consent processes focusing on reaching agreement on the basis for which a project should proceed as well as ensuring access to appropriate grievance and dispute resolution processes.

We recognise and respect legitimate tenure rights and the right to water and sanitation. We reject the use of all forms of slavery, child or forced labour within our operations and the operations of our suppliers and actively work to ensure we are not complicit in human rights abuses committed by others.

We have a zero tolerance of threats, intimidation and attacks against human rights defenders.

Our human rights principles are embedded within multiple policy and procedural documents including those related to employee health and safety, employment conditions, diversity, equality, security, environmental management and stakeholder engagement.

More information

[Human Rights Policy](#) (100-PO-AD-0017)

5.2 Security and human rights

Fortescue is aligned with the Voluntary Principles on Security and Human Rights. All security activities must be conducted in accordance with the Security Policy and national, state and local laws.

More information

[Human Rights Policy](#) (100-PO-AD-0017)

5.3 Development of Traditional Lands

Fortescue recognises the significant role it has to ensure the rights of Indigenous people within the areas it operates are protected, and acknowledges the UN Declaration on the Rights of Indigenous Peoples (external site) and the human rights principles it embodies, including the principle of Free, Prior and Informed Consent (FPIC). Consistent with FPIC, Fortescue's engagement processes seek to secure the consent of Traditional Custodians for mineral exploration and development on their traditional lands.

More information

[Human Rights Policy](#) (100-PO-AD-0017)

06

Business integrity



Fortescue has a zero tolerance approach to bribery and corruption.

6.1 Anti-Bribery and Corruption

Bribery and corruption undermine legitimate business activities, distort competition and expose Fortescue and its employees to significant risks. Fortescue's commitment to conduct business with integrity means it complies with the laws of every country in which it operates.

You must never:

- Offer, pay, solicit or accept bribes in any form – payment under duress is the only exception whereby those faced with imminent danger may make a payment which would otherwise be forbidden.
- Offer or accept gifts, entertainment, sponsored travel or any Other Items of Value (including sponsorships, donations, community development projects/investments, per diems, employment etc) that may be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices.
- Engage in any form of corrupt business practice, whether for the benefit of Fortescue, yourself or another party.

6.1.1 Facilitation Payments and Secret Commissions

Facilitation Payments are typically small payments or other inducements provided to a Government Official to expedite a routine Government transaction the Government Official is ordinarily obliged to perform. The making of Facilitation Payments is prohibited.

Secret Commissions (or 'Kick Backs') typically arise when a person or entity (such as a Fortescue employee) offers or gives a commission or benefit to an agent or representative of another person (such as a customer of Fortescue) which is not disclosed by that agent or representative to their principal. Such a payment is made as an inducement to influence the conduct of the principal's business. Fortescue prohibits the payment of Secret Commissions.

6.1.2 Dealings with third parties

It is important any third party engaged to act for, or on behalf of Fortescue, implement appropriate controls to ensure the actions of the third party will not adversely affect Fortescue. These third parties may include agents, intermediaries, suppliers and/or purchasers or other contractors.

Third parties who pose particular risk to Fortescue of breaching anti-bribery and corruption laws include those operating in emerging economies or involved in negotiating any business arrangements or transactions within the public sector on behalf of Fortescue, (Government intermediaries).

6.2 Gifts, entertainment and sponsored travel

Fortescue prohibits the giving and receiving of gifts, entertainment and sponsored travel (benefits) in connection with its operations that go beyond common courtesies associated with general commercial practice.

This is to ensure the offer or acceptance of a Benefit does not create an obligation or cannot be construed by others to allege favouritism, discrimination, collusion or similar unacceptable practices by Fortescue.

Benefits offered or accepted by Fortescue must comply with the Seven Key Principles of Appropriate Benefits. They must be:

1. Transparent
2. Proportionate
3. Reasonable
4. Bona fide
5. Legal
6. Infrequent
7. Obligation-free.

Fortescue prohibits the offer or acceptance of Sponsored Travel to/from a Government Official (unless such payment has been approved by the CEO). The CEO may grant exceptions to the general prohibition provided:

1. The payment is for reasonable and bona fide expenditure, properly incurred in relation to travel or travel-related activity.
2. The travel is directly related to the promotion, demonstration or explanation of Fortescue's business, products or services, or directly related to the performance of a contract with a Government or State-Owned Entity.

The prohibition does not apply to travel undertaken by a Government Official to a remote Fortescue site in connection with their role of function.

Benefits offered/accepted by Fortescue are subject to reporting and pre-approval requirements as outlined in the Company's Gifts, Entertainment and Sponsored Travel Standard. The Company's Gifts, Entertainment and Sponsored Travel and Other Items of Value Register can be accessed via the Fortescue Hub. If you are unsure about the reporting or pre-approval requirements of a Benefit, seek advice from the Corporate Governance and Compliance team.

This is the Company's minimum standard with regards to the offer and acceptance of Benefits. However, the Company reserves the right in certain circumstances to apply a higher standard (i.e. in jurisdictions with endemic bribery and corruption), including where necessary a complete prohibition on offering or accepting Benefits.

Fortescue employees may attend political functions where approval by the Corporate Governance and Compliance team and the Director Aboriginal Development, Community and Government has been obtained. Attendance at political functions must be disclosed via the Company's Gifts, Entertainment, Sponsored Travel and Other Items of Value Register.

More information

[Gifts, Entertainment and Sponsored Travel Policy](#)
(100-PO-AD-0016)

[Gifts, Entertainment and Sponsored Travel Standard](#)
(100-ST-CP-0002)

Other Items of Value

For the purpose of the Code, "Other Items of Value" include (but are not limited to) sponsorships, donations, community development projects/investments, per diems and offers of employment. Other Items of Value have the potential to be disguised as vehicles for bribes, especially in emerging economies, therefore the following rules apply when dealing with such items:

1. All Other Items of Value to be offered to Government Officials require Governance and Compliance endorsement.
2. Political donations are prohibited (unless such payment has been approved in advance by the Board).
3. Political and charitable donations must be made in accordance with the Company's Delegated Authority Policy and disclosed by law.

All Other Items of Value must be accurately and transparently recorded in the books and records of the Company.

More information:

[Anti-Bribery and Corruption Policy](#) (100-PO-AD-0015)

[Anti-Bribery and Corruption Standard](#) (100-ST-AD-0001)



6.3 Sanctions compliance

Fortescue is committed to complying with relevant economic and trade sanctions laws (Sanctions) in all jurisdictions in which it operates. Fortescue maintains a Sanctions Compliance Policy to meet its obligations under United States, United Nations, European Union and other Sanctions regimes whenever they apply to Fortescue.

Priority is given to the following regimes:

- U.S. Department of Treasury's Office of Foreign Assets Control
- United Nations Security Council
- European Union (including its member states)
- France
- Her Majesty's Treasury
- Australia.

All Fortescue employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to the Company's Sanctions Compliance Policy and all related standards, guidelines and procedures. Any questions should be directed to business.conduct@fmgl.com.au.

More information

[Fortescue Sanctions Compliance Policy](#) (100-PO-FI-0014)

6.4 Trading in Fortescue Securities

It is important you are aware of Fortescue's Securities Trading Policy and comply with it at all times.

Inside information

If you have information concerning Fortescue which is not generally available, and which a reasonable person would expect to have a material effect on the Fortescue's share price, it is unlawful for you to buy, sell or otherwise deal in Fortescue's shares. It is also unlawful in those circumstances to encourage someone else to deal in Fortescue's shares or to pass the information to someone you know who may use the information to buy or sell the Fortescue shares.

This behaviour is commonly referred to as 'insider trading'.

It does not matter how or where the person obtains the information. It does not have to be obtained from Fortescue to constitute inside information. There are very serious penalties, including possible imprisonment, for violation of these laws.

A person does not need to be an employee of Fortescue to be guilty of insider trading. The prohibition extends to dealings through nominees, agents or associates, such as family members, family trusts and family companies.

More information

[Securities Trading Policy](#) (100-PO-AD-0013)

Contact the Company Secretariat

T: +61 8 6218 8839
E: cosec@fmgl.com.au

6.5 Declaration of interests

Fortescue recognises and respects its employees' rights to take part in financial, business and other activities in their own time subject to the terms of their contracts of employment. Any such activities should be free from conflict with the employee's responsibilities to Fortescue and should not impact the employee's impartial and dedicated performance of their duties. All Actual, Potential and Perceived Conflicts of Interest should be disclosed and managed in accordance with the Company's Declaration of Interests Policy and Standard.

In addition to the disclosure of any Actual, Potential or Perceived Conflict of Interest, employees are required to disclose Other Disclosable Interests. Other Disclosable Interests are defined within the Declaration of Interests Policy and include, for example, where:

- An employee is a Politically Exposed Person.
- An employee holds secondary employment, or otherwise receives payment for the performance of services, outside of Fortescue.
- An employee owns 50 per cent or more of a registered company.
- An employee is a director, officer, secretary or member of a board of a registered company, council or not-for-profit organisation.

Employees must not use their position within Fortescue to obtain a benefit for themselves or third parties, such as relatives, friends or business associates.

The Company's Declaration of Interests Register can be accessed via the Fortescue Hub. If you are unsure about the disclosure or management requirements of an Interest, seek advice from the Corporate Governance and Compliance team.

More information

[Declaration of Interests Policy](#) (100-ST-AD-0010)

[Declaration of Interests Standard](#) (100-PO-AD-0032)



**Fortescue is committed to
conducting its business
in a manner consistent with
the laws of the jurisdictions
in which it operates**



6.6 Competition Law

Fortescue is committed to conducting its business in a manner consistent with the laws of the jurisdictions in which it operates, including in compliance with relevant Competition Laws, referred to in some jurisdictions as Anti-trust Laws.

Broadly, these laws prohibit anti-competitive agreements or understandings between competitors, certain 'exclusive' supply or distribution arrangements, misuse of market power to damage competition, anti-competitive mergers and misleading or deceptive conduct.

You should not engage in, or be part of, in any way any conduct which would be considered anti-competitive behaviour under the Competition Law Standard and relevant legislation.

A breach of these laws can result in serious consequences, including imprisonment and/or fines for individuals and Fortescue.

More information

[Competition Law Standard](#) 100-ST-FI-0012

6.7 Continuous disclosure

Fortescue is legally obliged to inform the Australian Securities Exchange (ASX) immediately upon becoming aware of any information concerning the Company which a reasonable person would expect to have a material effect on the price or value of its shares. The Company Secretary makes disclosures in accordance with relevant ASX rules and must be advised of any information which may need to be disclosed.

You should notify the Company Secretary immediately upon becoming aware of any potentially market sensitive information, where such information has not already been released to the market.

More information

[Continuous Disclosure and Market Communications Policy](#)
(100-PO-AD-0012)

6.8 Privacy

Fortescue's Privacy Standard details permissible means of collecting, using and managing the security of personal information processed by Fortescue. In compliance with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (the Privacy Act) and the General Data Protection Regulation (GDPR), Fortescue has the right to process personal information, where a legal basis for such processing exists, such as where:

- Consent has been provided.
- Processing is necessary for compliance with a legal obligation to which Fortescue is subject.
- Processing is necessary for the purposes of carrying out employment obligations.
- Processing relates to personal data which are made public by the data subject.

If you have access to personal information in carrying out your duties, you are expected to:

- Ensure you are aware of Fortescue's Privacy obligations; and
- Comply with such requirements.

More information

[Privacy Standard Doc](#) (100-ST-AD-0008)

E: privacy@fmgl.com.au

Contact the Company Secretariat

T: +61 8 6218 8839

E: cosec@fmgl.com.au

07

Using Fortescue resources and technology

Resources provided to you to undertake your role at Fortescue should not be used for personal reasons unless the use is incidental (e.g. wearing a uniform) or where exceptions are made within relevant policies.

7.1 Use of Fortescue's information systems

You are permitted to use Fortescue's information systems for occasional personal use. Such use must not interfere with the performance of your duties and must comply with the conditions of use for the Company's computer systems.

You are subject to the Appropriate Use of Information Technology Policy (100-POIT-0006) and expected to be aware of its contents. The policy includes the following responsibilities:

- Do not disclose passwords to any other person, or use a password which is not yours
- Do not access information systems to which you have not been authorised
- Do not access information systems to access, store, display or transmit material which is illegal, offensive, sexually explicit, defamatory, discriminatory, abusive, harassing or violent
- Do not access information systems to engage in activities for the purposes of private profit
- Do not use information systems to delete or attempt to destroy electronic records which are, or are reasonably likely to be, required in evidence in a legal proceeding or regulatory investigation
- Do not disclose any information that appears to be of a sensitive nature to anyone, unless authorised
- Do not download, store, copy or distribute copyright materials, including commercial music or videos
- Do not distribute unsolicited commercial emails (i.e. spam)
- Ensure confidential information is appropriately labelled and

described when stored (either hard copy or electronic copy)

- Ensure, if necessary, you encrypt data when transmitting confidential information over the internet. Only approved encryption methods should be used
- Ensure you always use a Fortescue approved desktop, laptop or mobile device when connecting to the Fortescue network and while handling Fortescue information

More information

[Appropriate Use of Information, Technology and Systems Policy](#) (100-PO-IT-0006)

[Appropriate Use of Information, Technology and Systems Standards](#) (100-ST-IT-0035)

7.2 Cyber security

At Fortescue, we embrace innovation and technology as key drivers of our performance and future success. We rely on technology to administer and run our world class operations. Protecting our technology and data is everyone's responsibility.

Cyber security has been identified as a material operational risk to our business and we work to ensure our operations are protected from potential threats. Our commitment is supported by a comprehensive Cyber Security Policy, which ensures that:

- Appropriate controls are in place to protect our operations from potential threats.
- A strong culture based on shared responsibility for cyber security is fostered.
- Cyber security risk is effectively managed to an acceptable level.
- Cyber resilience and our ability to detect, respond to and recover from cyber incidents are continually improved.

More information

[Cyber Security Policy](#) (100-PO-IT-0072)

Improper use of Fortescue equipment and resources could lead to increased costs and place the Company at risk of operational damage, regulatory non-compliance and/or reputational harm



7.3 Fraud and theft

Fortescue has a zero tolerance approach to fraud and theft. You are expected to comply with the following:

- Fortescue assets or other resources may not be used for personal benefit - you are responsible for safeguarding Fortescue assets and resources under your control.
- Report instances or suspicions of fraud and theft immediately after you become aware, regardless of whether the instance relates to an employee, a contractor or any other party.
- Funds must be used wisely and frugally. You should consider whether expenditure you are required to authorise is appropriate in the circumstances. All expenditures must be correctly allocated and reported on a timely basis.

Fraud

Fraud is dishonest activity causing actual or potential financial loss to any person or organisation.

The following actions are prohibited and regarded as fraud:

- Theft of money or other property.
- Deliberate use of false documents or covering up or destroying documents, for, or intended for, business use.
- Improper use of information or position for personal financial benefit.
- Misuse of Fortescue's assets, including its intellectual property.

Theft

You must take appropriate precautionary action to prevent theft, damage or misuse of Fortescue resources.

The following actions are prohibited and regarded as theft:

- Unauthorised removal of Fortescue equipment, supplies, or other resources.
- Selling, lending or donating Fortescue resources without appropriate approval.
- Intentionally damaging, destroying or disposing of Fortescue property (excluding items of nominal value which can no longer be used) without appropriate approval.
- Submission of a fraudulent expense reimbursement claim and use of corporate credit cards for personal use.

This is regarded as serious misconduct for which disciplinary action will be taken.

7.4 Accurate and auditable records

An accurate and auditable record of all financial transactions relating to Fortescue must be maintained in accordance with generally accepted accounting principles.

No entry should be made in Fortescue's records which distorts or disguises the true nature of any transaction. Non-financial records (for example personnel files, environmental documentation, safety records and statistics) must also be accurately and rigorously maintained.

08

Governance and media relations



8.1 Government relations

Fortescue expects you to conduct yourself according to the highest ethical standards in your dealings with government. Government relations includes all contact in the course of business with governments, their agencies and representatives in national and local jurisdictions around the world.

In your interactions with government, you should:

- Cooperate with every legitimate government request for information or in regulatory investigations while asserting Fortescue's basic legal rights, such as representation.
- Take appropriate steps to protect confidentiality when submitting information to any authority.
- Not hire a government employee to perform services except under written contract with the government specifying the legitimate nature of the services to be provided – in some countries hiring a government employee is illegal.
- Not provide gifts to, or entertain, government employees.

Speak to your manager or the Government Relations team if you have any questions about interactions with government representatives.

8.2 Public policy debate

As a listed Australian Company which employs large numbers of people and contributes to the growth and development of the Australian economy, Fortescue has a responsibility to its shareholders, customers, employees and stakeholders to understand and contribute to public policy development, and ensure the Company and operating environment is understood by policymakers.

Fortescue participates in public policy by:

- Making submissions to inquiries and industry consultation processes, where appropriate
- Participating in public discussion
- Holding meetings with stakeholders
- Hosting stakeholder visits to its operations
- Participating in industry, public policy and political conferences and seminars
- Contributing to the policy work of industry groups.

8.3 Communicating with media and investors

Fortescue aims to manage its media liaison effectively, including providing media outlets with ways to constructively engage with the Company, effectively showcasing the Company's achievements and ensuring Fortescue speaks with a consistent, authoritative voice on all matters related to its operations, results and values.

The following specified officers are authorised to speak on behalf of Fortescue:

- The Chairman of the Board, or his/her nominee, speaks for the Board of Fortescue.
- The CEO may speak on all areas of Fortescue's activities .
- The CEO FFI, may speak on all areas related to FFI activities.
- The following members of the Executive Team are authorised to be spokespeople for the areas within their portfolio:
 - Chief Operating Officer
 - Chief Financial Officer
 - Deputy Chief Executive Officer.



Fortescue's Media Advisor or other officers as authorised from time to time may respond to media enquiries as delegated by the CEO.

All other directors, officers, employees, subsidiary and business partners, contractors or suppliers shall not represent themselves as spokespeople. They should not engage in discussions, emails or correspondence with any representatives of the media in relation to Fortescue matters unless expressly authorised to do so by the CEO.

The Fortescue Corporate Affairs team is responsible for media liaison and the writing, approval and distribution of all Fortescue media releases, as well as liaising with relevant journalists, drafting key messages and developing communication strategies.

The FFI Brand and Communications team is responsible for media liaison and the writing, approval and distribution of all FFI media releases, as well as liaising with relevant journalists, drafting key messages and developing communication strategies, that relate to FFI.

More information

[Media Policy](#) (100-PO-PU-0002_Rev 2)

8.4 Representing Fortescue

Fortescue manages all external communications made on the Company's behalf and by its employees. It does so in order to protect the interests of shareholders, employees and customers by ensuring Fortescue's brand and reputation are consistently protected and enhanced in line with its current corporate strategy, vision and values. Fortescue aims to mitigate against the publication of false and inaccurate information and prevent inappropriate disclosure of commercial information, ensuring compliance with ASX Listing Rules and the Corporations Act 2001 (Cth).

This includes:

- External speaking engagements, conference and seminar presentations
- Submission of awards to industry and professional bodies
- Approval of third party communications referencing Fortescue
- All other publications for external distribution.

All requests related to Fortescue's external communications should be directed to the Corporate Affairs team.

E: communications@fmgl.com.au

All requests related to FFI activities should be directed to the FFI Brand and Communications team.

E: ffimediarelations@fmgl.com.au

More information

[External Communications Policy](#) (100-PO-PU-0003)

