

Human rights due diligence on operations

We conduct due diligence as part of our approach to human rights management, in line with the UN Guiding Principles on Business and Human Rights.

The due diligence process includes an in-depth assessment of human rights risks and impacts across all operations and critical projects; incorporation of due diligence findings into corrective actions; follow-up on corrective actions; and communications on identified risks and impacts.

It is conducted on our operations, projects and joint ventures following an annual schedule and may result in action plans for mitigation or remediation. These plans are closely monitored and the outcomes are fed back into the company's policies and processes.

Due diligence results are also incorporated into new controls in our operations, either refining existing processes or implementing new ones.

External human rights due diligence methodology

Our due diligence process is an integral part of the Vale Human Rights Roadmap, with operations organized into territorial clusters that share similar levels of human rights risks and logistical complexity.

In summary, the due diligence process comprises the following steps:

- I. Align with site directors/executive managers
- II. Collect and review requested documents
- III. Hold individual interviews with site managers
- IV. Conduct site visits/interviews and focus group sessions
- V. Review, collate and provide feedback on collected data
- VI. Refine recommendations and issue final report
- VII. Implement corrective actions and risk controls at the site
- VIII. Follow up on action plan and recommendations

Due diligence is carried out by independent consultants who review documents, assess on-site conditions, and conduct interviews. Focus groups in the due diligence process include employees and contractors, women,

children, local communities (including indigenous people and traditional communities), and public authorities.

The findings from document reviews, on-site inspections and interviews are shared with Vale's Human Rights team and with each evaluated site and its leadership. Recommendations are translated into controls and corrective action to improve risk management and address identified negative impacts. The Human Rights Management team oversees the entire external due diligence process and monitors the implementation of controls and corrective action.

Mergers, acquisitions and new projects, including joint ventures, also undergo external due diligence.

Non-Operated Joint Ventures (NOJVs)

In 2022, Vale initiated a process to engage major operational joint ventures not operated by Vale around ESG (Environmental, Social, and Governance) practices. This included maturity assessments on practices and cross-functional benchmarking sessions attended by both Vale and joint-venture partners.

Within the Social dimension, we carried out a human rights risk assessment on all companies in which Vale holds a stake greater than 10%. Vale recognizes that human rights risks are inherent to the business and industries of evaluated joint ventures.

Survey responses from these companies regarding their human rights management practices revealed that 36% have implemented mitigating measures to address human rights risks.