



2030 Commitment: Eliminate major gaps in ESG (Environmental, Social and Governance) regarding the best practices

- Initiative not started
- Initiative in progress
- Already addressed/concluded

**ESG GAPS**

**DAMS**

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
1	Greater disclosure on the Plano de Ação de Emergência de Barragens de Mineração (PAEBMs)	2019	<a href="#">Evidence</a>
2	Greater transparency in the external auditing process	2019	<a href="#">Evidence</a>
3	Quantitative evidence of compliance with the ICMM guidelines	2025	<a href="#">Evidence</a>

**COMMUNITY DEVELOPMENT**

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
4	Disclosure of the systematic involvement of local stakeholders in the community development planning	2020	<a href="#">Evidence</a>
5	Structure social KPIs with short, medium and long term goals	2021	<a href="#">Evidence - Social Ambition</a> <a href="#">Evidence - Social KPIs</a>
6	Statement on the socioenvironmental impact of Onça Puma on indigenous communities	2019	<a href="#">Evidence</a>

**HUMAN RIGHTS**

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
7	Stablish a human rights due diligence process	2021	<a href="#">Evidence</a>

**ETHICS AND CORRUPTION**

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
8	Have a supplier compliance verification program	2019	<a href="#">Evidence</a>
9	Disclosure of the sorts of problems reported to the Ombudsman	2019	<a href="#">Evidence</a>
10	Demonstrate that the Board of Directors is capable of providing significant oversight of the Executive Board	2019	<a href="#">Evidence</a>

**WORKFORCE**

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
11	Have a program to address illness in the workforce	2019	<a href="#">Evidence</a>
12	Establish maximum working hours allowed in a week	2019	<a href="#">Evidence</a>
13	Goal to increase the percentage of women on the workforce	2019	<a href="#">Evidence</a>

ENVIRONMENTAL MANAGEMENT			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
14	Have all operations with the ISO 14001 certification	2024	<a href="#">Evidence</a>
15	Perform sensitivity analyses and/or stress test related to water and climate risk	2020	<a href="#">Evidence for water risk</a> <a href="#">Evidence for climate risk</a>
16	Include waste management in the environmental management policy	2020	<a href="#">Evidence</a>
17	Disclose environmental violations in a consolidated form	2020	<a href="#">Evidence</a>
18	Establish goals for waste management	2019	<a href="#">Evidence</a>
19	Establish goals for greenhouse gas emissions	2019	<a href="#">Evidence</a>
20	Establish goals for SOX emissions	2021	<a href="#">Evidence</a>
21	Establish goals for NOX emissions	2021	<a href="#">Evidence</a>
22	Establish goals for particulate matter	2021	<a href="#">Evidence</a>
23	Better disclosure of sustainability KPIs	2019	<a href="#">Evidence</a>
24	Devise climate change scenarios in strategic planning	2020	<a href="#">Evidence</a>
25	Inform annual monetary value for investments in reducing CO2 emissions	2020	<a href="#">Evidence</a>
26	Define internal carbon pricing	2019	<a href="#">Evidence</a>
27	Implement water management policy for units operating in water-stressed areas	2020	<a href="#">Evidence</a>
COMPENSATION			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
28	Sustainability and/or health and safety targets in long term goals	2019	<a href="#">Evidence</a>
29	Increase disclosure of executive compensation	2020	<a href="#">Evidence</a>
30	Disclosure of the results of long-term executive compensation metrics	2019	<a href="#">Evidence</a>
31	Have the variable remuneration component paid in company shares	2019	<a href="#">Evidence</a>
32	Present minimum ownership requirements for the CEO and members of the Executive Board	2019	<a href="#">Evidence</a>
33	Have part of the CEO short-term incentives granted in the form of company's shares	2019	<a href="#">Evidence</a>
34	Inclusion of malus clause	2019	<a href="#">Evidence</a>
35	Report information on compensation, segmented by men and women	2019	<a href="#">Evidence</a>

HEALTH AND SAFETY			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
36	ISO 45001 certification or equivalent	2030	Vale is in the process of consolidating and implementing its unique VPS management system that will serve as the basis for applying for ISO 45001 certification by 2030.
37	Disclosure of major Health and Safety risks	2019	<a href="#">Evidence</a>
38	Disclosure of how the company manages Health and Safety risks	2019	<a href="#">Evidence</a>
39	Detail information on fatalities	2019	<a href="#">Evidence</a>
40	Detail the TRIFR rate between own and outsourced employees	2019	<a href="#">Evidence</a>
SUPPLY			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
41	Have formal supplier monitoring programs	2019	<a href="#">Evidence</a>
GOVERNANCE			
#	Initiative	Estimated Conclusion	STATUS
42	Increase number of independent board and committee members	2021	<a href="#">Evidence</a>
43	Increase number of board members with experience in mining, especially in dams	2021	<a href="#">Evidence</a>
44	Greater diversity on the Board of Directors	2025	<a href="#">Evidência <sup>1</sup></a>
45	Independent Chair of the Board of Directors	2021	<a href="#">Evidence</a>
46	Creation of the remuneration committee, majorly composed by independent members	2021	Vale established the People, Compensation and Governance Committee with a majority of independent members.
47	Have an Audit Committee, with independent majority and composed by experts	2020	<a href="#">Evidence</a>
48	Have a nominating committee	2020	<a href="#">Evidence</a>
49	Elect a leading independent director	2021	<a href="#">Evidence</a>
50	Increase disclosure of the frequency of board meetings	2019	<a href="#">Evidence</a>
51	Establish evaluation process for the Board of Directors and disclose the evaluation	2021	<a href="#">Evidence</a>
FINANCE			
#	Initiative	Estimated Conclusion	STATUS
52	Disclosure of Tax Transparency Report	2020	<a href="#">Evidence</a>

<sup>1</sup>The composition of the Board is reviewed periodically, with attention given to the diversity of its members.

## ESG GAPS EXPANSION

To keep evolving Vale, through continuous assessments, incorporated 11 more ESG gaps in its Action Plan in order to achieve the ESG best practices and aligned with its 2030 commitment

RISK MANAGEMENT			
#	Initiative	Estimated Conclusion	STATUS
53	Improve report on long-term emerging risks	2021	<a href="#">Evidence</a>
VALUE CHAIN			
#	Initiative	Estimated Conclusion	STATUS
54	Improve customer satisfaction management	2021	<a href="#">Evidence</a>
55	Expand suppliers periodic evaluation process, for those mapped as critical and of high risk for Sustainability	2022	<a href="#">Evidence</a>
WORKFORCE			
#	Initiative	Estimated Conclusion	STATUS
56	Conduct global employee engagement survey <sup>1</sup>	2022	<a href="#">Evidence</a>
CLOSURE PLANNING			
#	Initiative	Estimated Conclusion	STATUS
57	Disclose information on mine closure planning, including community engagement process	2022	<a href="#">Evidence</a>
ENVIRONMENTAL MANAGEMENT			
#	Initiative	Estimated Conclusion	STATUS
58	Establish formal commitment related to UNESCO World Natural Heritage Sites	2021	<a href="#">Evidence</a>
59	Set a target for effluent management and improve effluents public report	2021	<a href="#">Evidence</a>
60	Disclose intensity of energy consumed by product	2021	<a href="#">Evidence</a>
61	Set a target to reduce energy use	2021	<a href="#">Evidence</a>
62	Energy management system certification to an international standard	-	<div style="border: 1px solid black; padding: 5px;"> <p>After an internal reassessment, Vale decided to deprioritize the energy management system certification. The search for efficient and sustainable energy management continues to be carried out through the Energy Efficiency Program, which principles are based on the ISO 50001 standard.</p> </div>
HEALTH AND SAFETY			
#	Initiative	Estimated Conclusion	STATUS
63	Establish a strategy to reduce the use of potentially hazardous substances in production processes	2025	<a href="#">Evidence</a>

<sup>1</sup>Gap revised in order to be in line with the best market practices related to the topic (previous gap: Develop a human capital return metric).