

This statement is published on behalf of Vale Canada Limited to Section 54(1) of the Modern Slavery Act 2015 in respect of the financial year ended 31 December 2020. References to "Vale," "we," "us," "our" or the "Company" are to the above named entity.

In accordance with Vale's Global Values, Code of Conduct, Sustainability Policy, and Human Rights Policy, Vale is committed to doing what is right. Vale is committed to safety, sustainability, and to respecting human rights throughout our entire value chain. We are opposed to modern slavery in all of its forms, including forced labour, bonded labour, child labour, prison labour, and trafficked labour. We expect our suppliers will also prohibit modern slavery in their own supplier and subcontractor networks and make these expectations clear in our Supplier Code of Conduct, Human Rights Policy, and Human Rights Guide.

Vale acknowledges its responsibility to the Modern Slavery Act 2015 and will ensure transparency within the organisation and with suppliers of goods and services to the organisation.

Vale recognises that slavery and human trafficking remains a hidden blight on our global society. As a Company, we have procedures to help us identify risks in our business and in our wider supply chain.

Vale will work to achieve these aims by identifying and managing risk in the following ways (but not limited to):

- Aligning with Vale S.A.'s Human Rights Policy and Human Rights Guide that define our expectations;
- Vetting (due diligence checks) suppliers, including through third-party research, questionnaires, database searches that include modern slavery indicators, and other means;
- Using standard contractual clauses with suppliers to help ensure respect for human rights;
- Providing appropriate supervision and management of our contracts through close oversight of their performance and identifying concerns if they arise;
- Including the risks of child sexual exploitation and child labour in annual human rights self-assessments and implementing steps to prevent and mitigate any risks that may be identified;
- Encouraging people to report concerns, protecting whistleblowers by providing anonymous reporting channels, and not tolerating retaliation of any kind toward individuals who report to Vale in good faith;
- Maintaining zero tolerance to slavery and human trafficking;
- Participating in training (face to face and online) on Vale S.A.'s Human Rights Policy and Human Rights Guide to relevant employees.

We regularly review this statement against our activities to establish whether the approach we have taken remains proportionate and in compliance with the Modern Slavery Act 2015.

This policy statement will be published on the website our parent company, Vale S.A., and will be reviewed annually. This policy statement will be made available to staff, stakeholders and other interested parties.

This statement has been approved and endorsed by the Board of Directors on February 12, 2021.

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**Peter Brady, Director**  
February 17, 2021