

< Other Sustainability Information

# OPERATING WITH INTEGRITY



**OUR CODE OF CONDUCT AND INTEGRITY**

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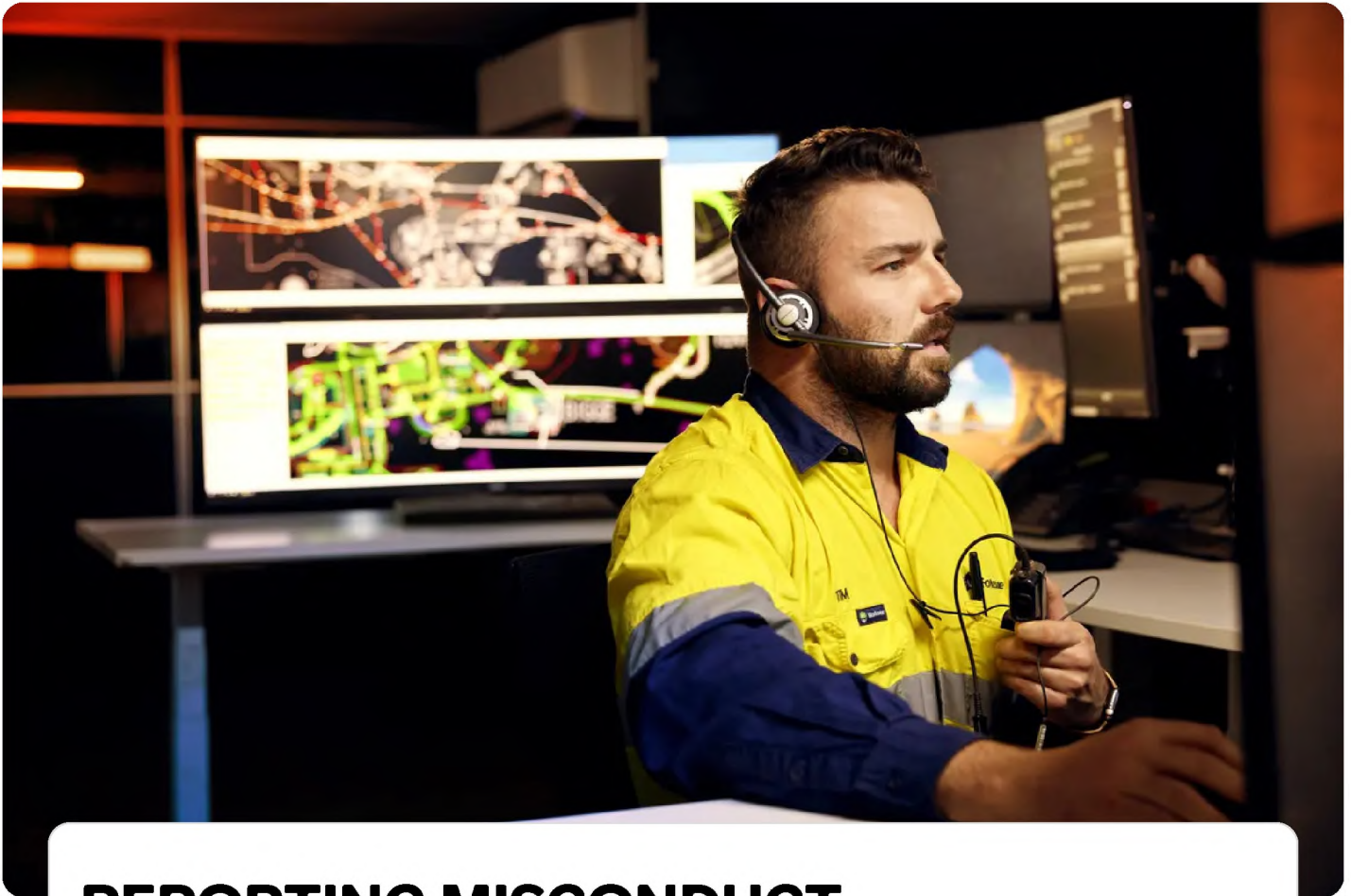
The Code of Conduct and Integrity (the Code) provides guidance on the standards of behaviour expected from those who work for and with us, including our directors, officers, employees, contractors, suppliers, business partners, and all those affiliated with our subsidiaries and related companies over which we have control.

Our core principles and Values are documented in the Code, which is supported by a suite of policies and standards that shape our business, including:

- Anti-Bribery and Corruption Policy
- Continuous Disclosure and Market Communications Policy
- Declaration of Interests Policy
- Directors Code of Conduct Policy
- Environment Policy
- Global Taxation Policy
- Health and Safety Policy
- Human Rights Policy
- Sanctions and Trade Controls Policy
- Securities Trading Policy
- Whistleblower Policy.

For more information, please see the Corporate Governance Statement within the *FY25 Annual Report* and the *Code of Conduct and Integrity* in our [Document Library](#).





## REPORTING MISCONDUCT

We provide various avenues for raising concerns about unethical or illegal business conduct, or other behaviour which may not accord with our Values or Code. In addition to reporting any concerns to their line manager, employees and contractors have the ability to raise concerns with our Company Secretary, the Governance and Compliance or Fortescue People teams or via our Speak Up service. Throughout the year, we continued to implement NAVEX Ethics Point, our new case management system that merged our previous Whistleblower and Speak Up services.

## Code of Conduct and Integrity Breaches



In FY25, 55 of the alleged breaches of the Code made via our new combined Speak Up service, were substantiated. The majority of these related to misconduct concerns, including behaviour such as discrimination and harassment. A number of investigations resulted in corrective actions, including warnings. In FY25, there were 15 dismissals relating to breaches of the Code.

### Substantiated Breaches



- 11: Business Integrity
- 25: Discrimination and Harassment
- 10: Health and Safety
- 0: Modern Slavery
- 0: Environment
- 9: Other



## Additional Information

For information relating specifically to psychosocial safety and matters reported to the safety regulator during the year, please refer to [Safety and Wellbeing](#), noting that the scope of reported matters was not limited to substantiated cases.

For more information on concerns relating to human rights and modern slavery, please see [Human Rights](#).

For more information on community grievances, please see [Communities](#).



## Anti-bribery and corruption

Our exposure to anti-bribery and corruption risk increases as our business expands and we take a global approach to the assessment of this risk.

In FY25, we continued to record and assess risks associated with Fortescue's international activities, including those associated with the Belinga project and Fortescue Zero. We rely on our Value of integrity and our strong corporate culture to ensure that all business is conducted fairly, openly, honestly and in compliance with all applicable legislation.

All employees must complete online anti-bribery and corruption training prior to commencing employment. Advanced face-to-face anti-bribery and corruption training is provided to employees operating in high-risk roles biennially, with the last training campaign held in FY24.

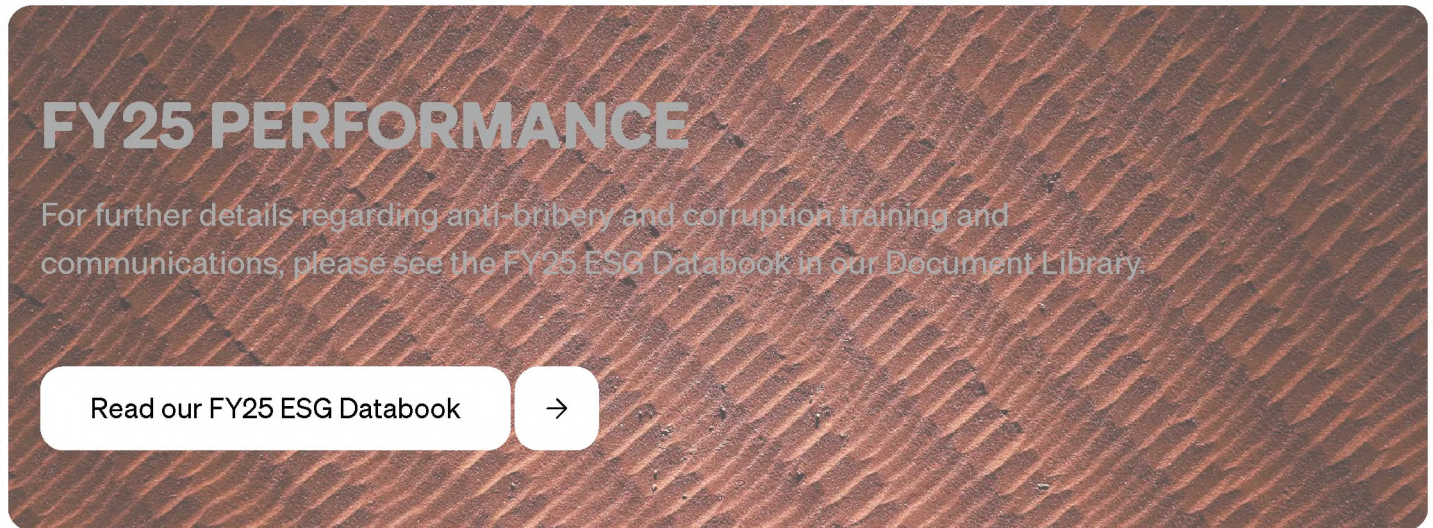
The Audit, Finance and Risk Management Committee (AFRMC) is responsible for overseeing matters related to anti-bribery and corruption. All AFRMC members are



aware of our policies and procedures and received advanced face-to-face anti-bribery and corruption training during the FY24 campaign.

All vendors onboarded via our standard supplier platforms are provided with our vendor documentation pack, containing our Anti-Bribery and Corruption Policy and Standard.

No external investigations into bribery or corruption occurred in FY25



## Communication of critical concerns

We provide a range of mechanisms to report suspected violations of the law or breaches of the Code or related policies and standards. These include:

- encouraging employees to raise issues with their line manager, the Company Secretary or a member of our Governance and Compliance or Fortescue People teams
- encouraging community members to report via our community or site offices or via our website
- providing a Whistleblower service for employees and external stakeholders.

Our Whistleblower service, Speak Up, provides an independent, confidential and anonymous mechanism for anyone, including employees, contractors, suppliers and members of the community, to raise concerns regarding potential illegal activity, violations or breaches of the Code. The service can be accessed via a QR code, online portal or phone and has multilingual capabilities.

Our *Whistleblower Policy* is available in our [Document Library](#).

All disclosures are received and reviewed by our Governance and Compliance team, who either conducts or commissions an investigation. Investigation findings are reported to the AFRMC. The effectiveness of the Whistleblower program is regularly reviewed.



Sustainability is central to Fortescue's vision and strategy. As we work to accelerate decarbonisation on a global scale, this report shares our progress and highlights how we're scaling solutions to deliver long-term value across our operations, communities and partnerships.

## Climate

## Nature

Biodiversity

Circularity

Mine Planning

Water

## People

Communities

Culture and First Nations Peoples

Diversity, Inclusion and Equity

Human Rights

Safety and Wellbeing

Security Practices

Talent and Skills

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Data

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Glossary



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