

<b>Subject:</b> Sustainability.	<b>Cluster:</b> Corporate.
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<b>Resolution:</b> DCA-015/2023.	<b>Issued on:</b> 2023/04/26.
<b>Responsible:</b> Sustainability Executive Vice-Presidency.	<b>Revision until:</b> 2028/04/26.

## 1. General Guidelines

Establish premises and guidelines for Vale's activities throughout the lifecycle of its enterprises and in all its regions where it is present, with the purpose of preventing and minimizing risks and negative impacts and enhancing positive impacts for people, communities and the planet, generating social, environmental and economic value beyond the Company's activities.

## 2. Applicability

This Policy applies to Vale S.A. and its controlled companies<sup>1</sup>, always observing the Bylaws, the articles of incorporation and the applicable legislation.

## 3. References

- POL-0001-G - Code of Conduct.
- POL-0005-G - Human Rights Policy.
- POL-0009-G - Risk Management Policy.
- POL-0012-G - Climate Change Policy.
- POL-0024-G - Socioenvironmental and Institutional External Expenditures Policy.
- POL-0032-G - Water and Water Resources Policy.
- POL-0035-G - Vale's Management Model Policy - Vale Production System - "VPS".
- POL-0036-G - Diversity and Inclusion Policy.
- POL-0040-G - Mining and Metallurgical Waste Management Policy.
- POL-0041-G - Misconduct Management Policy.

## 4. Operating premises

Sustainability must be integrated into Vale's business and decision-making process, and the following premises must be adopted throughout project life cycle:

**Active listening, dialogue and engagement:** listening carefully and maintaining a communication channel with stakeholders, promoting open and transparent dialogue, considering different views and interests, and seeking to find convergent paths for the Company's decision-making, with agility in responding to interactions and grievances.

**Compliance:** respect the applicable legislation, the Company's normative documents and national and international principles and practices of reference.

**Diversity, equity and inclusion:** treat all people fairly and equally, respect and value their singularities, promote an inclusive work environment and not tolerate any form of bias and discrimination based on race, ethnicity, gender identity, sexual orientation, age, social class, disability, religion, nationality, political beliefs, among others.

**Future use:** rethink post-mining areas, aligning territorial and socioeconomic aptitudes and the sustainable use of existing resources, while generating shared value between the company and society.

**Global objectives:** align the company's strategic objectives with the main applicable global initiatives that contribute to sustainable development, such as the Sustainable Development Goals (SDGs) and the UN Global Compact.

**Health:** promote measures to avoid and, when necessary, mitigate the exposure of employees and contractors to health risk factors, fostering prevention, promotion, education, access to treatments and psychological and social support networks, aiming at well-being and work capacity.

<sup>1</sup> To learn about the classification of controlled companies, see POL-0043-G - Vale Group Business and Entity Management Policy.



**Human rights:** respect, raise awareness and promote human rights, prevent potential adverse impacts and human right violations and, when necessary, mitigate and remedy those, considering the principles and standards contained in the Company's normative documents on the subject.

**Impact management:** apply mitigation hierarchy to avoid, minimize, remedy/recover and/or compensate/repair the negative socio-environmental impacts resulting from the Company's activities and act to enhance the positive impacts.

**Operational excellence:** operating according to the guidelines of the Vale Management Model (VPS), in order to: develop people, standardize best practices, act with safety and operational discipline, and promote the continuous improvement of processes, products and services, seeking to act in an integrated way, leveraging efforts, maximizing results and optimizing the use of natural resources, including eco-efficiency, the responsible generation and disposal of waste, and biodiversity conservation.

**Research, development and innovation:** investing in research, innovation, new technologies, new skills, in the development of products or mineral exploration, aiming to create strategic options for the business and to boost more efficient, safe, sustainable processes that generate value for the company, the environment, and society. Generate and share knowledge and results that serve as a reference for the mining sector and for other businesses.

**Resources:** guarantee the necessary resources for the implementation of the Strategic Sustainability Plan and allocate expenditures, including External Socioenvironmental and Institutional Expenditures as the Discretionary Social, Environmental and/or Institutional, Social and/or environmental Operational Impact Management and Mandatory Social and/or Environmental, in line with the applicable specific normative guidelines and documents.

**Risk management:** manage risks proactively and effectively, always valuing the safety of people and the environment, as well as avoiding and mitigating impacts on operational continuity and reputation, in accordance with the values, the Code of Conduct and other normative documents of the Company.

**Safety:** act safely and manage the associated risks to people, activities, operations, products and services, seeking to achieve a culture of excellence, to support the objective of zero fatalities and zero life-altering security incidents, among employees, contractors and communities. Life, physical and psychological integrity and safety are more important than any financial or material goods result, and must be prioritized in every decision-making process.

**Transparency and accountability:** be transparent in accounting for actions taken and commitments made, taking ownership of the respective consequences and acting with diligence and responsibility.

**Value chain:** adopt human rights, health, safety, social and environmental requirements in the management and relationship with suppliers, customers and partners, and engage them to adopt, when applicable, the same operating premises listed in this Policy.

## 5. Drivers

Among Vale's strategic priorities which contribute to achieving our purpose of **“We exist to improve life and transform the future. Together”**, the Company has committed to positively impact society, with the social ambition of being a partner company in the development of resilient communities, engaged in relevant issues to humanity and committed to sustainable mining. Therefore, the main drivers are established below:

**Leverage positive results for nature:** from investment in restoration, environmental conservation, nature-based solutions and research, development and innovation, leverage positive results for biodiversity, climate, water and people, based on the engagement and strengthening of local communities, including Indigenous Peoples and Local Communities (IPLC), and partnerships, beyond our borders. Advocate for external agendas that contribute to positive results for nature.

**Acting in causes relevant to humanity:** engaging and developing corporate projects on topics relevant to humanity, such as Indigenous Peoples and Traditional Communities (IPLC), Human Rights, Poverty, Amazon Conservation and Climate Change, not limited to the areas where the Company operates.

**Contribute to local development:** develop and foster structured actions that contribute to resilient community development in the territories where the Company operates. Encourage the direct or indirect contracting of local



enterprises throughout the Company's project lifecycle. Engage in themes relevant to humanity, mainly in the axes of education, culture, health, income generation and fight against poverty, establishing intersectoral partnerships, strengthening public policies and promoting economic diversification, with respect for the aptitude, culture and environmental diversity of the territories, through active listening, dialogue and engagement with stakeholders.

**Create shared value:** in addition to developing socio-environmental initiatives and projects with the perspective of impactful investments and businesses, efforts should be made to develop business practices that can generate economic value and increase Vale's competitiveness and, at the same time, create value for society and the environment, balancing company existence with the resolution of social or environmental challenges.

**Demonstrating leadership in low carbon mining:** promote solutions to limit the increase in global average temperature to less than 2°C, in accordance with the Paris Agreement. The company recognizes that climate change represents one of society's greatest challenges and seeks to collaborate in achieving net-zero greenhouse gas emissions in the steel, metallurgical and shipping chains. The NetZero<sup>2</sup> strategy establishes guidelines for climate change, such as: reduction and greenhouse gas emissions neutrality, preservation and reforestation, renewable energy use, among others.

## 6. Governance

Vale's Board of Directors' mission is to protect the Company's assets and maximize, in the long term, the return on investment for its shareholders, acting within the highest ethical principles, in order to maintain the Company's perpetuity so that it transforms natural resources into prosperity and sustainable development.

To make the Sustainability Strategy viable, the Board of Directors counts on a Sustainability Committee for advise, aiming to align the Company's policies and practices with Sustainability, enhancing discussions on the subject and providing greater efficiency and quality to the Board's decisions.

The Executive Committee counts on Executive Risk Committees to support the preventive action of the risks to which Vale is exposed. It also counts on thematic and multidisciplinary forums with the participation of external members, to support the definition and monitoring of the Sustainability Strategy.

## 7. Responsibilities

### Board of Directors:

- Evaluate and approve the Company's Sustainability Strategy and guidelines, as well as their integration into Vale's strategic planning, aimed at creating value, competitiveness, and sustainability.
- Approve this Policy and its amendments, as proposed by the Executive Committee.

### Sustainability Committee:

- Assist the Board of Directors in the exercise of its attributions, as described above, evaluating and recommending the aforementioned topics.
- Recommend the approval of this Policy and its amendments, as proposed by the Executive Committee.

### Executive Committee:

- Evaluate and propose to the Board of Directors, considering socio-environmental issues, the Company's sustainability guidelines and strategic plan.
- Evaluate and propose this Policy and its amendments to the Board of Directors.

### Sustainability Executive Vice-Presidency:

- Prepare, considering socio-environmental issues, the guidelines and the Company's Strategic Sustainability Plan.
- Prepare and propose this Policy and its amendments to the Executive Committee.

<sup>2</sup> For more information, consult the Climate Change Policy – POL – 0012-G.



- Promote dissemination and deployment actions related to this Policy.

#### Accounting, Tax & Controllershship area:

- Monitor the execution of dissemination actions related to this Policy.
- Monitor the execution of training plans in this Policy, reporting the results to the Executive Committee and the Audit and Compliance Board, at least annually.

#### Audit and Compliance area:

- Evaluate the effectiveness of dissemination actions related to this Policy.

#### General Secretary of Corporate Governance:

- Evaluate this Policy and any need for adjustment prior to its submission to the Board of Directors or Sustainability Committee.
- Monitor the deadlines and needs for revision of this Policy, ensuring the timeliness of processes and procedures between the Executive Committee, the Advisory Committees and the Board of Directors.

## 8. Definitions

**Resilient communities:** are communities that have access to essential rights, such as health, education, and basic conditions of infrastructure and to generate work and income, exercise social control of public policies, are capable of generating skills to respond and adapt positively to changes, and in which human rights are fully respected.

**Sustainable development:** development that meets the needs of the present without compromising the ability of future generations to meet their own needs<sup>3</sup>.

**Local development:** social, environmental and economic prosperity of a certain territory, promoted from the articulation and permanent integration between the public, private and civil society sectors, capable of favoring the well-being of its population through actions or projects conceived in line with the concept of sustainable development.

**Nature:** the natural world, with an emphasis on the diversity of living organisms (including people) and their interactions among themselves and with their environment<sup>4</sup>.

**Impact business:** ventures that aim to solve socio-environmental problems through their main activity, be it the products, services and/or their form of operation. They operate with market logic, seeking financial returns, and are committed to measuring, monitoring and reporting the socio-environmental impacts generated<sup>5</sup>.

**Sustainable Development Goals (SDGs):** established by the United Nations (UN), are the set of 17 (seventeen) global goals to be achieved by 2030, which constitute a global call to action to end poverty, protect the environment and climate and ensure that people everywhere enjoy peace and prosperity.

**UN Global Compact:** is a call for companies to align their strategies and operations with the Ten Principles in the areas of Human Rights, Labour, Environment and Anti-Corruption and to develop actions that contribute to face the challenges of society.

**Nature-based solutions:** are actions to protect, sustainably manage, and restore natural and modified ecosystems that address societal challenges effectively and adaptively, simultaneously benefiting people and nature (IUCN, 2020).

<sup>3</sup> Concept of the Brundtland Report, "Our Common Future", 1987.

<sup>4</sup> Concept used by TNFD. Díaz, S et al (2015) The IPBES Conceptual Framework – connecting nature and people.

<sup>5</sup> Concept adapted from the study "What are impact businesses" – characteristics that define ventures as impact businesses, produced in 2019 by Aliança pelo Impacto in partnership with Pipe.Social.



## 9. Disclosure and Dissemination

This Policy will be archived and disclosed by the Finance and Investor Relations Executive Vice-Presidency in Vale's official repositories in attendance to the internal and external public, as applicable, with the Sustainability Executive Vice-Presidency responsible for promoting the necessary actions to disseminate it.

## 10. Consequence Management

Noncompliance with this policy is subject to the terms of the Company's Misconduct Management Policy, "POL-0041-G".

## 11. Deadline for Policy Revisions

This Policy must be revised within a maximum period of 5 (five) years, or whenever necessary in order to keep its content up to date.

## 12. Final Provisions

In the event of any conflict between this Policy and Vale's Bylaws, the latter shall prevail and this Policy shall be amended as necessary. This Policy comes into force on the date of its approval by the Board of Directors.

## 13. Approvals

Areas:	Description:
Sustainability Executive Vice-Presidency.	<ul style="list-style-type: none"> <li>Drafting.</li> </ul>
Corporate and Institutional Affairs Executive Vice Presidency. People Executive Vice-Presidency. Finance and Investor Relations Executive Vice-Presidency. Health, Safety, Environment and Operational Risks. Audit and Compliance. General Secretary of Corporate Governance.	<ul style="list-style-type: none"> <li>Review / Recommendation.</li> </ul>
Executive Committee (DDE - 045/2023).	<ul style="list-style-type: none"> <li>Approval / submission to the Board of Directors.</li> </ul>
Board of Directors (DCA - 015/2023) with recommendation from the Sustainability Committee and the Nominating and Governance Committee.	<ul style="list-style-type: none"> <li>Approval.</li> </ul>