

Sanctions and Trade Controls

Our Commitment

Fortescue Ltd (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. Compliance with these laws and regulations is a key element of our robust culture of compliance.

We understand that failing to comply with relevant Sanctions and Trade Control laws and regulations can not only result in legal and financial consequences but may harm Fortescue's reputation and adversely affect our social licence to operate.

Our Strategy

Fortescue complies with relevant Sanctions and Trade Control laws and regulations through:

- Clear and explicit senior leadership commitment and "tone-from-the-top"
- Regular risk assessments to identify Sanctions and Trade Control-related risk exposure
- Robust controls that mitigate unauthorised import and export of goods, services and technology that may be subject to Sanctions or Trade Controls laws and regulations
- Training of employees (and business partners where appropriate) to raise awareness of Sanctions and Trade Control obligations
- Due diligence and ongoing monitoring (including audits) of business processes
- International payment due diligence and transaction monitoring
- Inclusion of Sanctions and Trade Control contractual terms and conditions in all relevant agreements (and seeking compliance declarations where appropriate)
- Accurate and proper record keeping that is consistent with relevant legal and regulatory obligations
- Investigating suspected Sanctions and Trade Control breaches and taking corrective actions to address non-compliance
- Effective escalation and reporting of breaches of this Policy.



Responsibility

Fortescue employees and business partners must read, understand and adhere to this Policy and all related standards, guidelines and procedures. Any questions should be directed to governanceandcompliance@fortescue.com.

"signature not required if approved online in PIMS"

"Insert Date approved here"

Fortescue Board

Dated

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Status	IFU - Issued for Use	20-May-24
Summary of Changes	Policy updated to incorporate Trade Control obligations.	
Author	Harshita Angarey	_____ Signature
Checked or Squad Review# (if applicable)	Meagan Briotti Phil McKeiver	_____ Signature
Approved	Fortescue Board	_____ Signature
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Revision History (to be completed for each version retained by Document Control)					
Author	Checker	Approver	Rev No.	Status	Issued Date
Meagan Pillinger	Cameron Wilson	Cameron Wilson	1	IFU	17/08/2021
Communications	Communications	Communications	2	IFU	21/03/2023
Meagan Briotti	Cameron Wilson	Cameron Wilson	3	IFU	17/07/2023
Harshita Angarey	Meagan Briotti Phil McKeiver	Fortescue Board	4	IFU	20/05/2024