



# Code of Conduct and Integrity





# **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**



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# Chief Executive Officer's message



**Dino Otranto**  
Fortescue Metals CEO



**Mark Hutchinson**  
Fortescue Energy CEO

Fortescue is a values-based business. Our 10 Values guide all of our decision making, how we behave and how we represent our Company.

Our Values are not a smorgasbord; all of them must be accepted wholeheartedly. We must never compromise on these Values.

Our Code of Conduct and Integrity brings these Values to life. It defines who we are and what we stand for, outlining what is expected of the Fortescue family including all who work for, on behalf of, or in connection with us. This includes Directors, employees, contractors, suppliers, business partners, subsidiaries, consultants and agents.

We must all hold each other to account to ensure we maintain a workplace where everyone feels respected and safe to speak up. This means you must become an active bystander and call out behaviour that does not align with our Values.

You can do this through various channels including our Speak Up service which is operated externally and available for anyone to raise genuine concerns, seek further assistance and report potential conduct breaches anonymously and confidentially.

We are protective of our people and always put them first.

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

Thank you for your support and commitment to demonstrating the Fortescue Values which is what makes our Company 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 focus on becoming the number one integrated green technology, energy and metals company.



# 1. 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 demonstrating appropriate behaviour and 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 in connection with your work. This includes in the workplace, accommodation villages, work related travel and transport, work functions, social gatherings, emails, phone calls, text messages and all forms of online social media.

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 our reputation.

The Code lets you know how you should conduct yourself when representing and working in connection with Fortescue and addresses your responsibilities to Fortescue, each other, its customers, suppliers, business partners, government and the communities in which we operate.

The Code applies to all activities and operations undertaken by Fortescue and its subsidiaries. All references to 'Fortescue', the 'Group' and the 'Company', refer to Fortescue Ltd, and its subsidiaries (including those based overseas).

## 1.2 Complying with the Code

The Code forms part of your terms and conditions 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
- Co-operate 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 not only with the Code, but with 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 (100-PO-AD-0011).

## 1.3 Who should follow the Code

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 think may not align with the Code, have the courage to raise your concerns.

Team members can ask questions, raise concerns or report unethical or illegal business conduct, including behaviour which goes against Fortescue's Values, this Code or Fortescue's other policies and standards, in the following ways:

- Talk to your Leader or another Leader you trust
- Speak with a Fortescue People team representative
- Speak with a member of the Governance and Compliance team.

If you do not want to raise your concerns via the internal channels listed above, you may instead use Fortescue's global Speak Up service. This is a secure, confidential and independent channel, operated externally, for anyone to raise genuine concerns, seek further assistance and report potential conduct breaches.

The global Speak Up service offers:

- Confidential reporting and optionality for anonymous reporting
- Telephone and online reporting options
- 24-hour access, seven days a week in local languages
- Ability to follow up on your concern

Any concerns that are raised with Fortescue will be kept confidential and treated professionally, in line with our Values. Concerns will also be handled in line with all local law requirements (which, for example, may affect whether a report may be made anonymously).

Fortescue's Whistleblower Policy (100-PO-GO-0002) and details on how to access the Speak Up service are available on the Company's website.

## Protection from retaliation

The Company has procedures in place which prohibit relation against or victimisation of a person because they have raised a concern.





# **SPEAK UP**

## **What do I use the Speak Up service for?**

If you see behaviour that does not align with our Values, you are encouraged to raise your concerns.

Speak Up is a safe and confidential service for the entire Fortescue family, globally. Reports can be made anonymously and all matters will be handled professionally in line with our Values.

Available 24 hours a day, seven days a week in local languages.

**SEXUAL HARRASSMENT AND  
OTHER FORMS OF HARASSMENT**

**BULLYING**

**DISCRIMINATION**

**DRUG AND ALCOHOL USE**

**THEFT, FRAUD, CORRUPTION OR  
BRIBERY**

**CONFLICT OF INTEREST**

**OTHER FORMS OF SERIOUS  
MISCONDUCT**



[fortescue.ethicspoint.com](https://fortescue.ethicspoint.com)



## 2. What Fortescue expects from you



### 2.1 Health and safety

Safety is at the core of Fortescue's Values. Fortescue's focus on safety empowers everyone to take whatever action is required to ensure our workplace is safe for all. This includes pausing and taking time to assess a task to ensure it is safe before proceeding and ensuring your workplace is psychologically safe for everyone. You must take care of your own health and safety at work, including your mental health, 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
- Contribute to a safe and inclusive workplace where all team members feel comfortable and supported to bring their whole selves to work
- 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
- Speak Up if you see or experience behaviour in the workplace that does not align with our Values or the Code
- 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 safety tools and personal protective clothing and equipment (PPE) as instructed
  - Taking good care of equipment provided by Fortescue
  - Co-operating 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

All team members are responsible for looking after their colleagues 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 co-workers
- 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
- 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; and
- 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 Health and Safety on the Hub.

**C:** Contact the Health, Safety and Risk team.

## 2.3 Workplace behaviour

Fortescue is committed to ensuring that all team members are treated with kindness, dignity, courtesy and respect at all times. We encourage a culture of Speaking Up and being a good bystander. We provide confidential and anonymous methods for raising concerns.

You are expected to behave in a manner that aligns with our Values, the Code and Fortescue's policies and procedures. This includes:

- Being a good bystander and calling out inappropriate behaviour if you see it;
- Speaking Up about any form of inappropriate behaviour you observe or become aware of; and
- Never engaging in unlawful discrimination, harassment, bullying, victimisation or any other behaviour that is not in line with Fortescue's Values or the Code.

### More information

Appropriate Behaviour Policy (100-PO-HR-0002\_Rev 6)

**C:** Contact the Health, Safety and Risk team.



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

## 2.4 Equal opportunity and employee discrimination

Fortescue values diversity and inclusivity and is committed to ensuring all its people are treated equally, 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.

### More information

Appropriate Behaviour Policy (100-PO-HR-0002\_Rev 6)

Diversity Policy (100-PO-AD-0014\_Rev 0)

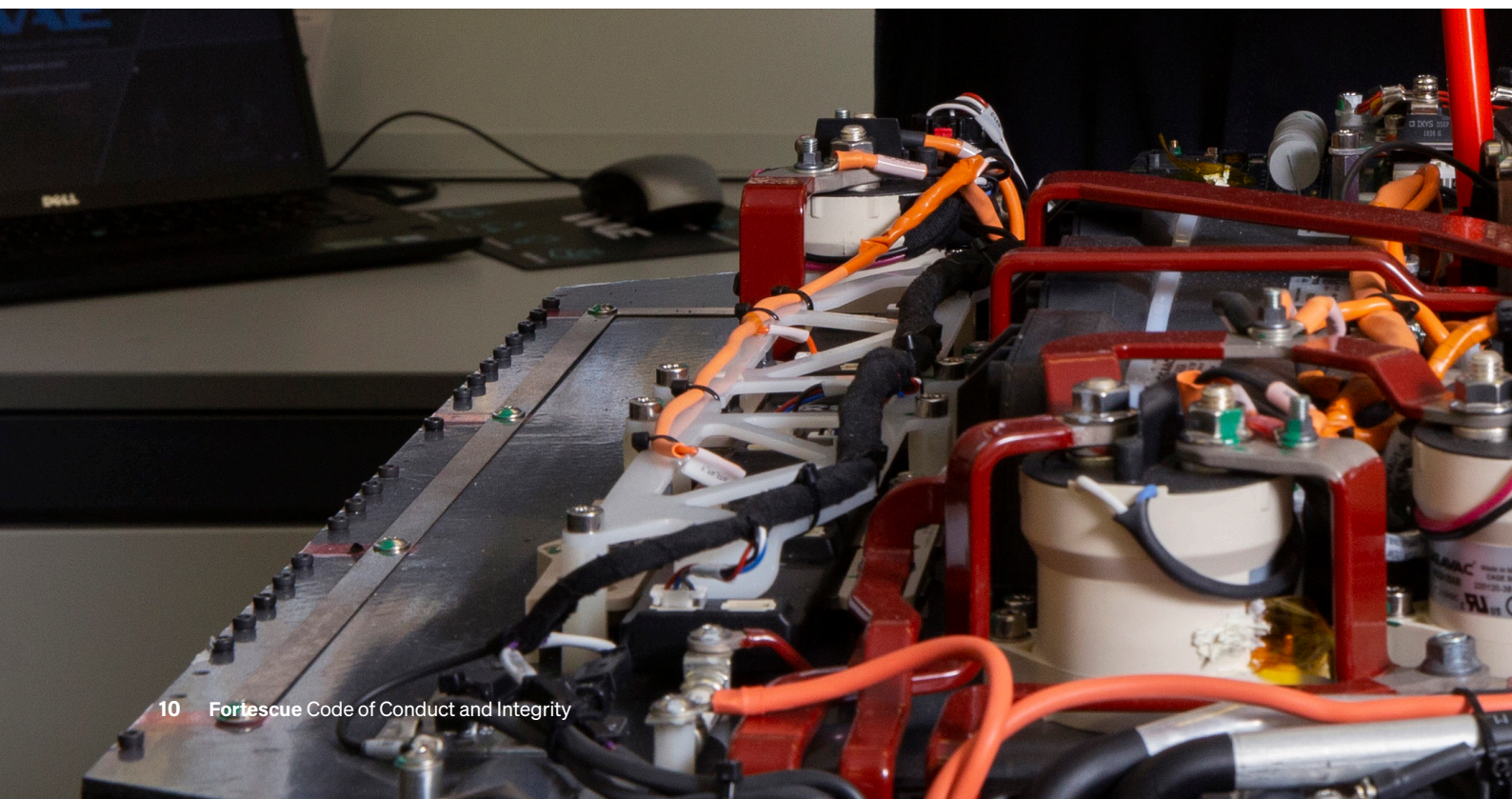
**C:** Contact the People team.

## 2.5 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 the Code, including equal opportunity and anti-discrimination laws
- Act with courtesy
- Act with fairness and respect
- Encourage co-operation
- 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 or someone working for 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.





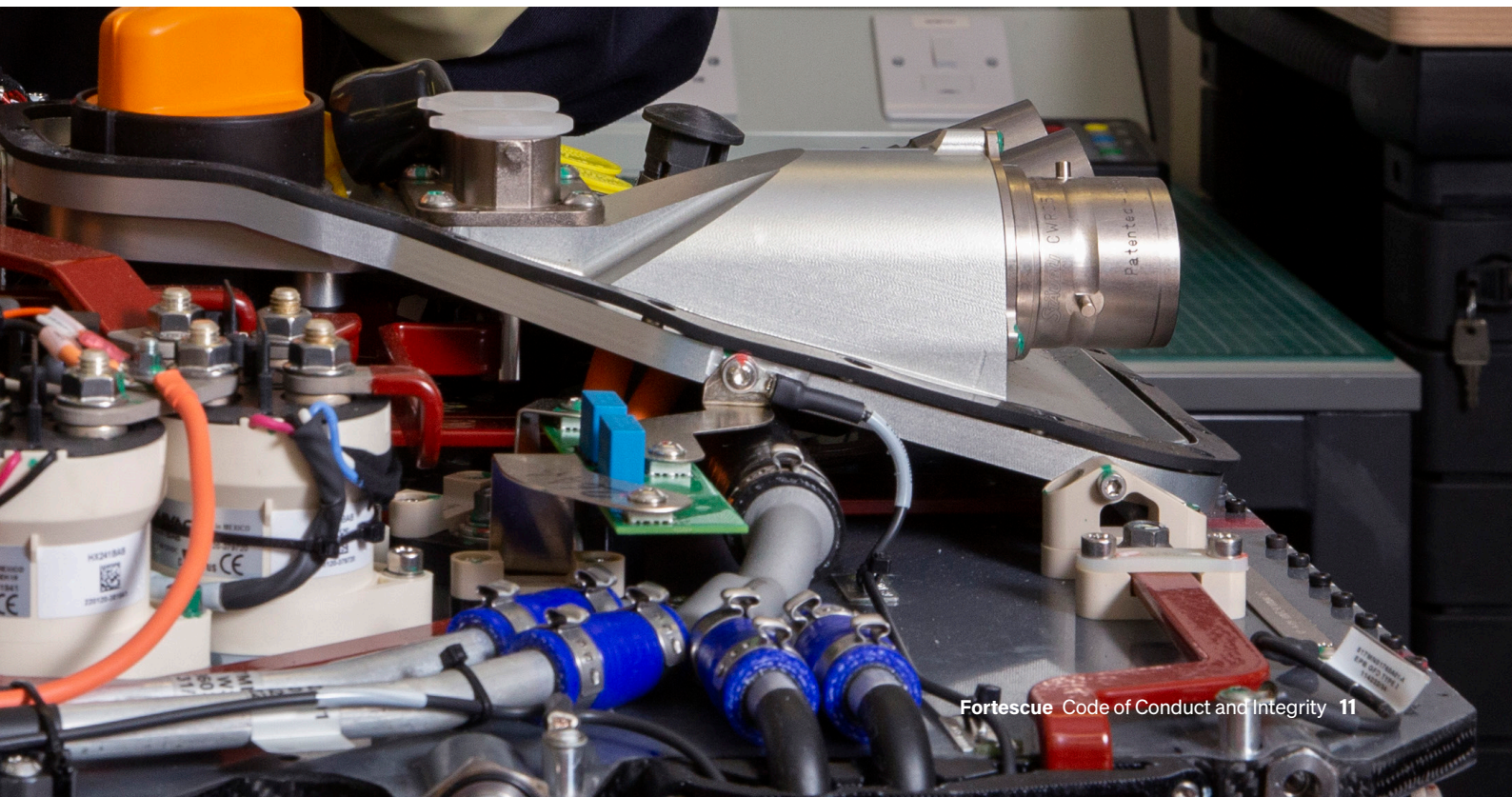
## 2.6 Prevention of violence in our home, workplace and community

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.

Violence may include verbal or physical abuse and/or intimidation, or the verbal or physical threat of abuse and/or intimidation, between people. Violence may include:

- Emotional abuse
- Sexual harassment
- 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. By fostering a safe and respectful workplace culture that champions family values, Fortescue can ensure it positively contributes to social change in our community.





# 3. Working within communities

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

Fortescue is committed to managing social impacts related to our activities and 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 First Nations people through education, training, employment and business development
- Actively encouraging feedback, consultation and engagement with communities to inform decision-making processes
- Implementing local content strategies that engage local businesses, employ local people and where appropriate, build a residential workforce
- Investment in projects that 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 First Nations employment

Fortescue is committed to providing opportunities to First Nations people and has dedicated programs that 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 the disparity of First Nations people 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. Our approach is set out in our Communities and Social Performance Standard (FFI-0000-CO-STD-0001).

Fortescue's Communities teams, which include staff with specialised skills in community engagement, including with First Nations communities, should be consulted before any engagement is undertaken and where relevant, should be directly involved. Consultation should also be undertaken with the Global Corporate Communications 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 First Nations groups including rights to protect and promote First Nations 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 First Nations cultural heritage; and
- 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)

**C:** Contact the Communities, Environment & Government team.





### **3.4 Philanthropic donations and non-commercial sponsorship**

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

Our 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 that supports your activity, asset or project for assessment against the Social Investment Framework.



# 4. 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 its activities.

Specialists within our Environment team are responsible for protecting biodiversity with all who work on our sites, 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)  
C: Contact the Environment team.

### 4.1 Climate change

Fortescue is committed to contributing to global efforts to combat climate change and has committed to achieve real zero terrestrial emissions across its iron ore operations by 2030 (Scope 1 and 2) and net zero Scope 3 emissions by 2040.

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

### More information

Climate Change Policy (100-PO-GH-0003)  
C: Contact the Sustainability team.







# 5. 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 on Human Rights 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 signatory to the UN Global Compact and endeavour to align our actions with industry good practice and standards.

## 5.1 Respecting human rights

We are committed to undertaking human rights due diligence, with a focus on mitigating high risk actions, and engage meaningfully, respectfully and transparently with communities and other rights-holders to respectfully manage and minimise potential project impacts.

We are committed to providing access to remedy through grievance mechanisms and will provide for, or cooperate in, remediation where we identify that we have caused or contributed to an adverse human rights impact. We actively work to ensure we are not complicity in the human rights abuses committed by others.

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

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

### More information

Human Rights Policy (100-PO-AD-0017)  
C: Contact the Sustainability Team.

## 5.2 Rights of workers and rejection of modern slavery

We reject all forms of slavery, child or forced labour within our operations and the operations of our suppliers.

We respect freedom of association, the right to a fair and living wage, and ensure that all our employees are treated fairly and without discrimination.

We work to avoid health and safety risk and impacts to our employees and the communities in which we operate.

### More information

Human Rights Policy (100-PO-AD-0017)  
C: Contact the Sustainability Team.

## 5.3 Security and Human Rights

Fortescue is aligning with the Voluntary Principles on Security and Human Rights and will ensure all relevant employees and contractors are trained in accordance with these principles.

### More information

Human Rights Policy (100-PO-AD-0017)  
C: Contact the Sustainability Team.

## 5.4 Indigenous Peoples Rights

We respect local and Indigenous communities, their values, heritage and connection to lands, waters and environment. We seek to avoid harm to spiritual and cultural heritage; we recognise and respect indigenous tenure rights and the right to water and sanitation. We support the UN Declaration on the Rights of Indigenous Peoples and the human rights it embodies including the principle of Free, Prior, and Informed Consent (FPIC). Consistent with FPIC, Fortescue's engagement seeks to obtain and maintain the FPIRC of affected Indigenous Peoples across all phases of an activity lifecycle.

### More information

Human Rights Policy (100-PO-AD-0017)  
Free, Prior and Informed Consent Policy (100-PO-HE-0002)  
C: Contact the Sustainability Team.





# 6. Business integrity

## 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 Item of Value 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 that the Government Official is ordinarily obliged to perform. The making of Facilitation Payments is prohibited.

Secret commissions (or "kickbacks") 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 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).

#### More information

Anti-Bribery and Corruption Policy (100-PO-AD-0005)  
Anti-Bribery and Corruption Standard (100-ST-AD-0001)  
**C:** Contact the Governance and Compliance team.



## 6.2 Gifts, Entertainment and Sponsored Travel

Fortescue prohibits the offer or acceptance 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 or collusion.

Benefits offered or accepted by Fortescue must be kept to a minimum and comply with the 7 Key Principles of Appropriate Benefits:

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

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

This is our Company's minimum standard with regards to the offer and acceptance of Benefits. However, our 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.

### More information

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

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

**C:** Contact the Governance and Compliance team.

## 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 Fortescue Board).

## 6.3 Sanctions and Trade Controls

Fortescue is committed to complying with relevant Sanctions and Trade Control laws and regulations in the jurisdictions in which it operates. This includes, but is not limited to, the laws of; Australia, the United States of America, the European Union, the United Kingdom and those derived from measures imposed by the United Nations.

Fortescue employees and business partners must read, understand and adhere to the Sanctions and Trade Controls Policy and all related standards, guidelines and procedures. Any questions should be directed to [governanceandcompliance@fortescue.com](mailto:governanceandcompliance@fortescue.com).

### More information

Sanctions and Trade Controls Policy (100-PO-FI-0014)

**C:** Contact the Governance and Compliance team.



## 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 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)

**C:** Contact the Company Secretariat team.

## 6.5 Declaration of Interest

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 all Actual, Potential and Perceived Conflicts of Interest, employees are required to disclose Other Disclosable Interests. Other Disclosable Interests are defined within the Declaration of Interests Standard and include 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.
- An Employee has a Disclosable Intimate Relationship with another Employee.

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 Governance and Compliance team.

### More information

Declaration of Interests Policy (100-ST-AD-0010)

Declaration of Interests Standard (100-PO-AD-0032)

**C:** Contact the Governance and Compliance team.





## 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.

These laws prohibit anti-competitive behaviour 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

**C:** Contact the Legal team.

## 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)

**C:** Contact the Company Secretariat team.

## 6.8 Privacy

Fortescue is required to operate in accordance with the privacy legislation in the jurisdictions in which it operates and processes personal information.

Fortescue prioritises only collecting and processing personal information where the consent of the data subject has been obtained and there is a business need for the information. Fortescue may from time to time collect and process sensitive information, where reasonable to do so and the consent of the individual has been obtained and/or where collection of such information is required by law.

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

- Ensure you are aware of Fortescue’s Privacy obligations
- Comply with such requirements
- Ensure that the data subject has consented to the processing of their personal or sensitive information
- Consider whether personal or sensitive information is still required or should be deleted.

### More information

Privacy Standard (100-ST-AD-0008)

Privacy Policy (100-TE-DC-0015)

**C:** Contact the Group Subsidiaries team.

## 6.9 Related Party Transactions


All personnel should ensure that appropriate governance arrangements are in place and operating effectively for related party transactions, to ensure that Fortescue complies with relevant legislation and Listing Rules and the interests of Fortescue, its Directors and employees are protected.

As well as the Related Party Transactions Standard (100-00000-ST-AD-0001) Fortescue has developed a Key Principles of Engagement Framework (100-PO-FI-0021), inclusive of contractual templates, to be used for certain related party transactions. It is important to note that all related party transactions require pre-approval in accordance with the Related Party Transactions Standard.

### More information

Related Party Transactions Standard (100-00000-ST-AD-0001)

**C:** Contact the Company Secretariat team.



**Fortescue is committed to  
conducting its business  
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# 7. 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

Occasional use of Fortescue's information systems is permitted but must not interfere with the performance of your duties and must fully comply with the Appropriate Use of Information, Technology and Systems Policy (100-PO-IT-0006). Your responsibilities under the policy are as follows:

- Do not access, store, display or transmit illegal, abusive, sexually explicit, defamatory, discriminatory, threatening or violent material
- Do not unlawfully download, store, copy or distribute material which infringes on intellectual property rights such as commercial audio, video and software
- Do not access systems for the purposes of private profit or unlawful conduct
- Do not access services which are inappropriate for a workplace, including those pertaining to drugs, gambling and pornography
- Do not attempt to connect to systems or view information that you are not authorised to access
- Do not 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 without prior authorisation
- Do not distribute unsolicited commercial emails (i.e. spam)
- Use strong passwords, do not re-use passwords and do not share passwords with anyone.

Fortescue is an attractive target for cyber-criminals and all team members should remain alert to sophisticated scams. If you suspect fraudulent activity on the Fortescue network or believe your device, user account details or any Company data has been compromised, immediately notify your Manager and the Technology Service Desk. If personal information may have been compromised, also contact [subsidiaries@fortescue.com](mailto:subsidiaries@fortescue.com)

**E:** Technology Services Desk  
([servicedesk@fmgf.com.au](mailto:servicedesk@fmgf.com.au) or 6218 8877).

### 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)

**C:** Contact the Global Technology and Automation team.

## 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-leading operations. Protecting our technology and data is everyone's responsibility.

Cyber security has been identified as a material 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)

**C:** Contact the Cyber Security EA & Portfolio team.

## 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.

## **More Information**

**C:** Contact the Governance and Compliance team.

## **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.

## **More Information**

**C:** Contact the Global Security team.

## **7.4 Delegations of Authority**

Fortescue's Board have delegated their authority and endorsed a control framework for entering contracts, commitments, managing Company assets and key business activities in the course of conducting Company business. All Fortescue personnel are expected to read, understand and adhere to their delegation of authority and to exercise a duty of care with respect to decisions made, and commitments and contracts entered into on behalf of Fortescue.

Delegation of Authority (Metals) 100-PO-CC-0017  
Delegation of Authority (FFI) FFI-0000-FI-POL-0002  
**C:** Contact the Finance team.

## **7.5 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.



# 8. Government 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:

- Co-operate 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 that supports your activity, asset or project 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
- Engaging with stakeholders
- Hosting stakeholder visits to its projects and 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 relations 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 business, results and values.

The following spokespeople are authorised to speak on behalf of Fortescue:

- The Executive Chairman
- Fortescue Metals CEO
- Fortescue Energy CEO

Fortescue's Global Corporate Communications team from time to time may respond to media enquiries on behalf of the Company.

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 Communications team.

Fortescue's Global Corporate Communications 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.

All media enquiries related to Fortescue, including Fortescue Metals, Fortescue Energy and Fortescue Zero Technologies, should be directed to [media@fortescue.com](mailto:media@fortescue.com)

#### More information

External Communications Policy (100-PO-PU-0003)

**C:** [media@fortescue.com](mailto:media@fortescue.com)

**P:** 1800 134 442

### 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.

#### More information

External Communications Policy (100-PO-PU-0003)

**C:** Contact the Communications team.



