



Code of Conduct and Integrity

Together we are Fortescue

ABN 57 002 594 872



Fortescue
The New Force in Iron Ore



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Fortescue's Values



Safety

Look out for our mates and ourselves



Empowerment

Take action and encourage your team



Family

Care for your work mates



Frugality

Use your brain not your cheque book



Stretch targets

Deliver against challenging targets



Integrity

Do what you say you're going to do



Enthusiasm

Be positive, energetic



Courage and determination

Never, ever give up



Generating ideas

Always be on the lookout for better ways



Humility

Show vulnerability in leadership

Fortescue's unique Values drive the Company's performance in a way that sets Fortescue apart.





Message from the Chief Executive Officer

Fortescue has a proud history, spanning more than 15 years as a responsible, ethical corporate citizen, with strong links to our communities and a determination to inspire confidence in our stakeholders.

We are a business built on values and we pride ourselves on our established reputation for acting with integrity and honesty; we behave with respect and care for people and the environment, taking responsibility for our presence and doing what we say we will do.

The Code of Conduct and Integrity is underpinned by our values and provides guidance on the standards of behaviour expected from the entire Fortescue family, which includes all who work for, on behalf of, or in connection with us, including directors, employees, contractors, suppliers, business partners, subsidiaries and related companies, consultants and agents.

By keeping the Fortescue Values at the core of what we do, we can ensure we remain trusted and respected in our communities and achieve our vision to be the safest, lowest cost, most profitable mining company.

Please ensure you read and understand this Code and, not only adopt the principles in your daily business activities, but support and encourage your colleagues to do the same.

01

About the Code of Conduct and Integrity

1.1 About

The Fortescue Code of Conduct and Integrity (the Code) is one of the ways Fortescue applies its Values and guides you in upholding the highest ethical business practices when working at, or in connection with, Fortescue. The Code outlines the ways in which Fortescue expects you to conduct 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.

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 of Conduct and Integrity does not stand alone. It brings in 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 Fortescue needs to comply. It is important to use your own common sense and understand where to go for further support and information.

Fortescue expects its workforce to follow the law, act with integrity and honesty in all matters, and be accountable for their actions.

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

You must comply with all applicable laws, standards or policies, however, where the Code sets a higher standard it is expected you will follow the Code.

Managers

Managers are expected to lead with integrity and be familiar with the Code in order to guide employees, 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 channel and ensure the reporting employee is protected from any form of retaliation.

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



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

1.3 Who should follow the Code of Conduct and Integrity?

All who work for, on behalf, or in connection with us, as outlined on page 4.

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
- Speak to someone outside Fortescue as outlined in section 1.5.

Fortescue has a dedicated Corporate Governance Manager to serve as the

primary point of contact for guidance and assistance.

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

T: +61 8 6218 8742

E: business.conduct@fmgl.com.au

W: Search [Reporting Violations](#) on the Hub

Protection from retaliation

The Corporate Governance Manager 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 and independent channel, operated externally by Deloitte, for anyone to raise genuine concerns, seek further assistance and report potential employee 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 hotline operator will provide a report to the Corporate Governance Manager to action.

How to report

Freecall

| | |
|-----------|----------------|
| Australia | 1800 976 100 |
| Argentina | 0800 666 3065 |
| China | 400 120 0518 |
| Colombia | 01800 518 9198 |
| Ecuador | 593 2 4004724 |
| Singapore | 800 852 3943 |

E: fortescue@deloitte.com.au

W: www.fortescue.deloitte.com.au

A: Deloitte Whistleblower Service, Reply paid 12628 A'Beckett Street, Victoria

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

SPEAK UP

(08) 6218 8277

**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

**SUSPECTED THEFT, FRAUD,
CORRUPTION OR BRIBERY
CONFLICT OF INTEREST
SUSPECTED SERIOUS MISCONDUCT
AND DISHONESTY**

**WHISTLEBLOWER
HOTLINE**

1800 976 100

**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 its 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.

The health and wellbeing of all employees and contractors should never be compromised, and Fortescue is committed to providing a safe workplace for all of its people, working together to become global leaders in safety.

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

- Be aware of the health and safety requirements of your role or ask your supervisor for guidance. Not knowing is not an excuse
- Comply with all health and safety policies, rules and procedures
- Immediately take action if you become aware of a hazard, by fixing the hazard if safe to do so, or reporting 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) provided by Fortescue, as instructed
 - Taking good care of equipment provided by Fortescue
 - Cooperating with others, including managers, on health and safety instruction.

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 affect the health and safety of others.

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 have a duty to ensure your personal behaviour within the workplace and elsewhere does not adversely affect your work performance, safety, or the reputation of yourself, your colleagues or Fortescue.

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.

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

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, irrespective of age, gender, race, sexual orientation, political or religious belief, culture, marital status, family commitments, physical or mental ability.

Discrimination must not influence any part of the employment or business relationship, including decisions in relation to:

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

No form of discrimination, harassment or bullying will be tolerated by Fortescue in the workplace, at work related

functions, using work-related resources and technology, in work-related accommodation or during work-related travel. Appropriate disciplinary action, up to, and including, dismissal, will be taken by Fortescue where any complaint of discrimination, harassment or bullying is substantiated.

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

More information

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

2.4 Honesty, integrity and respect for others

Honesty, integrity and respect for others are essential in establishing and maintaining successful business relationships and send a clear message to others about how Fortescue do business. You should ensure you act with honesty, integrity and respect at all times.

This obligation extends to the entire workplace, work-related social functions, and work-related travel. 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 an environment where rational debate is encouraged, with a view to achieving shared goals
- Avoid behaviour which could

reasonably be perceived as harassment (including sexual harassment), bullying or intimidation

- 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 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 our communities



Fortescue is committed to empowering communities by providing opportunities that create prosperity and deliver positive economic, social and environmental benefits, within the communities which host Fortescue's activities. 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
- 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.

Commitment to Indigenous employment

Fortescue is committed to ending Indigenous disparity and has a dedicated program which addresses barriers to employment and provides training, education and business opportunities. Fortescue also requires its contractors, suppliers and business partners to help towards its efforts to end Indigenous disparity through the provision of skills, employment and business opportunities.

3.1 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 Government and Community team, which includes 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.

3.2 Native Title and Heritage

Fortescue recognises the interests of native title holders and the proximity of the company's operations to places of cultural meaning. The Company respects the rights and interests of native title holders and Traditional Custodian groups 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 enter onto, damage or interfere with any cultural heritage sites
- Do not disturb or remove any cultural heritage items or material
- 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 \(100-GU-HE-0003\)](#)



Fortescue is committed to safeguarding our environment and protecting biodiversity for future generations.

3.3 Safeguarding our environment

Fortescue is committed to safeguarding our environment and protecting biodiversity for future generations, and aims to minimise the impact to the landscapes within which it operates.

The Company takes a precautionary approach to environmental challenges and invests in initiatives and technologies which allow it to operate sustainably and contribute to an overall environmental benefit.

Fortescue strives to operate in a manner which complies with relevant statutory and regulatory requirements. Similarly, all Fortescue employees and contractors are individually empowered to act as environmental stewards; that is to identify exposures and opportunities for continuous improvement and share environmental management across the business.

More information

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



04

Human Rights



Fortescue recognises the importance of protecting human rights and is committed to protecting the rights of all people including those of its employees, the communities in which it operates, those who may be impacted by its activities, its customers and those within its supply chains.

Fortescue conducts business in a manner consistent with international human rights principles encompassed in the following:

- [Universal Declaration of Human Rights](#) (external site)
- [International Labour Organisation's Declaration on Fundamental Principles and Rights at Work](#) (external site)
- [United Nations \(UN\) Global Compact](#) (external site)
- [Forced Labor Convention](#) (external site)
- [United Nations Guiding Principles on Business and Human Rights](#) (external site).

4.1 Protecting human rights

Fortescue works to ensure it is not complicit in human rights abuses committed by others. The Company rejects and prohibits the use of all forms of slavery or forced labour in its operations and the operations of its suppliers. Importantly, this includes the transportation, harbouring, recruitment, transfer, or receipt of persons by means of threat, force, coercion, abduction, fraud, or payments to any person having control over another person for the purpose of exploitation.

Fortescue has zero tolerance for threats, intimidation and attacks against human rights defenders.

The Company is committed to working with its suppliers to eradicate modern slavery from its supply chain and implements a due diligence process to monitor suppliers, contractors and partners.

4.2 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](#)



Fortescue has zero tolerance for threats, intimidation and attacks against human rights defenders.

05

Business Conduct Principles

Fortescue has a zero tolerance approach to bribery and corruption.

5.1 Bribery and Corruption

Bribery and corruption undermines legitimate business activities, distorts competition and exposes 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 an item, money, travel, hospitality, entertainment or other token of appreciation 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.

More information:

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

5.2 Facilitation payments and secret commissions

Facilitation payments are typically minor, unofficial payments made to secure or speed up a routine government action by a government official or employee. The making of facilitation payments by Fortescue employees is prohibited.

Secret commissions are also prohibited. These payments typically arise where a person or entity (such as a Fortescue employee) offers or gives a commission 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 incentive to influence the conduct of the principal's business.

5.3 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 laws include those operating in emerging economies, or involved in negotiating any business arrangements or transactions with the public or private sector on behalf of Fortescue.

5.4 Gifts and entertainment

Fortescue prohibits the giving and receiving of gifts in connection with Fortescue's operations which go beyond common courtesies associated with general commercial practice. This is to ensure the offer or acceptance of a gift does not create an obligation or cannot be construed or used by others to allege favouritism, discrimination, collusion or similarly unacceptable practices by Fortescue.

There is a Fortescue Gift and Entertainment Register in which all declarable gifts (as defined in the Gifts and Entertainment Standard) given or received must be recorded. If you are uncertain about whether a gift should be accepted, or recorded in the Gift and Entertainment Register, seek advice from your Supervisor, Group Manager, or the Company Secretary.

More information

[Gifts and Entertainment Standard](#)

5.5 Sponsored travel

Fortescue prohibits the payment of travel and travel related expenses for foreign government officers (unless such payment has been approved by the CEO).

The CEO may grant exceptions to the general prohibition provided:

- Payment is for reasonable and bonafide expenditure, properly incurred in relation to travel or travel related activity



Fortescue's commitment to conduct business with integrity means it complies with the laws of every country in which it operates.

- 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 government-owned organisation.

This prohibition does not apply to travel undertaken by a government officer or employee to a remote Fortescue site in connection with their role or function.

5.6 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. By sponsoring and partnering with stakeholders, Fortescue helps create strong and vibrant communities. Fortescue's Corporate Social Responsibility (CSR) Strategy provides the framework for prioritisation and resourcing of CSR related initiatives and programs, including those related to philanthropic donations and non commercial sponsorship.

Requests for donations, sponsorships and support should be directed to the Manager Community Development for assessment against the objectives and targets of the CSR Strategy. In accordance with the strategy, creating positive social change programs captured under the following are prioritised:

- Creating opportunities for Aboriginal peoples through training, employment and business development
- Building local communities through local procurement, investment in key infrastructure and financial support for not-for-profit and community organisations.

In addition to monetary donations, Fortescue is able to share expertise and talent in various areas. Sharing capacity and transferring know-how can be an effective and sustainable alternative to financial contributions.

Philanthropic donations are made only to registered or accredited independent non-governmental organisations (NGOs) or not-for-profit charities, excluding government, political and religious entities.

5.7 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](#)

Contact the Company Secretary

T: +61 8 6218 8839

E: cosec@fmg.com.au



**Funds must be used
wisely and frugally**

5.8 Conflicts of Interest

While Fortescue recognises and respects your rights to take part in financial, business and other activities in your own time, these activities should be free of conflict with your responsibilities to Fortescue and should not impact on the impartial and dedicated performance of your employment duties.

You should not engage in activities which involve, or appear to involve, a conflict of interest. Such circumstances could compromise your ability to make impartial business decisions which are in the best interests of Fortescue.

While carrying out your duties, you should avoid all situations in which your personal interests conflict, or might appear to conflict, with your duties to Fortescue. You must not use your position with the Company to obtain personal gain or benefit for yourself or third parties (such as friends, relatives and business associates).

Circumstances which may give rise to actual or perceived conflicts include:

- Holding or trading in assets that involve, or could appear to involve, a conflict between personal interests and the interests of Fortescue
- Holding interests or investments in a competitor, customer or supplier or potential supplier
- Influencing Fortescue decisions concerning your partner, family members, business associates or friends.

You are required to disclose to Fortescue, in writing, all actual or perceived conflicts of interest.

This written notification should be provided to your manager immediately upon becoming aware of the conflict,

or potential conflict, and should also be forwarded to your Group Manager and the Company Secretary.

A common area of potential conflict of interest relates to the identity of external organisations involved in a tendering or procurement process for the supply of goods or services to Fortescue.

If you are involved in such activities, you must ensure you are aware of and understand the Procurement policy, and related procedures and manuals, which can be found on the Fortescue intranet.

If you are unsure of your obligations in this scenario, you should clarify your understanding with your manager. It is your manager's responsibility to ensure the matter is properly reviewed, including whether it is appropriate for the individual to continue involvement in the activity.

Fortescue relies on you to practice sound decision-making and take actions which will preserve an ethical workplace.

Remember, you are in charge of your decisions. No one, at any level, has the authority to tell you to do something unethical or illegal.

5.9 Trade practices and anti-competitive behaviour

In Australia and many other countries, laws exist which promote competition in business and protect the interests of consumers. In Australia most of these laws are embodied in the [Competition and Consumer Act 2010 \(Cth\)](#) (external site). 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 goes against the *Competition and Consumer Act 2010 (Cth)* and related legislation in Australia or similar legislation or rules preventing anticompetitive behaviour in any other country.

Collusive conduct relating to the sale of products or procurement of goods, services or equipment for Fortescue use, which involves understandings with competitors on prices, volumes, terms of sale and the like, will not be tolerated.

A breach of these laws can result in serious consequences, including imprisonment and/or fines for individuals and Fortescue. Businesses and/or consumers who are damaged by unlawful conduct may be able to sue to recover damages.

More information

Contact the Company Secretary
T: +61 8 6218 8839
E: cosec@fmgl.com.au

5.10 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 Policy](#)

06

Using Fortescue resources and technology

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. 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.

6.1 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-PO-IT-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.

6.2 Fraud and theft

Fortescue has 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 Fortescue equipment and resources could lead to increased costs and place the Company at risk.

- 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.

6.3 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.



07

Privacy and confidentiality

Fortescue is committed to recognising and respecting the privacy of its employees, contractors, suppliers, business partners, customers and shareholders.

Personal information collected is used for business purposes only, in accordance with our Privacy Policy.

Fortescue abides by the following:

- Personal information will be collected ethically and lawfully, in a manner which is not unreasonably intrusive
- Personal information will only be used for the purposes for which it was provided
- Personal information may be disclosed where authorised by the party concerned and is necessary to prevent a serious threat to health and safety, or is required by law, or to assist authorities in enforcing the law.

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

- Comply with the requirements listed above
- Not access such information other than for necessary, work-related purposes.

More information

E: privacy@fmgl.com.au



08

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:

- 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 Director Community, Environment and Government 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 Political contributions

Fortescue does not make political donations to any political party, politician or candidate for public office, unless the donation has been approved in advance by the Board.

8.4 Attendance at political functions

Attendance at party-political functions is permitted where there is a legitimate business reason. Attendance at these functions must be approved by the Director Community, Environment and Government.

8.5 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 the Company's activity
- The following members of the Core Leadership Team (CLT) 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.

More information

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

8.6 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

More information

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

[Corporate Affairs](#) (Fortescue Intranet)



