



Objective: To establish guidelines and general principles so that Vale's actions are carried out with the respect for Human Rights in the development of its activities, partnerships and in its production chain, in all the regions where it is present and in the entire lifecycle of its enterprises.

Application:

This Policy applies to Vale and its wholly-owned (100%) subsidiaries and shall be followed by its direct and indirect subsidiaries, in Brazil and in other countries, always respecting the instruments of incorporation and applicable law. Its adoption is encouraged in other entities in which Vale is a shareholder, in Brazil and in other countries.

All Employees, Administrators, and Members of the Fiscal Council of Vale and its subsidiaries must know and adhere to the rules set forth in this Policy and are responsible for disseminating and practicing the guidelines contained herein.

All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations.

The guidelines set forth in this Policy shall apply globally, even if the respective local laws have more lenient rules and therefore allow or tolerate conduct different from the ones set forth herein. In cases of conflict between this Policy and local law, the most protective rule should apply.

References:

- POL-0001-G – Code of Ethical Conduct
- POL-0009-G – Risk Management Policy
- POL-0016-G – Anti-Corruption Policy
- POL-0019-G – Sustainability Policy
- POL-0025-G – Sanctions and Compliance Policy
- POL-0024-G – Socioenvironmental Investments Policy

Definitions:

- **Administrators:** any member of Vale's Board of Directors, Advisory Committees, and Executive Board or its subsidiaries, or occupy another statutory or similar position, in accordance with applicable laws in the jurisdictions in which Vale or its subsidiaries operate.
- **Customers:** Any customer, including its intermediaries, of Vale's or its subsidiaries' products or services.
- **Employees:** any employee, direct or contracted, temporary or not, intern and/or trainee of Vale or its subsidiaries.
- **Suppliers:** any supplier of goods and/or services of Vale or its subsidiaries.
- **Partners:** any entities (associations, institutions, organizations, etc.) with which Vale or its subsidiaries enter into any type of commercial, technical, social, institutional partnership, among others, that do not constitute a Customer or Supplier.

General Principle:

Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale's activities and throughout its production chain, through engagement with stakeholders and in accordance with the following international principles and standards:



- Universal Declaration of Human Rights;
- United Nations International Covenant on Economic, Social and Cultural Rights;
- United Nations International Covenant on Civil and Political Rights;
- International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work;
- United Nations Declaration on the Rights of Indigenous Peoples;
- United Nations Global Compact;
- United Nations Guiding Principles on Business and Human Rights;
- Voluntary Principles on Security and Human Rights (VPSHR);
- International Council on Mining and Metals (ICMM);
- Organization for Economic Cooperation and Development (OECD) Guidelines for Multinational Enterprises;
- Sustainable Development Goals (SDGs) guidelines, goals, and indicators;
- International Finance Corporation (IFC) Performance Standards.

Action and management guidelines for respect, awareness, promotion and remediation of Human Rights:

Vale's human rights activities and management are anchored in the United Nations Guiding Principles on Business and Human Rights:

- **Policy Commitment:**

In addition to this Human Rights Policy and other company regulations, Vale has a Human Rights Guide and specific documents that help address relevant human rights issues in the extractive sector. The company makes the Guide and supporting documents available to all employees through dissemination processes and on-site and online training.

- **Due Diligence:**

Vale implements its human rights due diligence process following the steps below:

- Assess potential human rights risks and impacts of its activities by identifying, designing and implementing detective, preventive and mitigation controls;
- Integrate the results of the above-mentioned assessment into company processes, including review of standards, procedures, budget, among others;
- Monitor controls to analyze their effectiveness in Vale activities and in relation to its suppliers and its supply chain;
- Report the company's human rights risk and impact management performance.

- **Remediation:**

Vale undertakes, when necessary, measures to remediate any adverse human rights impacts it has caused or contributed to and collaborates with other relevant human rights initiatives in the territories where it operates. It does this directly and/or through partners, seeking to involve relevant stakeholders in the design and implementation of remediation actions and is committed to the non-repetition principle.

- **Establishment of Grievance Mechanisms:**

Vale seeks to establish legitimate, accessible, and equitable channels for capturing all types of manifestations, including demands, claims, and complaints. In the case of complaints, the company has a specific complaint channel, through the Ombudsman, and ensures the option of anonymity. Vale also provides community relations professionals whose objective is to strengthen dialogue and engagement. Vale's grievance mechanisms do not prevent access to other judicial or extra judicial mechanisms. Vale considers its grievance mechanisms to be fundamental tools for the prevention and remediation of potential human rights impacts and violations.



Stakeholders:

Vale's ability to influence the respect for human rights in its value chain varies depending on the level of interaction with its stakeholders. With those who the company has a direct contract with, it is possible to implement preventive measures and respect for human rights. With others, Vale seeks to establish actions to raise awareness and promote human rights. Vale encourages its customers, suppliers, and partners to act in the same way with all their stakeholders.

Based on the guidelines set forth in this Policy, Vale interacts with its stakeholders through the following actions:

Employees:

- to provide structured, transparent, and effective selective processes, valuing local hiring.
- to provide decent working conditions.
- to promote educational actions that enable the professional and personal growth of employees.
- to maintain a safe and healthy work environment.
- to respect and value diversity, promote inclusion, and not tolerate discrimination or harassment of any nature, including moral or sexual, in accordance with applicable local laws.
- to respect and practice the freedom of association and collective bargaining in all areas, in accordance with applicable local laws.
- to provide training to help promote the respect of human rights to ensure that all employees are aware of and enforce its principles, as employees are both the subject and strategic agent of human rights.

Vale prohibits the use of child labour and any kind of employment practice that may be interpreted as equivalent to forced or modern slavery labour in its activities and by its suppliers and expects its customers and partners to act the same.

Security teams (direct employees and contractors):

Vale is a signatory and applies the Voluntary Principles on Security and Human Rights (VPSHR) in its activities. It includes potential human rights violation risks in its risk assessment of security requirements. The Company's management approach considers the following aspects:

- to select employees and strictly monitor them, considering previous experience, technical capacity, and emotional stability.
- to regularly train security professionals to carry out their activities in line with human rights principles and the proportional and progressive use of force.
- to seek peaceful solutions that ensure the physical integrity of people, as well as the preservation of assets, information, and the maintenance of the production process.
- to work in accordance with the UN Basic Principles on the Use of Force and Firearms by Law Enforcement Officials.
- to abide by the United Nations Code of Conduct on law enforcement by officials.
- to treat vulnerable people and groups with special care, especially when involving women and children.

Vale is committed to collaborating with public safety providers and communicating its policy to demonstrate its commitment to respecting the human rights of its administrators and employees and all members of the communities in which it operates. The company rejects the abuse of power and inhumane treatment and acts to ensure and foster non-discrimination and respect for citizens' privacy.

**Clients, Suppliers, and Partners:**

- to establish relationships with entities that share the same principles and values as Vale and are aligned with this Human Rights Policy, the Sustainability Policy, the Code of Ethical Conduct, and the Supplier's Code of Ethics and Conduct.
- to promote respect for human rights in its value chain, including the adoption of contractual clauses and the requirement for supporting documentation of legal compliance.
- to notify the customer, supplier, and/or partner in the event of breach of human rights, duly substantiated, to take corrective action, as well as perform the appropriate contractual arrangements.
- to provide training to help promote the respect of human rights.
- to encourage suppliers to ensure the selection of business partners that operate within labor, environmental, and ethical standards consistent with the Supplier's Code of Ethics and Conduct provisions.

Vale requires, through contractual clauses, that its suppliers prohibit the use of child labor and any type of employment practice that may be interpreted as equivalent to forced or modern slavery.

Local Communities:

- to know and respect the communities and territories where Vale operates or intends to operate.
- to prioritize and establish an ongoing process of engagement with communities in the areas of influence of its enterprises, ensuring management of potential human rights risks and impacts.
- to involve communities in the process of assessing potential human rights risks and impacts, as well as in defining prevention, mitigation and, when needed, remediation measures.
- to respect the right to information and participation and the right to freedom of association and expression and peaceful manifestation of the communities.
- to recognize the importance of communities' right to access to land and other natural resources.
- to respect the right of communities to water availability, quality and accessibility, and contribute to maintaining and improving the quality of life and sustainable local development of communities.
- to provide training to help promote the respect of human rights.

Vale promotes human rights awareness actions, with special attention to the eradication of forced, modern slavery, and child labor and the promotion of the rights of children and adolescents, with specific efforts to combat the sexual exploitation of minors in the vicinity of its operations in all phases of the life cycle. In addition, Vale expects its suppliers and partners to also respect these rights and to act the same way.

Indigenous Peoples and Traditional Communities:

- to promote respect for the rights, cultures, customs, heritage, and livelihoods of indigenous peoples and traditional communities.
- to recognize the right of access to land and water, as well as the immaterial value that these natural resources represent for indigenous peoples.
- to promote consultation and free, prior and informed consultation and consent and assessments of potential human rights risks and impacts.
- to contribute to the promotion of the ethnodevelopment of these peoples and communities.

Vale is committed to the International Council on Mining and Metals (ICMM) Positioning on Indigenous Peoples and Mining, complies with specific applicable laws, follows the principles of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) and the Convention number 169 of the International Labor Organization (ILO), and expects its clients, suppliers, and partners to respect the same rights.



Human Rights Defenders:

- to respect the freedom of expression and demonstration of all persons, provided that they occur in a peaceful manner and do not impact the human rights of any person and current local laws.
- to use as a reference in the process of assessing potential human rights risks and impacts the United Nations Declaration on the Right and Responsibility of Individuals, Groups or Organs of Society to Promote and Protect Universally Recognized Human Rights and Fundamental Freedoms (Resolution 53 / 144), which deals with the work of human rights defenders.
- to seek engagement with human rights defenders to address common challenges, through regular and proactive dialogue.

Vale does not tolerate or contribute to threats, intimidation, and attacks against human rights defenders and provides grievance mechanisms for registering and handling potential adverse impacts from its activities. Vale also expects its customers, suppliers, and partners to respect the rights of human rights defenders and to act the same way.

Government and Society:

- to observe the laws and regulations of the locations where the company operates.
- to cooperate with the authorities to respect and promote human rights.

Vale cooperates with the investigation of potential impacts and violations of Human Rights in its activities and throughout its production chain.

Relevant Issues in the Mining Sector:

- to support recognized initiatives that seek to mitigate the potential negative social, economic, and environmental impacts related to mining activities, including artisanal and small-scale mining; health and safety; diversity and gender and involuntary resettlement;
- If the involuntary resettlement process is unavoidable as a result of its activities, the company works in accordance with International Finance Corporation (IFC) Performance Standard No. 5 to minimize potential impacts on affected communities;
- In the case of legal small-scale and/or legal artisanal mining in areas within or adjacent to its operations, the company seeks to contribute to the dissemination of good environmental, health and safety practices, child and adolescent rights, and working conditions.

General Provisions:

- This policy is based on Institutional Commitments and International Reference Standards related to human rights issues, listed in Annex 1.
- Any violations of this Policy are considered violations of the Company's Code of Ethical Conduct and are subject to the penalties provided for therein.
- This Policy shall be reviewed periodically, at least once (1) every three (3) years or on demand and submitted for approval by the Board of Directors.



Annex 01 - International Commitments and References

Institutional Commitments:

- *International Council on Mining and Metals (ICMM)*
- *Voluntary Principles on Security and Human Rights (VPSHR)*
- *Women's Empowerment Principles, United Nations (UN Women) guidelines*

International Reference Standards:

- *Universal Declaration of Human Rights*
- *International Covenant on Civil and Political Rights*
- *International Covenant on Economic, Social and Cultural Rights*
- *United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP)*
- *United Nations Guiding Principles on Business and Human Rights*
- *International Finance Corporation (IFC) Performance Standards*
- *Global Reporting Initiative (GRI)*
- *ISO 26000 - Social Responsibility*
- *OHSAS 1800, 2007 - Occupational Safety and Health Management System*
- *SA 8000, 2008 - Social Responsibility.*
- *Organization for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises*
- *United Nations Global Compact*
- *United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials*
- *United Nations Code of Conduct on Law Enforcement by Officials*
- *Eight Fundamental Conventions of the International Labor Organization (ILO) and two other relevant ones (169 and 176)*
 - *Convention No. 29 on Forced or Compulsory Labor, 1930*
 - *Convention No. 87 on Freedom of Association and Protection of the Right to Organize, 1948*
 - *Convention No. 98 on the Right to Organize and Collective Bargaining, 1949*
 - *Convention No. 100 on Equal Remuneration, 1951*
 - *Convention No. 105 on the Abolition of Forced Labor, 1957*
 - *Convention No. 111 on Discrimination (Employment and Occupation), 1958*
 - *Convention No. 138 on Minimum Age, 1973*
 - *Convention No. 169 on Indigenous and Tribal Peoples, 1989*
 - *Convention No. 176 on Mine Safety and Health, 1995*
 - *Convention No. 182 on Worst Forms of Child Labor, 1999*
 - *Voluntary guidelines for responsible governance of land, fisheries and forest land regimes in the context of national food security (FAO)*
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