



VPI IMPLEMENTATION UPDATE 2025



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.

CONTENTS

01	About the Report	4
02	About Fortescue	5
03	Commitment to the Voluntary Principles	6
	1. Our commitment	
	2. Engagement in the VPI	
	3. Transparency	
	4. Promoting awareness of the VPI	
04	Policies, Procedures and Related Activities	7
	1. Relevant policies and procedures	
	2. Risk assessment	
	3. Incidents, grievances and remediation	
05	Implementation	9
	1. Belinga Iron Ore Project, Gabon	
	2. Engaging Private Security Providers	
	3. Engaging With Public Security Providers	
	4. Training	
	5. Monitoring implementation	
06	Lessons and Priorities	10
	1. Lessons and priorities for 2026	

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.

ABOUT THE REPORT

This report has been prepared as part of our membership requirements of the Voluntary Principles on Security and Human Rights (VPSHR) and to meet the requirements of the [reporting guidelines for corporate pillar members](#).

The report details the actions by Fortescue Ltd (Fortescue) to implement the VPSHR in our business and across our activities during the calendar year 1 January 2025 to 31 December 2025. All references to our, we, us and Fortescue refer to Fortescue Ltd (ABN 57 002 594 872) and its subsidiaries. All references to the year are the calendar year 1 January 2025 – 31 December 2025, unless otherwise stated.

The report covers our Metals and Growth and Energy operations, including those under exploration and development and those operated through subsidiaries and joint ventures where we have operational or management control.

For more information about our human rights approach, and sustainability performance, see our [FY25 Sustainability Microsite](#).

This report has been reviewed internally and approved by Bronwyn Grieve, Director of Global Sustainability & External Affairs on 30 April 2026.

FEEDBACK

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



ABOUT FORTESCUE

Fortescue exists to accelerate decarbonisation at a global scale, rapidly and profitably. We underpin this strategy with consistent operational excellence and disciplined growth to deliver low-cost, scalable solutions the world needs to help eliminate emissions.

Founded in 2003, Fortescue quickly established itself in the Pilbara and today that connection is deeper than ever. Our mining operations are linked by 760km of rail to Port Hedland, exporting almost 200 million tonnes of iron ore annually to customers worldwide. Backed by a workforce of over 15,000, we have built a position as one of the world's leading low-cost iron ore producers through relentless focus on safety, productivity, capital discipline and operational performance.

Those same values and spirit underpin our future.

We have a steadfast commitment to delivering on our ambitious Real Zero Target - an emissions reduction target that aims to eliminate Scope 1 and 2 emissions from our Australian terrestrial iron ore operations by the end of 2030. By embedding innovation into our core operations, we are proving that decarbonisation can strengthen competitiveness and create new value.

Fortescue is investing significantly in research and development to diversify and grow our core business by combining the operational expertise of a world-leading mining business with groundbreaking technologies. As we expand our global footprint, our growth remains deliberate and commercially focused. We continue to be trailblazers, pushing the limits of what is possible, with sharp discipline, clear priorities and strong execution.

Beyond business, we are committed to building thriving communities and delivering lasting social and economic impact. Through training, employment and business development initiatives, including our Billion Opportunities program which has awarded more than A\$6.8 billion in contracts to Australian First Nations businesses since 2011, we are ensuring our success delivers shared and enduring value.

The majority of people employed across Fortescue are based in Australia and the remainder work in more than 27 different countries.



03. COMMITMENT TO THE VOLUNTARY PRINCIPLES

1. Our commitment to the Voluntary Principles

Fortescue's [Human Rights Policy](#) and [Code of Conduct and Integrity](#) form the foundation for respecting human rights at Fortescue and guide our approach to security and human rights.

We conduct our business in a manner consistent with the International Bill of Human Rights, the UN Guiding Principles on Business and Human Rights, and the International Labor Organization's Declaration on the Fundamental Principles and Rights at work. Fortescue is a signatory to the UN Global Compact and endeavours to align our actions with industry good practice principles and standards.

Our commitment to the VPSHR is set out in multiple policies and standards, including our:

- [Code of Conduct and Integrity](#)
- [Human Rights Policy](#)
- Security Policy
- Human Rights Standard
- Communities and Social Performance Standard; and
- Sustainable Procurement Standard.

Security and Conflict has been identified as a salient human rights issue for Fortescue and is managed as part of Fortescue's broader Human Rights Framework. Fortescue's Safety and Sustainability Committee (a sub-committee of Fortescue's Board) has oversight of human rights matters, including security and human rights, Fortescue's commitment and implementation of the VPSHR.

We communicate our commitment to the VPSHR and approach to security and human rights in our annual Sustainability Reports and on our [website](#).

2. Engagement with the VPI

Fortescue is proud to be a full member of VPSHR since May 2024, and we continue to actively participate and support the Voluntary Principles Initiative.

This year, in addition to participating in the VPI Plenary in March 2025, corporate pillar meetings, verification presentations and other activities, Fortescue became a corporate pillar representative on the VPI Board contributing to governance and strategic oversight.

3. Transparency

Fortescue has committed to reporting annually on our human rights performance through our Sustainability Report, Modern Slavery Statements and on our website. This is our second annual report as full members of the VPI and it is published on our website.

4. Promoting awareness of the VPI

In 2025, Fortescue continued to promote awareness of the VPSHR throughout our organisation by:

- Convening an internal working group of key stakeholders to address audit actions and enhance our implementation of the VPSHR across our business
- Monitoring implementation of the VPSHR as a standing agenda item at Fortescue's Human Rights Steering Group meetings
- Providing updates to Fortescue Executive Sustainability Committee and Board Safety and Sustainability Committee on progress to implement the VPSHR as appropriate; and

- Maintaining content about the Voluntary Principles on Security and Human Rights in Fortescue's mandatory online Business and Human Rights Module and developing our VPSHR Security Personnel training module.

Fortescue is also committed to promoting awareness of the VPSHR through our international engagements. In 2025, Fortescue participated in the VPI Annual Plenary in London enabling us to engage with a range of stakeholders including corporates, governments and civil society members on emerging security and human rights risks and practical approaches. Fortescue also participates in the VPSHR Latin America (LATAM) Forum to support regional collaboration and the practical application of VPSHR in local operating contexts.

04. POLICIES, PROCEDURES AND RELATED ACTIVITIES

1. Relevant policies and procedures

Fortescue is committed to respecting and supporting the human rights of all people. Our commitment to aligning with the VPSHR is set out in the policies and standards listed in section 3.1 and implementation supported by other procedures and internal documents, such as:

- Security Risk Management Framework
- Security Procedures and Guidelines – outlining management systems and controls
- Risk Management for Global Growth Standard
- Incident Reporting and Investigation Group Procedure
- Corporate Grievance Procedure
- Anti-Bribery and Corruption Policy
- Whistleblower Policy

2. Risk assessment

Fortescue's group wide risk management approach is governed by our Risk Management Framework, Policy, Risk Management Standard and Risk Management Procedure setting a consistent approach to the identification, assessment, treatment, monitoring and reviewing of risks, including security and human rights risks.

To help ensure the protection of our people and assets, Fortescue conducts three levels of assessments including: country, threat and security risk assessments for our sites and activities.

The requirements for country risk assessments are governed by Fortescue's Risk Management for Global Growth Standard and are led by Fortescue's Risk and Assurance Team.

Fortescue's security risk assessment approach is aligned with both ISO 31000 and the AS/NZ 167 (2006).

When assessing security risks, Fortescue considers security risks/threats to our people, assets, reputation and information according to the primary threat vectors of terrorism, crime, war (inter-state and intra-state), civil unrest and kidnap.

Consideration is also given to internal and external context which may impact Fortescue's operations such as economic, social, cultural, political and civil factors, corruption, infrastructure, security forces, cyber security, security and human rights, supply chains, and armed conflict.

Threat and security risk assessments are conducted by Fortescue's Security Team. Identified security risks and controls, such as engaging private security, are captured in Security Risk Management Plans, managed by Fortescue's Security Team. Assessments and Management plans are updated periodically and when the security environment changes.

This work is further supported by Fortescue's Global Policy and Insights Team providing ongoing analysis relevant to Fortescue's global activities.

Fortescue's Sustainability Team is responsible for the day-to-day management of Fortescue's Human Rights approach across the business. Fortescue's Human Rights Standard sets out the minimum requirements for human rights due diligence for key business activities including corporate saliency risk assessments, country entry, project development, supply chain, business partnerships and security activities. Requirements to consider conflict, security and human rights risks are integrated into human rights due diligence tools designed to support the implementation of the Human Rights Standard. Human rights risks are captured on Fortescue's corporate risk register with mitigation and action items assigned to responsible roles/functions.

3. Incidents, grievances and remediation

Fortescue's Human Rights Policy sets out our commitment to providing access to remedy through effective grievance mechanisms, and will provide for, or cooperate in remediation where we identify we have caused or contributed to an adverse human rights impact. Fortescue implements multiple systems to enable the reporting and management of security and human rights concerns and incidents.

Speak Up platform

Fortescue continues to implement NAVEX Ethics Point, our 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 concerns including human rights and security. 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 in multiple languages including English, Spanish, Portuguese, French, Indonesian, Chinese, Russian and Swahili.

Concerns raised through Speak Up 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 concern investigative reports may include recommendations for remedial or disciplinary actions. For more information about Speak Up see Fortescue's FY25 Sustainability Microsite.

Grievance Mechanism

Fortescue operates and maintains community level grievance mechanisms in the communities in which we operate. 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 to the United Nations Guiding Principles on Business and Human Rights effectiveness criteria, and provides guidance on how to record, investigate, manage, remediate and close out community grievances.

Fortescue's Communities Team is responsible for establishing and maintaining community grievance mechanisms. Where possible, our Communities Teams work with local communities and stakeholders to contextualise the design and implementation of community grievance mechanisms.

This year, we continued to work on our Grievance Mechanism Gender Sensitive Approaches Toolkit. More information will be published in our FY26 Sustainability Report.

Incident management system

Fortescue's incident management system includes a classification for security incidents and a specific sub-classification for VPSHR breaches by security providers. Fortescue's Incident Reporting and Investigation Group Procedure provides guidance on the reporting, recording and investigation of incidents.

Remediation Guidelines

Fortescue's Remediation Guidelines provide guidance for the investigation and remediation of adverse human rights impacts – including security and human rights incidents – that we recognise we have caused or contributed to. Designed in alignment with the United Nations Guiding Principles on Business and Human Rights, the Remediation Guidelines supplement our existing grievance and incident management processes and procedures to help support a rightsholder centred approach by providing guidance on investigation approaches, remediation design, preventative actions, notification and escalation, recording and monitoring.



SPEAK UP

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.

05. COUNTRY IMPLEMENTATION

1. Belinga Iron Ore Project, Gabon

Fortescue believes the Belinga Project in north-east Gabon is one of the world's largest undeveloped high-grade hematite deposits. Fortescue began exploration in 2022 with activities focused on exploration drilling to support a feasibility study.

Ivindo Iron SA is the operating entity for the Belinga Iron Ore Project, with Fortescue holding 72 per cent interest in the company. Ivindo currently engages around 37 private security personnel in Gabon.

To support our implementation of the VPSHR in Gabon, we undertook the following actions in 2025:

- Updated our Security Risk Assessment and Management Plan, aligned to the VPSHR, including human rights and security risks.
- Developed an Ivindo Iron Security Provider Code of Conduct aligned to the VPSHR, translated the Code of Conduct to French and communicated it to security personnel and management.

A local level grievance mechanism, guided by Fortescue's Grievance Procedure, has been established for our activities in Gabon.

2. Engaging Private Security Providers

Last year, Fortescue accelerated our Contracts and Procurement transformation program to further embed sustainable supply chain approaches into our sourcing activities, including launching a new Sustainable Supply Chain Procedure, broadening our human rights considerations, developing a new Sustainability Assessment and due diligence tools.

The Sustainability Assessment provides qualitative information about identified human rights related risks relevant to the sourcing activity and prompts mandatory enhanced due diligence actions. In addition to assessing our engagement of private security providers directly, the Sustainability

Assessment helps us to identify where private security providers are/may be sub-contracted on our behalf. We also developed and launched our security provider supplier self-assessment questionnaire to target specific risks relevant to security practices.

Fortescue's new Sustainable Supply Chain Standard sets out our expectations of all our suppliers. It includes general requirements for suppliers providing security services or employing security personnel on Fortescue's behalf including operating lawfully, registration and recruitment of qualified personnel.

Fortescue's new Security Provider Code of Conduct details the expected ethical and professional standards of conduct specific to private security contractors and their activities including use of force, apprehension of persons, and reporting of security incidents. The Security Provider Code of Conduct is incorporated in our terms and conditions when engaging private security contractors.

Our Standard Terms and Conditions set out human rights requirements for suppliers, such as not engaging in conduct inconsistent with human rights, maintaining processes and procedures to identify, assess and address human rights risks, and to notify Fortescue of incidents. Our Standard Terms and Conditions include rights for Fortescue to undertake verification activities and terminate engagement for failure to remediate human rights incidents.

The majority of Fortescue's security providers are members or affiliates of the International Code of Conduct Association (ICoCA).

For more information about our sustainable supply chain transformation program see our [FY25 Modern Slavery Statement](#).

3. Engaging with public security forces

Fortescue currently does not have formal memorandums of understanding with public security forces. However, we recognise the importance of continuous and effective engagement with public security forces and importance of establishing formal written agreements or memorandums of understanding with public security forces in reducing ambiguity and establishing accountability.

4. Training

Fortescue continues to implement its mandatory human rights training for all employees, including security personnel. Two modules are available, an online induction module (Introduction to Business and Human Rights) and face-to-face training for teams identified as working in higher risk functions. Both modules include content on the VPSHR, Fortescue's memberships and requirements. Employees are required to update this training every two years.

As of 30 June 2025, 11,449 active Fortescue employees had completed human rights training within the past two years, representing 71.5% of total Fortescue employees.

Fortescue also offers an online International Humanitarian Law: Security and Conflict training module developed with Australian Red Cross. As of 30 June 2025, 543 Fortescue employees had completed this module.

This year we continued our work to develop and deliver Fortescue's VPSHR Security Personnel face-to-face training module. Further information will be provided in our FY26 Sustainability Report.

5. Monitoring implementation

Our activities to monitor the implementation of the VPSHR across our business and at our sites include:

- Regional Security Leads' ongoing oversight of security activities in-country
- Regular communications between Fortescue's Corporate Security Team and other key functions across the business, including, for example, Communities, Contracts and Procurement, Sustainability, Governance and Compliance and site/regional teams
- Convening an internal working group of key stakeholders meeting periodically to address audit actions and enhance our implementation of the VPSHR across our business
- Monitoring of progress on addressing audit actions and enhancing implementation of the VPSHR as a standing agenda item at Fortescue's quarterly Human Rights Steering Group meetings
- Providing periodic reports to the Fortescue Executive Sustainability Committee and Board Safety and Sustainability Committee on progress to implement the VPSHR.

06. LESSONS AND PRIORITIES FOR 2026

Adopting a continuous improvement approach, we continue to embed the Voluntary Principles in our security activities and raise awareness throughout our business. In 2026 we will focus on:

- Delivering our VPSHR Security Personnel training to relevant security personnel
- Continuing work to finalise Fortescue's internal VPSHR Guidelines
- Continuing our active engagement with the VPSHR including in our role as a corporate pillar representative on the VPI Board.





