



Objective: To establish the guidelines of Vale’s Management Model, considering its dimensions and elements, in accordance with Vale’s Values.

Scope:

This Policy applies to Vale and its wholly owned (100%) subsidiaries and shall be reproduced by its direct and indirect subsidiaries, in Brazil and in other countries, always respecting the constitutive documents and applicable law. Its adoption is encouraged in other entities in which Vale has a participation interest in Brazil and in other countries.

References:

- POL-0001-G – Code of Conduct.
- POL-0009-G – Risk Management Policy.
- POL-0016-G – Anti-Corruption Policy.
- POL-0005-G – Human Rights Policy.

General Guideline:

Vale’s management model aims to support the accomplishment of its mission, fortify its values, leverage operational continuous improvement results. The primary guideline is to foster organizational culture through people development, best practices standardization, operational discipline and routine compliance. It previsions the implementation of policies and practices to develop safer and environmentally responsible operations that ensure Vale’s assets integrity and respect and dignity for people.

Dimensions and Elements of Vale’s Management Model:

The Management Model is based on 3 (three) dimensions: (i) Leadership, (ii) Technical and (iii) Method, which have 17 (seventeen) elements in total. Each element belongs to one of the dimensions and has minimum conformity requirements.

I – Leadership Dimension:

This dimension focuses on the leader’s role in shaping Vale’s organizational culture. Thus, its elements establish the leadership practices expected to reinforce key behaviours and shape culture and organizational culture.

Elements:

- 1. Leadership Behavior and Commitment:** practice and leverage of Vale’s Values and key behaviors in all their interactions, according to the local regulations, the Code of Ethical Conduct and other Vale’s internal rules.
- 2. People Management and Training:** selecting, training, developing, recognizing, retaining and evaluating people, promoting the engagement that generates high performance.
- 3. Organizational Design:** ensuring that the organizational structure is respected according to design and sizing guidelines, with scope and responsibilities of the functions defined to meet their deliveries in terms of health, safety and risk management

II – Technical Dimension:

This dimension focuses on how to ensure safe operations with sustainable results. It is composed of technical elements that establish common policies, guidelines and technical process requirements to manage assets and address risks inherent to our business.

**Elements:**

4. **Risk Perception and Risk Management:** Continuous enhancement of best practices of people's security, human rights and corporate sustainability to be replicated throughout the organization.
5. **Health, Safety, Environment and Communities:** management of the impacts and risks that operations provide to communities, and promotes a positive social legacy, supported by stakeholders¹ relationships and guided by respect for human rights.
6. **Projects and Constructions:** development and execution of projects and constructions according to a methodology that encompasses technical and business processes, achieves safe operations, predictability and competitiveness through a multidisciplinary approach.
7. **Operations:** facilities operating reliably within standards, parameters, norms and legal requirements, while focusing on the safety of people and assets.
8. **Maintenance:** maintenance of the facilities within standards, parameters, norms and legal requirements established with a focus on the safety of people and assets, in a reliable way.
9. **Change Management:** a process that aims to identify and measure hazards and risks of change and manage all actions and measures to ensure that they eliminate, control or minimize impacts before implementation.
10. **Systems and Technology:** maintenance of technological solutions that support its business, increase reliability and agility in obtaining data, allowing the elimination of parallel controls and providing information and indicators in a reliable, transparent and standardized way.
11. **Supplies and Services:** the flow of goods and services through the supply chain, carried out in accordance with internal norms and legal requirements, considering the risks associated and always seeking to add value to the business.
12. **Emergency Planning:** design, development and maintenance of emergency preparedness and response plan to address emergencies, based on the risks inherent to our activities, minimizing impact. After an emergency, the necessary repairs are identified and managed.

III – Method Dimension:

The Method dimension focuses on how processes and routines are structured to ensure the results are achieved and improved. Its elements establish structured routines, methodologies and tools to sustain and improve results.

Elements:

13. **Strategic Deployment:** strategic deployment and communication allow everyone to understand their role and know how their activities contribute to the achievement of Vale's results.
14. **Routine Management:** management routines create discipline and ensure that all areas continuously analyze indicators, expose problems, align priorities and take the necessary actions to achieve results.
15. **Processes and Standardization:** Standardization of processes and procedure to ensure the safety of activities, predictability of results and the implementation of best practices.
16. **Problem Solving and Continuous Improvement:** Problems are identified and reported as soon as they occur and are resolved as quickly as possible through structured methods that encourage continuous improvement.
17. **Assessment of Management System and Results:** Assessments are performed based on process and result indicators, ensuring model compliance, and helping the leader identify problems, providing information to improve the implementation of VPS and the area's results.

¹ Clients, suppliers, suppliers, service providers, investors, partners, communities, government, civil society and non-governmental organizations.



General Provisions:

- Vale’s management model considers its implementation successful when: (i) Vale’s employees start the day with a clear sense of purpose and end the day safe with a sense of accomplishment, (ii) problems are visible, and people are engaged in problem-solving, (iii) Vale’s assets are operated and maintained with excellence, (iv) there is the operational discipline by complying with our standards and processes and (v) Vale has a good reputation within its stakeholders.
- This Policy shall be reviewed periodically, at least once (1) every three (3) years or on-demand.