



2030 Commitment: Eliminate major gaps in ESG (Environmental, Social and Governance) regarding the best practices

● Initiative not started
● Initiative in progress
■ Already addressed/concluded

ESG GAPS

DAMS

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
1	Greater disclosure on the Plano de Ação de Emergência de Barragens de Mineração (PAEBMs)	2019	Evidence
2	Greater transparency in the external auditing process	2019	Evidence
3	Quantitative evidence of compliance with the ICMM guidelines	2025	<p>Vale is committed to the implementation of GISTM in its operations. By December 2021, the company reported adherence to the standard requirements above 60%, according to the self-assessment process. The company expects to reach: (i) 90% adherence in 2022; (ii) 100% for extreme or very critical structures for 2023; and (iii) 100% for other structures in 2025, with a scope related to the tailings storage facilities of Vale S.A., in line with ICMM's deadlines.</p>

COMMUNITY DEVELOPMENT

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
4	Disclosure of the systematic involvement of local stakeholders in the community development planning	2020	Evidence
5	Structure social KPIs with short, medium and long term goals	2021	Evidence - Social Ambition
6	Statement on the socioenvironmental impact of Onça Puma on indigenous communities	2019	Evidence - Social KPIs Evidence

HUMAN RIGHTS

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
7	Stablish a human rights due diligence process	2021	Evidence

ETHICS AND CORRUPTION

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
8	Have a supplier compliance verification program	2019	Evidence
9	Disclosure of the sorts of problems reported to the Ombudsman	2019	Evidence
10	Demonstrate that the Board of Directors is capable of providing significant oversight of the Executive Board	2019	Evidence

WORKFORCE

#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
11	Have a program to address illness in the workforce	2019	Evidence
12	Establish maximum working hours allowed in a week	2019	Evidence

13 Goal to increase the percentage of women on the workforce

2019

[Evidence](#)

ENVIRONMENTAL MANAGEMENT			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
14	Have all operations with the ISO 14001 certification	2024	Vale aims to meet environmental management requirements, enabling the development of best practices in its operations, through the implementation of ISO 14001. In this sense, this item was rescheduled for 2024.
15	Perform sensitivity analyses and/or stress test related to water and climate risk	2020	Evidence for water risk Evidence for climate risk
16	Include waste management in the environmental management policy	2020	Evidence
17	Disclose environmental violations in a consolidated form	2020	Evidence
18	Establish goals for waste management	2019	Evidence
19	Establish goals for greenhouse gas emissions	2019	Evidence
20	Establish goals for SOX emissions	2021	Evidence
21	Establish goals for NOX emissions	2021	Evidence
22	Establish goals for particulate matter	2021	Evidence
23	Better disclosure of sustainability KPIs	2019	Evidence
24	Devise climate change scenarios in strategic planning	2020	Evidence
25	Inform annual monetary value for investments in reducing CO2 emissions	2020	Evidence
26	Define internal carbon pricing	2019	Evidence
27	Implement water management policy for units operating in water-stressed areas	2020	Evidence
COMPENSATION			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
28	Sustainability and/or health and safety targets in long term goals	2019	Evidence
29	Increase disclosure of executive compensation	2020	Evidence
30	Disclosure of the results of long-term executive compensation metrics	2019	Evidence
31	Have the variable remuneration component paid in company shares	2019	Evidence
32	Present minimum ownership requirements for the CEO and members of the Executive Board	2019	Evidence
33	Have part of the CEO short-term incentives granted in the form of company's shares	2019	Evidence
34	Inclusion of malus clause	2019	Evidence
35	Report information on compensation, segmented by men and women	2019	Evidence

HEALTH AND SAFETY			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
36	ISO 45001 certification or equivalent	2030	Vale is in the process of consolidating and implementing its unique VPS management system that will serve as the basis for applying for ISO 45001 certification by 2030.
37	Disclosure of major Health and Safety risks	2019	Evidence
38	Disclosure of how the company manages Health and Safety risks	2019	Evidence
39	Detail information on fatalities	2019	Evidence
40	Detail the TRIFR rate between own and outsourced employees	2019	Evidence
SUPPLY			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
41	Have formal supplier monitoring programs	2019	Evidence
GOVERNANCE			
#	Initiative	Estimated Conclusion	STATUS
42	Increase number of independent board and committee members	2021	Evidence
43	Increase number of board members with experience in mining, especially in dams	2021	Evidence
44	Greater diversity on the Board of Directors	Under evaluation	●
45	Independent Chair of the Board of Directors	2021	Evidence
46	Creation of the remuneration committee, majorly composed by independent members	2021	Vale established the People, Compensation and Governance Committee with a majority of independent members.
47	Have an Audit Committee, with independent majority and composed by experts	2020	Evidence
48	Have a nominating committee	2020	Evidence
49	Elect a leading independent director	2021	Evidence
50	Increase disclosure of the frequency of board meetings	2019	Evidence
51	Establish evaluation process for the Board of Directors and disclose the evaluation	2021	Evidence
FINANCE			
#	Initiative	Estimated Conclusion	STATUS
52	Disclosure of Tax Transparency Report	2020	Evidence

ESG GAPS EXPANSION

To keep evolving Vale, through continuous assessments, incorporated 11 more ESG gaps in its Action Plan in order to achieve the ESG best practices and aligned with its 2030 commitment

RISK MANAGEMENT			
#	Initiative	Estimated Conclusion	STATUS
53	Improve report on long-term emerging risks	2021	Evidence
VALUE CHAIN			
#	Initiative	Estimated Conclusion	STATUS
54	Improve customer satisfaction management	2021	Evidence
55	Expand suppliers periodic evaluation process, for those mapped as critical and of high risk for Sustainability	2022	●
WORKFORCE			
#	Initiative	Estimated Conclusion	STATUS
56	Conduct global employee engagement survey*	2022	●
CLOSURE PLANNING			
#	Initiative	Estimated Conclusion	STATUS
57	Disclose information on mine closure planning, including community engagement process	2022	●
ENVIRONMENTAL MANAGEMENT			
#	Initiative	Estimated Conclusion	STATUS
58	Establish formal commitment related to UNESCO World Natural Heritage Sites	2021	Evidence
59	Set a target for effluent management and improve effluents public report	2021	Evidence
60	Disclose intensity of energy consumed by product	2021	Evidence
61	Set a target to reduce energy use	2021	Evidence
62	Energy management system certification to an international standard	2022	●
HEALTH AND SAFETY			
#	Initiative	Estimated Conclusion	STATUS
63	Establish a strategy to reduce the use of potentially hazardous substances in production processes	2024	Following assessments in 2021, in-depth work remains ongoing, with completion rescheduled for 2024.

*Gap revised in order to be in line with the best market practices related to the topic (previous gap: Develop a human capital return metric).