



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

● Initiative not started
 ■ 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	2021	●
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	●
6	Statement on the socioenvironmental impact of Onça Puma on indigenous communities	2019	Evidence
HUMAN RIGHTS			
#	Initiative	Estimated Conclusion	EVIDENCE/STATUS
7	Stablish a human rights due diligence process	2021	●
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	2022	●
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	●
21	Establish goals for NOX emissions	2021	●
22	Establish goals for particulate matter	2021	●
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	-	Vale is in the process of consolidating and implementing its unique VPS management system that will serve as the basis for applying for ISO 45000 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	After the 2021 AGM	●
43	Increase number of board members with experience in mining, especially in dams	After the 2021 AGM	●
44	Greater diversity on the Board of Directors	After the 2021 AGM	●
45	Independent Chair of the Board of Directors	After the 2021 AGM	●
46	Creation of the remuneration committee, majorly composed by independent members	After the 2021 AGM	●
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	After the 2021 AGM	●
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	●
FINANCE			
#	Initiative	Estimated Conclusion	STATUS
52	Disclosure of Tax Transparency Report	2020	Evidence

* In 2019 there were targets for atmospheric emissions established for some specific units, within the Sustainability KPI. However, in 2020, the need to define a global goal for the theme (SOx, NOx and particulate material) was identified. New goals are being established, considering a long-term horizon.

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	●
VALUE CHAIN			
#	Initiative	Estimated Conclusion	STATUS
54	Improve customer satisfaction management	2021	●
55	Expand suppliers periodic evaluation process, for those mapped as critical and of high risk for Sustainability	2022	●
WORKFORCE			
#	Initiative	Estimated Conclusion	STATUS
56	Develop a human capital return metric	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	●
59	Set a target for effluent management and improve effluents public report	2021	●
60	Disclose intensity of energy consumed by product	2021	●
61	Set a target to reduce energy use	2021	●
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	2021	●

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