



VALE

HSE Guide for Vale Suppliers

Reference:

PNR-000067- Health, Safety, and
Environment Management for Vale
Contractors

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1 INTRODUCTION

1.1 Purpose

Guide contractors and subcontractors in the application of key Health, Safety, and Environment (HSE) requirements during process of procurement of material assets and services, ensuring they comply with Vale's policies, standards, and procedures, as outlined in Vale's guidelines and contractual documents, throughout the execution of their activities for Vale.

1.2 Application

The guidelines established in this guide are applicable to contracts with activities in controlled areas and, therefore, must meet the requirements established in the Vale Production System (VPS), Supplier Management System and applicable legal requirements.

All requirements in this guide and those defined in the Technical Request/Technical Specification of the contract must be applied in their entirety by contractors and subcontractors in all stages of the HSE Management Model for Vale Suppliers.

The HSE requirements contained in this guide are mandatory, as are all applicable legislation, and failure to comply with any of these requirements will represent a serious breach, subject to penalties.

2 GENERAL GUIDELINES

2.1 Vale Production System (VPS)

The VPS is the path we must follow to be a safe, sustainable, reliable and productive company. It strengthens Vale's cultural transformation through the development of people, the standardization of best practices, and compliance with routine and operational discipline.

The model focuses on results and foresees the deep and comprehensive implementation of policies and practices to enable safe and environmentally responsible operations, in addition to ensuring the integrity of our assets. The system is constantly evolving, continually improving its approach, methods, techniques and tools used, in accordance with the lessons learned internally and externally.

The VPS contains practices that must be adopted daily by all Vale employees and contractors, which are based on dimensions and elements, as represented in the figure below. The guidelines and guidance related to the VPS are available in POL-0035-G - Vale Production System – VPS and in NFN-0019 - Management Model Standard – VPS.



Dimensions

Leadership

1. Culture and engagement
2. Talent management and development
3. Individual and organizational performance

Technical

4. Risk perception and management
5. Health, safety and environment
6. Projects and construction
7. Operation
8. Maintenance
9. Change management
10. Mining planning
11. Sustainability
12. Emergency, crisis and business continuity

Management

13. Strategy deployment
14. Routine management
15. Processes and standardization
16. Problem solving and continuous improvement
17. Evaluation of the management model and results



Leadership

Set of leadership practices expected to reinforce key behaviors and shape organizational culture and discipline.

Technical

Common policies, guidelines and technical process requirements for managing assets and dealing with risks inherent in our business.

Management

Structured management routines, methodologies and tools to sustain and improve results.

Figure 1 – VPS Management Model

2.2 Supplier Management System

Suppliers may use their own Management System, processes, standards, tools and HSE documents, as long as these meet the policies, standards and procedures established in Vale guidelines, contractual documents and applicable legal requirements.

2.3 Legal Requirements

The contractor must fully comply with applicable legal requirements during the term of the contract and, in the event of overlap between local legislation and Vale's internal standards, the most restrictive HSE guidelines must prevail.

All evidence of compliance with legal requirements and other requirements related to the scope of the contract must be available for any internal and/or external inspections or audits.

During the term of the contract, the contractor must ensure that legal non-conformities and/or those that impact HSE processes are identified, recorded, monitored and resolved effectively, thus preventing their recurrence.

3 HSE MANAGEMENT MODEL FOR SUPPLIERS

The HSE Management Model for Suppliers aims to establish HSE Guidelines to ensure uniformity and transparency in the relationship between Vale and Suppliers and the implementation of minimum HSE practices and procedures during the execution of activities for Vale. This model consists of 5 steps, as illustrated below:



The HSE policies, standards and procedures referenced in this Guide and necessary to comply with the steps contained in the HSE Management Model for Vale Suppliers are available at the link <https://vale.com/im-a-supplier>.

3.1 Supplier Qualification

Suppliers wishing to be eligible to participate in the processes of contracting and supplying goods and services to Vale must have prior knowledge of Vale's guidelines, as well as be registered and approved in accordance with HSE requirements.

To register in Vale's supplier database, it is necessary to contact the Vale representative to start the registration process on the GSRP (Global Supplier Registration Portal) platform. After the process begins, an invitation will be sent by email with the acceptance term, requested information and the documents that must be sent, when applicable, inherent to the scope to be provided.

Suppliers that do not qualify under the HSE criteria will be prevented from being hired by Vale, as will companies included in the Employer Registry that have subjected workers to conditions analogous to slavery, known as the "Dirty List".

3.2 Hiring Suppliers


The process of hiring Suppliers at Vale includes the following steps: (a) Technical Request/Technical Specification; (b) Technical Visit; (c) Technical Proposal; and (d) Contract Kick-off Meeting. In each of these steps, the supplier must consider the legal and internal HSE requirements applicable to the scope of the contract.

In contracts involving subcontracting, the subcontracted companies must comply with all contractual clauses, HSE standards, applicable legal requirements, in addition to all guidelines in this guide. It is the contractor's responsibility to ensure compliance with these items, and must provide Vale with all HSE documentation and/or information for the company(ies) to be subcontracted.

3.2.1 Technical Request / Technical Specification

Vale will inform in the specific HSE field of the Technical Request / Technical Specification the risks, control measures applicable to the scope of the contract and any specific HSE requirements for the location, which must be considered in the HSE Technical Proposal that will be prepared by the proponent for execution of the scope of the contract. To this end, the following information will be presented:

- i HSE requirements to meet the scope to be contracted;

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- ii HSE risk classification of the contract;
 - iii HSE hazards and risks of Vale's processes that have interfaces with the contractual scope, in addition to environmental aspects and impacts;
 - iv Minimum HSE conditions to be ensured at work fronts, construction sites and/or facilities, if applicable;
 - v Need for the proponent to prepare the PAE or whether the contract will be met by Vale's plan, in addition to resources and responsibilities;
 - vi Requirements for mobilization of people, machines, equipment, vehicles and facilities;
 - vii Information on meetings, HSE routines and specific training for contractors for the activity and/or site;
 - viii Specific requirements for demobilization.

3.2.2 Technical visit

The Technical Request/Technical Specification will inform the applicability of a Technical Visit, which aims to allow bidders to get to know the area where the service will be performed, the scope to be executed and the risks existing in the Vale environment, in addition to clarifying doubts related to technical or HSE issues.

3.2.3 Technical Proposal

Suppliers must present in their Technical Proposals a chapter describing how the HSE requirements established in the Technical Request/Technical Specification will be met and any limitations to meeting these requirements during the term of the contract, highlighting the HSE items that will not be met during the provision of the contract by the Supplier, with due justification, for analysis by Vale.

When analyzing the technical proposal prepared by the Supplier, the requester will verify adherence to the HSE items defined in the Technical Request/Technical Specification.


3.2.4 HSE Contract Kick-off Meeting

A meeting held prior to the start of the Supplier's activities, in order to ensure knowledge of important HSE issues at the Vale location where the contract will be executed.

It also aims to present, clarify and disclose the duties of the contract manager, contract inspector, agent (contractor's representative), Vale/Contractor's HSE teams and Corporate Security in compliance with Vale HSE legislation and guidelines, in addition to clarifying doubts related to the mobilization, management and demobilization stages of the contract, as well as deadlines for meeting demands, accessing systems (when required), providing reports, information and indicators, among other requirements.

3.3 Mobilization

Upon mobilization, the contracted supplier must send Vale the legal documentation of the company and its subcontractors (if applicable), including contracted employees, machines, equipment, vehicles and installations that will be mobilized to execute the contract.



The contracted supplier, its employees, machines, equipment, vehicles and installations must comply with their contractual obligations, local legislation, Vale's internal standards and procedures and, to this end, must consult and apply the guidelines established in the Mobilization Guide and in the Technical Request/Technical Specification.

The Contractor must ensure the consistency and reliability of the information presented. If the documents present inconsistencies, irregularities and/or require adjustments, the Contractor must regularize them under penalty of demobilization, notifications and fines.

During the execution of the contract, the Contractor must update the documents in Vale's systems in accordance with legal requirements or when requested by Vale.

The Mobilization Guide is available on Vale's Supplier page, in the I am a Supplier section, at the link <https://vale.com/im-a-supplier>.

3.3.1 Mobilization of Contracted/Subcontracted Employees

When mobilizing contracted/subcontracted employees, legal documentation, certificates, training and qualifications are presented. It is the responsibility of the contracted company to ensure that all of its contracted/subcontracted employees have received Vale's Basic HSE Training and have the training required to perform their duties, in accordance with legal and Vale requirements, prior to starting their activities in Vale's areas.

The Contractor may provide Basic HSE Training, provided that it uses the training material provided by Vale.

In order to preserve health and safety in the workplace, Vale has Golden Rules and safety requirements that must be observed by all its employees, visitors and people providing services to Vale.

Therefore, the CONTRACTOR may only allocate employees who have not violated Vale's Golden Rules and/or contributed, directly or indirectly, to N1/N2 events in the two years immediately prior to the date of their attempted mobilization, even if such violation and/or contribution by the employee occurred under the management of another supplier.

3.3.2 Mobilization of machines, equipment and vehicles (MEV)

The machines, equipment and vehicles to be mobilized must meet the requirements established in PNR-000069 - Critical Activity Requirements, in addition to the applicable technical and legal requirements.

The checklists for MEV mobilization are available in PNR 000067 – Health, Safety and Environment Management for Vale Contractors.

3.3.3 Mobilization of installations

The locations defined for contractors' installations must be planned, designed, inspected and released before use by third-party employees. The planning must consider an assessment of the installation site, possible interferences, necessary resources and preparation of projects, layouts, issuance of reports and environmental licenses, as applicable.

The installations must comply with technical criteria, relevant legislation and Vale's internal requirements set forth in the Technical Request / Technical Specification.

3.4 Contractor's HSE Management

During the term of the contract, the contractor must comply with Vale's applicable requirements, whether local or corporate, as well as applicable legislation and other contractual obligations in accordance with the Technical Request/Technical Specification. All of the contractor's employees must be qualified to perform their tasks.

During the term of the contract, any changes in procedures or scope of activity must be agreed between Vale and Supplier.

The locations may develop and conduct periodic assessments of contractors in order to monitor and verify compliance with local legislation, Vale's HSE guidelines and contractual requirements. In the event of non-compliance, action plans must be prepared and monitored by the contractor.

Such assessments will be considered in the analysis of the supplier's performance and will support recognition actions, supplier selection in future contracts and, when necessary, the application of contractual penalties, such as notifications, bans, fines and others.

3.4.1 HSE Risk Management

The contractor must ensure that the hazards and risks, as well as the HSE aspects and impacts inherent to the contract, are identified, analyzed, mitigated, controlled and monitored.

The Contractor must also guide all its employees on the risks and controls of the activities in which they are involved, as well as establish that its employees refuse to perform any activity if any situation of serious and imminent risk to the safety of people is identified.

The identification of hazard and risk scenarios / aspects and impacts must be carried out according to the guidelines established in PNR 000068 (Job Safety Analysis) and PNR-000182 (Survey of Environmental Aspects and Impacts).

In order to ensure greater effectiveness in eliminating/controlling risks, the contractor's leadership must consider applying the hierarchy of controls for risk management, always prioritizing the most efficient methods.

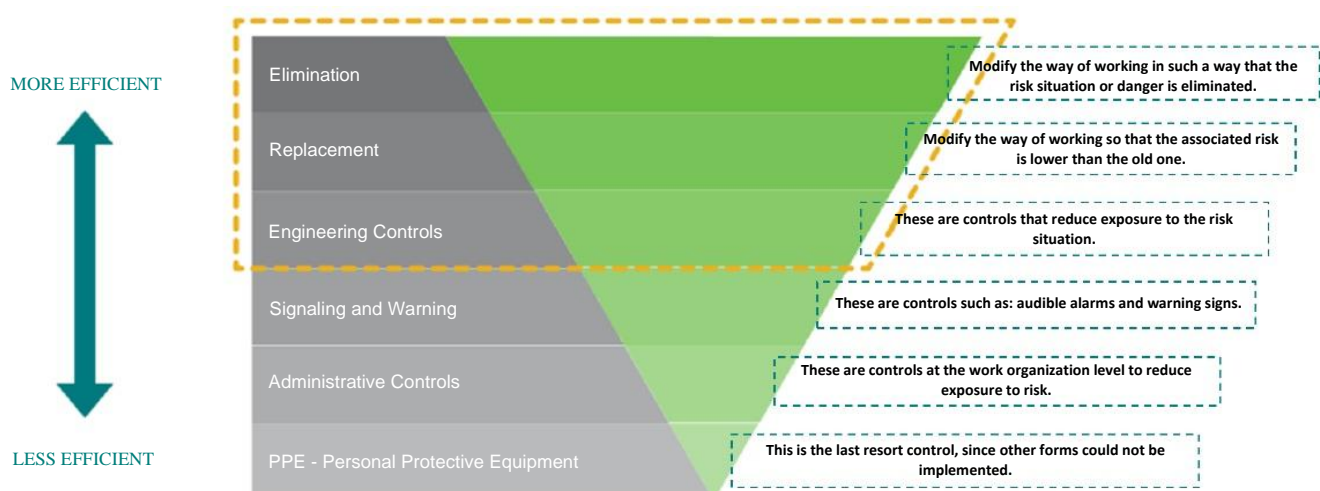



Figure 2 - Hierarchy of controls for risk management



The results of Vale's Risk Analysis and Environmental Aspect and Impact Survey that have interfaces with the scope of the contract will be reported in the Technical Request / Technical Specification.

The contractor must establish its operational controls based on risk assessments, identification of environmental aspects and impacts, legal requirements and Vale's requirements, in order to ensure the implementation of effective actions to mitigate risks and control the identified aspects.

3.4.1.1 Job Safety Analysis – JSA

Job Safety Analysis (JSA) is a risk analysis method that consists of identifying, at each step of the task, the causes, risk or hazard situations and control measures that must be applied so that an event does not occur or so that the consequences of these events are mitigated. Once this information is established, the risk is classified at each step of the task, based on probability and severity.

The Job Safety Analysis must be carried out by a multidisciplinary team, composed of, at least: a) Employee trained and knowledgeable in the JSA method; b) Employee knowledgeable in the task to be performed. This team is responsible for identifying all the information necessary to prepare the JSA and carrying out the identification, analysis, classification and assessment of risks. It is important that the information is described clearly and objectively so that the person performing the task can understand it.

The contractor's internal operating procedures may be requested for evaluation by Vale. Every task to be performed requires a planning risk analysis. For tasks in which a procedure has been prepared, it must be based on a planning JSA.

The guidelines and requirements for preparing and adapting JSA are available in PNR 000068 - Job Safety Analysis – JSA.

3.4.1.2 Survey of Environmental Aspects and Impacts

The Survey of Environmental Aspects and Impacts is a methodology used to identify, evaluate and manage environmental aspects and impacts arising from an organization's activities, products and services.


Its application allows us to understand the interaction (environmental aspects) of processes/activities with the environment and identify the possible effects (environmental impacts), in order to determine the significant aspects.

The guidelines and requirements for preparing and adapting the Survey of Environmental Aspects and Impacts are available in PNR 000182 - Survey of Environmental Aspects and Impacts.

3.4.2 Conduct Management for HSE

Conduct Management for HSE are Health and Safety requirements based on methodologies that enable the clear, standardized and aligned application of the consequences attributed to expected or unexpected behaviors.

The Golden Rules are HSE standards that employees and contractors must commit to following and represent the minimum requirements for carrying out any activity, that is, they are inviolable principles to be applied to all people who work at Vale. They do not replace the other health and



safety requirements established in the VPS and were established to reflect the value “Life Comes First”.

Contracted companies must make their employees fully aware of the Golden Rules and their compliance by formalizing this understanding in the Instrument of Awareness and Commitment. Whenever an event N1, N2 and/or non-compliance with the Golden Rule occurs, the Committee for Life must be activated.

The requirements for compliance with the Conduct Management for HSE process must follow the criteria established in PNR 000267 - Conduct Management for HSE.

3.4.3 Leadership, Roles and Responsibilities

It is the responsibility of contractors to:

- i. Implement HSE processes and programs during the term of the contract with Vale, considering the definitions established in the Technical Request/Specification, Vale Production System (VPS), Supplier Management System and applicable legal requirements;
- ii. Demonstrate active leadership, through participation, promotion of HSE activities and initiatives, engaging all employees and ensuring the resources and support necessary for effective management;
- iii. Conduct HSE inspections in the field, according to guidelines established by the location;
- iv. Conduct a critical analysis of inspections, actions to address non-conformities, implementation and functionality of controls related to the activities under their responsibility and demonstrate continuous improvement of their HSE performance;
- v. Participate in HSE meetings, according to the agenda established by the contracting area;
- vi. Implement HSE processes and programs, in accordance with applicable legal requirements;
- vii. Implement Conduct Management for HSE;
- viii. Implement own controls for managing risks and impacts related to HSE, Communities and Human Rights in its activities and those of its subcontractors;
- ix. Report to the manager, contract inspector and/or Vale's HSE area any occurrence of undesirable events (personal, material, environmental and/or involving the community) and participate in their analysis, in accordance with Vale standards;
- x. Share knowledge and lessons learned with Vale and its employees;
- xi. Collect, consolidate and make available the company's HSE information and indicators.

Vale values the physical integrity of contracted employees who perform activities in its areas with the aim of providing a healthy and safe environment. In this approach, minimum HSE guidelines have been established that all companies must consider during all stages of the contract term, as follows:



- i. Employees of contractors and subcontractors must not access Vale areas or areas on Vale's behalf without due authorization;
- ii. The contractor is responsible for coordinating the services of its subcontractors, whether or not they have their own HSE teams;
- iii. Working hours, rest periods and breaks, as well as all other labor rights, must be met as defined in local legislation or specific agreement;
- iv. When sizing field HSE teams, it is important to consider local legislation and the requirements established in the Requisitions/Technical Specifications;
- v. Vale may interrupt any work whenever there is evidence of a serious and imminent risk to the health and safety of people, installations, the environment, human rights and the community, until the risk conditions are eliminated or controlled.

3.4.4 Documents, Records and Information

The contractor must ensure that HSE documents and records, as well as updates and information on compliance with HSE legislation and standards applicable to the scope of the contract, are available (in physical or electronic form) and controlled during the execution of activities for inspection or audit purposes.

Locality-specific information or documents will be made available in the Technical Request/Specification or at the HSE Kick-off Meeting, and the updating of this information or documents will be carried out by the contract manager or inspector.

The operational procedures for executing activities, as well as their records, must be prepared by the contractor with its logo, in compliance with HSE legal requirements and Vale's requirements.

3.4.5 Mandatory HSE Training

The contractor must ensure that all its employees have their training needs identified by position and function, and that they are properly trained, qualified and qualified in accordance with Vale's legal requirements and internal standards.


Evidence of qualification and the updated training matrix must be available at any time for carrying out mobilization, checks, inspections and/or audits during the contract term.

The training matrix must contain, as a minimum:

- i. Position and/or function;
- ii. Training related to your activities by position and/or function;
- iii. Validity and recycling period;
- iv. Workload.

3.4.6 Human Rights Training for Private Security Agents

If the employee's function is that of a Private Security Agent, all of them must be trained in the Human Rights training, developed by Vale specifically for this audience.



The contracted company will be responsible for scheduling this training and Vale is responsible for its implementation. The guidelines inherent to this training are available in PGS 005031 - Rules of Engagement for Corporate Security Actions.

3.4.7 Communication and engagement of contracted employees

It is the responsibility of contractors to develop effective communication processes with their employees in order to disseminate information and guidelines on HSE and Human Rights regarding the execution of the Vale contract, including, at a minimum:

- i. Communication of Health, Occupational and Process Safety, Environmental and Community Events;
- ii. HSE Indicators;
- iii. Programs and information for the prevention of diseases and accidents provided for in local legislation;
- iv. Information for the prevention of Human Rights violations.

The following may be used as means of communication, among others:

- i. Awareness campaigns;
- ii. HSE Meetings;
- iii. HSE Dialogues.

The contractor must keep records that demonstrate communication with its employees and evaluate the effectiveness of the communication, addressing the opportunities for improvement identified.

The contractor may use its own HSE dialogue methodology and forms, provided that this process is systematized and must follow the requirements defined in local procedures.

3.4.8 Safe Work Permit – SWP


The Safe Work Permit (SWP) process involves the pre-planning, planning, programming and execution stages of a given task through prior knowledge of the risks and definition of controls, aiming to protect the performers in critical activities that require prior permission to be carried out in the area of another owner.

The SWP must also be issued whenever it is required by a legal requirement or other external requirement, under any circumstances.

The requirements and training for designating issuers, accredited performers and performers to comply with the PTS process must follow the guidelines of the areas and criteria established in PNR 000031 - Guidelines on Safe Work Permits.

3.4.9 Critical Activity Requirements - CAR

CAR are fundamental Safety controls and must be implemented with the purpose of preserving the lives of employees hired during the execution of activities.



Vale's critical activity requirements, described in PNR 000069 - Critical Activity Requirements, apply to both Vale's own employees and employees hired by service providers.

The contractor must analyze the Technical Request/Specification in order to map the applicability of the CAR and define the control measures established for each CAR. These requirements must be previously known, planned and fully applied from the beginning of the execution of the contract.

During the term of the contract, contractors and their subcontractors must fully comply with CAR. The contractor is responsible for carrying out periodic self-assessments to ensure compliance with all requirements applicable to its activities, including new reviews.

If the employees' role involves carrying out critical activities, all these employees must be trained in the related CAR's and carry the CAR passport issued by the mobilization system. CAR training is the contractor's responsibility.

Training must be carried out in accordance with the guidelines established in PGS 005235 – CAR Model Training Guidelines, following the indicated workload and using, at a minimum, the teaching material prepared for each of the CAR'S.

All contractors who perform activities related to the CAR's must develop a medical control program for professionals who perform critical activities and must perform the type of examination (initial, periodic, for changes in occupational risk or return to work) according to the mapped CAR'S.

3.4.10 Personal Protective Equipment (PPE)

The contractor must define and use PPE appropriate to the risks of its activities and in compliance with legal requirements. The specific details regarding the specification of PPE for access to Vale areas are defined in the Requisition/Technical Specification. It is mandatory to use a standardized uniform per company that allows for easy identification of employees at the service fronts.

Uniforms and PPE must be provided and replaced by the contractor according to their validity or condition. Vale reserves the right to inspect and, if necessary, require their replacement, under penalty of restricting access of the contracted employee to the service points until the situation is regularized.


The contractor is prohibited from charging any amount or deducting from the payroll related to the supply or replacement of uniforms and PPE for contracted employees.

3.4.11 Chemical Dependency Program

It is forbidden to possess or consume any alcoholic beverage or illegal substance on Vale's premises. The contractor is responsible for monitoring its employees, in accordance with local legislation, before they enter Vale's areas and during their work shift.

Employees found under the influence of alcohol or drugs at Vale must be removed from the premises.

Guidelines and instructions for alcohol and drug testing are available in PNR 000270 - Corporate Guidelines for Alcohol and Psychoactive Drug Testing.



Vale may request the creation of a Chemical Dependency Program with the aim of preventing any employee who is under the influence of alcohol or drugs from entering the workplace.

The guidelines and instructions for monitoring chemical dependency are available in PGS 003788 - Disability Prevention Guidelines.

3.4.12 Endemic Diseases and Traveler's Health

The contractor must create and implement an Endemic Disease Prevention and Traveler's Health Program when operating in remote areas with serious endemic diseases, such as malaria and yellow fever, or when traveling internationally.

Guidelines and guidance for endemic diseases and traveler's health are available in PGS 005391 - Guidelines for Traveler's Health Management.

3.4.13 Occupational hygiene

Exposure of contractors' employees to chemical, physical and biological agents must be managed in order to identify and control exposures above the occupational exposure limits determined by local legislation.

3.4.14 Ergonomics

The contractor must have an Ergonomic Prevention Program that must anticipate, recognize and manage the ergonomic risks of its employees. The necessary operational actions and controls must be implemented using technical criteria, in accordance with legal aspects and regulatory standards, with the aim of preventing or mitigating harm to the health of its employees.

3.4.15 Fatigue Prevention

The contractor must have a Fatigue Prevention Program for the prevention, prediction, control and monitoring of fatigue, in accordance with PNR 000257 - Guidelines for Fatigue Prevention Programs, for functions in which fatigue and drowsiness may contribute to the occurrence of events, especially functions related to the operation of mobile equipment (CAR 03) and motor vehicles (CAR 02).

3.4.16 Physical Working Conditions


The contractor must provide a healthy, safe and comfortable work environment for its employees, ensuring that its installations (bathrooms and washrooms, changing rooms, dining installations (canteens), kitchens, accommodation, transportation and rest areas) are kept in perfect condition, hygiene and cleanliness.

The guidelines and directives for physical working conditions are available in PNR 000256 - Corporate Guidelines for Physical Working Conditions.

3.4.17 Occupational Health Guidelines

Any activity carried out outdoors or activities that cause thermal stress must have a rehydration program, rotation and sun protection measures adopted.

Pre-employment exams must be carried out in accordance with local legislation and before the employee is hired, assessing, above all, their physical and emotional capacity for the tasks they will perform. The pre-employment medical exam must consist of a clinical evaluation with



occupational anamnesis, in addition to complementary exams directly related to the risks of the work environment and the characterization of functional capacity.

The contracted company must manage the health of its employees with a comprehensive approach to preventing cardiovascular diseases. Employees aged 40 or over must undergo a clinical exam, targeted questionnaires and laboratory tests to calculate a cardiovascular risk score (Framingham Score).

For the activities listed in the table below, contracted companies must observe the performance of the aforementioned exams, in addition to the other recommended exams, including them in the management documents and certificates, when applicable.

Table 1 - Tests for specific activities

SPECIFIC ACTIVITY	RECOMMENDED EXAMS	FREQUENCY
Cafeteria workers	Stool protoparasitological test and coproculture; serology for hepatitis A	Admission and annual
Private company security guards	Psychological evaluation for security guards	Admission

The vaccines recommended for the performance of specific activities by contracted employees are listed in the table below, and other vaccines may be indicated by local legislation.


Table 2 - Vaccines for specific activities

SPECIFIC ACTIVITY	RECOMMENDED VACCINES
Cafeteria workers	Hepatitis A vaccine (for negative employees)
Workers in yellow fever endemic areas	Yellow Fever Vaccine
Health professionals	Vaccine against Hepatitis B (for negative employees)
All workers	Tetanus vaccine
Caving workers	Rabies vaccine

3.4.18 5S

The contractor must implement, maintain and verify the efficiency of the 5S Program, which is important to increase productivity, optimize resources, prevent accidents and increase employee satisfaction with the work environment. The contractor must contribute to maintaining the standard of physical organization of the areas where they carry out their activities, in accordance with Vale guidelines, as well as their installations and/or construction sites, and be prepared to comply with the 5S checks and/or inspections carried out by Vale. The guidelines for the 5S Program are available in PNR-000039 Vale Processes and Standardization.

3.4.19 Environmental Controls



The needs and specificities of the area related to the contract, such as water consumption, treatment or disposal of effluents, disposal of waste, atmospheric emissions and others are defined in the Technical Request/Technical Specification.

3.4.20 Biodiversity

The contractor must guide its employees on the preservation and conservation of biodiversity.

The removal of any type of vegetation is not permitted without prior authorization from Vale and the competent environmental agencies.

Documents informing the origin of natural inputs, such as sand, gravel and wood from forestry sources, must be presented to Vale.

3.4.21 Water Resources and Wastewater

The contractor must implement physical controls or barriers to avoid impacts on the soil and water resources in activities such as supply, cleaning, drainage, maintenance, storage, among others, in accordance with legal and Vale requirements.

In the event of an accident with equipment that results in impacts on the soil or water, the contractor must remedy the damage caused and immediately inform Vale.

Effluents (treated or not) generated by the contractor must not be directed to receiving bodies, storm drainage networks and treatment plants without prior formal authorization from Vale.

3.4.22 Atmospheric Emissions

Activities involving particulate emissions (earthmoving, bulk transportation, handling or storage of powdery materials, among others) must have adequate controls such as enclosure, wetting, water spraying, use of binders, dust suppressants or other dust removal systems.

The contractor, which uses diesel vehicles to transport cargo or passengers, must comply with local legislation regarding the monitoring of atmospheric emissions.

Painting activities must preferably be carried out in cabins equipped with exhaust and gas treatment systems to control organic vapors.

3.4.23 Waste

The contractor must ensure the segregation and storage of its waste, in addition to knowing and implementing the local unit's waste program. Recipients such as drums, cans and others must be clearly identified and kept closed in order to prevent spills, leaks, rainwater retention and proliferation of vectors.

If it is the contractor's responsibility to transport or dispose of waste, the environmental authorizations, specific conditions and applicable legislation must be met and their evidence must be available during the term of the contract, in order to avoid potential generation of internal and external environmental liabilities.

The following is not permitted: (a) burning waste in the open air; (b) disposing of waste of any nature directly on the ground or in water bodies; and (c) disposing of waste in a waste pile, without authorization from Vale.



3.4.24 Greenhouse Gas

If requested in the Requisition/Technical Specification, the contractor must prepare a Greenhouse Gas Inventory, file its records and submit it to Vale when requested.

3.4.25 Chemical Product Management

The contractor must identify the risk scenarios and authorizations required for the acquisition, transportation, handling, storage, transfer, use and post-use of chemical products, in accordance with legal and Vale requirements.

Chemical products, regardless of their application, must have legible identification on the label, pictogram and be accompanied by the SDS - Safety Data Sheet (in the local language and the language of its users) for consultation, and its recommendations must be fully followed, including their identification and storage.

If a product does not identify its composition due to claims of industrial secrecy, the product supplier must be asked to provide a declaration that the composition of its product is free from substances contained in Vale's Prohibited List (reference) and Restricted List; is not included in the list of controlled products and does not contain CMR substances (carcinogenic, mutagenic and toxic to human reproduction).

The use of chemical products on the Prohibited List is not permitted. The use of chemical products on the Restricted List must be justified by the contractor and approved by Vale, and it is recommended that a replacement be sought.

If the Contractor uses chemical products containing substances controlled by the Federal Police, the Civil Police, the Army or other competent authorities, these must comply with the authorization, permission and notification requirements of these competent bodies, as well as the stock movements reported at the frequency required by law, when applicable.

To use Controlled Products, it is necessary to previously have a license for use from the competent body in the Company Registration Number of the supplier/transporter and user. Control maps involve acquisition, handling and transportation. The transfer of controlled materials from one site to another can only be carried out after checking whether there is a license for the site. Every Contractor that uses a product controlled by the Army, Federal Police, Civil Police or other competent authorities needs a license with the indication of a technical and legal representative, when applicable.

The guidelines and lists of Chemical Products with restricted and/or prohibited use at Vale are available in PGS 003038 – Chemical Product Management.

3.4.26 Maintenance and Integrity of Machines, Equipment, Vehicles and Installations

The machines, equipment, vehicles and installations, as well as the measuring/testing devices of the contracted company that are considered critical for HSE, must be inventoried and have a maintenance plan to ensure their functionality within the established control parameters and with due quality.

The performance of any type of maintenance (preventive, predictive and corrective) on machines, equipment and vehicles owned by the contractor within Vale's premises will be subject to contractual requirements or authorization from the contract manager or inspector.

3.4.27 Inspections and Audits

Vale may, at any time, carry out inspections and audits on the contractors' installations and activities to verify compliance with applicable HSE requirements and standards, as well as to assess legal compliance. The contractor must provide all information and documentation necessary to carry out these inspections and audits.

The contractor must also have an inspection program containing, at a minimum, planning, recording, evaluation of results and critical analysis of the program, and must consider the entire scope of the contract, in addition to the main risks and aspects of the area in which it operates.

Inspections must focus on identifying deviations, actual or potential losses that may cause damage to HSE. Inspections must use Vale's regulations, the supplier's management system and applicable legal requirements as a reference, encouraging the application of best HSE practices.

All non-conformities, opportunities for improvement and deviations identified in the inspection and audit processes will be addressed to the contractor and must be duly dealt with.

3.4.28 Monitoring, Performance Indicators and Continuous Improvement

The contractor must define a system for monitoring HSE indicators in order to ensure the tracking of information, monitoring of goals and directing actions to address deviations. The table below presents the indicators that must be implemented, monitored and reported to Vale, monthly, by the contractor.

Table 3 - HSE Indicators

Type	Name of the indicator	Calculation formula
Proactive	HSE Inspections	$(\text{Number of HSE inspections carried out} / \text{Number of HSE inspections planned}) * 100$
	Register of Best Practices	Number of HSE best practices carried out
Reactive	Recordable Occupational Injury Frequency Rate (TRIFR)	$\{([Injuries \text{ that Resulted in Fatality}] + [Injuries \text{ With Time Away}] + [Injuries \text{ With Restriction}] + [Injuries \text{ With Medical Treatment}]) / \text{HHT}\} * 1,000,000$
	Occupational Injury Frequency Rate with Time Away (LTFIR)	$\sum ([Occupational \text{ Injuries with Time Away}] / \text{HHT}) * 1,000,000$

The evaluation of the contractors' HSE performance will be carried out periodically during the execution of the contract and will be recorded in order to guarantee contractual compliance and seek continuous improvement of the supplier.

The evaluation and results will contribute to and support recognition actions, supplier selection in future contracts and, when necessary, the application of consequence management.

In order to reinforce engagement and commitment, contracts that present the best HSE performances may be recognized and awarded at the corporate and local level. The guidelines and requirements for Performance Evaluation and Recognition are available in PGS-002992 - Supplier Performance Evaluation.



3.4.29 Management of Change

If any need for change is identified that may directly or indirectly impact the risks of the processes or activities covered by the scope of the contract, the contracted company must inform the contract manager or inspector and perform an analysis of the process as a whole following the guidelines of PNR-000101 – Management of Change.

3.4.30 Communication of Events and Scope

Contracted companies must instruct their employees on the obligation to immediately notify the person responsible for the activity or area when they witness, experience or identify an event, that is, any occurrence or adverse condition that resulted, or could result, in loss, damage or impact, regardless of whether there is a release of energy.

All events, whether related to occupational safety, the environment, process safety and/or those involving the community, as well as infraction reports, fines, notifications received from authorities and complaints from interested parties, must be immediately recorded and reported to Vale.

In the occurrence of an event, the contractor must collaborate with the analysis of the causes, not making any changes to the scenario without prior authorization from Vale, making its employees available for interviews, presenting the requested evidence and collaborating in the investigation of the facts.

At the end of the analysis or whenever other events are shared, the contractor must carry out an internal analysis to verify whether the causes that contributed to the event in question are correlated or present in its processes, in addition to adopting an action plan for its elimination.

Guidance and requirements for event management are available in PNR-000070 – Health, Occupational and Process Safety, Environment and Community Events Management.

3.4.31 Emergency Management and Response

All suppliers must be covered by an Emergency Response Plan (ERP). If the ERP is not an obligation provided for in the Technical Request/Technical Specification, the supplier will be integrated into the ERP of the Vale location where it operates, and it is the supplier's obligation to ensure that its employees are trained and aware of the guidelines of the local Vale plan.


For services that require the Supplier to have its own ERP, the Supplier must follow the emergency obligations provided for in the Technical Request/Technical Specification and adhere to national and local legislation and technical standards applicable to the scope of the service.

3.4.32 Social and Human Rights Impact Management

The contractor must identify, assess and treat the social risks and impacts arising from its activities in order to prevent, mitigate and offset negative impacts and enhance positive impacts, in compliance with legal requirements and Vale's guidelines.

The contractor must respect social diversity and cultural aspects and ensure good relationships and coexistence between workers and communities, with special attention to vulnerable groups.

The contractor must develop and publicize channels for receiving and monitoring complaints and complaints, for investigating the facts and, when applicable, for applying administrative sanctions to those directly and indirectly responsible.



The contractor must publicize the Whistleblower Channel and other Vale listening and response mechanisms, available in the location, at its installations dedicated to the activities provided for in the contract.

The contractor must establish prevention and control measures to avoid or minimize potential risks and impacts on the health, safety and human rights of its workers and communities that may arise as a result of its activities, subcontractors and/or its supply chain, such as:

- Excessive noise, vibrations and particulate emissions;
- Traffic accidents or speeding involving employees hired in local communities;
- Community exposure to hazardous substances;
- Sexual exploitation of children and adolescents (especially in locations close to worker accommodation, construction sites and transportation services);
- Occurrence of degrading working conditions, forced or slave-like labor and child labor in its activities or in its value chain;
- Retention of workers' identification documents and payment of fees in recruitment and selection;
- Inadequate conditions of workplace installations and accommodation;
- Changes in violence rates in the area of direct and indirect influence.

3.5 Demobilization

At the end of the contract, the supplier and subcontractors must remove all their machines, equipment, vehicles, installations, construction sites, chemical products, among others, from the Vale area, ensuring that all risk conditions and HSE liabilities have been eliminated and/or controlled.

The return of the Vale badge is mandatory if the employee is not mobilized in another contract with the same company.

At the end of the contract, the contract manager/inspector will carry out an assessment considering the records of inspections, checks, audits, meetings and critical analyses that occurred during the term of the contract, in addition to a demobilization inspection to demonstrate that all obligations and/or pending issues have been addressed.

The contractor must guarantee workers recruited in other regions the resources necessary for their return, without discounts or charges to the worker.

4 FINAL PROVISIONS

When performing activities for Vale, contractors are responsible for managing the employees, processes, services, activities, machines, equipment, vehicles and installations used to fulfill the purpose of the contract, and are responsible for the health and safety of their employees and the environment.



Compliance with the HSE obligations set forth herein does not exempt contractors from adopting, respecting and complying with other measures, especially legal measures, that prevent or control risks and ensure the health and safety of their employees and the environment.

Vale may suspend or interdict the contractor's services, in whole or in part, whenever a situation of serious and imminent risk to HSE or to the communities is characterized, or even for non-compliance with Vale's legislation and standards.

If the information provided to contractors is not sufficient to clarify all doubts, a direct consultation with the contract manager should be made for clarification.