



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                 | Vale is committed to the implementation of GISTM in its operations. By December 2021, the company reported adherence to the standard requirements of 60%, according to the self-assessment process. The company expects to reach: (i) 90% adherence in 2022; (ii) 100% for structures with extreme or very high potential consequences by August 2023; and (iii) 100% for other structures by August 2025, with a scope related to the tailings facilities of Vale S.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>                         |
| 6 | Statement on the socioenvironmental impact of Onça Puma on indigenous communities                    | 2019                 | <a href="#">Evidence - Social KPIs</a><br><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

[Evidence](#)

| ENVIRONMENTAL MANAGEMENT |   |                      |   |
|--------------------------|---|----------------------|---|
| #                        | Initiative  | Estimated Conclusion | EVIDENCE/STATUS   |
| 14                       | Have all operations with the ISO 14001 certification                                  | 2024                 | Vale is in the process of consolidating and implementing its single environmental management system. In this sense, this item was rescheduled for 2024. |
| 15                       | Perform sensitivity analyses and/or stress test related to water and climate risk     | 2020                 | <a href="#">Evidence for water risk</a><br><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   | Under evaluation     | ●  |
| 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>   |

## 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 <sup>2</sup>                               | -                    | <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. A new gap will be defined throughout 2023.</p> </div> |
| HEALTH AND SAFETY        |  |                      |  |
| #                        | Initiative   | Estimated Conclusion | STATUS   |
| 63                       | Establish a strategy to reduce the use of potentially hazardous substances in production processes             | 2024                 | <div style="border: 1px solid black; padding: 5px;"> <p>Following assessments in 2021, in-depth work remains ongoing, with completion rescheduled for 2024.</p> </div>   |

<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).

<sup>2</sup> Gap to be replaced after internal evaluation and validation.