



VALE

HSE Guide for Vale Suppliers

Reference:

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

Ver.: 08 – 04/01/2026



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 aims to establish an integrated system that organizes the way Vale operates, connecting culture, people, and processes, all anchored in the Purpose, to ensure that the entire company operates safely, efficiently, and with social and environmental responsibility.

The model incorporates industry's best practices, strengthens governance, ensures compliance with applicable national and international standards, and promotes safety, efficiency, sustainability, and continuous improvement based on the PDCA cycle.

By integrating purpose, behaviors, and processes, the VPS guides people in their pursuit of the best results, ensuring consistency and synergy in the way we work and contributing to a safer, more efficient, and more responsible Vale.

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



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:

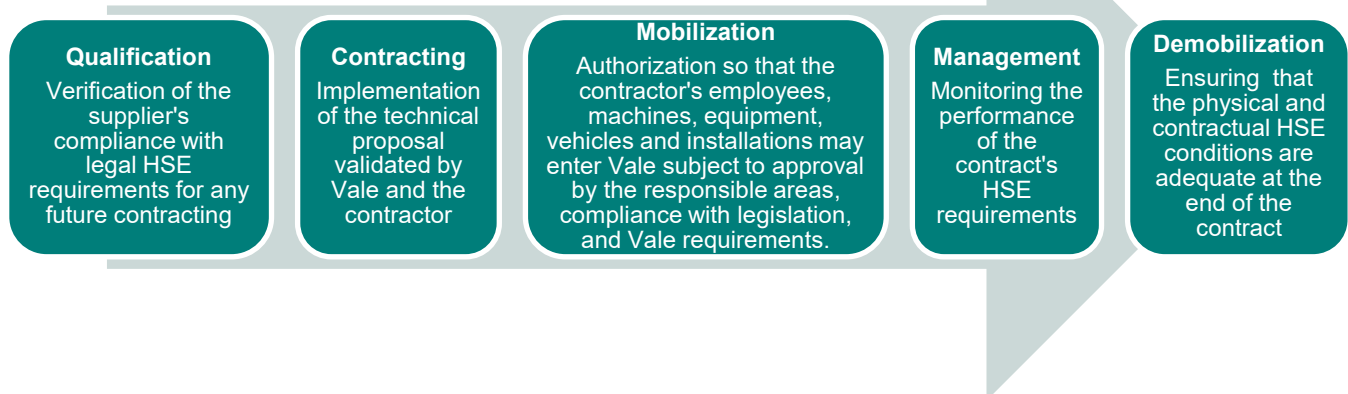


Figure 2 – HSE Management Model for Suppliers

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 meet the HSE criteria established during the qualification process may not be contracted by Vale. Similarly, companies listed in the Registry of Employers that have subjected workers to conditions analogous to slavery, published by the Ministry of Labor and Employment in accordance with current regulations, are barred from being contracted.

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 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. Requirement to comply with Vale's HSE Guide for Suppliers during the term of the Contract and the link to access it;
- ii. HSE requirements for fulfilling the scope of the contract;
- iii. Contract classification (controlled or monitored) and HSE risk classification (low, medium, high, or very high), in accordance with Annex 2 of PGS 005871;
- iv. Applicability of technical visits for guidance and clarification;
- v. HSE hazards and risks associated with Vale's processes that interface with the contractual scope, in addition to environmental aspects and impacts;
- vi. The minimum HSE conditions to be ensured at work sites, construction sites, and/or the Contractor's own facilities;
- vii. The need to develop the Contractor's Emergency Action Plan (PAE) or whether this will be covered by Vale's plan, in addition to resources and responsibilities;
- viii. Requirements for the mobilization of personnel, machinery, equipment, vehicles, and facilities;
- ix. Information on HSE meetings and routines;
- x. Specific training for contractors regarding the activity and/or site;
- xi. Specific requirements for demobilization.

3.2.2 Technical visit

The Technical Specification will indicate whether a site visit is required. The purpose of the site visit is to allow bidders to familiarize themselves with the area where the service will be performed, the scope of work to be carried out, and the risks present in the Vale environment, and, when necessary, to clarify any questions related to technical and 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 Supplier's commencement of work, with the purpose of ensuring awareness of important HSE issues at the Vale site where the contract will be performed.



It also aims to present, clarify, and communicate the responsibilities of the Contract Manager and Supervisor, the Contractor's Representative, the HSE teams from both Vale and the Contractor, as well as Corporate Security, ensuring compliance with current legislation and Vale's HSE guidelines.

The meeting also addresses questions related to the contract's mobilization, management, and demobilization phases, as well as deadlines for fulfilling requests, access to systems (when required), the provision of reports, information, and indicators, and other requirements necessary to meet contractual obligations.

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 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

3.3.1.1 General Guidelines

When mobilizing contracted and subcontracted employees, the relevant legal documents, certificates, training records, and qualifications must be presented. It is the responsibility of the Contractor to ensure that all of its employees and subcontractors have completed Basic HSE Training and possess the training required to perform their duties, in accordance with legal requirements and Vale's guidelines, prior to commencing their activities on Vale's premises.

Given that services are provided in areas where activities carry a high risk of events and/or exposure to harmful agents, the Contractor, as part of its selection, recruitment, and mobilization process, must require contracted and/or subcontracted employees to provide proof of literacy as a minimum educational requirement.

To safeguard the health and safety of the workforce in the workplace, Vale has established Golden Rules and health and safety requirements that must be observed by all its employees, visitors, and individuals providing services to Vale.

Accordingly, prior to the mobilization phase that is, during the selection phase for workers to be hired or subcontracted, the Contractor, in order to ensure the safety of employees in light of the



work to be performed on Vale's premises, must assess whether the candidates meet the requirement set forth in the preceding paragraph.

Once the assessment has been conducted, the selection process shall be carried out at the sole discretion of the Contractor, and, for the purposes of complying with this provision, the following requirements must be strictly observed:

- i. hire or subcontract workers who have proven technical competence and skills to perform the services;
- ii. hire or subcontract workers who have complied with Vale's Golden Rules and safety requirements during the eighteen months immediately preceding the date of selection of the workers, even if they were employed by another supplier;
 - a) The recommendation in item (ii) stems from the nature of the job or role to be performed, which may jeopardize the safety and well-being of other employees;
- iii. hire or subcontract workers in accordance with the requirements of Law No. 6,019/74 (if applicable).

The CONTRACTOR shall manage processes that encourage safe behavior, promoting safety and health in the workplace.

The recruitment and selection process for its employees shall be conducted using criteria that take into account experience and technical skills relevant to the job requirements, in addition to assessing behavioral profiles related to safety.

The onboarding of new employees into the workplace must also focus on Safety, Health, and Environment (HSE) principles and practices and must include training and a mentoring program, ensuring that all professionals begin their duties with an awareness of risks and expected behaviors, guaranteeing continuous monitoring of new employees and thereby reducing the likelihood of incidents.

Training for HSE leaders and teams on Safe Behavior should also focus specifically on how to foster safe behaviors within teams, strengthening the role of leaders and safety professionals as agents of change in HSE culture and maturity, actively working to prevent events (e.g., behavioral approach techniques, behavioral interview techniques, safe leadership practices, recognition training, psychological safety, among others).

3.3.1.2 Basic HSE Training

The Basic HSE Training does not replace local legal requirements and must be of sufficient duration (a minimum of 4 hours) to cover all items included in the content available at the link below, in accordance with the specific characteristics of the activity and the location; it may be conducted online, remotely, and/or in person.

The Basic HSE Training may only be reused for training sessions conducted using the current version, which must not be more than 2 years old, as per the training material provided by Vale, available at the following link:

<https://valpaebmstorage.blob.core.windows.net/arquivos/TBSSMA.zip>



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

3.3.2 Mobilization of machines, equipment and vehicles (MEV)

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

The process for mobilizing machines, equipment, and vehicles must be carried out through the current mobilization system. The guidelines and criteria are set forth in PGS 005865 - Guidelines for Mobilization and Demobilization at Vale Brazil, and the mobilization checklists are available on Vale's Supplier page, in the "I am a Supplier" section, at the following link: <https://vale.com/pt/sou-um-fornecedor>.

3.3.3 Mobilization of installations

The locations designated by Vale for contractors' installations must be planned, designed, inspected, and approved before they are used by contracted and subcontracted employees. These sites, classified as central or forward construction sites, must provide adequate working conditions and physical arrangements, as well as infrastructure and resources compatible with the tasks to be performed.

The planning step must include an assessment of the installation site, the identification of potential interferences, and the determination of the resources needed to prepare designs and layouts, issue reports, and/or obtain environmental permits, with the aim of complying with technical and legal standards as well as Vale's internal requirements, when specified in the Technical Specification.

The assembly of the installations must be carried out in accordance with the designs and layouts approved by Vale. Whenever adjustments, expansions, or modifications are necessary, these must be communicated in advance, reviewed, and formally authorized.

Upon completion of the installation's construction, the Contractor may only begin using them upon formal approval issued by the local HSE department, in conjunction with the controller.

For areas designated for parking vehicles and/or equipment, the rules set forth in the local traffic plans and the following guidelines must be observed:

- i. Drivers/operators must use safe routes when entering or exiting with vehicles or equipment;
- ii. People are prohibited from entering the maneuvering yards;
- iii. In exceptional cases, authorized personnel may enter the maneuvering yard only if all vehicles and equipment are stationary and all access points are blocked;
- iv. Vehicles and equipment must be parked in reverse and within the designated bays; raising the dump bed of trucks within the bays is prohibited;
- v. Trucks must not park in bays with a load exceeding the height of the dump bed's edge;
- vi. Bays must be of dimensions appropriate for the type of vehicle/equipment, ensuring sufficient side and rear clearance to allow for operator inspection; connection to a safe route; and curb heights appropriate for the size of the tires.

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 Specification. All contractors' 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.

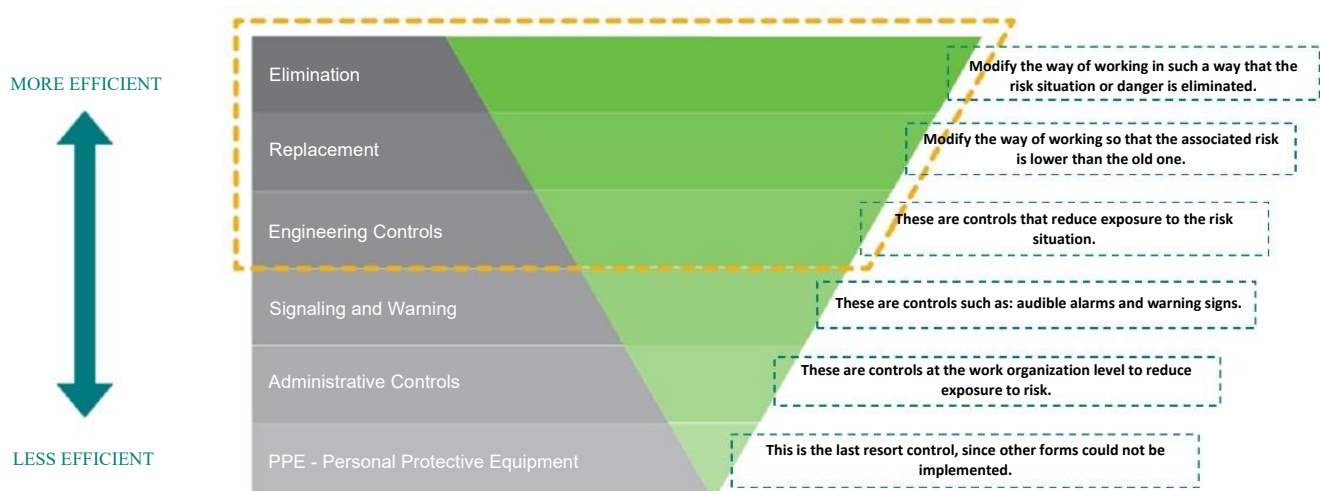


Figure 3 - Hierarchy of controls for risk management



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 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”.

Contractors must fully inform their employees about the Golden Rules and ensure compliance by formalizing this understanding in the Acknowledgment and Commitment Agreement. Whenever an N1 or N2 event occurs and/or there is a violation of a Golden Rule, the Committee for Life must be activated.

In addition, actions must be taken to recognize, value, and reinforce behaviors and practices that promote workplace safety, encouraging employee engagement by positively reinforcing desired attitudes and strengthening the safety culture (e.g., dissemination of HSE best practices, Kaizens, public recognition of safe/exemplary behaviors, among others).

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 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 VES for Contractors

The VES for Contractors platform is a solution that provides access to training content required for the execution of tasks by contracted employees. These trainings are related to Vale's policies and normative standards, for which the qualifications are not mandated by local legislation, and are aligned with the content presented in this guide.

The training platform uses the contracted employee's passport number as the individual access key and requires a valid and individual email address, either corporate or personal, to send access instructions to the platform.

The platform offers online training content and enrollment in in-person training sessions, according to availability and scheduling, previously authorized by the normative content areas and validated by Vale's legal department.

Access to the VES for Contractors platform, as well as the form for registering new users and regularizing access, is available through the following link: [VES for Contractors](#).

3.4.7 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.

3.4.8 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.

3.4.9 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.

3.4.10 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.



3.4.11 Critical Risk Management

CRM is a Critical Risk Management methodology that enables the identification, recognition, control, and mitigation of risks associated with any and all activities that pose a risk of death. The objective is to ensure, through physical verification, that all critical controls are in place and effective. A critical control is a barrier that prevents an employee from dying during an activity.

Critical controls are verified using checklists that must be completed in the CRM application. To this end, during the contract planning phase, contractors must:

- i. Understand the critical risks of the tasks to be performed, apply the controls defined in the risk analyses, and verify that they are implemented;
- ii. Requests from managers, contract supervisors, and local HSE departments the plan for implementing the CRM in the contracts;
- iii. Provide and manage mechanisms for recording and verifying controls, following the guidelines established in PGS 007180;
- iv. Ensure that contracted and/or subcontracted employees who will apply to the CRM have completed the training available on Vale's platforms, either in person and/or online;
- v. Halt activities in the event of a missing or failed critical control.
- vi. The guidelines and requirements for implementing and applying the CRM are available in PGS 007180 - Guidelines for Verifying Critical Controls Using the CRM.

3.4.12 Process Safety

Process safety aims to ensure the safety of assets, operational systems, and processes that handle hazardous energy and products throughout the stages of an asset's life cycle by applying best practices in engineering, operation, and maintenance, with the goal of preventing process safety incidents that could have significant impacts on people, communities, the environment, and business continuity.

Contractors performing activities in operational areas, industrial facilities, process units, critical auxiliary systems, classified areas, maintenance shutdowns, commissioning, construction, assembly, inspection, maintenance, industrial cleaning, the handling of hazardous products, or any activity that may affect the integrity of process safety barriers must fully comply with the Safety, Health, and Environment requirements and the specific Process Safety requirements established by Vale.

In addition, they must ensure that contracted employees can perform their duties safely and that the contracted services do not introduce new hazards, compromise existing safeguards, or increase the facility's operational risk. For the purposes of this guide, process safety requirements are defined as all those necessary to prevent, control, or mitigate major events, such as fire, explosion, toxic release, loss of containment, uncontrolled reaction, overpressure, structural collapse, significant environmental contamination, or any event with the potential for catastrophic consequences.

Before work begins, the Contractor must receive sufficient information regarding the relevant hazards of the area and the process, consistent with the scope of the work. The Contractor must ensure that this information is understood by its employees and subcontractors before the work



is performed. In addition, the Contractor must also participate in the mobilization, integration, and safe work planning process, including risk analysis, communication of site hazards, definition of controls, issuance of work permits, and coordination of interfaces with operations, maintenance, and other service areas. No activity may be initiated without formal authorization, a valid work permit, and the implementation of the required controls.

The asset management PNR's are Vale engineering standards that establish technical requirements and minimum critical safety and integrity controls throughout the entire life cycle of our assets, to prevent process safety events (P events). The online training courses available on VES for suppliers do not replace a thorough reading of the PNRs, but they support an understanding of the regulatory context and offer a structured and integrated approach to the topics.

3.4.13 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.

3.4.14 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 recommends the development of a Program for the Prevention of Risks to Workers' Health Posed by Psychoactive Substances, with the goal of preventing any employee under the influence of alcohol or drugs from entering the workplace, as well as supporting employees with substance use disorders by referring them to support and treatment networks.

Vale has specific guidelines and instructions for its employees regarding substance use disorder treatment, which are available in PNR 000302 - Global Comprehensive Health Guidelines and may be used as a reference by the Contractor in developing and implementing the program.



3.4.15 Endemic Diseases and Traveler's Health

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

Vale has specific guidelines and instructions for its employees regarding the prevention of endemic diseases and traveler health, which are available in PNR 000302 - Global Comprehensive Health Guidelines and may be used as a reference by the Contractor in developing and implementing the program.

3.4.16 Occupational hygiene

The exposure of employees to chemical, physical, and biological agents must be managed in such a way as to identify and control exposures that exceed the occupational exposure limits established by local law.

Vale has specific guidelines and instructions for its employees regarding Occupational Health Management, which are available in PNR 000306 - Corporate Guidelines for Occupational Health Management and may be used as a reference by the Contractor in developing and implementing the program.

3.4.17 Ergonomics

The contractor must establish and maintain a structured Ergonomics Program capable of anticipating, identifying, assessing, and managing ergonomic risks, including work-related psychosocial risk factors, to which its employees are exposed. Preventive measures and operational controls must be defined, implemented, and monitored based on recognized technical criteria, in accordance with applicable legal requirements and current regulatory standards, with the aim of preventing, eliminating, or mitigating adverse impacts on workers' health and safety.

The management of ergonomic risks, including psychosocial risks, must be integrated into Occupational Risk Management and duly reflected in the Contractor's Risk Management Program, or as required by local legislation, covering, at a minimum: the identification of hazards and risk factors, the assessment of ergonomic risks, the definition and implementation of control measures, the monitoring of the effectiveness of the actions taken, and continuous updating based on critical analysis and continuous improvement.

Additionally, the Contractor must ensure that information regarding compliance with the Ergonomics Program is formally recorded in its Risk Management Program in accordance with local legislation, including the risk inventory and the action plan.

Vale has specific guidelines and instructions for its employees regarding Ergonomics Management, which are available in PNR 000291 - Corporate Guidelines for Ergonomics Management and may be used as a reference by the Contractor in developing and implementing the program.

3.4.18 Fatigue Prevention

The Contractor must have a Fatigue Prevention Program in place to manage fatigue, in accordance with PNR 000257 — Guidelines for Fatigue Prevention Programs in order to cover all duties in which fatigue and drowsiness may contribute to the occurrence of events, especially



those duties related to the operation of mobile equipment (CAR 03) and motor vehicles (CAR 02).

The Program must include, at a minimum, the stages of planning, implementation, control, monitoring, and critical analysis, ensuring continuous management of fatigue-related risks. Special attention should be given to the incorporation of:

- Preventive tools, such as the “Readiness Test”;
- Monitoring tools, such as drowsiness detection systems, as established in document PNR 000257.

3.4.19 Physical Working Conditions

The Contractor must ensure a healthy, safe, dignified, and comfortable work environment for all its employees and/or subcontractors, in full compliance with the principles of worker protection set forth in applicable legislation, occupational safety and health regulations, as well as international human rights principles related to decent work.

Installations / Facilities, including restrooms and sinks, changing rooms, dining areas (cafeterias), kitchens, living quarters, transportation, and rest areas, must be maintained in a state of good repair, proper functioning, hygiene, and cleanliness, ensuring adequate conditions for health, well-being, and respect for human dignity.

Compliance with minimum physical working conditions must be in accordance with the provisions of PNR 000256 - Basic Working Conditions as well as applicable legislation and local technical standards, particularly those related to health, safety, comfort, accessibility, and sanitary conditions.

3.4.20 Occupational Health Guidelines

The Contractor must manage health risks prior to hiring and throughout the employment contract in order to monitor potential health effects that may arise from exposure to occupational hazards and upon returning to work following an occupational or non-occupational injury or illness.

For any activity performed outdoors or activities that cause heat stress, a rehydration and rotation program must be maintained, and measures for sun protection must be adopted.

Pre-employment medical examinations must be conducted in accordance with local laws and before the employee is hired, assessing, above all, their physical and emotional capacity to perform the tasks they will undertake. The pre-employment medical examination must consist of a clinical evaluation including an occupational medical history, supplemented by additional tests directly related to workplace risks and the assessment of functional capacity.

Professional drivers in public passenger transportation and professional drivers in freight transportation, in their capacity as employed drivers, must undergo a toxicology test, in accordance with current legislation.

Vale has guidelines and directives for implementing comprehensive health care for its employees, for occupational health management, disability prevention (musculoskeletal disorders and mental and behavioral disorders), traveler health management, and the implementation and execution of health promotion campaigns and programs, which are available



in PNR 000302 - Global Comprehensive Health Guidelines, and may be used as a reference by the Contractor.

The Contractor must manage its employees' health with a focus on the prevention of cardiovascular diseases. Employees aged 40 or older must undergo a clinical examination, targeted questionnaires, and laboratory tests to calculate their cardiovascular risk score (Framingham Score).

For the activities listed in the table below, Contractors must ensure that the aforementioned examinations are performed, in addition to other recommended examinations, and include them in management documents and medical 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

3.4.21 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.



3.4.22 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 Specification.

3.4.23 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.

3.4.24 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.

3.4.25 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.

3.4.26 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.

3.4.27 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.

3.4.28 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.

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

The Contractor's machines, equipment, vehicles, and installations, as well as its measurement and testing devices, that are considered critical to HSE must be inventoried and have a maintenance plan in place to ensure their functionality within established control parameters and at the required quality level.



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

During the performance of the services, the Contractor must maintain process safety barriers, comply with procedures and work permits, maintain effective supervision, control subcontractors, report deviations, and ensure that its employees exercise their authority to stop work whenever they identify an unsafe condition, an unassessed change, or the absence of a critical control.

When the scope of the contract involves equipment, piping, instruments, valves, electrical systems, structures, relief systems, fire suppression systems, detection systems, or instrumented safety elements, the Contractor must comply with the mechanical integrity requirements defined by Vale.

The Contractor must not return any critical system to operation, release it, or declare it complete until the tests, inspections, reinstallation of protective devices, removal of temporary lockouts, and field verification have been completed and accepted by Vale. In addition, the Contractor must provide all required quality, inspection, and test documents, certificates, reports, and evidence prior to the final acceptance of the service.

Prior to startup, commissioning, energization, pressurization, inerting, product introduction, or return to service of any facility or system affected by a contracted activity, a formal verification of operational readiness must be performed. In cases covered by PNR 000132 - Pre-Startup Safety Review (PSSR) the PSSR process must be followed, and startup may only occur after formal approval.

3.4.30 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.

3.4.31 Monitoring, Performance Indicators and Continuous Improvement

The Contractor must establish a system for monitoring HSE indicators that ensures the tracking of information, the monitoring of targets, and the definition of actions to address deviations.



The Contractors' HSE performance will be evaluated periodically during the term of the contract, with formal records that ensure compliance with contractual requirements and promote the continuous improvement of the services provided.

The results of these evaluations may inform recognition initiatives, support supplier selection processes for future contracts, and, when necessary, guide the application of consequence management.

To encourage engagement and commitment, contracts with the best HSE performance may be recognized and rewarded at the corporate and/or local level. The guidelines and requirements for Performance Evaluation and Recognition are available in PGS 002992 - Supplier Performance Evaluation

3.4.32 Management of Change

The contractor is not authorized to make any changes to equipment, installations, materials, procedures, protective systems, instruments, control logic, operating conditions, or execution sequences without prior approval through Vale's Change Management process, in accordance with the requirements described in PNR 000101 – Management of Change.

Any need for a change that may directly or indirectly impact the risks of the processes or activities covered by the contract scope, including temporary solutions, bypasses, shutdowns, material substitutions, and/or method changes must be immediately reported to the contract manager or supervisor and may only be implemented after evaluation and formal authorization. Activities performed outside the approved scope must be treated as a serious process deviation and may result in service interruption, contract revision, and team demobilization.

3.4.33 Communication of Events and Scope

Contractors must instruct their employees on the requirement to immediately notify the person in charge of the activity or area whenever they witness, experience, or identify an event that is, any incident or adverse condition that has resulted in, or could result in, loss, damage, or impact, regardless of whether energy was released.

Every employee has the authority and obligation to halt the activity whenever they identify an unsafe condition, an unassessed change, the absence of a critical control, uncertainty regarding the scope, a communication failure, imminent danger, or any situation with the potential to cause an event, whether related to occupational safety, the environment, process safety, and/or involving the community. A work stoppage for safety reasons must not result in punishment for the worker or the contractor. Work may only resume after the condition has been assessed, controls have been established, all parties involved have been notified, and formal authorization.

All events whether related to occupational safety, the environment, process safety, and/or involving the community, as well as violation notices, fines, notifications received from authorities, and complaints from stakeholders, must be immediately recorded and reported to Vale.

In the occurrence of an event, depending on its classification, the Contractor must cooperate and/or conduct a root cause analysis, refrain from making any changes to the scene without Vale's prior authorization, make its employees available for interviews, provide the requested evidence, and cooperate in the investigation of the facts.



Upon completion of the analysis or whenever other incidents are reported, the Contractor must conduct an internal analysis to verify whether the causes that contributed to the incident are correlated with or present in its processes and must adopt an action plan to eliminate them.

Guidelines, requirements, and lessons learned for event management are available in PNR 000070 – Management of Health, Occupational and Process Safety, Environmental, and Community Events.

3.4.34 Emergency Management and Response

All contracted companies must be covered by an Emergency Response Plan (ERP). If the ERP is not a requirement specified in the Technical Specification, the supplier will be integrated into the ERP of the Vale location where it operates, and it is the supplier's responsibility 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 EAP, the supplier must comply with the emergency requirements set forth in the Technical Specifications and adhere to national and local laws and technical standards applicable to the scope of the service.

Before work begins, the Contractor must participate in the emergency orientation conducted by Vale, when applicable, which includes a presentation of the facility's Emergency Response Plan (ERP), identification of accident scenarios relevant to the work area, recognition of alarm signals and their meanings, escape routes, assembly points, and evacuation procedures. The Contractor must ensure that all its employees and subcontractors are familiar with and capable of carrying out the expected response actions before beginning any activity on site.

In addition, when requested, the Contractor must participate in emergency drills conducted by Vale. In the event of a real emergency, the Contractor's employees must follow the instructions of Vale's emergency brigade and response teams and must not interfere with control and firefighting efforts without express authorization. The Contractor must not use the facility's resources, equipment, or emergency routes for purposes other than responding to the incident. Any damage to firefighting equipment, detection systems, emergency signage, or escape routes must be reported immediately to Vale and treated as a process of safety deviation.

The guidelines and requirements for Emergency Management and Response are available in PNR 000066 - Emergency Response Management.

3.4.35 HSE Technical Channel for Suppliers

In case of technical questions regarding standards, regulatory requirements, and systems related to Health, Safety, and Environment management, the Contractor may submit its inquiry to the corporate email address ssma.fornecedores@vale.com, following the eligibility criteria based on the subject of the inquiry, as shown in the table below.

Table 3 – Eligibility Criteria for Topics to Be Referred to the Technical Channel

Eligible	Not Eligible
Technical questions regarding Health, Safety, and Environment (HSE) regulatory standards	Administrative, financial, or human resources-related requests
Clarifications regarding HSE management systems and tools	Requests related to the deployment of contracted employees or physical access to operational facilities
Questions regarding HSE audit, inspection, and verification processes	Complaints related to ethical or behavioral conduct
Suggestions for improving Vale's HSE processes	Other requests not related to technical aspects of Health, Safety, and the Environment

For further clarification on issues classified as ineligible for submission to the Technical Channel, the Contractor should contact the Contract Manager or use Vale's feedback channels, available at the following link: [Fale Conosco - Vale](#).

3.4.36 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 contracted and/or subcontracted companies must remove all their machines, equipment, vehicles, and installations / facilities, among other items, from the Vale site, ensuring that all risk conditions and any HSE liabilities have been eliminated and/or properly controlled.

The Supplier is required to ensure the return of the Vale ID badge issued for access by the contracted and/or subcontracted employee upon termination of the contract or when the employee is demobilized under the contract.

The Contractor must provide workers recruited from other regions with the necessary resources for a safe return to their place of origin, without any deductions 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.