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Purpose:

- To establish guidelines and principles for Vale's actions regarding the respect for human rights in its projects and operations, throughout its activities and in its value chain, in the regions where Vale is present.

Scope:

- This Policy applies to Vale. For all other entities in which Vale holds interest, it is recommended to reproduce this normative document in accordance with Instruction for Implementing Policies Management in Subsidiaries (INS-0002-G).

References:

- POL-0001-G - Code of Ethics and Conduct
- POL-0003-G - Sustainable Development Policy
- Supplier's Code of Conduct

Note: See Appendix 01 about International Commitments and References

Principles:

- Respect, protect, promote and create awareness of human rights throughout our activities and along our production chain, in accordance with the UN International Bill of Human Rights.

Operating Guidelines:

- **Human rights due diligence:** we work actively and voluntarily to identify, prevent and mitigate adverse human rights impacts, conducting human rights impact assessments and prevention or mitigation actions for high-risk operations on a coordinated basis. We report internally and externally over time and integrate human rights into our daily practices.
- **Spheres of influence:** we recognize that our ability to interfere with policies, procedures and practices varies based on the degree of our influence with our stakeholders. Even in cases in which our influence capacity is not as strong, we commit to engage with stakeholders together with employees, suppliers, partners, across communities, governments and society to contribute with awareness-raising actions and the promotion of human rights.
- **Employees:** we provide respectful working conditions and seek to promote educational activities enabling professional and personal development, of our employees. We maintain a healthy and safe place to work. We respect and value diversity and promote inclusion, not tolerating, any type of discrimination and/or harassment of any type whatsoever, be they moral or sexual. We respect and practice employees' right to freedom of association and collective bargaining in all our activities, in compliance with applicable local legislations. We prohibit the use of child labor or any types of employment practice that may be construed as equivalent to forced or mandatory labor.
- **Security teams (employees and contractors):** our risk assessment of security requirements includes human rights violations risks. Rigorously select and monitor our employees and contractors, taking into account prior experience, technical skills and emotional stability. Undertake to engage with public security providers assigned

to company operations to the greatest possible extent in order to communicate our policy and demonstrate our commitment to respect civil rights of employees or any members of host communities. Educate and train these security professionals to perform activities in accordance with human rights principles, rejecting the abuse of power and degrading and inhumane treatment and assuring non-discrimination and citizens' privacy. We seek for pacific solutions which ensure the physical integrity of persons, property and information preservation and production process maintenance.

- **Suppliers (contractors), partners and customers:** we seek to establish relationships with entities that share the same principles and values as Vale. We also seek to disseminate human rights awareness and respect along our value chain, including the adoption of legal contractual clauses and documentation proving legal compliance. In the event of disrespect to human rights, duly proven by government authorities and mechanisms provided by legislation, we notify the supplier/partner or the customer so they may adopt corrective measures and, in cases in which such measures are not taken, we then are entitled to rescind the respective commercial relationship. Our suppliers must also strive to select commercial partners that operate in accordance with labor legislation and ethical standards compatible with the premises defined on the Suppliers Code of Conduct.
- **Local, indigenous and traditional communities:** we seek to maintain a detailed knowledge of territories where we operate or intend to operate. To maintain a lasting engagement with communities and implement social, cultural, economic and environmental impacts management, and contribute to local sustainable development also promoting community initiatives in education, culture, urban development and sports. We respect and preserve the culture heritage, knowledge and practices of indigenous peoples within our influence area. We promote human rights awareness-raising actions, with especial focus to the eradication of forced and child labor, in addition to promoting the rights of children and adolescents. This includes specific efforts to combat sexual exploitation of minors in the proximity of our projects under implementation and operations.
- **Governments and society:** we comply with the local legislation and rules where we operate and we cooperate with the authorities in respecting and promoting internationally recognized human rights as well as in the investigation of any incidents involving allegations of disrespect of these rights along our production chain.
- **Relevant issues for the mining industry:** we support recognized initiatives seeking to improve the social, economic and environmental conditions of mining, such as those relative to health and safety, involuntary resettlement and artisanal and small-scale mining. We seek to avoid situations where involuntary resettlement is required as a result of our projects and operations - and to work according to internationally recognized best-practice standards to minimize the adverse impacts on affected communities where this cannot be avoided. In cases of small scale or artisanal mining in areas internal or adjacent to our operations, we are able to contribute with the exchange of environmental and health and safety good practices.
- **Communication and grievances mechanisms:** we have an Ombudsman Office Department, responsible for receiving and coordinating the investigation of complaints relating to this or other policies. A Reporting Channel is available on our website (www.vale.com), and we also offer a communication channel, the "Contact Us", for suggestions, information and clarify questions about human rights among other issues.

Appendix:

- Appendix 01 - International Commitments and References

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- Vale's Human Rights policy and its actions are based on international commitments and references related to human rights issues. Among them are:

Institutional Commitments:

- UNGC – United Nations Global Compact
- GBC – Global Business Coalition on HIV/AIDS, Tuberculosis and Malaria.

International References:

- ONU – Guiding Principles on Business and Human Rights
- UN International Bill of Human Rights
 - Universal Declaration of Human Rights
 - International Covenant on Civil and Political Rights
 - International Covenant on Economic, Social and Cultural Rights
- UN Guiding Principles on Business and Human Rights
- Voluntary Principles on Security and Human Rights
- ILO – International Labor Organization Conventions (29, 87, 98, 100, 105, 111, 138 and 182)
- IFC Performance Standards of International Finance Corporation
- GRI – Global Reporting Initiative (G4 Guidelines)
- ICMM – International Council on Mining and Metals