


<b>Subject:</b> Drafting and Publication of Policies 	
<b>Identification:</b> POL-0042-G / Version: 00	<b>Use:</b> Public
<b>Resolution:</b> DCA – 088/2021	<b>Issued on:</b> 11/25/2021
<b>Person in charge:</b> General Secretary of Corporate Governance	<b>Revision by:</b> 11/25/2026

## 1. General Guidelines

The guidelines contained in this Policy govern the structure and processes for the drafting, revision, approval, disclosure and dissemination of Vale's Policies. Policies may be classified as Corporate Policies or Administrative Policies, segregated by "ownership" and responsibility; the Board of Directors is responsible for approvals of Corporate Policies and the Executive Committee is responsible for approvals of Administrative Policies.

Policies must be principle-driven and objective, clearly establishing roles and responsibilities. When defining the Company's Policies<sup>1</sup>, legal and regulatory requirements, institutional requirements, and the capacity to be absorbed by Vale's culture must be observed.

Policies must establish, at a minimum, i) General Guidelines, ii) Applicability, iii) Governance and Responsibilities, iv) Disclosure and Dissemination, v) Consequence Management, vi) Final Provisions and vii) Approvals.

## 2. Applicability

This Policy applies to Vale and its 100% controlled companies and must be reproduced by its direct and indirect controlled companies, in Brazil and other countries, always respecting organizational documents and applicable local legislation. Its adoption is encouraged by other entities in which Vale has equity interest, in Brazil and in other countries.

For purposes of this Policy, the internal nomenclature contained in Vale's organizational chart was adopted to facilitate interpretation and understanding of the Policy's users. Thus, the "Executive Board" is internally called the "Executive Committee" and "Executive Officers" are also called "Executive Vice-Presidents".

## 3. References

- Vale's By-Laws

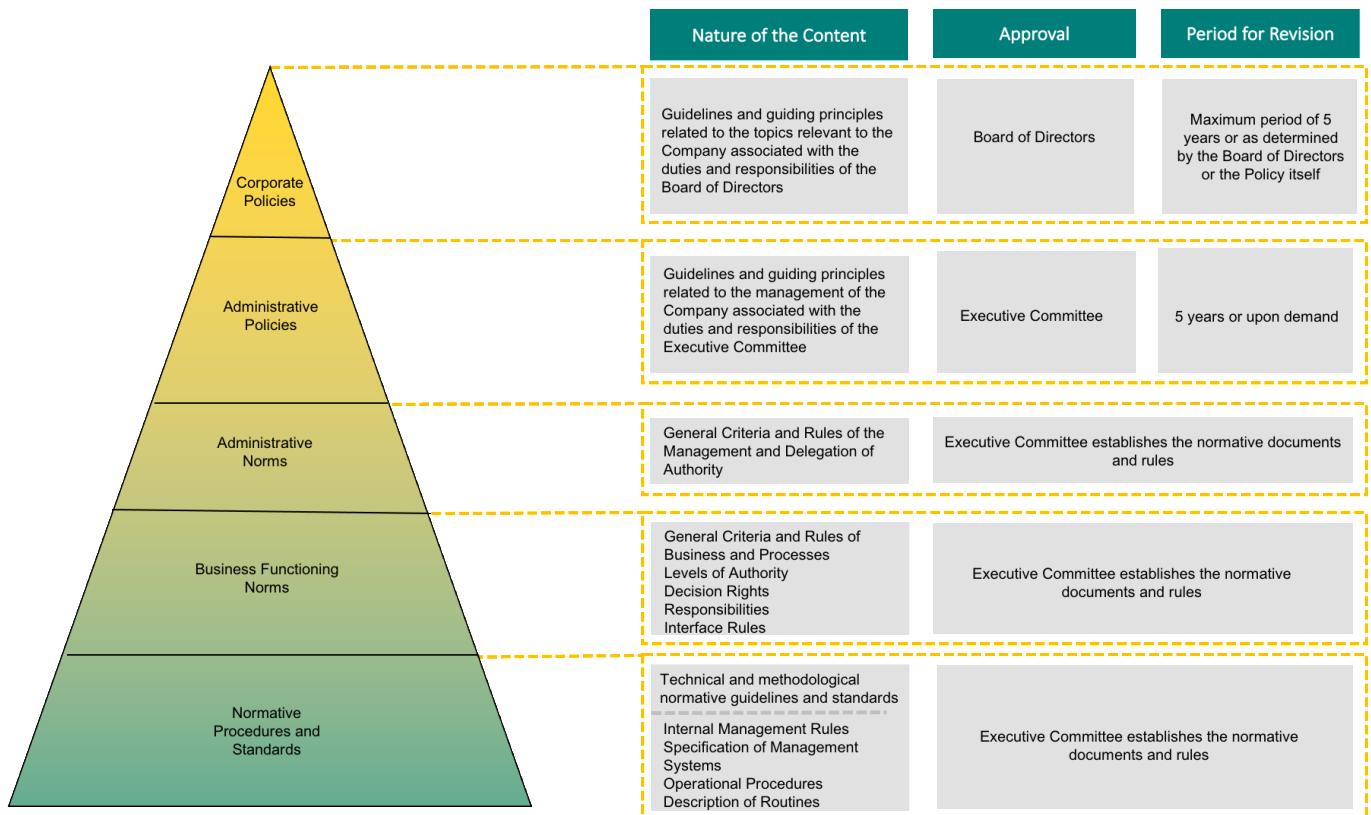
---

<sup>1</sup> set of documents compounding the top of Vale's normative documents hierarchy and defining the Company's guidelines. They are further cascaded through other categories of normative documents.



## 4. Structure of Vale’s Normative Documents

Vale’s normative documents are categorized according to the below hierarchy:



**Corporate Policies** are documents that are principle-driven in nature, used to define, formalize, and disseminate the guidelines, roles and responsibilities of the Company’s governance structures with respect to the relevant topics associated with the duties and responsibilities of the Board of Directors.

**Administrative Policies** have the same principle-driven nature as the Corporate Policies, but they address topics not included in the Collection of Corporate Policies defined by the Board of Directors.

**Administrative Norms** establish general rules for management and levels of delegation of authority, supplementing, detailing and upholding conformity with Vale’s Corporate and Administrative Policies. These documents are used internally.

**Business Functioning Norms** establish decision rights, responsibilities and interface rules associated with a process that is relevant for Vale as a whole. These documents are used internally.

**Normative Procedures and Standards** detail a business process, “what to do” and/or “how to do it.” These documents are used internally.

## 5. Policy Approval Process

The Corporate Policies are approved by the Board of Directors, with advice from the People, Compensation and Governance Committee, in addition to the other committees relevant to each topic. The Corporate Governance Office (“CGO”) is responsible for coordinating the process of prioritization and planning of drafting or revising the Corporate Policies, and the Executive Manager, Business Risk, Internal Controls and Process Governance is responsible for, together with the technical areas, coordinating the drafting and revision of drafts. The Executive



Committee will monitor the entire normative process and will formally recommend it, when submitting the draft for final approval by the Board of Directors.

The Administrative Policies will be deliberated by the Executive Committee, based on the guidelines and principles established by this policy and, when applicable, the Corporate Policies.

## 6. Disclosure and Dissemination of Policies

The internal disclosure and dissemination of the Corporate and Administrative Policies are fundamental for their effectiveness, and the areas in charge must ensure they are incorporated into Vale's culture.

Vale's technical areas, according to their scope, must develop training plans for dissemination of the Corporate and Administrative Policies to all employees or to specific groups, as necessary. The Executive Manager, Business Risk, Internal Controls and Process Governance is responsible for monitoring execution of the training plans, and the Compliance Area is responsible for evaluating the effectiveness of such trainings. The Corporate and Administrative Policies will be filed and published, by the Executive Manager, Business Risk, Internal Controls and Process Governance, in Vale's official repositories serving the internal and external public, as applicable.

Unless otherwise decided by the Board of Directors, the Corporate Policies are public documents and must appear on Vale's institutional websites, including the Investor Relations website. Exceptions shall only occur in the event of a specific need for confidentiality related to the topic. Administrative Policies are internal, except in the event of justified resolution otherwise by the Executive Committee.

The Investor Relations area is responsible for disclosing the public Policies to the external public, notably regulatory bodies of the securities market and investors.

## 7. Deadlines for Policy Revisions

The Corporate and Administrative Policies' content must be reviewed with a frequency no greater than 5 years, or whenever necessary in order to ensure their content is up-to-date.

## 8. Responsibilities in the Policy Management Process

### Board of Directors:

- Approve the drafting, revision or revocation of Vale's Corporate Policies.
- Approve the guidelines and guiding principles for the drafting of the Company's Corporate and Administrative Policies, embodied in this Policy.
- Define the collection of the Company's Corporate Policies, with the prerogative of reviewing the classification of Policies whenever necessary.
- Resolve on omissions and questions regarding the interpretation of this Policy.

### Advisory Committees to the Board of Directors:

- Advise the Board of Directors in establishing the guidelines and guiding principles for the drafting of Corporate and Administrative Policies and in the processes of drafting, revision or revocation of Vale's Corporate Policies, according to operating areas.
- Advise the Board of Directors on the definition and alteration of the collection of the Company's Corporate Policies, according to operating areas.
- Act, when necessary and upon request of the Executive Committee, as a "Sounding Board" for the development of Administrative Policies.

### People, Compensation and Governance Committee (in addition to the responsibilities listed for all the Advisory Committees):

- Issue recommendations on proposals for the drafting, revision or revocation of the Corporate Policies, and/or alternations to the collection of Vale's Corporate Policies, to be submitted to the Board of Directors.



- Monitor, at least annually, with the support of the Compliance Area, and together with the Audit Committee, the suitability of Vale's normative system.

### **Audit Committee (in addition to the responsibilities listed for all the Advisory Committees):**

- Monitor, at least annually, with the support of the Compliance Area, and together with the People, Compensation and Governance Committee, the suitability of Vale's normative system.
- Monitor the conclusions of audits in the normative system, including the implementation of its recommendations, as well as the drafting and execution of training plans for the company's Corporate and Administrative Policies.

### **Executive Committee:**

- Analyze and express its opinion, during the process of drafting or revision of Corporate Policies, and issue a formal recommendation, upon submission of the draft for approval by the Board of Directors.
- Submit to the Board of Directors, even if not requested, proposals for alteration, creation or removal of Corporate Policies.
- Evaluate and approve the proposals of Administrative Policies.
- Define Norms or Procedures for the management of Normative Documents that may be Administrative Norms, Business Functioning Norms, Procedures and Standards, observing the principles of this Policy.

### **Executive Vice-Presidencies (Executive Managers and/or Officers in charge of the topic – Applicant Area, owner of the process):**

- Draft, together with the Executive Manager, Business Risk, Internal Controls and Process Governance, the drafts of Corporate Policies, according to guidance from the Board of Directors and Executive Committee.
- Draft and propose the creation, revision or revocation of Administrative Policies on matters under its responsibility or that directly interface with its duties, observing the impacts and recommendations of the areas affected by the process in all geographies where Vale operates, submitting them to the analysis and deliberation of the Executive Committee.
- Disseminate and train the target audience, global and local, in Corporate and Administrative Policies, on the topics under its responsibility.

### **Compliance Area:**

- Evaluate, as an advisory area, the Corporate and Administrative Policies in light of Vale's Ethics and Compliance Program.
- Include in the Internal Audit's annual plan the monitoring of Vale's normative system, including Policies, focusing on its suitability, effectiveness, control and dissemination throughout the organization.
- Evaluate the effectiveness of the training on Vale's Corporate and Administrative Policies.

### **Legal Executive Vice-Presidency:**

- Evaluate, as an advisory area, the Corporate and Administrative Policies and other normative documents, guiding all levels involved on applicable legal aspects.

### **General Secretary of Corporate Governance:**

- Coordinate the processes for defining the collection of Corporate Policies, prioritizing and planning the drafting or revision of Vale's Corporate Policies, interacting with the Executive Committee and the Executive Manager, Business Risk, Internal Controls and Process Governance.
- Monitor the deadlines and needs for preparing or revising Corporate Policies and the collection of Corporate Policies, ensuring the timeliness of processes and procedures between the Executive Committee, the Advisory Committees and the Board of Directors.
- Ensure the filing of Corporate Policy approval records and the document that consolidates the collection of Vale's Corporate Policies.
- Monitor the disclosure Corporate Policies to the public by the Investor Relations area.



**Executive Manager, Business Risk, Internal Controls and Process Governance:**

- Prepare, together with the respective process owners, the drafts for the preparation or revision of Vale’s Corporate and Administrative Policies, as directed by the Board of Directors and Executive Committee.
- Coordinate the drafting, revision and resolution of Corporate and Administrative Policies, together with the Vice-Presidencies and the Executive Committee.
- Monitor the deadlines and needs for revising Administrative Policies, ensuring the timeliness of processes and procedures between the process owners and the Executive Committee.
- Ensure that the Corporate and Administrative Policies follow the guidelines established in this Policy and that they are consistent with other normative documents.
- Act in an advisory role with the Vice-Presidencies, when requested, to facilitate understanding of the normative issues of Corporate and Administrative Policies.
- Manage the base of Corporate and Administrative Policies, as well as other normative documents, keeping the official repository always up to date.
- Monitor the execution of training plans for Corporate and Administrative Policies, reporting their results to the Executive Committee and the Compliance Department, at least annually.

**Investor Relations Area:**

- Arrange for the disclosure of Public Policies with respect to regulatory bodies of the securities market and investors, in accordance with the resolutions of the Board of Directors (Corporate) and the Executive Committee (Administrative).
- Bring to the Executive Committee and the Personnel, Compensation and Governance Committee the perceptions received from the external public about the need to improve the company’s policies.

## 9. Consequence Management

Noncompliance with this policy is subject to the terms of the Company’s Consequence Management Policy.

## 10. Final Provisions

In the event of any conflict between this Policy and Vale’s By-Laws, the latter shall prevail, and this Policy shall be amended as necessary.

This Policy shall enter into force on the date of its approval by the Board of Directors.

## 11. Approvals

Area	Description
General Secretary of Corporate Governance and Executive Managing Body of Business Risk, Internal Controls and Process Governance	Drafting
Executive Vice-President of Finance and Investor Relations	Revision / Recommendation
Compliance Board	Revision / Recommendation
Legal and Tax Executive Vice-President	Revision / Recommendation
Personnel, Compensation and Governance Committee	Revision / Recommendation
Board of Directors (DCA – 088/2021)	Approval