

# Sanctions Compliance Policy

## Our Commitment

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

## Our Policy

- Fortescue complies with the requirements of all Sanctions regimes in the jurisdictions in which it operates or intends to operate.
- Fortescue requires its vendors, contractors, consultants and other business partners not to engage in any activities that could lead to Fortescue breaching applicable Sanctions obligations.
- Fortescue avoids any business relationships that pose an unacceptable risk to Fortescue's compliance with applicable Sanctions obligations.
- Fortescue adequately investigates any credible allegations of Sanctions breaches within its business activities and reports such allegations (and their resolution) to the Fortescue Board of Directors and any regulatory agency as required by law.
- Fortescue takes appropriate action against any individual or entity that has contributed to a compliance breach or has increased the potential for such a breach to an unacceptable level.

## Our Strategy

Fortescue supports compliance with this Policy through:

- A clear and explicit commitment from the Board, the Core Leadership Team and all senior management to compliance with all relevant Sanctions obligations;
- Counter-party and pre-employment due diligence and monitoring;
- International payment due diligence and transaction monitoring;
- Sanctions compliance declarations, special contractual terms and conditions;
- Accurate and proper record keeping that is consistent with any relevant legal and/or regulatory obligations;
- Training of employees and other relevant business partners;
- Periodic risk assessments and audits of compliance with this Policy; and
- Effective escalation and reporting of actual or potential breaches of this Policy.

## Responsibility

All Fortescue employees, vendors, contractors, consultants and other business partners are expected to read, understand and adhere to this Policy and all related standards, guidelines and procedures. Any questions should be directed to [business.conduct@fmgl.com.au](mailto:business.conduct@fmgl.com.au).