

# Human Rights

## Overview

2023



<b>1. Approach and commitment</b>	<b>3</b>
<b>2. Governance</b>	<b>4</b>
<b>3. Embedding human rights into management and culture</b>	<b>5</b>
3.1. Capacity building and integration	
3.2. Risk and impact assessment	
3.3. Suppliers	
3.4. Labor relations	
3.5. Health and safety	
3.6. Community relations	
3.7. Indigenous Peoples and Traditional Communities	
3.8. Diversity, equity, and inclusion	
3.9. Climate change	
<b>4. Monitoring and reporting</b>	<b>11</b>
<b>5. Grievance mechanism and whistleblower channel</b>	<b>12</b>
<b>6. Stakeholders and salient human rights issues</b>	<b>14</b>

# 1. Approach and commitment



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Vale has the ambition to leave a positive legacy for the planet and people, through the development of sustainable mining. Therefore, it acts assertively in the management of human rights in the company's operations and in its value chain. It is committed to maintaining continuous dialogue with society to solve problems and to build a culture of respect for the dignity and integrity of people impacted by its activities and business relationships.

Vale's Human Rights commitment is directly connected to its strategic pillars, to its Integrity agenda, to the [Ethics & Compliance Program](#) and the Company's Cultural Transformation. Vale is also adherent to international standards, such as the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact, and the principles of the International Council on Mining and Metals (ICMM), among others.

The demands and obligations related to these commitments are met through regulations related to salient human rights issues in the extractive sector. Vale has a set of documents (and training on) that guide the company's management and positioning on issues such as respect for diversity; for freedom of association and collective bargaining; awareness raising regarding sexual harassment; fight against sexual exploitation of children and adolescents, discrimination, child labor and forced labor; business security practices; relationships with communities, including Indigenous Peoples and Traditional Communities; involuntary resettlement; grievance channels and the Whistleblower Channel.

Vale has a global Code of Conduct applied to its controlled companies and affiliates, with a specific chapter covering Human Rights. In addition, [Vale's Human Rights Policy](#), exists since 2009 and is in accordance with the Guiding Principles on Business and Human Rights of the United Nations (UN). Another important internal reference is the [Human Rights Guide](#).

All employees, contractors, as well as Vale operated joint ventures, must know and follow the Human Rights Policy principles. In accordance with the Policy and the Principles of Conduct for Third Party, suppliers and partners are also expected to apply equivalent principles to those of the Human Rights Policy in their operations and in their chain.

A further commitment by Vale is to remediate impacts on human rights that it may have caused, contributed to, or with which it has been linked. This work is done directly, and/or through partners, seeking to involve stakeholders in the preparation and implementation of remediation actions. In this sense, the company acts in the direct remediation of the impacts caused by the rupture of the Córrego do Feijão Dam, in Brumadinho, and in support of the Renova Foundation to repair the impacts of the collapse of the Fundão Dam, of Samarco, in Mariana.

Vale is also committed to the principles of precaution and non-repetition, having re-evaluated all aspects of its business as part of the strategy to strengthen its performance in Sustainability.

## 2. Governance

The respect for human rights is reflected throughout Vale. The Board of Directors, its highest governance body, acts as guardian of this commitment, in accordance with the company's bylaws. Human rights issues are monitored by the Sustainability Committee of the Board of Directors and dealt with in the Executive Committees of Operational Risks and Compliance Risks, as established by Vale's Risk Management Policy. These committees are preventive and have the mission of supporting the Executive Committee in monitoring business risks and in the necessary decisionmaking.



Foto: Leo Lopes

The risk management governance at Vale, including within human rights risks takes place through three lines of defense. The first line takes on the main responsibility and directly manages human rights risks by identifying and monitoring them in a holistic manner. The second line develops and maintains risk management, internal controls, compliance, in addition to identifying and monitoring new/emerging risks, ensuring continuous improvement and compliance with the risk management model, laws, regulations and standards. Vale's Human Rights area is part of the second line of defense. The third line consists of the Internal Audit, independent of management, which carries out evaluations and inspections with tests of controls and investigation of complaints.



For more information on Governance, please visit [Vale's ESG Portal](#)



### 3. Embedding human rights into management and culture



Vale's Code of Conduct and Human Rights Policy are disseminated to all employees, in a continuous capacity building effort, in addition to other internal communication initiatives on the Human Rights topics.

Vale employees have a dual role: they are subjects and agents of dissemination of Human Rights. They must have their rights respected and must respect those of their colleagues, family members, and people from the communities.

#### 3.1. Capacity building and integration

Vale has a front for training and dissemination of Human Rights content, as well as awareness raising actions and continuous education with the workforce. The training is mandatory for employees, direct and contracted, and available in Portuguese and English. In some countries where Vale operates, the training video for contractors is also offered in the local language such as Arabic, Hindi, Malay and Bahasa. In addition, targeted training is carried out in areas of greatest risk in relevant topics, such as the Voluntary Principles on Security and Human Rights, to which Vale is a signatory.

Vale also discloses, to employees, suppliers, joint ventures and customers, content related to salient human rights issues, such as:

- Culture and reality of indigenous peoples;
- Gender relations;
- Forced and child labor;
- Sexual Exploitation of Children and Adolescents;
- Collective bargaining and freedom of association;
- Diversity and inclusion.



The Human Rights lens is also incorporated into the regulations and decision-making processes of the areas most touched by the subject such as Risk, Procurement, Corporate Security, Human Resources, Facilities and workers' lodging, Health and Safety, among others. The human rights risk assessment results and the recommendations of the external human rights due diligence are also embedded through new controls that are adopted by operations through new processes.

## 3.2. Risk and impact assessment

Vale integrates Human Rights among the themes considered in the evaluations of potential risks and impacts of mineral research activities, operations, projects, and joint ventures. This results in a continuous improvement process that seeks to identify, prevent, mitigate, and treat risks and negative impacts on human rights with a focus on people – direct employees and/or contractors and community members – including the most vulnerable such as women, children, Indigenous Peoples and Traditional Communities.

Since 2020, 100% of Vale's operations have their risks related to human rights violations, along with other business risks, registered in the company's risk management system. The human rights risk assessment at Vale involves the analysis of salient Human Rights issues such as: poor working conditions and modern slavery; child labor and sexual exploitation of children and adolescents; discrimination and harassment; large-scale human rights violations; violations arising from the security forces; and from relations with communities. All Vale risks are evaluated through the human rights and social dimension.

The identification of risks leads to the preparation and implementation of action plans with preventive and mitigatory controls complementary to those already adopted, in order to reduce the exposure of people and the Company. Risk mitigation also occurs through a continuous engagement process with communities and through strategic partnerships with preventive and mitigatory actions.

The monitoring of controls is carried out in order to analyze their effectiveness, both in Vale's activities and in the relationship with its suppliers and business partners.



### **External Human Rights Due Diligence (HRDD)**

In addition to risk assessments, Vale also carries out external verification or due diligence processes, as part of the Human Rights management. Human Rights Due Diligence (HRDD) is an in-depth assessment of human rights risks and impacts by external experts across its operations and critical projects, in cycles of three to five years.

The process is run independently through document verification and on-site condition inspections, as well as through interviews and focus groups, sometimes grouped by gender, with own employees and contractors, community members, and representatives from government, academia, and civil society. The results are integrated through operation corrective actions, with monitoring and reporting on the treatment of risks and impacts detected.

Between 2019–2020, external pilot due diligence were carried out in four operations, two of which were international. In 2021, with the revised methodology, 14 external due diligence were carried out in the operations and projects of the Northern Corridor in Brazil. In 2022, 22 more were carried out in enterprises of the Southeast and South Corridors, thus closing the cycle of external HRDD in active operations in Brazil.

Mergers and acquisitions of new projects and joint ventures also go through an external due diligence process, as well as Vale's suppliers and employee housing / camps, following specific methodologies and procedures.

Since 2020, 100% of Vale's operations have their risks of human rights violations registered in the company's risk management system along with other business risks.

### 3.3. Suppliers

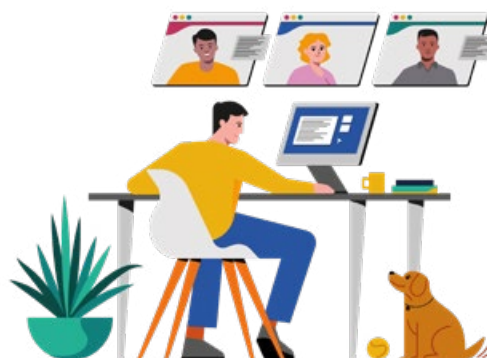
As part of the risk and impact assessment process, Vale implements Human Rights management in its suppliers. In contracts with Vale, suppliers commit to clauses related to the respect for Human Rights and to being aligned with their principles and values, thus respecting the Global Human Rights Policy, the Sustainability Policy, the Code of Conduct, the Principles of Conduct for Third Parties, the Safety and Environment Health Guide (HSE) and the Anti-Corruption Guide for suppliers and third parties and the Service Provider Mobilization Guide.

To assess the level of commitment of suppliers in their respect for human rights, Vale has been carrying out, in partnership with Procurement, external Human Rights due diligence in suppliers since 2019. This process is established throughout the supplier's journey in the company, from the registration stage to contract management. In recent years, human rights risk assessment has intensified, with the application of a self-diagnosis questionnaire, desktop and field inspections, and monitoring of supplier action plans.

### 3.4. Labor relations

Vale's Human Rights Policy includes the commitment to ensure respect for employee human rights and labor rights. They are free to join unions, a commitment stated in our Code of Conduct. The educational strategy focuses on the development and qualification of employees through of a portfolio of training courses that expand and reinforce their competencies.

Employees are paid fairly with a package that involves competitive wages and benefits. In fact, direct employees receive a living wage level in all locations where Vale operates. This assessment was first done in 2022 in partnership with external consultancy specialized in the subject.



### 3.5. Health and safety

For Vale, the health and safety of its employees and the communities where it operates are priorities. The tragedy of the rupture of Dam I of the Córrego do Feijão Mine, in Brumadinho, led the company to revamp its health and safety strategy.

The Company improved, for example, hazard identification processes and risk assessment involved in activities and services of a catastrophic nature – Hazard Identification and Risk Analysis (HIRA); carried out the expansion of engineering controls to block activities; and improved the work permit process, including risk assessments by task, among others. The company’s governance was also reviewed, establishing an executive vice-presidency, with its own budget, to act as a second line of defense.

Regarding safety in operations, communities and their activities, Vale maintains a system for recording accidents and reinforces corrective actions and training in operations. Vale is committed to registering and verifying events involving communities and with setting continuous improvement actions to mitigate risk to achieve

the community safety target. Since 2022, Vale has a key performance indicator (KPI) goal linked to employee variable compensation associated with the safety of communities.

See more on [Leadership Compensation](#).

### 3.6. Community relations

Vale’s activities require interaction with communities throughout the business life cycle, from the preliminary phases of design and licensing to closure.

Relationship with communities is strategic for Vale’s social performance. The process consists of identifying and characterizing communities and stakeholders, managing demands, relationship plans, and conflicts with communities and salient issues.

The engagement happens in several ways such as through visits, structuring management committees, participatory meetings, and forums for monitoring actions.



Foto: Renato Resende



It is Vale's responsibility to know the territories to be able to prepare Community Relationship Plans (CRPs). The commitment is that 100% of priority communities have CRPs implemented by 2026. The Company maintains active relationships with more than 1500 communities in Brazil, Canada, Peru, Chile, Oman, Indonesia, and Malaysia.

In order to improve the relationship with communities, since 2022 the "Community Perception Survey" is carried out covering all Vale territories in Brazil. The research seeks to identify the level of trust and expectations of communities in relation to Vale.



More information on the ESG Portal in [Social Performance](#)

### 3.7. Indigenous Peoples and Traditional Communities

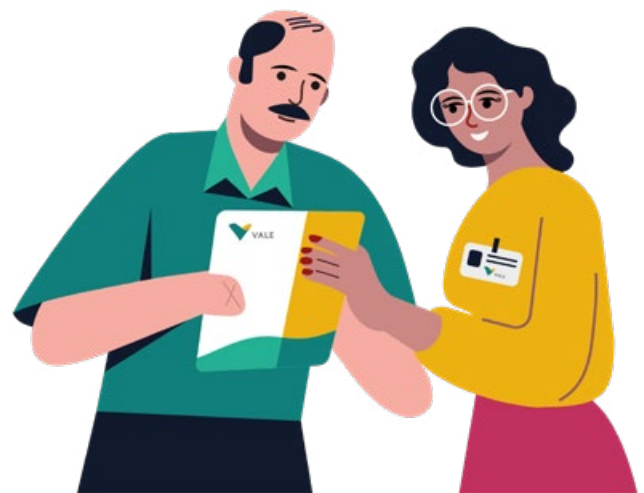
Mining projects can generate significant impacts on Indigenous Peoples and Traditional Communities. Therefore, it is essential that the rights of these peoples are respected. The traditional practices carried out by these groups lead to a unique relationship – considering physical, socioeconomic, cultural and spiritual aspects – of Indigenous Peoples and Traditional Communities and the territories where they live.

The relationship with these populations focuses on building and maintaining trust, supporting the autonomy and resilience of communities, contributing to mutual benefits, and promoting a positive legacy. Vale respects and promotes governance mechanisms, understanding the specificity of the social organization of each community and ensuring, whenever possible, gender and generational representativeness that enables the effective participation of these populations.

In addition to following guidelines throughout its operations and projects to establish relationships with potentially impacted Indigenous Peoples, Vale complies with global commitments and applies international guidelines, such as the position statement on the theme of the International Council on Mining and Metals (ICMM), Convention No. 169 of the International Labor Organization (ILO), and the United Nations Declaration on the Rights of Indigenous Peoples. The Vale team responsible for the work consists of experts in the subject matter and has the support of indigenous and anthropological consultancies.

The company also incorporates the indigenous theme and that of traditional communities in a transversal way in the various processes of internal risk analysis and enterprises feasibility, seeking Free, Prior and Informed Consent (FPIC) to ensure the rights and interests of these communities in decision-making. In addition, as part of [Vale Social Ambition](#), commitment, the company supports all indigenous communities neighboring Vale's operations in the preparation and execution of its plans in pursuit of rights provided for in the United Nations Declaration on the Rights of Indigenous Peoples.

Together with traditional communities, such as quilombolas, fishermen, and coconut breakers, Vale also carries out initiatives to support its ethnodevelopment within the scope of the environmental licensing process and voluntary actions.



### 3.8. Diversity, equity, and inclusion

Vale respects and values diversity, promotes inclusion and does not tolerate discrimination. The company is engaged in:

- Promoting an environment of respect for the uniqueness of each person;
- Ensuring a safe environment for sharing ideas;
- Transparent processes;
- Fostering the debate on diversity through affinity groups such as ethnic racial, LGBTQIA+.



#### Vale's diversity goals:



To increase the proportion of women in our workforce to **26%** by 2025.



To increase the proportion of Blacks in leadership roles in Brazil to **40%** by 2026.



More information on the ESG Portal in [Our People/Diversity and Inclusion](#)

### 3.9. Climate change

The risks arising from climate crises impact the ways of life of local communities, especially the most vulnerable, affecting their rights. Vale considers the effects of climate change on communities and territories where it is present. Therefore, in addition to its responsibility in relation to its assets and supply chain, considering the Company's contribution to a healthy and safe environment for its employees and communities, Vale's role is to support the adaptation of these communities and mitigate the impacts in relation to the effects of climate crises.



Understand more about Vale's goals in relation to [Climate Change](#)





## 4. Monitoring and reporting



Foto: Leo Lopes

The Company operates focused on the continuous improvement of the management of Human Rights and the dissemination of information on its activities and operations. Information such as non-discrimination, fight against child labor and sexual exploitation, forced labor and/or modern slavery, business security practices, and Indigenous Peoples' rights. Human Rights assessments are reported through the global Reporting Initiative (GRI) standard, published annually in the Integrated Report and quarterly on Vale's ESG Portal.

In relation to the communities, periodic meetings are held and the agenda is co-defined, portraying their priorities.

Community Relationship Plans are monitored by the community relations teams (RCs). The RCs promote community engagement by involving them in the processes of assessing potential risks, as well as in the definition of preventive, mitigatory, and remediation measures, jointly evaluating the adherence and effectiveness of the results with them. This monitoring is recorded in the System of Stakeholders, Demands and Issues (SDI).

Vale's operations register their risks in the Company's risk management system and 100% of the Human Rights risk action plans are monitored, along with other business risks. The internal reporting of Vale's Human Rights management performance is carried out following Vale's risk management governance. The Risk Committee monitors Human Rights risks on a monthly basis, which are also reported to the Board of Directors periodically.



## 5. Grievance mechanisms and whistleblower channel



Vale is committed to responding to 100% of the allegations and controversies received from the BHRC.

Foto: Felipe Borges

Vale has a global Grievance mechanism composed of listening channels that can be accessed by anyone to communicate/interact with Vale. They require some response and/or action on the part of the company. The mechanism follows international human rights guidelines that determine channels must be legitimate, accessible, predictable, equitable and transparent.

The listening channels are the structures responsible for demands management process and provide different means of contact (toll free phone, individual service, online form, among others) for any stakeholder to interact with the company. In addition, the channels have a response return rate of up to 10 days.

Currently, Vale has the following listening channels available to all stakeholders with global coverage in different languages: Contact Us (English and Portuguese) and Relationship with Communities (local languages, such as English, Bahasa, Spanish). It also has local channels in certain territories, such as the Reparation Service Center and 'Alô Ferrovias', the latter for railroad related demands.

These listening channels are part of Vale's **social performance model**, supported by the relationship with stakeholders, which is based on gaining trust, in the practice of active listening, in a transparent approach, and in the engagement for decision-making through participatory processes.

Learn more about our channels at: <https://vale.com/en/fale-conosco>



Vale considers that grievance mechanisms, as well as those dedicated to receiving complaints, are critical tools for remediation of potential impacts and violations of human rights, and especially to prevent them. Depending on the complexity of the Human Rights topic, the treatment of demands received through the grievance channels can occur at different levels. If it cannot be resolved locally, the matter is submitted to higher internal bodies, including regional management committees, business area committees, national committees and even the Executive Committee or Board of Directors.

In addition, as part of its Ethics & Compliance Program, Vale has a reporting channel that can be accessed by anyone to report a case or suspicion of human rights violations.

The Company also provides the Respect Channel, established to listen, welcome, and guide employees and contractors who are experiencing a situation

of sexual harassment or discrimination. To report a situation, the employee may call 0800 222 5540.

Allegations of human rights violations received, on an institutional company level, follow a structured process outlined in an internal allegations rule. Vale is committed to responding to 100% of the allegations and controversies received from the Business Human Rights Resource Centre (BHRRC).

To learn more, go to the [2022 Ethics and Compliance Program Report](#).



**The Grievance and whistleblower channels (which may be anonymous) do not prevent the complainant from accessing other judicial or non-judicial mechanisms.**



## 6. Stakeholders and salient human rights issues



The guidelines of Vale’s Global Human Rights Policy underpin the actions and engagement with the different stakeholders in its value chain. Engagement with stakeholders on salient human rights issues within the mining sector is necessary to achieve better proposals and solutions and contributes to the advancement of the agenda at Vale across the board.

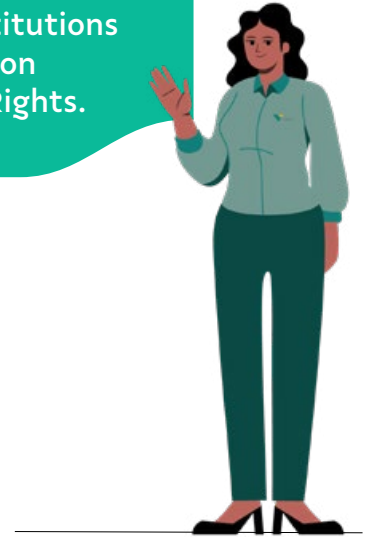
Stakeholders	Salient Human Rights issues		
	Fight against	Respect and promotion of	Proper treatment to
Employees (direct and contractors)	modern slavery	the rights of children and adolescents	involuntary removal
Security Teams	trafficking of persons	diversity, inclusion and non-discrimination	artisanal and small-scale mining
Customers, suppliers, and partners	child labor	political and trade union freedom	land-use conflicts
Local communities (considering gender issues and children and adolescents)	sexual exploitation of children and adolescents	freedom and personal security	
Indigenous People and traditional communities	discrimination of any nature	community health and safety	
Human Rights Defenders	sexual harassment	freedom of Expression and Promotion of Transparent Dialogue	
Government and society			

## Voluntary partnerships on Human Rights

Vale participates in key initiatives with organizations that work in Human Rights, engaging on salient issues, such as sexual exploitation of children and adolescents, modern slavery, artisanal and small-scale mining, and living wage. This strategic participation also includes contributing to the development of standards and procedures, sharing challenges and good practices, and anticipating and understanding global trends.

Among the initiatives and organizations are: Global Business Initiative on Human Rights (GBI); Voluntary Principles on Security and Human Rights (VPSHR); Childhood Brasil; National Pact Institute for the Eradication of Slave Labor (InPACTO); World Business Council for Sustainable Development (WBCSD); Brazilian Business Council for Sustainable Development (CEBDS); BSR; and the International Council on Mining & Metals (ICMM).

Vale participates in key global and local initiatives with institutions working on Human Rights.



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