

10 December 2025

FORTESCUE PUBLISHES FY25 MODERN SLAVERY STATEMENT

Fortescue Ltd (Fortescue, ASX: FMG) advises that it has today released its FY25 Modern Slavery Statement, reaffirming the Company's ongoing commitment to respecting human rights and continually strengthening its approach to addressing modern slavery.

A testament to Fortescue's commitment to transparency and accountability across its operations and supply chain, the FY25 Statement is the Company's eighth and the sixth required under the Australian *Modern Slavery Act 2018*. It is also published on behalf of Fortescue Zero Limited (UK) to meet the requirements of the UK *Modern Slavery Act 2015*.

Key actions undertaken during FY25 included:

- Launched our new Sustainable Supply Chain Standard and strengthened due diligence procedures
- Continued our worker welfare assessment program, conducting assessments with two suppliers across four facilities
- Delivered ethical recruitment initiatives including training, updates to our Talent Acquisition Guidelines and worker pre-engagement survey
- Delivering renewable deep dive and traceability training sessions in addition to our ongoing human rights and modern slavery training.

Fortescue Executive Chairman, Dr Andrew Forrest AO, said "Around 50 million people globally today are trapped in modern slavery – working in industries we all rely on, in communities where exploitation thrives in plain sight.

"At Fortescue, we do not pretend that we are immune from this. Our operations and supply chain carry risk, and we are confronting that risk directly.

"This year, we launched a new Supply Chain Standard and strengthened due diligence procedures and traceability actions for higher risk categories, including renewable technologies – because we know that growth and the transition to green energy cannot come at the cost of human rights.

"This statement reaffirms our commitment not just to transparency, but to taking action – to identifying and addressing modern slavery, and to driving meaningful change for the people whose freedom and dignity are at stake."

For further information, please refer to the complete Modern Slavery Statement, available on Fortescue's website at fortescue.com.

This announcement was authorised for lodgement by the Company Secretary.

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**MODERN SLAVERY
STATEMENT**

2025

OUR VISION

**IS A THRIVING DECARBONISED WORLD
POWERED BY INNOVATION, WHERE
INDUSTRIAL-SCALE SOLUTIONS CREATE
PROSPERITY FOR PEOPLE AND THE PLANET**

OUR PURPOSE

**AT FORTESCUE, OUR PURPOSE IS CLEAR: TO
ACCELERATE DECARBONISATION ON A GLOBAL
SCALE, RAPIDLY AND PROFITABLY**

OUR VALUES

**FAMILY
EMPOWERMENT
FRUGALITY
STRETCH TARGETS
INTEGRITY
ENTHUSIASM
SAFETY
COURAGE AND DETERMINATION
GENERATING IDEAS
HUMILITY**

OUR VALUES ARE AT THE HEART OF EVERYTHING WE DO

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Important note

This report should be read in its entirety, together with the Forward Looking Statement Disclaimer at the back of this report.

Acknowledgement of Country

Fortescue acknowledges the First Nations people of the lands upon which we live and work. We acknowledge their rich cultures and their continuing connection to land, waters and community. We are proud to work, partner and engage with First Nations people. We pay our respects to the culture and people, their Elders and leaders, past, present and emerging.

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ABOUT THIS STATEMENT

Fortescue Ltd has prepared this statement to meet the requirements of the Australian *Modern Slavery Act 2018* (Cth) (Aus Act) and United Kingdom *Modern Slavery Act 2015* (UK) (UK Act) for the financial year 1 July 2024 to 30 June 2025.

This is a joint statement under section 14 of the Aus Act on behalf of Fortescue Ltd (ABN 57 002 594 872) and its subsidiary reporting entities set out in Appendix 2. This statement is also made on behalf of Fortescue Zero Limited (UK) (Fortescue Zero), a subsidiary of Fortescue Ltd, which is a reporting entity under section 54 of the UK Act.

The statement details the actions taken by the reporting entities, and their owned and/or controlled entities to identify, assess and address modern slavery risks in their operations and supply chains. The information provided in this statement applies to all reporting entities and their owned and/or controlled entities unless otherwise stated.

Unless stated otherwise, references to 'our', 'we', 'us', the Company, the Group, or Fortescue refers to Fortescue Ltd and its subsidiaries, including reporting entities.

All references to 'year' are to the financial year ending 30 June 2025 unless otherwise stated. All monetary values are listed in Australian dollars (A\$) unless otherwise stated.

The definition of modern slavery in the Aus Act is adopted in our statement, which includes slavery, servitude, forced labour, debt bondage, forced marriage, trafficking of persons, deceptive recruitment practices for labour and/or services, and the worst forms of child labour.

This statement forms part of our annual reporting suite which includes our FY25 Annual Report, FY25 Sustainability Microsite and 2025 Climate Transition Plan, available on our website [fortescue.com](https://www.fortescue.com)

CONSULTATION

Fortescue's actions to identify, assess and address modern slavery risks in our operations and supply chains require a collaborative, cross-functional approach across a range of teams during the reporting period.

This statement was prepared by Fortescue's Sustainability team, which is responsible for Fortescue's human rights and modern slavery work programs, together with contributions from our Global Contracts and Procurement (C&P); Fortescue Zero Contracts and Procurement (Fortescue Zero C&P); Global Governance and Compliance; Fortescue Zero Governance; Marketing and Shipping; Port Operations; Global Corporate Communications; People; Communities; Legal; Company Secretariat; and Risk and Assurance teams. These teams are responsible for delivering the day-to-day operational and supply chain shared services for Fortescue, its reporting entities, and owned and controlled entities.

The statement was prepared in consultation with the Leadership team of Fortescue comprising the Chief Executive Officer Fortescue Metals and Operations, Chief Executive Officer Growth and Energy, Group Chief Financial Officer and executive directors who have functional responsibility and oversight of Fortescue, its reporting entities, and other owned and controlled entities. Each were provided with an advance copy of the statement to review and opportunity to provide comments and input.

The directors of Fortescue's subsidiary reporting entities listed in Appendix 2 were consulted during the preparation of this statement. They were also provided with an advance copy of the statement and an opportunity to provide comments and input before the statement was finalised for approval by Fortescue's Board of Directors.

APPROVAL AND SIGNATURE

For the purposes of the Aus Act and the UK Act, this statement was approved by Fortescue's Board of Directors on 31 October 2025 and signed by Fortescue's Executive Chairman (page 5), on behalf of all Aus Act and UK Act reporting entities in the Fortescue Group.

ASSURANCE AND VERIFICATION

In addition to our internal verification processes, Management has sought independent, third-party verification of material metrics in this statement, including key supply chain data, training data, vessel inspections, grievance data and data reported against our Key Performance Indicators (KPIs).

FEEDBACK

We value all feedback. Please forward any comments on this statement or requests for additional information to sustainability@fortescue.com.

EXECUTIVE CHAIRMAN'S MESSAGE



DR ANDREW FORREST AO

Around 50 million people globally today are trapped in modern slavery – working in industries we all rely on, in communities where exploitation thrives in plain sight. Walk Free, together with the International Labour Organization and the International Organization for Migration, estimates this staggering number – a reminder that exploitation exists in plain sight across every economy.

It is one of the most pervasive failures of human dignity in our time.

At Fortescue, we do not pretend that we are immune from this. Our operations and supply chain carry risk, and we are confronting that risk directly.

This year, we launched a new supply chain standard and strengthened due diligence procedures and traceability actions for higher risk categories, including renewable technologies – because we know that growth and the transition to green energy cannot come at the cost of human rights. We've enhanced our worker engagement practices, including delivering ethical recruitment training and implementing pre-engagement survey questions, to help us identify and stop practices like unlawful recruitment fees.

When we investigate, we don't always like what we find. We have uncovered overtime beyond legal limits, withholding of wages, and wage deductions in our supply chain. The easy option would be to walk away and cut ties with these suppliers. But that does nothing to help the workers whose labour rights are being exploited. The harder path, and the right one, is to hold suppliers to account. We demand real improvements – to change practices and to remediate harm to workers. We are investing in long-term relationships that lift standards, not quick exits that leave workers abandoned. That is what real leadership looks like, and that is what Fortescue stands for.

Around the world, governments are moving beyond transparency alone – introducing mandatory human-rights due diligence and banning imports made with forced labour. Australia and the United Kingdom led early, but the next step is clear: legislation that drives real change for workers, not just disclosure.

We have an opportunity to strengthen the legislation in Australia – creating an environment where businesses don't just report risks but work together to prevent, uncover and address them, and eliminate modern slavery from operations and supply chains.

This fight is not about ticking boxes. It is about people's lives, their livelihoods, their human rights. Fortescue will not be a bystander. We will confront issues, act with courage and hold suppliers to account.

This statement reaffirms our commitment not just to transparency, but to taking action – to identifying and addressing modern slavery, and to driving meaningful change for the people whose freedom and dignity are at stake.

Dr Andrew Forrest AO
Executive Chairman

KEY ACTIONS IN FY25

SUSTAINABLE SUPPLY CHAIN TRANSFORMATION

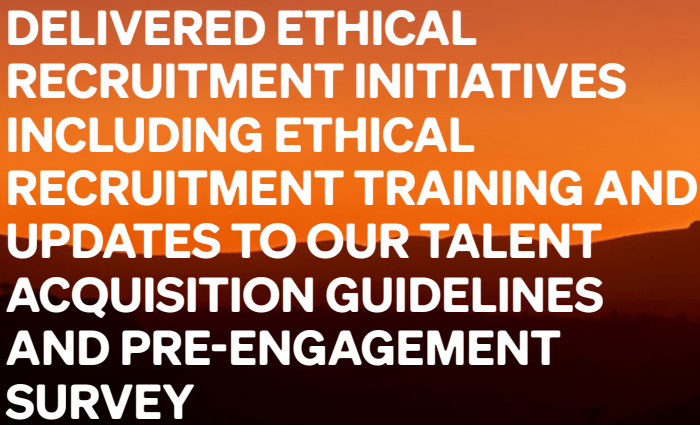
Including new Sustainable Supply Chain Standard, Sustainable Supply Chain Procedure and Enhanced Due Diligence Guidelines



**FORTESCUE HOSTED
THE HUMAN RIGHTS
RESOURCE AND ENERGY
COLLABORATIVE
ROUNDTABLE WITH
INAUGURAL AUSTRALIAN
ANTI-SLAVERY
COMMISSIONER**

**VESSEL
INSPECTIONS
CONDUCTED**

51



DELIVERED ETHICAL RECRUITMENT INITIATIVES INCLUDING ETHICAL RECRUITMENT TRAINING AND UPDATES TO OUR TALENT ACQUISITION GUIDELINES AND PRE-ENGAGEMENT SURVEY

RENEWABLE DEEP DIVE TRAINING AND TRACEABILITY TRAINING SESSION DELIVERED

EMPLOYEES received Human Rights Training (in the last two years)

11,449



CONDUCTED WORKER WELFARE ASSESSMENTS WITH TWO SUPPLIERS ACROSS FOUR FACILITIES

ABOUT FORTESCUE

Our structure and operations

Fortescue Ltd is a global company headquartered in Perth, Western Australia and listed on the Australian Securities Exchange (ASX: FMG). It holds a number of owned and controlled entities, including other reporting entities (Appendix 2) and other key subsidiaries (Appendix 3).

Founded in 2003, Fortescue has grown to become one of the world's largest iron ore producers. Since producing first ore at Cloudbreak in 2008, we have expanded our large scale operations in the Pilbara, Western Australia, where three mining hubs are connected by rail to our port facilities at Herb Elliot Port and Judith Street Harbour towage in Port Hedland. In FY25, we shipped 198.4 million tonnes of iron ore to customers globally, delivering both hematite and magnetite products, supported by marketing offices in Singapore and China.

Fortescue continues to explore and develop opportunities across multiple geographies, including Australia, Gabon and Latin America. Alongside our iron ore and critical minerals exploration, we are advancing a portfolio of energy projects.

Fortescue Zero is our technology and engineering services business, innovating and developing integrated solutions to enable a zero emissions future.

Fortescue Capital, headquartered in New York City, United States, is a dedicated investment manager and fiduciary of third-party capital, committed to accelerating global decarbonisation and advancing the adoption of green energy.





PORT HEDLAND OPERATIONS

PILBARA AND HEDLAND OPERATIONS

Our Pilbara mine and ore processing facilities (OPFs) include the Chichester Hub, Western Hub and Iron Bridge.

The Chichester Hub, located in the Chichester Ranges, includes two mines (Cloudbreak and Christmas Creek) with an annual production capacity of around 100 million tonnes per annum (Mtpa) from three OPFs. Christmas Creek is home to Fortescue's Green Energy Hub and hosts the Green Metal Project that will use hydrogen and electricity, together with Fortescue's iron ore production, to produce a high purity green iron. This reflects how we are deepening our research and development efforts in green ironmaking technologies, knowing that breakthroughs here could unlock significant emissions reductions across the global supply chain.

Our Western Hub, located near the Hamersley Ranges, includes two mines (Solomon and Eliwana) and three OPFs in total, with a combined production capacity of around 100Mtpa.

Iron Bridge, located 145km south of Port Hedland, is Fortescue's first magnetite operation and is an unincorporated joint venture between FMG Magnetite Pty Ltd (69 per cent) and Formosa Steel IB Pty Ltd (31 per cent). Iron Bridge produces a wet concentrate product which is transported to Port Hedland through a 132km slurry pipe.

Fortescue wholly owns and operates 760km of purpose-built heavy haulage railway connecting our Pilbara mining hubs to our port facilities in Port Hedland. We operate five berths at our Herb Elliot Port with approvals to export up to 210Mtpa of iron ore. Our fleet includes 10 tugs based at Judith Street Harbour towage facility and eight 260,000 tonne-capacity Fortescue ore carriers. Each year we load more than 990 carriers of ore from Herb Elliot Port.

OUR VALUE CHAIN



FORTESCUE HIVE

The Fortescue Hive is a purpose-built, integrated operations centre that powers our Pilbara operations from Perth. Operating 24 hours a day, seven days a week, the Fortescue Hive is a high-tech command centre that remotely and safely orchestrates our fixed plant infrastructure, autonomous mining fleet, and port and rail assets.

DECARBONISATION

At Fortescue, we remain firmly committed to reducing our emissions rapidly and profitably, and supporting the broader decarbonisation of industry. Our decarbonisation roadmap includes deploying additional renewable energy generation and battery storage, expanding electrical infrastructure at our mine sites, and rolling out an electrified mining fleet.

Key decarbonisation milestones achieved during FY25 include the commissioning of our first electric drill and expansion of our fleet of electric excavators to seven units across the Pilbara. We have also commissioned a 100MW solar farm at North Star Junction which is already supplying around 25 per cent of Iron Bridge's current power demand.

Through Pilbara Energy Connect, we have integrated our power requirements across the Pilbara into a unified, highly efficient network to support our ambitious decarbonisation efforts. Key projects currently underway include early design and procurement of approximately 130MW of wind generation, construction of a 190MW solar farm at Cloudbreak, early design and procurement for approximately 60km of 220kV transmission lines and substations to connect future wind farms, as well as construction of 250MWh Battery Energy Storage System (BESS) at North Star Junction and 120MWh BESS at Eliwana.



THE HIVE

FORTESCUE ZERO

Fortescue Zero is our technology and engineering services business based in the United Kingdom. Its portfolio includes high performance battery systems, autonomous vehicle solutions and advanced battery intelligence software – technology designed to decarbonise heavy industry at scale.

We have developed a next generation Fleet Management System and Autonomous Haulage Solution. These systems form a connected ecosystem of smart hardware and software, enabling fully autonomous, driverless mining operations that enhance safety, precision and production.

Fortescue Zero's battery intelligence software, Elysia, enhances battery safety and enables batteries to communicate in real time, providing critical information like early warning signs of potential safety issues, end-of-life notifications, and optimal charging times and methods. This technology will be integrated into electric fleet and BESS operations supporting our decarbonisation work.



FORTESCUE ZERO

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GLOBAL GROWTH

Fortescue's global footprint includes a diversified portfolio of energy, critical minerals and iron ore projects that underpin long-term value creation and support the global energy transition.

Fortescue has a pipeline of energy projects, however, market development, policy frameworks and infrastructure readiness remain key challenges. Following a detailed review, we determined that the Arizona Hydrogen Project in the United States and PEM50 Project in Gladstone will not proceed.

Our global pipeline of future projects is being studied and developed in a disciplined manner, and projects will only progress when they are economically viable and the market is ready.



IRON ORE AND CRITICAL MINERALS EXPLORATION

We continue to advance our global exploration activities, with a focus on sustaining and expanding our iron ore and copper portfolios. In FY25, iron ore activities focused on advanced exploration in Mindy South, Wyloo North and White Knight. In addition, near mine exploration continues to be a focus at Solomon mine site and the Chichester Hub.

In the critical minerals portfolio, Fortescue is focusing on copper exploration, alongside exposure to rare earths. Exploration drilling is active in multiple jurisdictions including Argentina, Kazakhstan and Australia. Other activities are progressing across the broader portfolio in Latin America (including Argentina, Brazil, Chile and Peru), Australia, Portugal and Canada.

BELINGA IRON ORE PROJECT, GABON

The Belinga Project in north-east Gabon is potentially one of the largest undeveloped high-grade hematite deposits. We began exploration in 2022, with activities focused on drilling and data collection to support a feasibility study. As of 30 June 2025, over 108,000 metres of reverse circulation and 12,000 metres of diamond core have been drilled.

Ivindo Iron SA is the operating entity for the Belinga Iron Ore Project, with Fortescue holding 72 per cent interest in the company.

LEARN MORE

Learn more about Fortescue's structure and operations within our FY25 Annual Report available on our website fortescue.com



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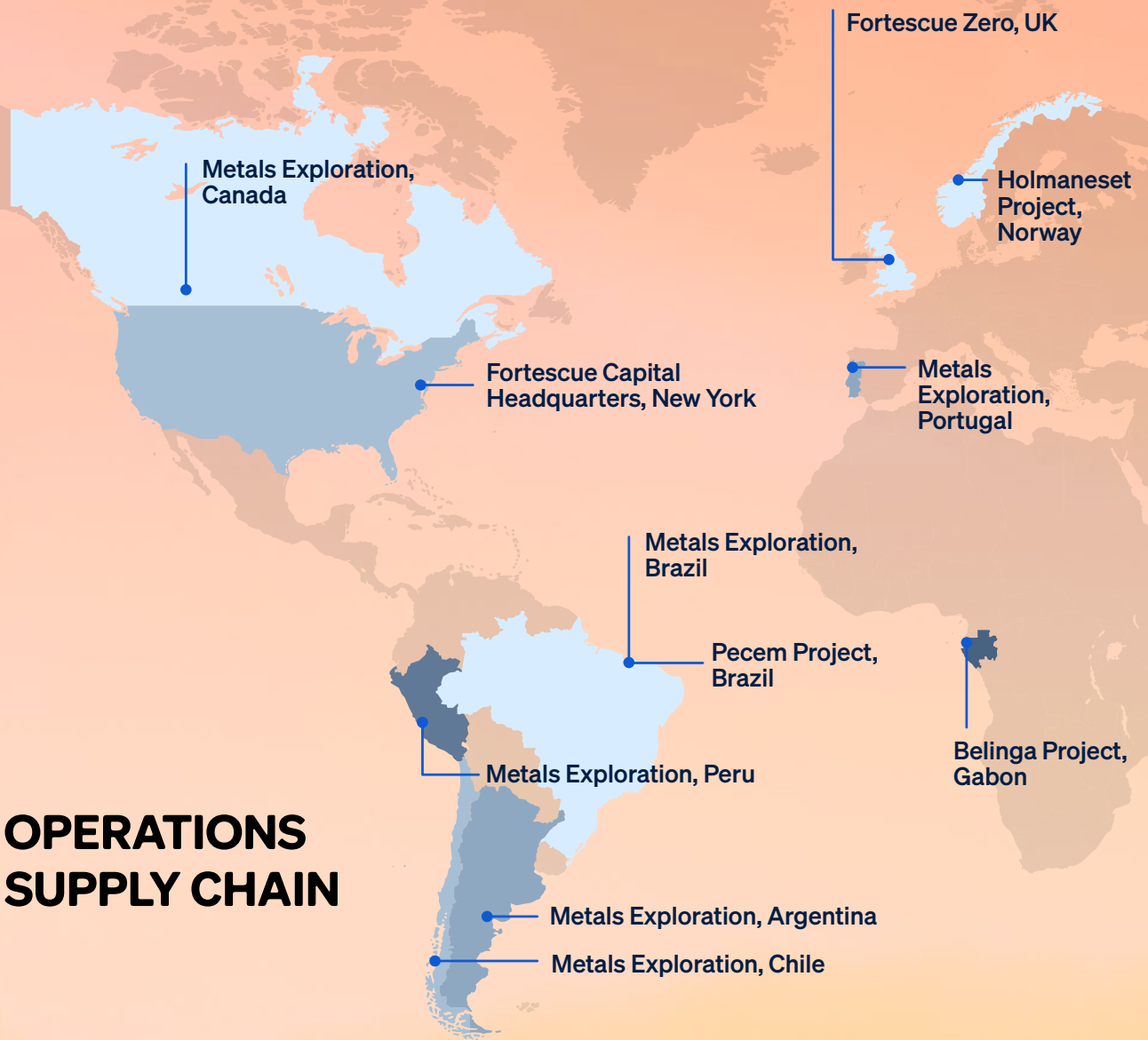
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OUR OPERATIONS AND SUPPLY CHAIN



GLOBAL SUPPLY CHAIN

5,888 SUPPLIERS

65 SOURCE COUNTRIES

\$12.3 BILLION IN CONTESTABLE SPEND

TOP 10 SOURCE COUNTRIES

	1	2	3	4	5	6	7	8	9	10
	Australia	United Kingdom	Gabon	China	United States	Argentina	France	Germany	Norway	Italy
Number of suppliers	3,018	1,114	59	91	311	438	30	76	33	23
Percentage of total contestable spend	90.8%	2.8%	1.3%	1.1%	1%	0.5%	0.3%	0.3%	0.3%	0.2%

GLOBAL SLAVERY INDEX PREVALENCE OF MODERN SLAVERY



Estimated prevalence of modern slavery per 1,000 (Walk Free Global Slavery Index 2023).

- Fortescue Head Office and marketing
- Fortescue



STAFF LOCATIONS BY REGION

16,005

PEOPLE EMPLOYED GLOBALLY

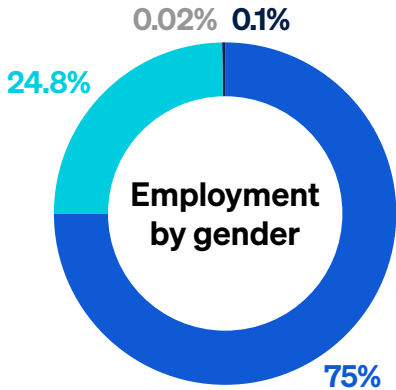
Oceania	14,242
Asia	84
Africa	137
North America	75
South America	208
Europe	1,237
Other	22



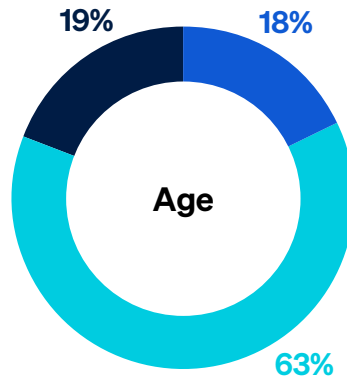
OUR WORKFORCE

As at 30 June 2025, we employed 16,005 employees (including labour hire) at Fortescue. Of our employees, 13,443 work in full time permanent roles, 350 in permanent part time roles, 379 in fixed term roles, 54 in casual roles and 1,779 in labour hire roles. The majority of our employees are based in Australia (14,241 people) with the remainder working in more than 27 countries. In Australia, 47 per cent of employees are covered by enterprise agreements.

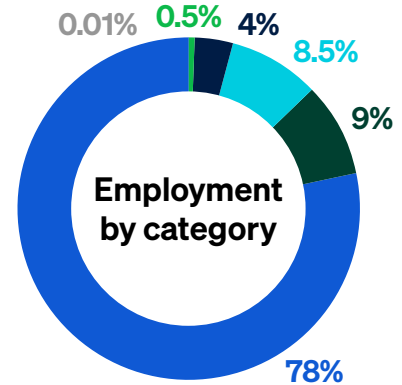
For more information about our workforce, see Fortescue's FY25 ESG Databook available on our website fy25sustainability.fortescue.com



- Non binary / gender diverse: 4
- Choose not to disclose: 18
- Female: 3,973
- Male: 12,010



- <30 years: 2,872
- 30-50 years: 10,079
- >50 years: 3,054



- CEO: 2
- General manager and above: 78
- Managers: 533
- Superintendents: 1,209
- Supervisors: 1,300
- Other: 11,123

OUR SUPPLY CHAIN

Fortescue's supply chain is complex and global, sourcing from 5,888 suppliers across 65 countries. Our purchases range from one-off transactions through to multi-year large value fixed term contracts.

In FY25, we spent A\$12.3 billion¹ with 3,018 Australian and 2,870 international Tier 1 (direct) suppliers. Most of our total spend (91 per cent) was with Australian suppliers, including 59 per cent with Western Australian suppliers and two per cent with local Pilbara suppliers.

International suppliers accounted for nine per cent of our total spend across 64 countries. Our top 10 source countries by spend were Australia;

United Kingdom; Gabon; China; United States; Argentina; France; Germany; Norway and Italy.

We recognise that the complexity and geographic diversity of our supply chain may increase exposure to modern slavery risks, particularly where manufacturing or labour intensive activities occur in higher risks jurisdictions. To help us manage these risks we have continued to embed our Sustainable Supply Chain Standard and associated due diligence processes across our sourcing activities. These include supplier screening, risk-based assessments and targeted worker welfare assessments. These actions help us to strengthen visibility of labour practices in our supply chain, communicate our expectations to

suppliers and support continuous improvement. We work to improve our understanding of our supply chain beyond Tier 1, with a current focus on higher risk categories, including renewable technologies. For more information about our supply chain approach, traceability questionnaire and traceability approach, see pages 26-31.

Our Global C&P team is responsible for sourcing activities, incorporating a dedicated Fortescue Zero C&P team that supports our Fortescue Zero sourcing activities. See page 32 for more information about Fortescue Zero's integration into our global sustainable supply chain approach.

¹ Spend (includes VAT/GST) that is subject to Fortescue's procurement processes and managed in accordance with Fortescue's Procurement Policy. It excludes shipping costs, government costs or charges (including royalties), donations, subscriptions and memberships, Native Title Group payments (other than payments made for the provision of direct goods or services), property leasing, related Fortescue entities and legal fees, intercompany payments, employee related payments.

FORTESCUE'S TOP TEN PROCUREMENT CATEGORIES

CATEGORY	DESCRIPTION	PERCENTAGE OF TOTAL SPEND	KEY SOURCE LOCATION
Mobile Equipment	Heavy mobile equipment, light vehicles, supporting mobile equipment, wet/dry hire, including autonomy services, tyres, components and spare parts.	21%	Australia, China, United States
Plant Processing	Rotable spares, crushers, conveyors, chutes, shutdown and maintenance services, including electrical, mechanical, scaffolding and craneage.	17%	Australia, China, Netherlands
Mining Services	Civil works, non-process infrastructure, contract mining, drilling materials and services, explosives, facilities management, and offsite laboratory testing.	15%	Australia, Gabon, United States
Energy and Renewables	Energy and power services, solar power systems and cells, battery energy storage solutions, wind energy, diesel, gas and lubricants.	13%	Australia, China, United States
Corporate Services	Labour hire, people and payroll services, security, real estate, professional services and consultancy, technology including software and cloud services.	10%	Australia, United States, United Kingdom
Major Projects	Major projects including greenfields and capital construction, exploration and studies.	4%	Australia, Gabon, Spain
Capital Projects	Construction and civil projects for enhancement or expansion of existing infrastructure and operations.	3%	Australia
Engineering	Engineering consultancy and technical services.	2%	Australia, France, Norway
Logistics	Logistics services, haulage, shipping, air freight and bulk cargo.	2%	Australia, China, United States
Rail	Rail rolling stock, ore cars, locomotives and spare parts.	2%	Australia, China, United Kingdom
Other	Raw materials, construction materials, consumables, pipes and valves, offsite fabrication and steel, marine services, Property, Plant and Equipment and chemicals.	11%	

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IDENTIFYING AND ASSESSING OUR MODERN SLAVERY RISKS

Modern slavery is a global issue, occurring in every country in the world. We understand that modern slavery has the potential to exist in our operations and supply chains, and that our risk profile changes with our business activities.

We also recognise that through our activities and business relationships we may cause, contribute or be directly linked to modern slavery. We understand a business may:

- **cause** modern slavery through its own actions or omissions (for example, if it exploits its own workers)
- **contribute** to modern slavery if its actions or omissions contribute to another party causing modern slavery, for example, by incentivising or turning a blind eye to the harm caused by a business partner (for example, if it puts significant pressure on a supplier to reduce costs or meet a specific delivery deadline that can only be achieved by exploiting workers)
- **be directly linked** to modern slavery through its operations, products or services or via its business relationships (for example, it purchases a product that contains critical minerals produced using forced labour).

Fortescue applies the United Nations Guiding Principles on Business and Human Rights (UNGPs) to identify and assess where we may cause, contribute to or be directly linked to adverse human rights impacts, including modern slavery, across our operations, supply chain and other business relationships.

Risk management framework

We identify and assess potential human rights risks including modern slavery risks across our operations and supply chain through the Fortescue Risk Management Framework. These risks are assessed, focusing on harm to people, considering the scale, scope and remediability of potential impacts.² Human rights including modern slavery risks are captured in our Corporate Risk Register, with mitigation actions and controls assigned to relevant functions and team members. This Framework helps us to ensure appropriate consideration of risks by senior management and oversight by the Board.

Learn more about Fortescue's Risk Management Framework in the Corporate Governance Statement within our FY25 Annual Report available on our website [fortescue.com](https://www.fortescue.com)



Human rights framework

In FY25, we launched the Fortescue Human Rights Framework and Standard. Applying the UNGPs, our Human Rights Standard sets out the minimum human rights due diligence requirements for key business activities to identify and assess where we may cause, contribute or be directly linked to adverse human rights impacts.



² Scale refers to how seriously a person or people's human rights may be impacted, scope refers to how many people may be impacted, remediability refers to the ability to restore people to the position they were in before the harm occurred.



Salient human rights issues

In FY25, we reviewed our corporate salient human rights issues, that is, those areas where we have the potential to have the most severe impact on human rights, including modern slavery, across our value chain. The process included reviewing existing risks in our Corporate Risk Register, desktop research, five stakeholder workshops and a range of interviews across our global business and a validation workshop with our Human Rights Steering Group. We assessed the scale, scope and remediability of identified risks to determine severity, and inform our updated salient human rights issues.

The rights of workers in our business (employees and contractors) and in our broader value chain, including in relation to working hours, wages, freedom from modern slavery, freedom of association and collective bargaining, remain salient human rights issues for our business.

Monitoring

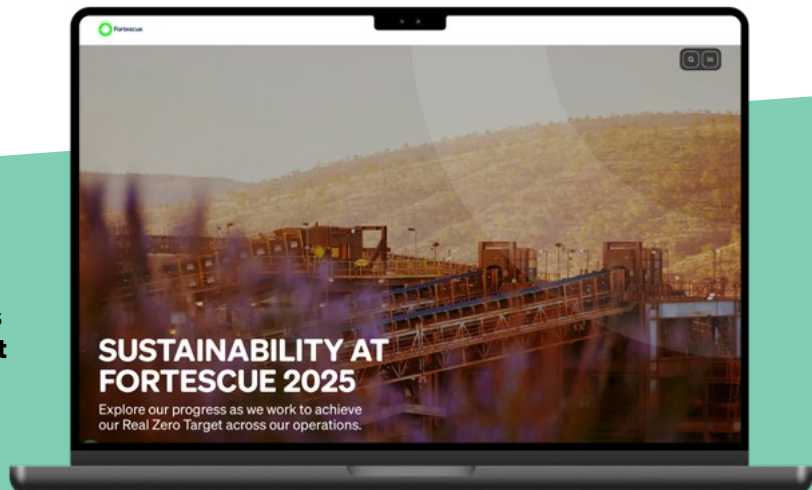
We monitor modern slavery and broader human rights risks in our operations and supply chains in several ways:

- ongoing analysis of country, industry and product trends relevant to modern slavery by our Global Policy and Insights team
- using third-party compliance screening and media monitoring platforms to identify and monitor supplier and business partner risks, and an ESG Country Risk platform to monitor modern slavery risks at a country level
- engaging with specialists including consultancy and advisory organisations, government functions, and leading NGO and civil society organisations such as Walk Free.

These activities help to ensure our understanding of modern slavery risks remains current and allow us to integrate new and emerging trends into our risk assessments and approaches.

LEARN MORE

About Fortescue’s Human Rights Framework, Standard and Salient Human Rights Issues on our [FY25 Sustainability Microsite](#)



MODERN SLAVERY RISKS IN OUR OPERATIONS

The extractive and energy industries are considered higher risk for modern slavery, particularly when located in countries that have a higher prevalence and vulnerability to modern slavery, and/or weaker protections of workers and government responses to address modern slavery. We understand that without proper controls, we could cause or contribute to modern slavery in our operations if, for example, employees or contractors were engaged in exploitative practices, or if our workforce, in their personal capacity, engaged in exploitative practices in the local community.

We conduct country risk assessments of our activities, including human rights and modern slavery risk factors. Our Risk Management for Global Growth Standard outlines the requirements for these assessments for business activities outside Australia. The outcomes are recorded in Fortescue's Corporate Risk Register and inform our mitigation actions and approach.

This year, we undertook a desktop modern slavery risk self-assessment of Fortescue's operations, exploration and energy activities using an internal methodology which considers the following criteria:

- country risk, as identified in Walk Free Global Slavery Index (2023) (Walk Free GSI) (prevalence, vulnerability and government response) and an external ESG Country Risk platform
- scope of our activities in the country
- our ability to control and/or influence mitigation actions to help us assess residual risk.

In FY25, our operating mines and the majority of our employees were located in Australia, a country with relatively lower prevalence and vulnerability to modern slavery, and comparatively stronger government response than many others³. More than 86 per cent of our workforce are engaged in permanent roles. We maintain direct control of our activities and sites and have the ability to implement controls such as policies, processes, grievance mechanisms and other measures to help us manage risk. Fortescue considers the risks of its operations within Australia of causing or contributing to modern slavery to be low, however, we acknowledge some risks remain

including, for example, for outsourced recruitment and labour, such as labour hire and sub-contracted labour. For more information on our approaches to address these risks, see pages 24-25.

Using the above criteria, our exploration and global growth activities in Gabon and Brazil were assessed to be medium risk considering the prevalence and government response data reported in Walk Free's GSI. While our exploration activities in Gabon are conducted through the joint venture Ivindo Iron SA, Fortescue is the majority shareholder with operational control enabling the implementation of our controls including policies, processes, grievance mechanisms, and other measures to help to manage modern slavery risks. We also own and control our activities in Brazil and implement our controls to help us manage modern slavery risks.

Using the above criteria, Fortescue considers our remaining activities to be low risk of causing or contributing to modern slavery. We acknowledge that risks remain—and may change over time—within our operations. We apply ongoing due diligence and targeted action to help us identify and address modern slavery risks. See pages 21-25 for the actions we are taking to address these risks across our operations.



MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

We recognise that modern slavery risks are inherent in global supply chains, particularly beyond Tier 1 suppliers, where visibility of worker conditions can be more limited. The level of risk varies depending on the country of manufacture or where services are delivered, the type of product or service, and nature of the workforce involved in the production or delivery.

We recognise that without proper due diligence and controls in place, our sourcing activities have the potential to contribute or be directly linked to modern slavery risks.

For example:

- contributing to modern slavery risks in our supply chain if our delivery expectations exceed what the supplier can reasonably achieve without exploiting workers, and this is disregarded, or
- being directly linked to modern slavery risk if a good we purchase, or its components or inputs, were produced by workers in exploitative conditions.

In addition to conducting ongoing due diligence of our supply chain (see pages 26-31), we also conduct an annual desktop risk assessment of our Tier 1 suppliers using our

Modern Slavery Risk Assessment Tool. Based on our FY25 annual assessment, we identified 120 high risk Tier 1 suppliers, representing A\$144 million (1.16 per cent of Fortescue's total contestable spend), and sourcing from the following countries in alphabetical order: Brazil, China, Democratic Republic of Congo, Djibouti, Egypt, Gabon, India, Kazakhstan, Kenya, Papua New Guinea, Sri Lanka, Thailand, and Vietnam. See the FY25 Spend Map for High Risk Sourcing.

Our high risk procurement categories are set out on page 20.

MODERN SLAVERY RISK ASSESSMENT TOOL

In FY25, we updated our Modern Slavery Risk Assessment Tool, updating country, industry, product and services risks and discontinuing entity criterion. We previously used the entity criterion as an indicator of supplier transparency and potential motivation to address modern slavery risks. Instead, we now consider a supplier's willingness to engage on modern slavery risks and their transparency throughout our engagement with them.

Country risk

The prevalence of modern slavery varies between countries depending on a range of factors such as political, social and economic conditions, legal frameworks, protections for workers and vulnerable groups, corruption and crime rates, instability, prevalence and vulnerability to conflict and environmental factors such as the occurrence of natural disasters or climate change that displaces communities and forces migration.

We draw on several sources to inform our understanding of country risk including the Walk Free GSI, our external ESG Country Risk platform and other publicly available sources. We prioritise assessing the country of manufacture for a particular good, component or delivery of a service rather than the registered headquarters of the supplier, as this provides a better indication of risk.

Industry, product or service risk

Modern slavery risk varies across industries, products and services. Those industries/services characterised as 'dirty, difficult and/or dangerous' tend to rely on low-skilled, migrant or vulnerable workers. Industries that are seasonal, have short production cycles, are low margin/competitive industries, have outsourced manufacturing or recruitment, or with long, complex and opaque supply chains are generally characterised as higher risk for worker exploitation and modern

slavery⁴. Certain products may also be associated with heightened human rights/modern slavery risks. For example, renewable technologies industries are linked to modern slavery/human rights risks associated with the extraction of essential critical/transition minerals⁵.

Spend

Spend is not an indicator of modern slavery risk. We use spend to identify our strategic and large sourcing activities and assist in identifying where we may have greater influence or leverage to partner with suppliers to identify, assess and address modern slavery risks and collaborative capacity building actions.

³ Walk Free, Global Slavery Index 2023 (<https://www.walkfree.org/>)

⁴ Responsible Sourcing Tool (<https://www.responsiblesourcingtool.org/>)

⁵ Business and Human Rights Resource Centre, 'Transition Minerals Tracker: 2025 Analysis' (<https://www.business-humanrights.org/en/transition-minerals-tracker-2025-analysis>)

FY25 SPEND MAP FOR HIGH RISK SOURCING

● Size of dot to represent % of total spend with high risk suppliers.

HIGH RISK PROCUREMENT CATEGORIES

CATEGORY	COMMENTARY
Renewable energy technologies	Renewable technologies, such as solar panels, batteries and wind technologies, are critical for the decarbonisation of our terrestrial Australian iron ore operations. However, the manufacturing of these technologies has been linked to modern slavery and the mining and processing of critical mineral inputs such as cobalt, copper, lithium, manganese, nickel, zinc, quartz and silicon have been linked to a range of human rights abuses. Workers in these industries are vulnerable to forced and child labour, unpaid and underpayment of wages, wage theft, hazardous work conditions, illegal overtime, exploitative hiring practices and other forms of exploitation. Renewable energy technology supply chains are often opaque, extending to higher-risk countries where governance is poor and transparency limited.
Construction	The construction industry commonly involves long supply chains and relies on lower skilled, lower paid manual work and migrant labour creating greater risks of modern slavery. Raw materials and goods used are often sourced from, or manufactured by suppliers beyond Tier 1 in higher risk countries. Modern slavery risks associated with construction will vary depending on the country of operation.
Labour hire/out-sourced recruitment	Temporary work carries higher risks of modern slavery due to its transitory and temporary nature, higher rate of migrant workers who may be more vulnerable to exploitation, and strong competition causing pressure to minimise costs.
Rail rolling stock	Rail equipment, locomotives, rail ore cars and rail steel is largely manufactured outside Australia. Some manufacturers are located in higher-risk countries where there is limited visibility of worker conditions.
Rubber	Rubber products including tyres, conveyor belts and gloves are manufactured using rubber sourced through third-party suppliers over whose activities we have limited visibility. Rubber farming and production, and the production of rubber products, are linked to higher risks of modern slavery, including child and forced labour.
Shipping	Fortescue charters vessels to ship our product to customers and we engage ship management services to manage our vessels and crew. The shipping industry has been linked to modern slavery indicators such as the withholding of wages, pay below a living wage, poor living and working conditions and lack of accessible grievance mechanisms.
Electronics	Fortescue sources a range of electronics, such as computers, mobile phones and electrical equipment such as cables. The Walk Free GSI has identified electronics as the highest value at risk import for modern slavery for most G20 countries, including Australia. Manufacturing often occurs in locations with minimal regulation and oversight, and is often undertaken by lower skilled workers. There are also risks that products are manufactured using raw material inputs produced by workers in conditions of modern slavery.
Cleaning, catering and security services	We procure cleaning, catering and security services for our mines and cleaning and security services at our offices. These services are linked to higher modern slavery risks, including in Australia, due to the low skilled, low paid, manual work and the prevalence of short-term, seasonal and migrant workers and subcontractors.

Fortescue takes actions to address modern slavery risks in our supply chain including screening suppliers, implementing our Sustainable Supply Chain Standard, conducting enhanced due diligence for high risk sourcing activities, conducting verification activities, incorporating human rights and modern slavery obligations in our contracts, and continuous engagement and monitoring of suppliers. See pages 26-31 for more information on our actions to address modern slavery risks in our supply chain.

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OUR ACTIONS TO ADDRESS MODERN SLAVERY RISKS

GOVERNANCE AND MANAGEMENT

Modern slavery risks in our operations and supply chain are managed as part of Fortescue's Human Rights Framework. We align our approach to the UNGPs and work to continuously improve our actions.

Fortescue's Sustainability team, including a human rights specialist, is responsible for the day-to-day management of Fortescue's human rights and modern slavery approach. The team is led by Fortescue's Director of Global Sustainability and External Affairs and reports human rights and modern slavery matters to the Board through the Safety and Sustainability Committee (SSC) and to the Leadership Team through the Executive Sustainability Committee.

Fortescue's Board of Directors, through the SSC, is responsible for oversight of human rights risk management, including modern

slavery, and receives quarterly updates on these matters.

Delivering Fortescue's human rights and modern slavery approach requires multi-functional collaboration. For example, the C&P team, supported by an internal Sustainable Supply Chain team, is responsible for implementing modern slavery due diligence actions in our supply chain and leading our collaboration with suppliers to address modern slavery risks.

To strengthen cross-functional collaboration, Fortescue's Human Rights Steering Group meets quarterly, bringing together key functions to share learnings, drive improvement and coordinate actions. Membership includes C&P, Communities, First Nations, Health and Safety, Legal, Security, Governance and Compliance, Risk and Assurance, People, Fortescue Zero and representatives from our regional teams. In FY25, key topics and initiatives included:

- oversight of our FY24 Modern Slavery Statement, risks, key actions from FY24 and actions to be implemented in FY25
- monitoring the integration of Fortescue Zero into Fortescue's supply chain due diligence approach
- review of Fortescue's efforts to protect the rights of migrant workers, as evaluated by the Business and Human Rights Resource Centre and Equidem, along with ongoing initiatives to mitigate recruitment-related risks⁶
- validation of Fortescue's corporate salient human rights issues.

Learn more about the SSC functions: in the SSC Charter and our Human Rights Governance and Management approach: [FY25 Sustainability Microsite](#)

⁶ Business and Human Rights and Resource Centre and Equidem (2024) ["Rush to renewables: toward migrant worker rights and just transition in the Gulf"](#) report.

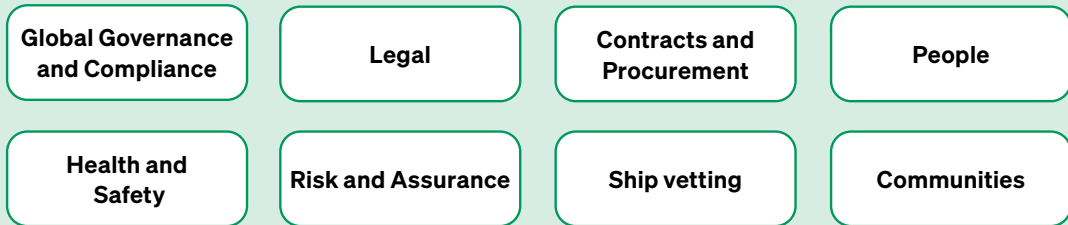
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HUMAN RIGHTS GOVERNANCE



KEY CORPORATE FUNCTIONS INCLUDE:



POLICIES, STANDARDS AND PROCEDURES

Our Code of Conduct and Integrity and Human Rights Policy form the foundation of our commitment to respect human rights and reject modern slavery. These commitments are reflected in other policies, standards and procedures outlined in the table below. These documents guide our actions in identifying and addressing modern slavery in our operations and supply chains.

Other policies that further help to implement our broader human rights approach include our Health and Safety Policy, Diversity Policy, Equal Opportunity, Discrimination and Workplace Bullying Policy, Communities and Social Performance Standard, and Anti-Bribery and Corruption Policy.

These policies apply across the Fortescue Group including all reporting entities and their owned and controlled entities.

KEY POLICIES, STANDARDS AND PROCEDURES

POLICY, STANDARD, PROCEDURE	PURPOSE, APPLICATION AND IMPLEMENTATION
Code of Conduct and Integrity	The Code sets out the essential standard of conduct and expectations, including respect for human rights and rejection of modern slavery, for employees, suppliers and contractors. It is provided to employees before commencing, and suppliers at onboarding and is a condition of doing business for and with Fortescue. The Code requirements are included in Fortescue's induction and human rights training modules.
Human Rights Policy	The Policy sets out our commitment to respecting human rights, rejecting modern slavery and our strategy for achieving our commitments. It applies to all Fortescue activities, employees, suppliers, contractors, consultants and business partners. It forms part of our supplier vendor documents. The Policy and our commitments are communicated to employees in our human rights training. Read more about our training on page 34.
Human Rights Standard (Internal document, launched in FY25)	The Standard sets out the minimum standard of human rights due diligence for key business activities including new country entry, project development, business partnerships, security, and supply chain. Human Rights due diligence tools were also launched to support implementation. The Standard and its expectations are included in our human rights training for employees. Read more about the Standard in our FY25 Sustainability Microsite.
Procurement and Logistics Policy	The Policy outlines our commitment to conducting sourcing activities responsibly and sustainably, while ensuring respect for human rights and rejection of modern slavery in our supply chain. It applies to all Fortescue sourcing activities and forms part of our supplier vendor documentation.
Sustainable Supply Chain Standard (Updated in FY25)	This year, we launched our Sustainable Supply Chain Standard (formerly Sustainable Procurement Standard) including guidance on how suppliers can apply our human rights and modern slavery expectations in their operations and supply chains, using practical examples of actions suppliers can implement to develop their approach no matter their size or level of maturity. The Standard acts as a supplier code of conduct, applies to all Fortescue suppliers, and forms part of our vendor documentation. A commitment to comply with the Standard is taken into consideration during the contract award process and during the term of the contract.
Sustainable Supply Chain Procedure (Internal document, developed in FY25)	As part of our Sustainable Supply Chain Transformation, our Modern Slavery Procurement Procedure was replaced by this Procedure in FY25. It sets out our human rights (including modern slavery) supply chain due diligence approach and applies to all Fortescue sourcing activities. To support the implementation of this Procedure, we launched our Sustainable Supply Chain Learning Academy (see page 34). Read more about the Sustainable Supply Chain Transformation, the Procedure, supporting Enhanced Due Diligence Guidelines, and application on pages 26-31.
Whistleblower Policy	This Policy outlines how we support whistleblowers to safely and confidentially raise concerns with us, including human rights and modern slavery concerns. It applies to all Fortescue activities. Fortescue's Speak Up service is communicated to employees during inductions, human rights training and internal communication channels. It is communicated to suppliers through our Sustainable Procurement Standard, Supplier Human Rights Information Pack and is promoted and available on our website. Read more about our Speak Up service on pages 35-36.
Grievance Procedure (Internal document)	This Procedure sets out the minimum design requirements for Fortescue's external local level grievance mechanism to help ensure that communities and other stakeholders have access to locally appropriate grievance mechanisms to raise concerns, including modern slavery concerns. Fortescue's Communities team are responsible for implementing and maintaining our local level grievance mechanism. Read more about our Grievance Procedure on pages 35-6.

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ADDRESSING MODERN SLAVERY RISKS IN OUR OPERATIONS

Our workforce

Fortescue's Code of Conduct and Integrity and Human Rights Policy set out our commitment to respecting the rights of our workers and firm rejection of modern slavery.

We take actions to mitigate modern slavery and labour exploitation risks in our workforce, including:

- providing all employees with a written contract setting out the terms and conditions of their employment including remuneration, working hours, locations, leave and other benefits
- offering remuneration packages that are competitive and above minimum wages, and conducting annual remuneration reviews (for example, our Australian entry level employees are paid on average, 169 per cent of the minimum wage for females and 167 per cent of minimum wage for males)
- not requiring recruitment fees be paid to us and paying the recruitment fees of third-party recruitment/labour hire agencies we work with
- implementing processes to verify the identity, age, qualifications and working rights of candidates
- not retaining workers' identity or right to work documents, such as passports or visas

- promoting Fortescue's Speak Up platform as a confidential channel to raise concerns
- complying with all applicable laws.

Fortescue's Talent and Acquisition Guideline, updated in FY25, sets out our commitment to conducting fair, transparent, voluntary recruitment processes that are free from coercion, deception and discrimination. The Guideline is implemented by Fortescue's People team.

Where we engage third-party recruitment or labour hire agencies, our supplier due diligence approach applies (see pages 26-31). Our Sustainable Supply Chain Standard outlines our expectations of recruitment or labour hire suppliers, including that suppliers reject modern slavery, workers never pay recruitment fees or associated costs for a job, workers are provided with a written contract in a language they understand, and personal identification or right to work documents are not retained.

FOCUS AREA: ETHICAL RECRUITMENT TRAINING

We undertake due diligence of our operations and our business partners (such as joint venture and investment partners) to identify, assess and address modern slavery risks related to our activities and relationships.

Our Global Governance and Compliance team use third-party screening platforms to screen and

monitor our business partners against specific criteria across international databases to identify human rights issues, including modern slavery, child labour, forced labour and human trafficking. These databases draw on sources including adverse media, court proceedings and investigations. If human rights or modern slavery concerns are identified, these are referred to the Sustainability team for review.

We communicate our commitments to respecting human rights and rejection of modern slavery to business partners, and our expectations of them, through our engagements and in our written agreements such as memoranda of understanding, joint ventures and investment agreements.

In FY25, we launched our Human Rights Standard and supporting due diligence tools, setting the minimum standard of human rights due diligence for key activities including new country entry, project development, business partnerships, security practices and supply chain activities.

LEARN MORE

About our Human Rights Standard within our FY25 Sustainability Report available on our website fy25sustainability.fortescue.com

In FY25, we delivered an ethical recruitment training workshop to key stakeholders in the C&P and People teams. Participants were identified based on their responsibility for direct and indirect engagement of workers, and engagement of recruitment and labour hire services.

The training focused on:

- identifying and managing forced labour risks and indicators across our recruitment activities including direct recruitment, engagement of labour hire and recruitment agencies and sub-contractor labour
- international labour standards and implementation of ethical recruitment practices
- identifying vulnerable workers, including migrant workers
- collaboratively identifying future actions to address these risks.

Following the training, the People team updated our Pre-Engagement Survey to ask workers whether they have paid any fees, charges or costs to any person or vendor related to their recruitment (excluding police clearances and health reports). This aims to identify instances of recruitment fee payments by workers. If a worker indicates they have paid such fees, the People team will investigate to determine what was paid or requested, and take appropriate action.

Assessing effectiveness of Ethical Recruitment Training

Assessing effectiveness of Ethical Recruitment Training



OBJECTIVE 1

Improve participants understanding of ethical recruitment and modern slavery risk in recruitment activities

COMMENTS:

Participants were surveyed after the training to assess whether their understanding of these issues improved. 56 per cent of respondents identified as having low/some understanding of modern slavery risks in recruitment activities before the training. After the training, 94 per cent of participants identified as having a high/good understanding of these risks.



OBJECTIVE 2

Engage participants in identification of high-risk recruitment activities and further actions Fortescue can implement to address modern slavery risk in recruitment activities

COMMENTS:

Respondents to the survey identified sub-contracted labour, recruitment agencies, labour hire and engagement of migrant workers a higher risk recruitment activity for our operations. During the workshop, participants agreed key actions to be implemented to help identify and address these types of risks in our recruitment activities. For example,

- our Pre-Engagement Survey was updated to include recruitment fee questions
- our online human rights module was also updated to include ethical recruitment content and red flags, to help improve understanding of modern slavery risks in recruitment across our business.

Completion of other agreed actions will be monitored in FY26.



Effective



Partially effective



Not effective

ADDRESSING MODERN SLAVERY RISKS IN OUR SUPPLY CHAIN

Fortescue continues to adopt a risk based approach and take proactive steps to identify, assess and address modern slavery risks across our global supply chain. Our approach combines robust due diligence with ongoing supplier engagement, underpinned by our Sustainable Supply Chain Standard and Enhanced Due Diligence Guidelines.

Sustainable Supply Chain Transformation

In FY25, we accelerated our transformation program to further embed sustainable supply chain approaches into our sourcing activities. Through this work we have expanded our modern slavery due diligence to incorporate broader human rights considerations, redesigned our annual Modern Slavery Risk Assessment, and launched our new Sustainability Assessment with

consolidated due diligence tools to advance our approach. As a result, our existing Modern Slavery Procurement Procedure has evolved to become our new Sustainable Supply Chain Procedure.

An overview of our approach is set out below.

Standard sustainable supply chain requirements

All suppliers are screened during onboarding and monitored throughout the relationship using third-party compliance platforms.

These platforms screen suppliers against specific criteria, including human rights and modern slavery, using international databases and external sources such as adverse media, court proceedings and investigations to identify risks.

Human rights and modern slavery flags identified through these platforms are referred to the Sustainability and C&P teams for investigation. Actions may include requests for information, supplier interviews and implementation of mitigation actions.

OUR APPROACH TO SUSTAINABLE SUPPLY CHAINS

Due diligence continues through relationship

Standard sustainability requirements



Sustainable Supply Chain Procedure



Enhanced Due Diligence for High Risk Sourcing



Worker welfare assessments



Traceability verification



Ongoing monitoring



All suppliers are required to comply with our standard human rights and modern slavery terms and conditions and comply with Fortescue's Code of Conduct, Human Rights Policy and Sustainable Supply Chain Standard. See page 28 for more information on our supplier engagement and contracting approach.

Sustainable Supply Chain Procedure

Our new Sustainable Supply Chain Procedure applies to sourcing activities requiring formal market assessments, including variations and extensions of existing contracts.⁶ The first step is completion of our new Sustainability Assessment.

Sustainability Assessment

Designed in-house, the Sustainability Assessment (Assessment) uses external data sources to identify risks specific to a sourcing activity against several factors, including:

- country risk – the sourcing location or delivery of services/works
- category, commodity or project scope
- labour profile – such as the potential use of temporary or migrant labour
- raw materials.

The output of the Assessment is specific to the sourcing activity and includes:

- a modern slavery risk score using our Modern Slavery Risk Assessment Tool methodology (see page 19)
- relevant sustainability risks and opportunities - human rights (including modern slavery), emissions, circularity, and traceability
- enhanced due diligence actions, if required.

The Assessment also provides qualitative insights into potential human rights risks, including modern slavery, relevant to the sourcing activities, goods, industry or services. For example, it may provide information about potential labour

risks in construction activities or modern slavery risks in renewable technologies supply chains. These insights are designed to build knowledge and awareness of these risks among our C&P team before engaging the market and entering discussions with suppliers.

Enhanced Due Diligence for High Risk Sourcing

This year, we replaced our previous supplier self-assessment questionnaires and implemented new targeted Enhanced Due Diligence Supplier Questionnaires for specific risks and activities including:

- human rights and forced labour
- traceability
- labour and recruitment
- engineering, procurement and construction
- security services.

When required, the relevant questionnaires are issued with our tender documents and form part of our evaluation criteria. Suppliers are expected to demonstrate that they have the governance to investigate, assess and address modern slavery risk in their operations and supply chain including conducting fit-for-purpose due diligence and remediation. Depending on the sourcing activity and risks identified in the Assessment, multiple questionnaires may be issued.

We are in the process of working with Fortescue Zero to implement the questionnaires into its local systems.

When required, we may also use specialist industry/supply chain reports from our internal Global Policy and Insights team or external independent consultants to better understand modern slavery risks relevant to specific sourcing activities or supply chains. In FY25, 200 specialised reports were completed by the Global Policy and Insights team. The findings help guide our approach and development of mitigation actions.

This year we launched supplementary Enhanced Due Diligence Guidelines

to support the C&P team to identify red flags and determine appropriate mitigation actions prior to award. Depending on the scope and risks identified for the sourcing activity, additional verification activities may be required.

Verification activities

Fortescue conducts a range of verification activities with suppliers, including as part of our Enhanced Due Diligence approach. Verification activities may include:

- worker welfare assessments (see pages 29-30)
- traceability audits (see page 31)
- site visits.

Where supplier site visits are conducted, our Workplace and Labour Conditions Supplier Site Visit Checklist may be completed. The checklist includes observational prompts relevant to health and safety, availability and quality of personal protective equipment, worker conditions such as appearance, demeanour, working environment, communications and availability of worker grievance and feedback mechanisms. In FY26, we will integrate the checklist requirements into our pre-qualification assessment for global sourcing.

Mitigating and managing risk

Modern slavery risks identified during tender are evaluated using our standard evaluation matrix. Where red flags are identified, appropriate mitigation actions must be developed and agreed with the supplier prior to contract award. Examples include enhanced contract clauses, commitments to address corrective actions within an agreed time period, undertaking verification activities during the contract term, and capacity building initiatives.

Identified modern slavery risks and mitigation actions are incorporated into our contract award documentation. Mitigation actions are recorded and monitored in our Corporate Risk Register. This enables better centralised recording and monitoring of risks and performance against mitigation actions.

⁶ A market assessment is a sourcing process led by Fortescue's C&P team that results in awarding a contract to a supplier for the provision of works, goods or services. Market assessments are typically undertaken for engagements that are complex, long-term, high-value, and/or high-risk.

Contracting

Our Standard Terms and Conditions include human rights and modern slavery provisions requiring our suppliers to:

- operate in a manner consistent with human rights and not engage in modern slavery
- take action to investigate, identify and assess human rights and modern slavery risks in their operations and supply chains including due diligence and remediation processes, and have the necessary policies, process and procedures to undertake these actions
- notify Fortescue of instances of modern slavery in their operations and supply chain and subsequent remediation actions
- permit Fortescue to undertake verification activities
- include equivalent commitments in contracts with their suppliers.

To support suppliers to comply with these expectations, the provisions include the opportunity for suppliers to seek reasonable assistance from us. Assistance may include capacity building, sharing lessons learnt about our experiences implementing modern slavery due diligence, and ongoing sessions with our internal subject matter experts.

Where we have identified heightened risks, we may implement enhanced human rights and modern slavery contracting provisions including mechanisms such as chain of custody or human rights management plans.

This year, we redesigned our sustainability requirements for global engineering, procurement and construction (EPC) contracts to include specific requirements for human rights risks assessments, management plans and reporting, in addition to our standard human rights and modern slavery terms.

To support our C&P team, our internal quick reference guide describes the purpose and objectives of our standard human rights and modern slavery contract terms, and how to engage with suppliers on Fortescue's minimum expectations. Negotiation support is provided by our Sustainable Supply Chain and Sustainability teams for strategic, high-risk engagements.

[Learn more about Standard Terms and Conditions and Vendor Documentation on our website Supplier Documentation | Fortescue Supplier Centre](#)

Continuous supplier engagement and monitoring

Supplier engagement is key to supporting our actions to identify, assess and address modern slavery risks in our supply chain. Our approach focuses on building collaborative relationships, knowledge sharing and raising awareness, recognising where we have leverage to influence supplier approaches and seeking feedback.

The C&P team is responsible for ongoing engagement with our suppliers on modern slavery and broader human rights matters throughout the tender and Enhanced Due Diligence process, contract negotiations and life of the relationship. The Sustainability team collaborates closely with the C&P team to provide expert input, including development of contracting strategies, assessing new supply chains and verification activities.

To support our C&P team to engage with suppliers on our new Sustainable Supply Chain approach and Enhanced Due Diligence requirements, we developed an internal Sustainable Supply Chain Supplier Briefing Pack. This pack sets out our approach, expectations, importance of building sustainable supply chains, and how we can work together to achieve success. It may be presented by the C&P team

to suppliers during tender briefings, supplier site visits and ongoing contract management meetings.

This year we also updated our Supplier Information Pack for Foundational Human Rights to incorporate additional information about international human rights due diligence standards, grievance mechanisms and ethical recruitment. This is published on our website and available to all global suppliers.

We continue to monitor our suppliers through our third-party screening platforms and contract management routines during the term of the relationship. We also monitor external factors to better understand global trends to understand how these may influence human rights and modern slavery risks in our supply chain. Where risk or issues are identified, we raise these directly with our suppliers to understand the situation and work together to implement additional mitigation actions as required.

[Read our updated Supplier Information Pack: Foundational Human Rights on our website Supplier Documentation | Fortescue Supplier Centre](#)

FOCUS AREA: WORKER WELFARE ASSESSMENTS

Fortescue continues to implement our worker welfare assessment program for high-risk strategic sourcing activities. Assessments are conducted in collaboration with suppliers, by third-party auditors appointed based on regional experience, language capabilities, and knowledge of local labour laws and international standards. These assessments focus on compliance with local labour laws, the Ethical Trading Initiative (ETI) base code and ILO Indicators of Forced Labour.

Our assessment process includes an expectation setting session with the supplier and C&P team, briefing with our third-party auditors on the assessment scope, onsite attendance at the supplier's facilities, document review, site tours, and confidential worker interviews (targeting 10 per cent of the total workforce). Worker interviews are anonymous and conducted in private by the auditors. Debrief sessions are held onsite with the supplier to clarify observations, discuss findings and recommendations for action.

We invest in building and maintaining collaborative and transparent relationships with our suppliers. Where issues are identified, in alignment with the UNGPs, Fortescue is committed to working collaboratively with suppliers and using our leverage to support suppliers to design and implement practical and meaningful corrective actions, improve approaches, remediate harm, and create lasting positive change for workers. We monitor suppliers' implementation of corrective actions and performance throughout our relationship with them. However, Fortescue maintains the contractual right to terminate suppliers for failure to remediate human rights issues, including modern slavery.

FY25 Assessments

In FY25, we conducted targeted worker welfare assessments with two suppliers across four facilities. The assessments were conducted by independent auditors evaluating suppliers compliance with local laws, labour management practices and worker conditions including, for example, recruitment practices, working hours and benefits, and access to grievance mechanisms. While these assessments did not identify any confirmed instances of modern slavery, several findings against two ILO Indicators of Forced Labour were identified (including key findings outlined below). We are working collaboratively with our suppliers to support them in addressing issues, remediating harm to workers and monitoring implementation of actions throughout our relationship.

FINDINGS	ACTIONS
<p>Withholding of wages</p> <p>including (a) wages below minimum wage and (b) disciplinary wage deductions for health and safety and behaviour breaches</p>	<p>(a) after investigation with the supplier, we identified the root cause to be an oversight in updating their payroll system to reflect recent changes to minimum wages in the region. The supplier is updating their payroll system, we continue to engage with them on this issue and monitor actions.</p> <p>(b) we continue to engage with the supplier to address the issue and make clear our expectations that disciplinary wage deductions cease.</p>
<p>Excessive overtime</p> <p>including overtime beyond legal limits and student/ intern workers (over the age of 18) working night shifts and/or overtime</p>	<p>We continue to work with the supplier on these issues and make clear our expectation that these be addressed.</p>

Continuing our work with suppliers assessed in FY24

In FY25, we continued our work with suppliers we conducted assessments with last year to support the implementation of corrective actions, improved approaches and remediation actions (as appropriate) (see our [FY24 Modern Slavery Statement](#)). Actions implemented by suppliers assessed in FY24 (to date) include:

- a supplier agreeing to remove disciplinary wage deductions for absenteeism and amending worker contracts to reflect this
- a supplier amending dispatch worker contracts, updating internal policies and implementing monitoring to help ensure dispatch workers receive statutory entitlements to leave and pay including overtime loading
- a supplier changing internal policies to now pay the costs of required pre-employment medical assessments previously paid by workers and agreeing to repay fees paid by workers.

We continue our engagement with suppliers to monitor the implementation of agreed corrective actions, and work with them to address findings. Throughout our relationship with suppliers, we look for opportunities to build and utilise our leverage to build capacity and improve approaches across our supplier's business to promote respect for human rights, for example, through our ongoing supplier relationship and post-award contract management.

Assessing effectiveness of Worker Welfare Assessments



OBJECTIVE 1

Understand working conditions and identify labour rights issues

COMMENTS:

Conducting worker welfare assessments enables us to understand the working conditions on the ground at our supplier facilities. It also enables us to understand more about local labour laws/conditions, industry or regional challenges and labour management practices.



OBJECTIVE 2

Identify forced labour indicators and/or modern slavery

COMMENTS:

While these assessments assist us in identifying forced labour indicators and/or incidents, we understand these assessments are representative of a point in time and do not enable continuous monitoring unless repeated periodically. We have identified forced labour indicators during our worker welfare assessments, but we have not yet identified modern slavery.



OBJECTIVE 3

Support collaborative actions with suppliers to address identified labour rights issues and/or modern slavery

COMMENTS:

We conduct these assessments in collaboration with our suppliers. The process has enabled us to have discussions about the importance of respecting workers labour rights before, during and after the assessment. We work collaboratively with suppliers to address issues identified and have seen improvements in workers conditions and suppliers' approaches. Suppliers have also commented that completing this work with us has enabled them to demonstrate to other customers their labour management capabilities and actions to identify and address labour rights issues. We acknowledge success against this objective is dependent on the willingness of a supplier to engage and collaborate with us to address identified issues. Where suppliers are unwilling to address issues, effectiveness against this objective is reduced.

Adopting a continuous improvement approach, we integrate lessons learnt from these assessments into our worker welfare assessment program.



Effective



Partially effective



Not effective

**FOCUS AREA:
TRACEABILITY AS AN
ENABLER FOR IMPROVED
HUMAN RIGHTS DUE
DILIGENCE**

Traceability is a cornerstone of our sustainable supply chain strategy and a critical tool for undertaking human rights due diligence and risk mitigation, particularly where the most severe human rights risks exist in deeper tiers of our supply chain.

Traceability is embedded into our approach to enhanced due diligence.

We begin by issuing a traceability supplier questionnaire and use this to conduct an internal traceability assessment to evaluate our Tier 1 supplier's capability and maturity including ability to map and manage their own supply chain. This assessment involves site visits by our

C&P team, observations of supplier facilities, and tailored workshops to identify gaps and improvement opportunities. Our C&P team includes a dedicated traceability specialist.

Following the assessment, our Tier 1 supplier submits a proposed supply chain for Fortescue's scope (including proposed Tier 2 and beyond suppliers). We conduct our own due diligence of the proposed supply chain and agree an approved supplier list to form part of our supply chain. This approved supplier list is incorporated into chain of custody obligations in our contracts.

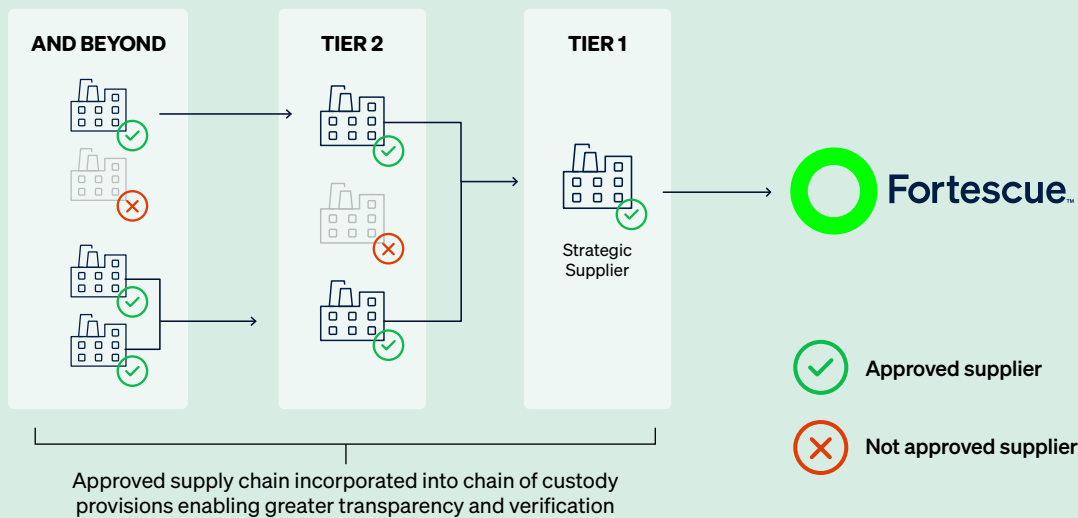
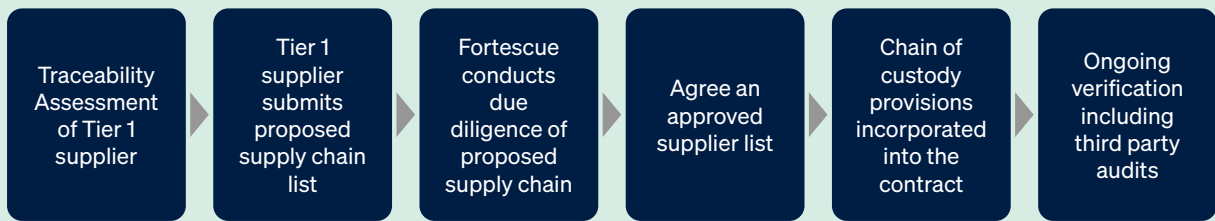
Chain of custody provisions are designed to extend visibility beyond our tier one suppliers, enabling Fortescue to conduct enhanced due diligence and verification at varying stages of the supply chain, using tools such as third-party traceability audits.

These activities are essential to building trust with our suppliers and deepening our understanding of their operations and supply chains. By taking a hands-on approach, we can work alongside our suppliers to strengthen traceability in a practical and collaborative way.

To strengthen capability across the business, this year we partnered with a third-party expert to deliver formal training on traceability to targeted C&P and Sustainability team members. The Sustainable Supply Chain team collaborated with the Sustainability team to deliver our first Critical Materials and Traceability Masterclass to 19 members of the C&P team, with further sessions planned for FY26.

Our traceability approach

Enhanced visibility allows Fortescue to identify risks and address risks earlier across our complex and global supply chains.



FOCUS AREA: FORTESCUE ZERO INTEGRATION

In FY25, we completed a gap assessment of Fortescue Zero's modern slavery due diligence approach against our Modern Slavery Procurement Procedure. We committed to align with the procedure by the end of FY25. This marked significant progress towards aligning and embedding Sustainable Supply Chain practices across the C&P team, ensuring that human rights remain central in our sourcing activities.

Source-to-contract

We created a bespoke Modern Slavery Risk Assessment Tool using Fortescue Zero's commodities and introduced mandatory human rights requirements into vendor onboarding. We also incorporated our global standard and human rights clauses into Fortescue Zero's contract templates.

We updated tender schedule templates with global standard human rights requirements and piloted global criteria for Enhanced Due Diligence. This will be launched in FY26.

Targeted capability building

A bespoke face-to-face training program was delivered to the Fortescue Zero C&P team, to ensure a shared vision and accountability for human rights and modern slavery due diligence in sourcing activities.

The training focused on real case studies and practical approaches applicable to Fortescue Zero's products and supply chain. This included an interactive workshop for 20 employees leading high-risk sourcing activities including battery cells and busbars, exploring forced labour risks throughout critical material supply chains. The training received positive feedback from participants.

We also delivered general human rights supply chain training sessions to 79 Fortescue Zero employees in the UK. Participants reported greater confidence when engaging with suppliers, and a clearer understanding of how human rights principles apply to their roles.

The Sustainable Supply Chain and Sustainability teams continue to work with the Fortescue Zero C&P team to support ongoing human rights and modern slavery due diligence activities.



SHIPPING

Fortescue directly operates eight bulk vessels and charters others to transport our ore to our customers. The international shipping industry is high-risk for modern slavery and worker exploitation, and we take action to help identify and mitigate these risks.

Ship vetting

Our internal Ship Vetting and Quality team vets all vessels nominated to load Fortescue shipped product. Assessments are strengthened using multiple information sources. The team vet vessels against specific criteria, data obtained from RightShip, public databases such as Equasis, past vessel performance records, and our Vessel Nomination Questionnaire. The Questionnaire incorporates a Maritime Labour Convention risk assessment tool and questions. It is sent to vessels for completion at the time of nomination and prior to arrival at our terminal. If vessels do not meet our standards, they are not approved to call at our terminal.

Vessel inspection

Our Ship Vetting and Quality team conduct inspections of vessels at Fortescue's terminal. In addition to vessel safety and quality, general seafarer welfare is assessed, including quantity and quality of food provisions, operation of air

conditioning and temperature within accommodations, cleanliness, access to communications technologies and access to shore leave.

In FY25, the team conducted 51 vessel inspections. Where issues were identified, specific corrective actions were requested, and completion is monitored by the team.

Contracts and warranties

Owners of vessels engaged by Fortescue must warrant that certain labour conditions and standards are met, in line with the requirements of relevant ILO Conventions. These include:

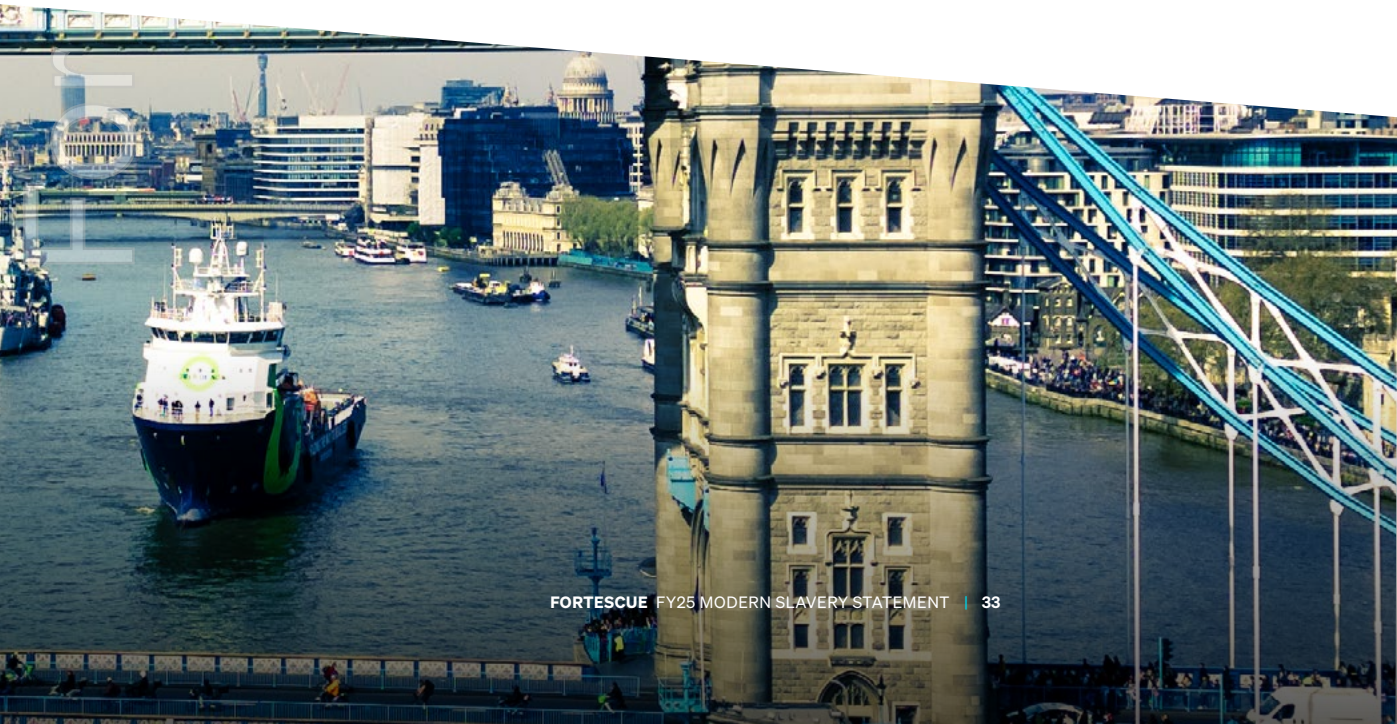
- seafarer employment terms and conditions must be in compliance with International Transport Workers' Federation standards or an equivalent benchmark
- prohibitions against forced labour and other forms of modern slavery
- vessel owners must thoroughly investigate their labour practices to ensure no instances of forced labour or other forms of modern slavery occur within their operations
- compliance with the Maritime Labour Convention, including Regulation 5.1.5, which requires onboard complaints and grievance mechanisms to be available

- vessels must maintain a valid Maritime Labour Certificate and a Declaration of Maritime Labour Compliance issued by the Flag State or a Recognised Organisation.

Fortescue vessels

Fortescue operated vessels are managed through a third-party ship management company. We require our ship manager to thoroughly investigate their labour practices and those of their direct suppliers, to help identify whether any modern slavery may be present in their operations or supply chain and take all necessary actions to prevent it.

The ship management companies we engage implement several initiatives focused on seafarer wellbeing and welfare on our vessels. These include onboard engagement and entertainment such as cultural events, festive celebrations, real-time streamed TV channels, wellness applications, and internet access, as well as dedicated mental and physical health support services. Seafarers are provided with multiple avenues to raise concerns, including onboard forums, structured grievance mechanisms, and independent third-party whistleblower platforms. Fortescue receives quarterly updates on crew grievances and we monitor resolutions through to completion, reinforcing our commitment to transparency and accountability in crew welfare.



TRAINING AND AWARENESS

Ongoing training is important to promote awareness and understanding of modern slavery risks in our operations and supply chains, and our actions to address them. We continue to implement mandatory training for our employees, including online and face-to-face modules.

As of 30 June 2025, 11,449 active Fortescue employees have completed our online or face-to-face human rights training within the past two years, representing 72 per cent of our employees.

In FY25, we updated our online human rights training module to incorporate our Human Rights Standard, updated Speak Up platform and new content on ethical recruitment and recognising red flags for modern slavery in recruitment activities.

In addition to our mandatory modules, we deliver bespoke capacity building sessions to targeted teams. In FY25, we delivered:

- ethical recruitment training to the C&P and People teams (see page 25)
- renewable deep dive sessions to C&P team focusing on the human rights and modern slavery risks in the supply chains of critical minerals such as cobalt, lithium, nickel and copper
- traceability training to C&P and Sustainability teams.

This year, as part of the Sustainable Supply Chain Transformation program, we launched our Sustainable Supply Chain Learning Academy. The Academy comprises five modules: Introduction to Sustainable Supply Chain, Greenhouse Gases, Circularity, Human Rights, and Traceability. The Human Rights Module includes content on modern slavery including

its different forms, how it may occur in our operations and supply chains, and our actions to address it. C&P team members are required to complete these modules.

The human rights internal hub page provides a central location for employees to access information about our actions to identify and address modern slavery, including policies, standards, due diligence and educational materials and videos on modern slavery. Periodic news and updates on our actions and educational resources are also shared through our internal social media platforms.



GRIEVANCE AND REMEDIATION

Fortescue is committed to providing access to remedy through effective 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 provide various mechanisms for raising concerns with us about unethical and illegal business conduct, or other behaviour which may not accord with our Values or Code of Conduct and Integrity including human rights and modern slavery concerns, and we offer protection to anyone who reports concerns in good faith. This applies to directors, employees, contractors, suppliers and other third parties in all jurisdictions in which we operate. All human rights concerns, including those related to modern slavery, are taken seriously, recorded, investigated and reported in accordance with relevant procedures and policies.

Ask us anything

A number of options are available to employees who have questions or wish to report concerns. In addition to reporting any concerns to their line manager, employees can raise concerns with our Company Secretary, Governance and Compliance Team, or via our external Speak Up platform.

This year, Fortescue established an internal 'Ask us anything' initiative to encourage employees to ask questions that are important to them. Employees have used the initiative to raise a range of questions including those related to human rights and modern slavery risks in our operations and supply chains and our actions to address these risks. Answers to these questions are published on our internal hub available to all employees.

Speak Up

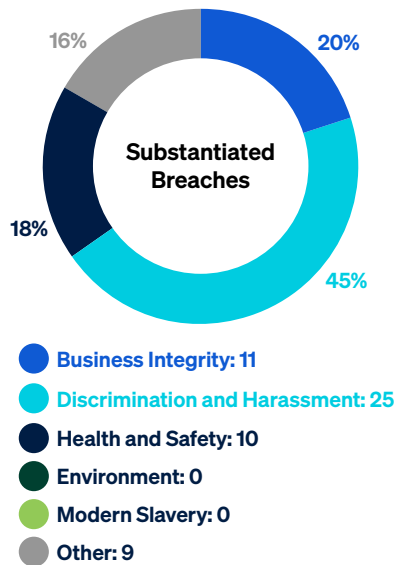
During the year, we continued to implement NAVEX EthicsPoint, our new case management system that merged our previous Whistleblower and Speak Up services. Fortescue's global Speak Up service provides a platform for employees, suppliers and their workers, and members of the public to raise conduct concerns,

including human rights and modern slavery. The service is administered by an independent third-party and provides a platform for people to safely, confidentially and anonymously report concerns. It can be accessed online, by phone or by using a QR code and is available 24 hours a day, 365 days a year and in multiple languages including English, Spanish, Portuguese, French, Indonesian, Chinese, Russian and Swahili.

Concerns raised through Speak Up platform are investigated and reported to the executive team and the Board by the Senior Manager, Governance and Compliance (after all identifying details have been removed). Depending on the nature of the disclosure, investigative reports may include recommendations for remedial or disciplinary action. The Sustainability team supports the Governance and Compliance team with investigations relating to human rights and modern slavery concerns.

In FY25, 55 alleged breaches of our Code of Conduct and Integrity made via our new combined Speak Up services were substantiated. The majority of these related to

misconduct concerns, including discrimination and harassment. A number of investigations resulted in corrective actions, including warnings. In FY25, there were 15 dismissals related to breaches of the Code of Conduct and Integrity. No modern slavery issues were raised through Speak Up during FY25.



[Learn more about Fortescue's Speak Up service on our **EthicsPoint**](#)

Grievance mechanisms

We operate and maintain community level grievance mechanisms in the communities where we operate. Of the 19 community-related grievances received in FY25, 17 have been resolved.

Fortescue's Community and Social Performance Standard and corporate Grievance Procedure outline our approach to establishing and maintaining community grievance mechanisms. The Procedure sets the minimum design standards for community grievance mechanisms, aligned with the UNGPs effectiveness criteria, and provides guidance on how to record, investigate, manage, remediate and close out community grievances. Our Communities teams are responsible for establishing and maintaining community grievance mechanisms. Where possible, our Communities teams work with the local community and stakeholders to design and implement community grievance mechanisms.

Community grievances received are reported quarterly to the Human Rights Steering Group.

Supply chain

We recognise the importance of accessible grievance mechanisms for workers in our supply chain. Our [Sustainable Supply Chain Standard](#) includes the requirement for suppliers to provide an appropriate and accessible grievance mechanism for their workers to raise concerns. This expectation is also included in our [Standard Terms and Conditions](#) which also require suppliers to implement appropriate remediation programs. To further support our suppliers in establishing these mechanisms, we have updated our [Human Rights Supplier Information Pack](#) to provide guidance on grievance mechanisms. We also communicate our Speak Up service to our suppliers, and the platform is open to workers in our supply chain to use for raising concerns with Fortescue.

For information about the grievance mechanisms available to seafarers on Fortescue operated and chartered vessels, see page 33.

Remediation guidelines

Fortescue’s Remediation Guidelines provide guidance for the investigation and remediation of adverse human rights impacts – including modern slavery – that we recognise we have caused or contributed to. Designed in alignment with the UNGPs and referencing Walk Free and the Human Rights Resource and Energy Collaborative’s [‘Modern Slavery Responses and Remedy Framework’](#), the Guidelines supplement our existing grievance and incident management processes and procedures to help support a rightsholder centred approach by providing guidance on investigation and assessment approaches; remediation design; preventative actions; notification and escalation; and recording and monitoring.

REPORT A CONCERN



Online

fortescue.ethicspoint.com

Phone

(toll free unless otherwise stated)

Argentina:	0800 345 2476
Australia:	1800 841 317
Brazil:	0800 000 2809
Canada:	844 858 4895
Chile:	800914518
China:	400 120 5081
Colombia:	01 800 5189520
Ecuador:	1800 001 242
Gabon:	0800 90 17 70**
Indonesia:	021 5091 8341
Kazakhstan:	871 72973013
Kenya:	0800 211 187
Mexico:	800 639 0176
Norway:	800 62256
Peru:	0800 74891
Portugal:	800815058
Singapore:	800 492 2727
United Kingdom:	0800 066 8879
United States:	844 858 4248

** The Gabon line is located in France. Callers using this line will need to add the French International code +33 if calling from Gabon. Call costs incurred for this line.

STAKEHOLDER ENGAGEMENT AND COLLABORATION

Eradicating modern slavery and addressing its root causes requires collaborative and collective actions from a broad range of stakeholders such as business, suppliers, governments and civil society. We continue to engage and collaborate with a range of stakeholders, including peers, multi-stakeholder forums, suppliers, industry organisations, partners and civil society to share learnings and best practice, and to advocate for greater action to address modern slavery and protect rightsholders.

KEY ENGAGEMENTS IN FY25

UN Global Compact Network Australia (UNGCNA)	Fortescue is a signatory to the UN Global Compact and actively participates in the UNGCNA. Key activities include participating in the UNGCNA Modern Slavery Community of Practice and Australian Dialogue on Business and Human Rights.
Human Rights Resource and Energy Collaborative (HRREC)	Fortescue is a founder, and current co-chair, of HRREC, a self-led practitioner forum. Our activities in FY25 included: <ul style="list-style-type: none"> hosting sessions, and sharing lessons learnt from our our worker welfare assessment program hosting a roundtable discussion with the inaugural Australian Anti-Slavery Commissioner and members on actions to address modern slavery participating in a roundtable dialogue hosted by Walk Free and the University of Western Australia.
Walk Free	Walk Free is a global NGO dedicated to the eradication of modern slavery. Our Executive Chairman, Dr Andrew Forrest AO, founded Walk Free with his daughter Grace Forrest. We continue our partnership with Walk Free to share lessons learnt and advocate for the eradication of modern slavery.
Shipping	Fortescue continues to support seafarer welfare through our partnership with the Mission to Seafarers at the Port Hedland Seafarers Centre, including funding and assisting with packing Christmas welfare packs. We actively participate in Seafarer Welfare Committee meetings and provide practical support during moments of crisis, such as facilitating crew welfare visits and assisting with crew medical evacuations.
Government	Fortescue provided a submission to the consultation for the development of the inaugural Australian Anti-Slavery Commissioner's strategic plan.
Civil Society Organisations/ Unions	We continue to engage with a range of civil society organisations on human rights and modern slavery issues. These engagements help us to better understand risks associated with specific industries, regions and vulnerable worker groups and help us to continuously improve our approach. This year we engaged with the: <ul style="list-style-type: none"> Business and Human Rights Resource Centre on their review of our approach to protection of migrant workers' labour rights in their 'Rush to renewables: toward migrant worker rights and just transition in the Gulf' report and participated in a related stakeholder roundtable International Transport Workers Federation Macquarie University Business and Human Rights Access to Justice Lab on their report 'Commitment gaps: A human rights assessment of top Australian companies'.
Investors and Customers	We engaged with our investors and customers about our human rights approach and actions to identify and address modern slavery. In FY25, we met with and responded to seven investor and customer queries/surveys about our approaches to human rights and modern slavery due diligence.

ASSESSING OUR EFFECTIVENESS

We consider that for modern slavery actions to be effective, they must be rightsholder focused. Recognising that no single action will be successful in identifying and addressing modern slavery in isolation, we implement a suite of actions designed to align to the UNGPs and strive to adopt international best practice. Strong policy commitments, clear communication, robust human rights due diligence and mitigation actions, monitoring, effective grievance mechanisms, and rightsholder centred remediation are all key elements of our approach to addressing modern slavery risks in our operations and supply chain. We are committed to continuously improving our approach and understand this will involve learning through experience and adaptation.

There are challenges in addressing modern slavery and assessing the effectiveness of our actions. Modern slavery is often hidden and is more difficult to identify and address where we have less visibility, control or leverage to influence positive outcomes for workers. Root causes of modern slavery may be influenced by economic, social or political factors that may be outside the influence of any individual business, instead requiring broad collaborative and collective actions from multiple actors.

We monitor and evaluate the effectiveness of our actions through a range of formal and informal mechanisms:

- monitoring and tracking progress of key actions through the Human Rights Steering Group (see page 21)
- tracking our actions via key performance indicators to help evaluate implementation and measure progress (see page 39)
- undertaking periodic internal and external reviews of our processes and procedures (see page 23 for FY25 updates)
- regularly reviewing and updating our Modern Slavery Risk Assessment Tool and other human rights assessments (see page 19 for FY25 updates)
- conducting due diligence activities, such as supplier assessments, worker welfare assessments, supply chain mapping and chain of custody audits, to help us understand risks in greater detail and identify indicators and actions to address identified issues (see pages 26-31)
- engaging with our suppliers to understand their approach and challenges in addressing modern slavery in their own operations and supply chains
- engaging collaboratively with and seeking feedback and insights from a range of external stakeholders, including civil society organisations, investors and peers, to help identify gaps and continuously improve our approach (see page 37)
- monitoring complaints received through our Speak Up and other grievance mechanisms (see pages 35-36)
- benchmarking our performance against peers and stakeholder expectations to identify opportunities for continuous improvement, for example, achieving a consistent 'A' rating in Monash University Modern Slavery Disclosure Quality Ratings.

FOCUSING ON IMPACT

When evaluating the effectiveness of our actions, we strive to assess the impact of the action. This year, we piloted self-assessing the effectiveness of two key actions: ethical recruitment training (page 25), and worker welfare assessments (pages 26-31) against impact focused objectives. These actions were evaluated using a three point scale (not effective; partially effective; and effective) against these objectives.

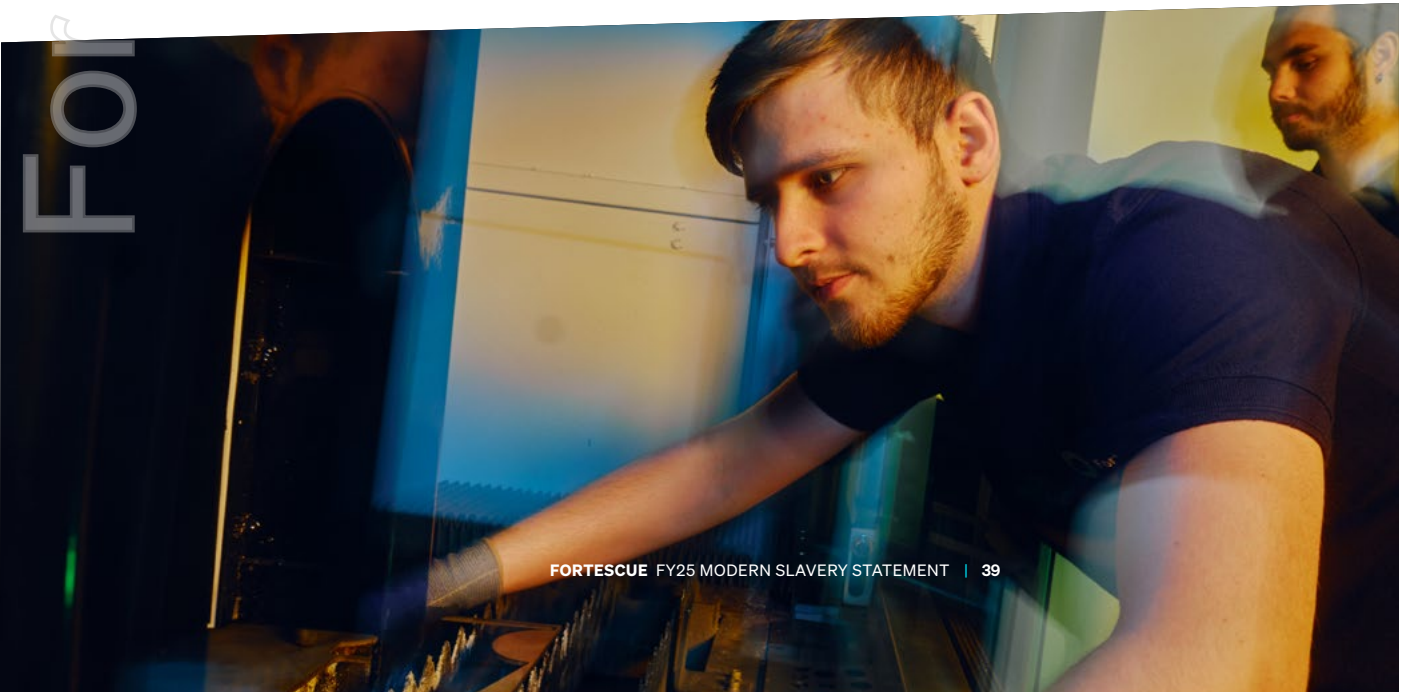
This approach was designed recognising that different actions have different objectives and desired impacts, for example, the objective of training actions generally is to improve employees' awareness of modern slavery risks and their ability to identify red flags, whereas the objective of worker welfare assessments is to establish an understanding of worker conditions at a particular facility at a specific point in time, work collaboratively with suppliers to address issues and ultimately improve conditions for workers. Assessing the effectiveness of our actions in this way helps us to understand whether the desired impact is being achieved, identify possible limitations or improvement opportunities.

KEY PERFORMANCE INDICATORS









The following table shows our performance against key performance indicators.

We continue to review our KPIs with a focus on impact and continuous improvement. This year, with the launch of our new enhanced due diligence supplier questionnaires (see page 27) we discontinued our previous supplier self-assessment questionnaire KPI which tracked the number of supplier responses received. We have introduced a new KPI tracking the number of ILO Indicators of Forced Labour identified in our operations and supply chain. Our objective is to address findings against these indicators to improve practices and deliver positive outcomes for workers.

KPI	FY25 OUTCOME	COMMENTS
Percentage of active employees (as of 30 June 2025) having completed human rights and modern slavery training in the past two years Target: 100%	72%	As of 30 June 2025, 11,449 active Fortescue employees have completed our online or face-to-face human rights training within the past two years. See page 34. We identified a gap in the allocation of the training with it not being included in the learning assignments for some labour hire personnel. This has been corrected.
Percentage of new suppliers screened and monitored via third-party platform Target: 100%	100%	All suppliers are screened for human rights and modern slavery risks during onboarding and monitored through our compliance screening platforms. See page 26.
Number of suppliers on RMPs	21	Risk management plans are integrated into our Corporate Risk Register. See page 27.
Number of confirmed modern slavery incidents in our operations or supply chains in FY25	0	We did not identify any confirmed instances of modern slavery in our operations or supply chains in FY25.
Number of ILO Indicators of Forced Labour identified in our operations or supply chain in FY25 (new in FY25)	2	This year we conducted worker welfare assessments with two suppliers across four facilities. The assessments identified a number of findings against two ILO Indicators of Forced Labour. We continue to work with the suppliers to address these issues and remediate harm to workers. See page 29-30 for more information about our worker welfare assessments and actions.
Number of human rights and/or modern slavery related grievances received	0	See pages 35-36.



ACTION TABLE

ACTION	FY25 UPDATE	STATUS
Identifying and addressing risks		
Review and update the Supplier Self-Assessment Questionnaire	Building from our existing Supplier Self-Assessment Questionnaire, in FY25 we developed new targeted Enhanced Due Diligence Supplier Questionnaires for specific risks and activities including human rights and forced labour, traceability, labour and recruitment, EPC, and security services. We are working to build these assessments into Fortescue Zero's local systems.	
Review and update the Modern Slavery Risk Assessment Tool and Modern Slavery Procurement Procedure	See page 19.	
Continue to improve our enhanced due diligence approach for renewables	This is an ongoing action. Key achievements this year include implementing the new Enhanced Due Diligence Guidelines (see page 27) and continuing our Worker Welfare Assessments (see page 28).	
Refine and improve our tender schedules	In FY25, we developed a global EPC tender template with tailored human rights and modern slavery requirements.	
Review and update the Human Rights and Modern Slavery Clauses	See pages 20-31.	
Increase vessel inspections	This year, we increased vessel inspections from 46 in FY24 to 51 in FY25.	
Update our Recruitment Guideline and improve due diligence approach for recruitment agencies.	Fortescue's Talent Acquisition Guidelines were updated in FY25. These Guidelines set out our commitment to conducting fair, transparent, voluntary recruitment processes that are free from coercion, deception and discrimination (see pages 24-25). Our new Sustainability Assessment evaluates labour profile information to identify potential human rights and modern slavery risks (see page 26). We launched a Labour and Recruitment Enhanced Due Diligence Questionnaire (see page 27).	
Implement a program of verification activities for key procurement categories	This year we conducted two worker welfare assessments and one traceability assessments with targeted suppliers (see pages 29-31).	

KEY



Complete



Continuous action



In progress / ongoing



Needs attention

ACTION	FY25 UPDATE	STATUS
Awareness		
Continuously improve internal training modules	This is an ongoing action as we continuously look to improve our training modules. Key updates this year included revising our online human rights training module to include requirements of the Human Rights Standard and incorporating information on ethical recruitment and red flags of modern slavery in recruitment activities (see page 34).	
Deliver internal capacity building session on ethical recruitment, including modern slavery risks in recruitment	See page 25.	
Review and update Supplier Information Pack	See page 28.	
Engagement and collaboration		
Continue to engage with HRREC and Civil Society	Co-chair of HRREC. See page 37 for other activities and engagements with civil society.	
Assessing effectiveness		
Continue to evaluate our modern slavery KPI's and effectiveness with a focus on impact and continuous improvement	Introduced a new KPI and piloted self-assessment of key actions against specific objectives with a focus on impact.	
Human Rights		
Implement Human Rights Standard, due diligence guidance and tools	See page 24.	
Implement remediation protocol	The Remediation Protocol was implemented in FY25. We commenced work in FY25 to integrate it into a new incident management system. This work is continuing into FY26.	
Other		
Externally assure FY25 Modern Slavery Statement	Key metrics in FY25 Modern Slavery Statement have been externally assured (see page 4).	

LOOKING AHEAD

This year we redesigned and introduced many new processes and procedures to enhance our modern slavery due diligence approach in our operations and supply chain. In FY26, we will prioritise implementation of these new approaches and evaluating their effectiveness. We embrace continuous improvement and leverage lessons learnt to enhance our actions.

IDENTIFYING AND ADDRESSING RISKS

- Implement our Sustainable Supply Chain Procedure, Sustainability Assessment, Enhanced Due Diligence Questionnaires and other actions
- Conduct verification activities with targeted suppliers.

AWARENESS

- Implement our Sustainable Supply Chain Standard
- Deliver capacity building sessions to targeted Fortescue teams
- Translate our Supplier Information Pack: Foundational Human Rights.

ENGAGEMENT AND COLLABORATION

- Continue our engagement with stakeholders including peers, civil society and governments to share knowledge, lessons learnt and advocate for greater action to address modern slavery
- Continue our active engagement with HRREC.

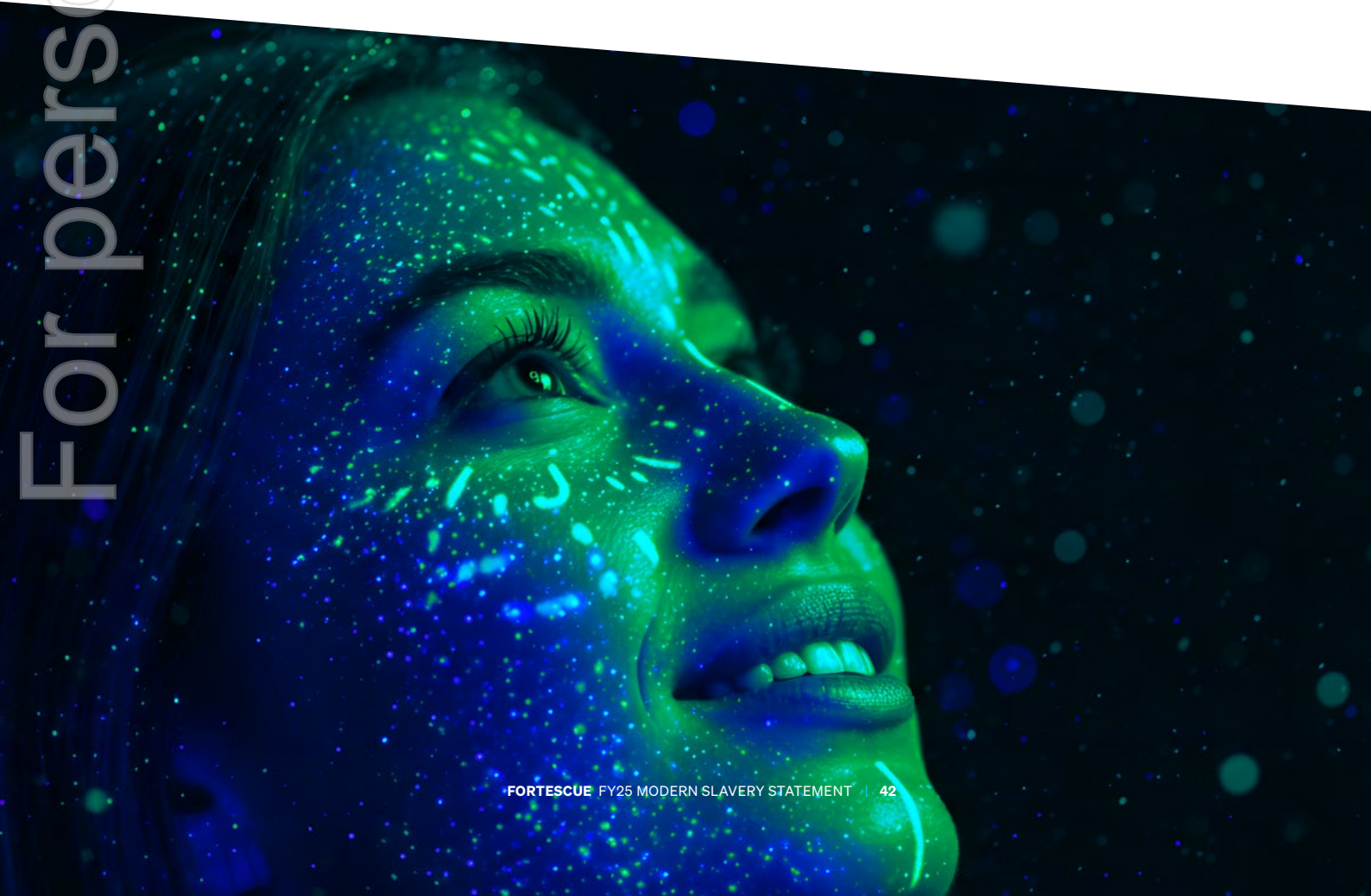
EVALUATING EFFECTIVENESS

- Develop internal case studies outlining supplier development, verification activity, trends and lessons learnt.

HUMAN RIGHTS

- Review and update our Human Rights Policy
- Review and update local level grievance mechanisms
- Continue implementing our Human Rights Standard, due diligence guidance and tools.

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APPENDICES

APPENDIX 1 NAVIGATIONAL INDEX

AUSTRALIAN MODERN SLAVERY ACT 2018 (CTH) MANDATORY REPORTING CRITERIA – SECTION 16	UK MODERN SLAVERY ACT RECOMMENDED REPORTING CRITERIA SECTION 54	REFERENCE IN THIS STATEMENT
Identify reporting entity		About Fortescue (page 8) About this statement (page 4)
Describe the reporting entities structure, operations and supply chain	Organisation's structure, its business and its supply chains	About Fortescue (page 8)
Describe the risks of modern slavery practice in the operations and supply chains of the reporting entity and any entities the reporting entity owns or controls	Parts of the organisations business and supply chains where there is a risk of modern slavery and human trafficking and steps taken to assess and manage that risk	Identifying our modern slavery risks (page 16)
Describe the actions taken by the reporting entity and any entity that the reporting entity own or controls, to assess and address those risks, including due diligence and remediation process	Organisation's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains	Addressing our modern slavery risks (page 21)
Describe how the reporting entity assesses the effectiveness of such actions	The effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate	Assessing our effectiveness (page 38)
Describe the process of consultations with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement		About this statement (page 4)
Any other information that the reporting entity, or the entity giving the statement, considers relevant	Training about slavery and human trafficking available to the organisations staff	Training and awareness (page 34) Stakeholder engagement and collaboration (page 37) Looking ahead (page 43)

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APPENDIX 2 REPORTING ENTITIES

JURISDICTION	ENTITY	OWNER	NATURE OF ACTIVITIES	EMPLOYING ENTITY (YES /NO)
Australia	Fortescue Ltd	Ultimate Holding Company	See About Fortescue on page 8	Yes
Australia	Chichester Metals Pty Ltd	FMG Pilbara Pty Ltd	Goods and services for Christmas Creek and Cloudbreak	No
Australia	FMG Solomon Pty Ltd	FMG Pilbara Pty Ltd	Goods and services for Solomon and Eliwana	No
Australia	FMG Magnetite Pty Ltd	FMG Iron Bridge (Aust) Pty Ltd	Holds Fortescue's interest in the Iron Bridge Joint Venture and relevant tenements	No
United Kingdom	Fortescue Zero Limited	Fortescue WAE Pty Ltd	Provides technology and engineering services. See About Fortescue page 8	Yes

APPENDIX 3 OWNED AND CONTROLLED ENTITIES WITH OVER \$5 MILLION PROCUREMENT SPEND

JURISDICTION	ENTITY	NATURE OF ACTIVITIES	EMPLOYING ENTITY ⁷ (YES /NO)
Argentina	Argentina Fortescue Future Industries SA	Pursuing renewable energy opportunities in South America	Yes
Argentina	Argentina Fortescue SAU	Exploration activities in South America	Yes
Australia	Australian Fortescue Future Industries Pty Ltd	Holds renewable energy assets located in Australia and New Zealand	No
Australia	FMG Air Pty Ltd	Goods and services related to aviation and associated services	No
Australia	FMG Autonomy Pty Ltd	Goods and services related to the commercialisation of autonomous technology	No
Australia	FMG Pilbara Pty Ltd	Mine-related services	No
Australia	FMG Procurement Services Pty Ltd	Goods and services for Fortescue operations	No
Australia	FMG Resources Pty Ltd	Tenement-related and exploration activities in Australia and overseas	No
Australia	Fortescue Future Industries International Pty Ltd	Goods and services related to renewable energy activities overseas	No
Australia	Gibson Island H2 Pty Ltd	Pursuing green energy opportunities in Australia	No
Australia	Gladstone H2 Pty Ltd	Goods and services related to research and development in Australia	No
Australia	IB Operations Pty Ltd	Goods and services related to Iron Bridge site	No
Australia	Karribi Developments Pty Ltd	Holds assets related to Hamilton Village	No
Australia	MIH2 Pty Ltd	Holds assets related to research and development	No
Australia	Pilbara Energy (Generation) Pty Ltd	Holds assets located in the Pilbara region	No
Australia	Pilbara Energy Company Pty Ltd	Holds assets located in the Pilbara region	No
Australia	Pilbara Marine Pty Ltd	Goods and services related to marine towage operations	No
Australia	The Pilbara Infrastructure Pty Ltd	Holds infrastructure assets and related goods and services in the Pilbara region	Yes

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JURISDICTION	ENTITY	NATURE OF ACTIVITIES	EMPLOYING ENTITY ⁷ (YES /NO)
Australia	WAE Technologies Australia Pty Ltd	Goods and services related to Fortescue Zero operations in Australia	No
Brazil	Brasil Fortescue Mineração Limitada	Exploration activities in South America	Yes
Brazil	Brasil Fortescue Sustainable Industries Ltda	Pursuing renewable energy opportunities in South America	Yes
China	Fortescue Hydrogen Technology (Hefei) Limited	Goods and services related to green energy production systems	Yes
Gabon	Ivindo Iron SA (72 per cent equity holding)	Exploration activities in Gabon	Yes
Kazakhstan	Kazakhstan Fortescue LLP	Exploration activities in Kazakhstan	Yes
Norway	Norway Fortescue Future Industries Holdings AS	Holds assets relating to renewable energy activities in Norway	No
Singapore	FMG International Pte Ltd	Goods and services related to logistics and charter arrangements	Yes
Singapore	PSV Leveque Pte. Ltd	Holds assets and goods and services related to the Green Pioneer vessel and research and development into ammonia-fuelled marine engines	No
United Kingdom	Fortescue UK Services Ltd	Goods and services related to activities in the United Kingdom	Yes
United States	FFI Ionix, Inc	Holds assets associated with renewable energy activities in North America	No
United States	MIH2 USA, LLC	Holds assets related to research and development	No
United States	Phoenix Hydrogen Hub LLC	Holds assets associated with renewable energy activities in North America	No
United States	USA Fortescue Future Industries LLC	Goods and services related to renewable energy activities in North America	Yes
United States	USA Fortescue Piquette LLC	Services associated with manufacturing opportunities in North America	No

⁷Employing entity includes direct employees only.

DISCLAIMER

Our report contains certain statements which may constitute “forward-looking statements”. Words that may indicate a forward-looking statement include words such as “intend”, “aim”, “ambition”, “commitment”, “aspiration”, “project”, “anticipate”, “likely”, “estimate”, “plan”, “believes”, “expects”, “may”, “should”, “could”, “will”, “forecast”, “target”, “goal”, “set to” or similar expressions.

Examples of forward-looking statements include: our projected and expected production and performance levels; our plans for major projects including investment decisions; our expectations regarding future demand for certain commodities; the assumptions and conclusions in our climate change related statements and strategies; and our plan to achieve our Real Zero Target as described in this report.

Any forward-looking statements in this report reflect the expectations held at the date of this document. Such statements are only predictions and are subject to inherent risks and uncertainties which could cause actual decisions, results, values, achievements or performance to differ materially from those expressed or implied in any forward looking statement. Forward-looking statements are based on assumptions regarding Fortescue’s present and future business strategies and the future conditions in which Fortescue expects to operate. Forward-looking statements are also based on management’s current expectations and reflect judgements, assumptions and information available as at the date of this report. Actual and future events may vary materially from the forward-looking statements made (and the conclusions and assumptions on which the forward looking statements were based) because events and actual circumstances frequently do not occur as forecast and future results are subject to known and unknown risks such as changes in market conditions and regulations.

Some of the various factors that could cause Fortescue’s actual results, achievements or performance to differ from those in forward-looking statements include: geopolitical and political uncertainty; trade tensions between major economies; the impacts of climate change; supply chain availability and shortages; the impacts of technological advancements including but not limited to the viability, availability, scalability and cost-effectiveness of technologies that can be used to decarbonise our business; our ability to identify profitable solutions for the residual sources of our emissions as we work towards our Real Zero Target; our ability to profitably produce and transport minerals and/or metals extracted to applicable markets; the availability of skilled personnel to help us decarbonise and grow our businesses; new ore resource levels, including the results of exploration programmes and/or acquisitions; inadequate estimates of ore resources and reserves; our ability to successfully execute and/or realise value from acquisitions and divestments; our ability to raise sufficient funds for capital investment; disruption to strategic partnerships; damage to Fortescue’s relationships with communities and governments; labour unrest; our ability to attract and retain requisite skilled people; declines in commodity prices; adverse exchange rate movements; delays or overruns in projects; change in tax and other regulations; cybersecurity breaches; the impacts of water scarcity; natural disasters; the ongoing impacts of the COVID-19 pandemic, or other epidemic or pandemic; safety incidents and major hazard events; and increasing societal and investor expectations, including those regarding environmental, social and governance considerations.

Accordingly, forward-looking statements must be considered in light of the above factors, and others, and Fortescue cautions against undue reliance on such statements. Recipients should rely on their own independent enquiries, investigations and advice regarding information contained in this report. Fortescue makes no representation, guarantee, warranty or assurance, express or implied, as to the accuracy or likelihood of the forward-looking statements or any outcomes expressed or implied in any forward looking statements contained in this report being achieved or proved to be correct.

Except as required by applicable regulations or by law, Fortescue disclaims any obligation or undertaking to publicly update or review any forward-looking statements, whether as a result of new information or future events. Past performance cannot be relied on as a guide to future performance.

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