

**Corporate Human Rights Benchmark  
2023 Company Scorecard**

**Company name** Vale  
**Sector** Extractives  
**Overall score** 25.8 out of 100

**CHRB Special Process for Major Catastrophic Events assessment**

Following Vale’s involvement in the 2019 Brumadinho dam collapse, the CHRB has applied the ‘special process for major catastrophic events’ to evaluate whether and the extent to which the company has taken steps to assess the causes of the event and prevent similar episodes from occurring in the future, and provided remedies to the affected stakeholders. For more information on the methodology and results, please refer to [the assessment](#). As a result of this assessment, Vale’s CHRB score is capped at 75%.

Theme score	Out of	For theme
3.9	10	A. Governance and Policy Commitments
11.6	25	B. Embedding Respect and Human Rights Due Diligence
7.5	20	C. Remedies and Grievance Mechanisms
7.6	25	D. Performance: Company Human Rights Practices
3.8	20	E. Performance: Responses to Serious Allegations

Please note that any small differences between the Overall Score and the added total of Measurement Theme scores are due to rounding the numbers at different stages of the score calculation process.

Please note also that the "Not met" labels in the Explanation boxes below do not necessarily mean that the company does not meet the requirements as they are described in the bullet point short text. Rather, it means that the analysts could not find information *in public sources* that met the requirements *as described in full* in the CHRB 2022 Methodology document for the sector concerned. For example, a "Not met" under "General HRs Commitment", which is the first bullet point for indicator A.1.1, does not necessarily mean that the company does not have a general commitment to human rights. Rather, it means that the CHRB could not identify a public statement of policy in which the company commits to respecting human rights.

**Detailed assessment**

**A. Governance and Policy Commitments (10% of Total)**

**A.1 Policy Commitments (5% of Total)**

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	2	The individual elements of the assessment are met or not as follows: Score 1 • Met: General HRs commitment: The Code of Conduct indicates: ‘We respect and promote Human Rights’. [Code of Conduct, 12/11/2020: <a href="http://vale.com">vale.com</a> ] Score 2 • Met: Commitment to UNGPs: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale’s activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following international principles and standards: [...] United Nations Guiding Principles on Business and Human Rights'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a> ]
A.1.2.a	Commitment to respect the human rights of workers: ILO Declaration on Fundamental	0.5	The individual elements of the assessment are met or not as follows: Score 1 • Met: Commitment to ILO core principles: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale’s activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following

Indicator Code	Indicator name	Score (out of 2)	Explanation
	Principles and Rights at Work		<p>international principles and standards: [...] International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Explicitly lists all four ILO core principles: The Human Rights Policy indicates: 'Vale prohibits the use of child labour and any kind of employment practice that may be interpreted as equivalent to forced or modern slavery labour in its activities'. It also commits 'to respect and value diversity, promote inclusion, and not tolerate discrimination or harassment of any nature'. Regarding to engagement to its employees it adds: 'to respect and practice the freedom of association and collective bargaining in all areas, in accordance with applicable local laws'. However, it is not clear whether it is committed to respect these rights in all contexts and locations (i.e. alternative mechanisms for those countries where there are legal restrictions to the exercise of these rights), as the Company indicates that it respects these rights 'in accordance with applicable local laws'. The Principles of Conduct for Third Parties makes reference to the rights to form or join trade unions and to bargain collectively, however, it is in the context of business partners. The 2023 Integrated Report notes: 'Our actions are guided by Vale's Code of Conduct, on local labor legislation, on the eight Fundamental Conventions of the International Labor Organization (ILO) and on the guidelines of the Organization for Economic Cooperation and Development (OECD). In the countries where we operate, when local legislation restricts this right, we strive to maintain dialogue with equivalent employee organizations'. However, only commitments placed in formal policy statements are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to ILO core principles: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale's activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following international principles and standards: [...] International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work'. The Human Rights Policy adds: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Explicitly lists all four ILO core principles for BPs/JVs: The Human Rights Policy indicates: 'Vale prohibits the use of child labour and any kind of employment practice that may be interpreted as equivalent to forced or modern slavery labour in its activities'. It also states: 'to respect and value diversity, promote inclusion, and not tolerate discrimination or harassment of any nature, including moral or sexual, in accordance with applicable local laws'. Regarding to engagement to its employees it adds: 'to respect and practice the freedom of association and collective bargaining in all areas, in accordance with applicable local laws'. The Human Rights Policy indicates: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. However, it is not clear whether the Company requires to respect those rights in all contexts, as it indicates 'in accordance with applicable local laws'. In these cases (companies referring to local laws in freedom of association and collective bargaining), companies are expected to require alternative mechanisms or equivalent workers bodies where the right to freedom of association and collective bargaining is restricted under law. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul>
A.1.2.b	Commitment to respect the human rights of workers: Health and safety and working hours	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect H&amp;S of workers: The Human Rights Policy indicates: 'Relevant Issues in the Mining Sector: to support recognized initiatives that seek to mitigate the potential negative social, economic, and environmental impacts related to mining activities, including [...] health and safety; [...]'. The Code of conduct states that: 'We put people at the centre of our decisions and believe that every worker has the right to a safe and healthy environment. Vale follows the Vale Production System – VPS, an integrated and efficient routine management model for performing our activities with excellence. Our most important indicators are health, safety and risk management. We believe that if we operate with excellence and, consequently, with safety, we will be attaining our production and financial goals as a natural result of this responsible and conscious management approach'. The Sustainability Policy states: 'Sustainability must be integrated into Vale's</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>business and decision-making process, and the following premises must be adopted throughout project life cycle: [...] Health: promote measures to avoid and, when necessary, mitigate the exposure of employees and contractors to health risk factors, fostering prevention, promotion, education, access to treatments and psychological and social support networks, aiming at well-being and work capacity'. [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Code of Conduct, 12/11/2020: <a href="http://vale.com">vale.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to ILO working hours standards or 48 hour regular work week</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Expects BPs/JVs to commit to H&amp;S of workers: The Principles of Conduct for Third Parties indicates: 'Third parties must comply with applicable workplace health and safety laws and regulations, and with any Vale-site specific health and safety rules and requirements when working at a Vale site, providing a safe and healthy working environment. [...] Third parties should strive for best market practices to promote a healthy and safe work environment. Third parties should continuously adopt and monitor solutions and technologies to identify, manage, reduce, and eliminate exposure to occupational health and safety risks'. [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Expects BPs/JVs to commit to ILO working hours standards or 48 hour regular work week</li> </ul>
A.1.3.a.EX	Commitment to respect human rights particularly relevant to the sector – land, natural resources and indigenous peoples' rights (EX)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to respect land ownership/natural resources as in IFC Performance Standards: The Human Rights Policy indicates: 'If the involuntary resettlement process is unavoidable as a result of its activities, the company works in accordance with International Finance Corporation (IFC) Performance Standard No. 5 to minimize potential impacts on affected communities'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Commitment to respect indigenous rights or ILO No.169 or UN Declaration: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale's activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following international principles and standards: [...] United Nations Declaration on the Rights of Indigenous Peoples'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Expects EX BPs to make these commitments: See above. The Human Rights Policy remarks: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to obtain FPIC or zero tolerance to land grabbing: According to the Human Rights Policy, 'Based on the guidelines set forth in this Policy, Vale interacts with its stakeholders through the following actions [...] Indigenous Peoples and Traditional Communities: 'to promote consultation and free, prior and informed consultation and consent and assessments of potential human rights risks and impacts'. However, 'to promote' is not considered a formal statement of commitment according to CHRB wording criteria. The 2023 Integrated Report notes: 'The creation of real value sharing, benefiting the communities surrounding mining projects, is an essential requirement for the success of new ventures. Securing and maintaining a social license to operate from local communities continues to be a challenge for the mining industry. This requires building relationships that include free, prior, and informed consent before the deployment of projects; rehabilitation initiatives and considered future uses of closed mines; and offering employment opportunities and local development'. The Company has provided a video to CHRB regarding this indicator. However, only policy commitments are considered a suitable source for this indicator under CHRB revised approach. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Met: Commitment to respect the right to water: According to the Human Rights Policy, 'Based on the guidelines set forth in this Policy, Vale interacts with its stakeholders through the following actions [...] Local Communities: [...] to respect the right of communities to water availability, quality and accessibility, and contribute to maintaining and improving the quality of life and sustainable local development of communities'. As for 'Indigenous Peoples and Traditional Communities: ' to recognize the right of access to land and water, as well as the immaterial value that these natural resources represent for indigenous peoples'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to make these commitments: See sub indicators above in relation to FPIC and right to water. The Human Rights Policy remarks: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. However, 'to promote' is not considered a formal statement of commitment according to CHRB wording criteria. The Principles of Conduct for Third Parties indicates: 'Third parties should respect and promote Human Rights in their supply chain and workplace, taking appropriate measures to prevent, mitigate and if necessary, remedy violations'. It is not clear the Company expects extractive business partners to commit to respecting ownership/use of land and natural resources which also includes a commitment to obtain the free prior and informed consent (FPIC) from indigenous peoples and local communities for transactions involving land and natural resources or to a zero tolerance for land grabbing. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
A.1.3.b.EX	Commitment to respect human rights particularly relevant to the sector – security (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to Voluntary Principles on Security and HRs: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale's activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following international principles and standards: [...] Voluntary Principles on Security and Human Rights (VPSHR)'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Commits to International Humanitarian Law</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Expects EX BPs to commit to these rights: The Human Rights Policy indicates its general principle: 'Respect, raise awareness, and promote human rights, prevent potential adverse impacts and potential human rights violations, and when necessary, mitigate and remedy them, in Vale's activities and throughout its supply chain, through engagement with stakeholders and in accordance with the following international principles and standards: [...] Voluntary Principles on Security and Human Rights (VPSHR)'. The Human Rights Policy also remarks: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. However, it is not clear it expects extractive business partners to commit to respect international humanitarian law (IHL). [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul>
A.1.4	Commitment to remedy	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Commitment to remedy adverse HRs impacts: The Human Rights Policy indicates: 'Vale undertakes, when necessary, measures to remediate any adverse human rights impacts it has caused or contributed to and collaborates with other relevant human rights initiatives in the territories where it operates'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Expects EX BPs to make these commitments: The Principles of Conduct for Third Parties indicates: 'Third parties should respect and promote Human Rights in their supply chain and workplace, taking appropriate measures to prevent, mitigate and if necessary, remedy violations'. [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to collaborate with judicial or non-judicial mechanisms: The Human Rights Policy indicates: 'Vale undertakes, when necessary, measures to remediate any adverse human rights impacts it has caused or contributed to and collaborates with other relevant human rights initiatives in the territories where it operates. [...] Vale's grievance mechanisms do not prevent access to other judicial or extra judicial mechanisms. Vale considers its grievance mechanisms to be fundamental tools for the prevention and remediation of potential human rights impacts and violations'. However, although it indicates that does not prevent access to other judicial or extra judicial mechanisms, it is not clear it has a commitment with them. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Commitment to work with EX BPs on remedy: The Human Rights Policy states: 'Vale undertakes, when necessary, measures to remediate any adverse human rights impacts it has caused or contributed to and collaborates with other relevant human rights initiatives in the territories where it operates. It does this directly and/or through partners, seeking to involve relevant stakeholders in the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			design and implementation of remediation actions'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a> ]
A.1.5	Commitment to respect the rights of human rights defenders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Zero tolerance of threats/attacks on HRDs: The Human Rights Policy indicates 'Vale does not tolerate or contribute to threats, intimidation, and attacks against human rights defenders'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Expects BPs to make this commitment: The Human Rights Policy indicates 'Vale does not tolerate or contribute to threats, intimidation, and attacks against human rights defenders'. The Human Rights Policy remarks: 'Vale also expects its customers, suppliers, and partners to respect the rights of human rights defenders and to act the same way'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Commitment to working with HRDs to create safe and enabling environment: In relation to Human Rights Defenders, the policy states: 'to respect the freedom of expression and demonstration of all persons, provided that they occur in a peaceful manner and do not impact the human rights of any person and current local laws. [...] to seek engagement with human rights defenders to address common challenges, through regular and proactive dialogue'. However, no evidence found that it also commits to working with human rights defenders to create safe and enabling environments for civic engagement and human rights at local, national or international levels. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul>

### A.2 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Board level responsibility for HRs: The Board of Directors and Leadership indicates that the Company has 'five statutory advisory committees'. According to the Internal Regulation of the Sustainability Committee, it is 'incumbent upon the Committee [Sustainability Committee] to assess and recommend the following to the Board of Directors: [...] the Company's corporate sustainability policies regarding its area of operation on the topics of security, environment, health, education and relationship with communities, indigenous peoples and other stakeholders, human rights, communication and institutional relations, all according to the authority of the Board of Directors, and jointly with the Nomination and Governance Committee'. The webpage section Human Rights adds: 'Human rights issues are also dealt with in the Risk Management Committee, which has its own governance and is responsible for addressing the most critical risks that have already been analyzed in the operational areas'. [Sustainability Committee Charter, 20/12/22: <a href="http://vale.com">vale.com</a>] &amp; [Board of Directors and Leadership_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Describes HRs expertise of Board member: The webpage section Board of Directors and Leadership discloses the Board of Directors selection process. It indicates Directors should have functional experience 'In socio-environmental and governance areas, in integrity and compliance processes, preferably in natural resource industries. Desirable experience of engagement with society, especially with neighboring communities'. It also discloses the Board Members profile, out of which many contain ESG experience. However, this subindicator looks for a specific description of the human rights expertise of the Board member(s) or Board committee tasked with that governance oversight. [Board of Directors and Leadership_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Board member/CEO signal importance of HRs in their communications: The Company discloses a presentation that took place in New York in 2022 in which the CEO talks about sustainable mining, discloses information of actions taken in Brumadinho, reparation in Mariana, Indigenous Peoples relations, diversity, health and safety, fighting poverty, community relationship, among other topics. He indicates: 'Brumadinho is a defining moment in Vale. [...] When you talk about Brumadinho, of course, I think it's something [...] that in conscious of the importance and the impact that we caused, but at the same time, we are fully engaged on repairing it fairly and quickly. [...] Brumadinho was kind of contained but it's not about money, right? This is about empathy, about talking to people, doing what they expect to be done, but they have to feel compensated. '. [Vale Day New York 2022_Transcript, 2022: <a href="http://api.mzig.com">api.mzig.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.2	Board responsibility	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Process to review HRs strategy at board level: According to the Internal Regulation of the Sustainability Committee, 'The Committee shall meet ordinarily, in accordance with the annual calendar approved, and extraordinarily, if necessary, upon a call notice served five (5) business days in advance'. In the context of health and safety management, the 2023 Integrated Report notes: 'Identified deviations are intended to be reported and addressed in order to promote the continuous improvement of the management system and are monitored by Vale's governance bodies, which includes the Executive Committee, the Sustainability Committee and the Board'. The 2022 Report of Governance discloses some of the Board's duties: 'The Board of Directors resolves on the strategic guidelines and strategic plan of the company, taking into account the safety of people, social progress, [...] acting as guardian of the enforcement of the approved strategy. In 2021, the Board of Directors met 5 times to address exclusively the strategic plan of the Company, and in 2022, 2 meetings have already been held to address this agenda, with a forecast of at least 2 more by the end of the year. [...] The Board of Directors periodically monitors, through the Vale Integrated Global Risk Map, the main risks of the Company, acting on them systematically through the adoption of prevention or mitigation measures. [...] The Board of Directors resolves on policies of functional conduct based on ethical principles embodied in the Code of Conduct of the Company, as well as acts as guardian of commitments relating to respect for human rights'. [Sustainability Committee Charter, 20/12/22: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Not Met: Example of HRs issues/trends discussed in last reporting period: The 2022 Integrated Report notes: 'The Advisory Committees to Vale's Board of Directors are charged with overseeing the scope and effectiveness of risk management. The Risk Executive Committees, whose creation is now the responsibility of Vale's Executive Committee, act in a preventive manner and support the Executive Vice Presidents in monitoring risks and making necessary decisions. There are five Risk Executive Committees, with different scopes of action [...]. The Integrated Risk Map, a non-exhaustive instrument that contains the set of potential risk topics, was re-evaluated and approved by the Board of Directors in July 2022, on the recommendation of the Executive Committee, with the goal of contemplating risks that need to be assessed and monitored in all Vale units'. It adds: 'Human rights is part of our Integrated Risk Map, which is one of the tools in Vale's risk management process'. However, it is not clear what are the specific human rights topics discussed at Supervisory Board level in last reporting period. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Describes how affected stakeholders / HRs experts inform board discussions</li> </ul>
A.2.3	Incentives and performance management	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: At least one board member incentive linked to HRs commitments</li> <li>• Not Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: The webpage section Compensation indicates: 'Board of Directors (BOD): Effective members receive a monthly fixed portion of the compensation, while the only alternate member receives the fixed portion of the compensation when participating in meeting of the Board of Directors [...] Members of the Board of Directors are not entitled to other types of remuneration or benefits, including bonuses, profit sharing, remuneration for participation in meetings, commissions, postemployment benefits, benefits motivated by the termination of the exercise of the position and remuneration based on in shares. Members of the Board of Directors are entitled to reimbursement of travel and subsistence expenses necessary for the performance of their duties'. The Company has provided comments to CHRB regarding this indicator on Executive Directors, however, this subindicator focuses on incentive or performance management scheme linked to the Company's human rights policy commitment for Board members. [Compensation_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Performance criteria linked to HRs made public</li> <li>• Not Met: Review of other board incentives for coherence with HRs policies</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.4	Business model strategy and risks	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Board process to review business model and strategy for HRs risks: The Risk Management Policy indicates: 'Vale has an integrated risk management governance model, based on the concept of Lines of Defense [...]. The general guidelines of risk management that drive Vale's businesses are established by the Board of Directors, which is supported by an Audit Committee that is responsible for supervising the compliance and effectiveness of Vale's risk management processes, among other attributes'. The 2022 Integrated Report adds: 'Human rights is part of our Integrated Risk Map, which is one of the tools in Vale's risk management process'. Also: 'The Advisory Committees to Vale's Board of Directors are charged with overseeing the scope and effectiveness of risk management. The Risk Executive Committees, [...] act in a preventive manner and support the Executive Vice Presidents in monitoring risks and making necessary decisions. [...] The Integrated Risk Map, a non-exhaustive instrument that contains the set of potential risk topics, was re-evaluated and approved by the Board of Directors in July 2022, on the recommendation of the Executive Committee, with the goal of contemplating risks that need to be assessed and monitored in all Vale units. [...] Excellence and Risk Committee relating to the Company's risks were incorporated into by the Audit and Risks Committee; operational excellence is now monitored directly by the Executive Committee, reporting to the Board of Directors'. However, no description found of the process it has in place to discuss and review its business model and strategy for inherent risks to human rights at Board level or a Board committee. This indicator focuses on the Company business model rather than focusing on the risk. [Risk Management Policy, 31/07/2019: file:///C:/Users/CHRB%202023/Downloads/risk-management-policy.pdf] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Not Met: Describes frequency and triggers for reviewing business model: The 2022 Report of Governance discloses some of the Board's duties: 'The Board of Directors resolves on the strategic guidelines and strategic plan of the company, taking into account the safety of people, social progress, [...] acting as guardian of the enforcement of the approved strategy. In 2021, the Board of Directors met 5 times to address exclusively the strategic plan of the Company, and in 2022, 2 meetings have already been held to address this agenda, with a forecast of at least 2 more by the end of the year. [...] The Board of Directors periodically monitors, through the Vale Integrated Global Risk Map, the main risks of the Company, acting on them systematically through the adoption of prevention or mitigation measures. [...] The Board of Directors resolves on policies of functional conduct based on ethical principles embodied in the Code of Conduct of the Company, as well as acts as guardian of commitments relating to respect for human rights'. The webpage section UN Global Compact notes: 'Human Rights issues are included in the scope of the Board of Directors, through the Sustainability Committee, and in the scope of the Executive Vice Presidency and the Executive Committee for Sustainability Risks. In addition, results and indicators of control and compliance, critical issues, risk assessment, and due diligence results are periodically presented'. The Company has provided comments to CHRB regarding this indicator further explaining its Risk Management Policy [see above]. However, this subindicator looks for a description of the frequency of and triggers for reviewing its business model or strategy and potential impacts on human rights. [Report on the Brazilian Code of Corporate Governance for Publicly-Held Companies, 2022: <a href="http://api.mziq.com">api.mziq.com</a>] &amp; [UN Global Compact, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets both requirements under score 1</li> <li>• Not Met: Example of actions resulting from reviews</li> </ul>

## B. Embedding Respect and Human Rights Due Diligence (25% of Total)

### B.1 Embedding Respect for Human Rights in Company Culture and Management Systems (10% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See A.1.2.a</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Senior responsibility for HRs implementation and decision making: The webpage section Human Rights indicates: 'From 2019 onwards, with the company's governance and risk management review, the Human Rights area started to act as a second line of defense and the related topics are dealt with in the Executive Committees for Operational Risks and Compliance Risks. [...] Second line of defense - the specialist corporate areas are responsible for developing and maintaining risk management, internal controls and compliance; and for identifying and monitoring new/emerging risks, ensuring continuous improvement and compliance with the risk management model, laws, regulations and standards'. It is not clear, however, what is the specific person/body at senior executive level in charge of implementing human rights commitments and decision making on the matter. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes day-to-day responsibility for implementing HRs commitments: The webpage section Human Rights indicates: 'Commitments to human rights must be respected by all the company professionals, regardless of their position or function. Starting with the Board of Directors and unfolding to all employees. This commitment is reflected in company main documents such as, in the Bylaws, where it is stated the Board of Directors' responsibility to act as a guardian of the commitments related to the respect for human rights'. The Human Rights Policy states: 'All Employees, Administrators, and Members of the Fiscal Council of Vale and its subsidiaries must know and adhere to the rules set forth in this Policy and are responsible for disseminating and practicing the guidelines contained herein'. However, it is not clear how it assigns responsibility for implementing its human rights policy commitment for day-to-day management across relevant departments. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Day-to-day resources and expertise allocation in own operations</li> <li>• Not Met: Resources and expertise allocation with EX BPs: The 2022 Integrated Report notes: 'As part of the human rights due diligence process it is also important to evaluate our supply chain. For this reason, in 2019, Vale began a process to verify our supply chain to assess its level of commitment to respecting human rights. [...] Before starting a business relationship with Vale, all our suppliers are subjected to a due diligence, assessment, based on public information and the scope of work to be performed'. However, although the Company indicates its has due diligence process to evaluate its supply chain, no description found of how it allocates resources and expertise for the day-to-day management of relevant human rights issues within its business partners. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul>
B.1.2	Incentives and performance management	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Senior manager incentives linked to HRs commitments: The 2022 Form 20F indicates: 'The short-term variable compensation component is based on collective goals and specific goals for each executive, taking into account [...] ESG driven performance goals, directly related to health, safety, risk management and sustainability targets'. The webpage Compensation describes each of the collective goals: 'Safety - Reduce the absolute number of recordable injuries with potentially critical or catastrophic severity. Includes penalty related to fatalities and lives changed [10% for CEO, CFO and Other Executive members]'; 'Sustainability + DE&amp;I - Sustainability: reduce events with community members compared to the 2021 baseline. People (DE&amp;I): - % of women, -% of black people in leadership [10% for CEO, CFO and Other Executive members]'. The 2023 Goal panel for collective goals includes similar safety goals. The Sustainability goals changes slightly: 'Evolve in community safety management, reducing exposure to the risk of events occurring'. As for DE&amp;I: 'Foster a diverse pipeline Annual Report Vale, increasing the total number of women and the number of blacks in leadership positions leadership [7.5 % for CEO, CFO and Other Executive members]'. The 2022 Integrated Report further explains: 'In 2023, the goal is to reduce the occurrence of injury events affecting community members by 10% compared to the 2022 result'. [Form 20F 2022, 2023: <a href="http://api.mziq.com">api.mziq.com</a>] &amp; [Compensation_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Incentive scheme linked to key HRs risks beyond employee H&amp;S: See above. It includes community safety management. It adds: 'The results obtained in relation to the safety target in communities have a direct bearing on the variable compensation of our executives, in an innovative and pioneering initiative to give concrete foundations to our value of life matters most'. [Compensation_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Performance criteria linked to HRs made public: See above. [Compensation_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Review of other senior management incentives for coherence with HRs policies</li> </ul>
B.1.3	Integration with enterprise risk management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HRs risks integrated as part of enterprise risk system: The webpage section Risk Management indicates: 'Business risk management focuses on the relevant potential risks that, if any, could impact people, communities, the environment, operational continuity, reputation and the achievement of the company's overall business objectives. Vale has an integrated Risk Management Governance flow, based on the concept of Lines of Defence, which represents how periodic reviews are performed. The objective is to ensure the alignment between strategic decisions, performance, definition and monitoring of risk tolerance limits approved by the Company's Board of Directors, upon recommendation of the Executive Vice Presidencies'. The webpage section Human Rights adds: 'From 2019 onwards, with the company's governance and risk management review, the Human Rights area started to act as a second line of defence and the related topics are dealt with in the Executive Committees for Operational Risks and Compliance Risks'. [Risk Management Policy, 31/07/2019: file:///C:/Users/CHRB%202023/Downloads/risk-management-policy.pdf] &amp; [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Provides an example: The webpage section Human Rights explains the three lines of defence: 'First line of defence - the enterprises have the primary responsibility and directly manage the risks, in an integrated manner (identification, evaluation, treatment, prevention, and monitoring). Second line of defence - the specialist corporate areas are responsible for developing and maintaining risk management, internal controls and compliance; and for identifying and monitoring new/emerging risks, ensuring continuous improvement and compliance with the risk management model, laws, regulations and standards. Third line of defence - the Internal Audit and the Whistleblower channel are totally independent from management. They carry out evaluations and inspections, and perform control tests and investigate complaints, providing impartial assurance-including on the effectiveness of management and risk prevention, internal controls and compliance'. The webpage section Risk Management indicates: 'In addition to the Executive Vice Presidency of Safety and Operational Excellence, which is the 2nd Line of Defence for Operational Risks, there are areas such as the Environment, Corporate Integrity, Social and Human Rights, not exhaustively, which should also act as the 2nd Specialist Line of Defence of the respective potential risks'. [Risk Management Policy, 31/07/2019: file:///C:/Users/CHRB%202023/Downloads/risk-management-policy.pdf] &amp; [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Risk assesment by Audit Committee or independent third party</li> </ul>
B.1.4.a	Communication /dissemination of policy commitment(s) to workers and external stakeholders	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 1 on A.1.2.a: See A.1.2.a</li> <li>• Met: Communicates HRs policies to all workers in own operations: The webpage section Human Rights indicates: 'As a deployment of the Global Human Rights Policy, since 2009 Vale has maintained a robust front of training and dissemination of Human Rights content for its employees. The knowledge has been internalized through in-person (webinars) and distance training of leaders, directors, executive managers, managers, specialists and supervisors and staff(analysts) by the Human Rights team. The training courses are available in Portuguese and English, in the several countries where Vale operates'. The 2021 Integrated Report indicates: 'In 2021, Vale trained 74,000 people via the two-hour online course that is mandatory for all its own employees, totalling 111,000 hours of training'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Communicates HRs policies to stakeholders: The Company has provided comments to CHRB regarding this indicator disclosing different channels through which it communicates its actions and policies, such as: the human rights webpage, Vale News, the diversity webpage, the grievance channel. However, it is not clear how it actively communicates its policy commitments to affected stakeholders, including local communities and other groups in general. Publishing policies on the website, and other actions, is not considered a direct communication with affected stakeholders. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Diversity_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.4.b	Communication /dissemination of policy commitment(s) to business relationships	0.5	<p>• Not Met: Example of how HRs policies are accessible for intended audience</p> <p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Meets ILO requirement for suppliers on A.1.2.a: See A.1.2.a</li> <li>• Not Met: Describes steps to communicate HRs policies to EX BPs: The webpage section Human Rights indicates: 'Vale seeks to ensure quality, transparency, and continuous improvement in its relationship with its suppliers by fostering sustainable and competitive businesses. Promotes knowledge sharing to build a more responsible and human rights conscious supply chain. With this objective, in 2022, 129 suppliers were engaged in training and participation in webinars on Human Rights themes. [...] If there is an impact or violation of human rights, appropriate measures are taken. Suppliers that present a higher degree of risk are engaged in different ways, including monitoring action plans to deal with deviations, meetings on Human Rights, and sharing of good practices'. The Company has provided information on its due diligence in human rights. However, it is not clear whether the Company actively communicates its human rights expectations for business partners generally. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes how HRs policies are contractual/binding for suppliers: The webpage Suppliers and Customers indicates: 'Suppliers commit to expected behavior standards in accordance with Vale's policies, [...] and commit, through contractual clauses, to: Provide decent working conditions; Combat child labor and sexual exploitation; Combat forced labor or modern slavery; Not tolerate discrimination; and Respect freedom of association and collective bargaining; Anti-corruption clauses; HSE clauses'. According to its Human Rights Policy a supplier is 'any supplier of goods and/or services of Vale or its subsidiaries'. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Requires EX BPs to cascade contractual/binding HRs policies to their BPs: The Human Rights Policy states: 'Vale prohibits the use of child labour and any kind of employment practice that may be interpreted as equivalent to forced or modern slavery labour in its activities and by its suppliers and expects its customers and partners to act the same'. The Principles of Conduct for Third Parties indicates: 'These Principles incorporate the Ten Principles of the United Nations Global Compact. We encourage our third parties to include these principles in their own codes of conduct'. However, it is not clear the Principles of Conduct for Third Parties is part of its contractual requirements down their supply chain, as the Company indicates it 'encourages' them. It adds: 'Third parties should respect and promote Human Rights in their supply chain and workplace, taking appropriate measures to prevent, mitigate and if necessary, remedy violations'. However, in this case, the Company is required to disclose specific requirements ensuring that they will be held accountable of their own business partners performance. No further evidence found. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
B.1.5	Training on Human Rights	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a: See A.1.2.a</li> <li>• Met: Describes how workers are trained on HRs policy commitments: The webpage section Human Rights indicates: 'As a deployment of the Global Human Rights Policy, since 2009 Vale has maintained a robust front of training and dissemination of Human Rights content for its employees. The knowledge has been internalized through in-person (webinars). [...] Vale also discloses - to employees, suppliers, joint ventures and customers - content related to critical human rights issues, such as: Culture and reality of indigenous peoples; Gender relations; Forced and child labor; Children sexual exploitation; Diversity and inclusion; Collective negotiation and freedom of association'. The 2021 Integrated Report indicates: 'In 2021, Vale trained 74,000 people via the two-hour online course that is mandatory for all its own employees, totalling 111,000 hours of training'. The 2022 Integrated Report adds: 'Online human rights training is mandatory for all own employees and lasts 2 hours. In 2022, 14,000 new employees were trained, totaling 28,000 hours of training. For new contractors, a training video is provided during onboarding, focusing on the main critical human rights issues'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Trains relevant managers including security on HRs: See above. In addition, regarding its security teams, the Human Rights Policy states: 'The Company's management approach considers the following aspects: to regularly train security professionals to carry out their activities in line with human rights principles and the proportional and progressive use of force'. The 2021 Integrated Report adds:</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>'more than 3,200 hours were dedicated to specific training on human rights and corporate security, according to the Voluntary Principles on Security and Human Rights, covering 80% of the total workforce'. The 2022 Integrated Report notes: 'For corporate teams responsible for Security, 223 of our own employees (100%) and 2,710 contractors (97%) were trained in human rights'. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See A.1.2.a</li> <li>• Met: Meets both requirements under score 1: See above.</li> <li>• Met: Trains BPs to meet HRs commitments: Regarding its Suppliers and Partners, the Human Rights Policy indicates: 'to provide training to help promote the respect of human rights'. The 2021 Integrated Report adds: 'For contractors, a video training program was provided focusing on the main human rights issues'. The Company has provided a short video on human rights. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Discloses % suppliers trained</li> </ul>
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Score of at least 1 on A.1.2.a: See A1.2.a</li> <li>• Met: Monitors implementation of HRs policy commitments across global ops and EX BPs: The 2021 Integrated Report indicates: '100% of Vale's operations have assessed the risk of human rights violations and monitored them periodically along with other business risks'. The 2022 Integrated Report notes: 'Before starting a business relationship with Vale, all our suppliers are subjected to a due diligence, assessment, based on public information and the scope of work to be performed. This verification process is part of our Ethics and Compliance Program. This includes human rights due diligence. The process starts during the registration stage and continues through to supplier contract management. Risk assessment, application of a self-diagnosis questionnaire, document and field inspections, and monitoring of supplier action plans are some of the practices intensified over the past three years'. The 2022 Form20-F adds: 'We have also made progress the human rights risk management related to suppliers in Brazil and Canada, including the increase of human rights inspections in suppliers in Brazil and the development of further human rights standards for suppliers'. The Company explains its Human Rights risk assessment on its webpage section Human Rights. The webpage Suppliers and Customers indicates: 'In the contract management phase, the risk management of suppliers with current contracts is carried out. The performance of suppliers is measured throughout the entire provision of services and supplies, and periodic monitoring of suppliers is carried out regarding social, environmental, humanitarian, performance and government relations aspects: Local Labor Obligations - Monitoring contracts with third parties in Brazil regarding labor aspects, minimizing exposure to risks in various aspects such as safety, exhaustive working hours, labor debts (Third Party Contracts Service Center); Dirty list of employers using slavery-like Labor [...]'. It indicates that these two types of monitoring happen monthly. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>] &amp; [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Discloses % of EX BP's monitored</li> <li>• Not Met: Describes how workers are involved in monitoring</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Score of 2 on A.1.2.a: See A1.2.a</li> <li>• Not Met: Describes corrective actions process: The webpage section Human Rights indicates: 'The results of the evaluation are then shared with Vale's Human Rights area and with each operation or project evaluated. The recommendations are transformed into controls and corrective actions for the risk management enhancement and remediation of the negative impacts identified. The Human Rights Management Area monitors the entire due diligence execution process and the controls and corrective actions implementation'. The Company has provided comments to CHRB regarding this indicator disclosing main results of the inspections. However, no evidence found of the actual corrective action process that the Company undertakes when non-compliances are found in the course of its monitoring process. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Discloses findings and number of correction action processes: The 2021 Integrated Report indicates: 'During the year, 3,014 corrective actions were established'. However, this figure is in relation to reports through the Whistleblower Channel. It is not clear the number of corrective action process as a result of the monitoring, nor its findings. The 2022 Integrated Report notes: 'The main results of the inspections [see above – human rights due diligence] pointed to weaknesses in the fight against the sexual exploitation of children and adolescents,</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			the dissemination and operation of whistleblower channels, and problems in labor relations and working conditions'. However, no further evidence found the number of corrective action processes as a result of the monitoring. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a> ] & [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]
B.1.7	Engaging and terminating business relationships	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: HRs performance affects selection EX BPs: The webpage Suppliers and Customers indicates: 'In order to build a responsible business model that involves Vale's entire supply chain, it is necessary to monitor the supplier's journey, from the registration stage to the end of the contract and demobilization. Before starting a commercial relationship with Vale, all our suppliers undergo a check called Due Diligence, where a reputational assessment is made based on public information and the scope of work to be performed. This verification process is part of Vale's Ethics &amp; Compliance Program. Furthermore, we request the submission of documents, such as a self-declaration form with information on Health, Safety and Environment, Human Rights and Integrity qualification for suppliers'. According to its Human Rights Policy a supplier is 'any supplier of goods and/or services of Vale or its subsidiaries'. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: HRs performance affects ongoing BPs relationships: The Principles of Conduct for Third Parties indicates: 'Vale may assess commitment to these Principles of Conduct by conducting routine evaluations and/or requesting supporting documentation. Failure to comply, or failure to correct non-complying situations may be grounds for Vale's termination of its business relationship with a third party'. The Principles of Conduct for Third Parties contains the Company's Human Rights expectations for extractive business partners. [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Works with EX BPs to meet HRs requirements: The webpage section Human Rights indicates: 'Vale seeks to ensure quality, transparency, and continuous improvement in its relationship with its suppliers by fostering sustainable and competitive businesses. Promotes knowledge sharing to build a more responsible and human rights conscious supply chain. With this objective, in 2022, 129 suppliers were engaged in training and participation in webinars on Human Rights themes. [...] If there is an impact or violation of human rights, appropriate measures are taken. Suppliers that present a higher degree of risk are engaged in different ways, including monitoring action plans to deal with deviations, meetings on Human Rights, and sharing of good practices'. The 2022 Integrated Report notes: 'In 2022, 432 suppliers in Brazil were classified as high risk in respect of human rights due to the characteristics of their contract with Vale. Of these suppliers, 118 had their risk level reduced based on the self-diagnostic questionnaire, 71 of them underwent training'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul>
B.1.8	Approach to engagement with affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes how workers and communities identified and engaged in the last two years: The Company discloses its different stakeholders on its website, including: Employees and Contractors; Security Teams; Customers, Suppliers and Partners; Local Communities; Indigenous Peoples and Traditional Communities; Human Rights Defenders. The 2021 Integrated Report remarks: 'Our materiality matrix was updated in 2021 according to the GRI Reporting Framework [...] The process involved the identification of priority topics [...] and prioritization of relevant themes by the company's main stakeholders. [...] Through consultation, we captured a total of 1,192 contributions, 910 from the internal public and 282 from the external public, considering the following stakeholder groups: 'Employees and contractors, [...] Local community, [...] Suppliers, [...] Traditional communities or indigenous peoples'. Also, 'The activities of Vale and the mining sector in general involve social impacts on several fronts, including risks related to the safety of communities surrounding the company's operations, conflicts arising from involuntary resettlement and land use, and conflicts with Indigenous Peoples and Traditional Communities, among others. Since 2020, we have adopted community relationship standards globally which compel us to identify, engage and monitor our relationship with these stakeholders. Vale currently has 2,092 local community relationships mapped, of which 1,304 are in Brazil, 80 in Canada, 355 in Mozambique, 163 in Malawi, 47 in Peru, 27 in Oman, 110 in Indonesia and 6 in Malaysia. To engage them, Vale seeks to establish structured spaces for dialogue to build our Community Relationship and Investment Plans'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Provides two examples of engagement with stakeholders: Regarding the communications with communities affected by the rupture of the dam in Brumadinho, the webpage section Human Rights indicates: 'Presently, the Community Relations team is composed of 11 professionals who work in Brumadinho. The dialogue takes place through field visits, meetings, and forums with the communities, in person and virtually, following all Covid-19 prevention protocols, and aims to bring transparency to the actions and explain how the reparation and compensation processes take place in the territories. The process of active listening in the communities also occurs through daily interaction, whether by teams of professionals dedicated exclusively to the relationship with the communities, or by technicians in water and agriculture, construction, and housing. The agendas are discussed in meetings with representatives of the impacted communities, prosecutors and other public authorities, and with the families of the victims and representatives of the Fire Department on a regular basis'. As for communication with Indigenous People, it also explains: 'Two senior anthropologists are responsible for the relationship with the Pataxó and Pataxó Hã Hã Hã, in São Joaquim de Bicas (MG). The performance follows the guidelines of the Brazilian National Indigenous Foundation (Funai) and the dialogue with them occurs through: Meetings in the village; Psychosocial care; Dedicated consultancy to oversee the Emergency Health Care Plan; Leaders' access to the Community Relations (RC) analyst's phone Monitoring of emergency payments; Monitoring the execution of the Term of Preliminary Agreement (TAP); Regular visits; Monitoring of the demands presented'. The 2022 Integrated Report continuous: 'Still within the scope of the Brumadinho reparation process, an Agreement for Collective Full Reparation and Individual Indemnities was signed with the Pataxó and Pataxó Hã-Hã-Hãe indigenous peoples of the Katurãma Village and of the Dona Eline Pataxó group, with negotiations with the Naô Xohã Village and the Gervásio and Antônia groups still pending'. The Report adds 'In 2022, we also celebrated 40 years of relations with the Xikrin do Cateté Indigenous People. We concluded an agreement, and to celebrate, I had the opportunity to visit the mother village of the Xikrin. [...] In Pará, Brazil, we carried out initiatives and agreements that made it possible to end legal disputes with the Xikrin do Cateté, Kayapó and Gavião (Parkatêjê, Kyikatêjê and Akrãtikatêjê) peoples, and strengthened Vale's relationships with these peoples. [...] The relationship with the Xikrin do Cateté people is intertwined with Vale's history in Carajás (Pará State). In 2022, the indigenous peoples and Vale marked the 40-year anniversary of this relationship at a celebration in the Xikrin do Cateté Indigenous Land, with the participation of Vale's CEO, Eduardo Bartolomeo, and vice presidents and directors of neighboring operations'. The Company provides a video of the agreement with the Cateté Xikrin people and Vale, where the CEO and members of the tribe talk about the agreement. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Analysis of stakeholder views on company's HRs issues</li> <li>• Not Met: Describes how stakeholders views influenced company's HRs approach</li> </ul>

## B.2 Human Rights Due Diligence (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying human rights risks and impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process of identifying risks in own operations: The webpage section Human Rights indicates: 'Since 2020, 100% of Vale's operations enter their risks into the company's global risk management system and work on action plans to address risk situations. [...] Using the Bowtie method, the risk situations are analyzed into a list of causes of the risk of Human Rights Violations, grouped within four critical Human Rights themes'. The webpage section Suppliers and Customers explains: 'Through the Bowtie method - a methodology used to control risks - the potential causes of risk of Human Rights Violations are analyzed, grouped into three critical issues: Degrading Working Conditions and Modern Slavery; Child Labor and Risk of Sexual Exploitation of Children and Adolescents and Violation of Human Rights in Labor Relations'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describes process for identifying risks in EX BPs: The webpage section Suppliers and Customers explains: ‘With the improvement of the Due Diligence process of Human Rights management in suppliers, Vale established a risk assessment process for suppliers that classifies the sensitivity of contracts and the vulnerability of the supplier based on its Human Rights management practices. [...] The integration of the results of these assessments is considered in the company’s management in a permanent process of continuous improvement focused on identifying, preventing, mitigating, and dealing with risks and negative impacts on human rights’. According to the Human Rights Policy, suppliers are ‘any supplier of goods and/or services of Vale or its subsidiaries’. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>] Score 2</li> <li>• Met: Describes global risk identification system incl. stakeholder consultation: The webpage section Human Rights indicates: ‘Vale’s risk management governance is based on the concept of lines of defence - and considers all topics related to Human Rights in the company’s activities, through risk identification, preparation and implementation of preventive and mitigating controls. These assessments are made by operations, by the Human Rights area, through internal or external due diligence, and by Audit. From 2019 onwards, with the company’s governance and risk management review, the Human Rights area started to act as a second line of defence and the related topics are dealt with in the Executive Committees for Operational Risks and Compliance Risks. First line of defence - the enterprises have the primary responsibility and directly manage the risks, in an integrated manner (identification, evaluation, treatment, prevention, and monitoring). Second line of defence - the specialist corporate areas are responsible for developing and maintaining risk management, internal controls and compliance; and for identifying and monitoring new/emerging risks, ensuring continuous improvement and compliance with the risk management model, laws, regulations and standards. Third line of defence - the Internal Audit and the Whistleblower channel are totally independent from management’. Also, ‘In addition to Human Rights risk assessments, Vale also carries out verification or due diligence processes as part of its Human Rights management. The due diligence includes, in a structured manner, the in-depth assessment of risks and impacts on Human Rights, primarily in all company operations and critical projects; [...] The process is carried out by a specialized and independent company which verifies documents and conditions in loco and conducts interviews and focus groups with employees and contractors, community members and Government representatives, academia, and civil society. The results of the evaluation are then shared with Vale’s Human Rights area and with each operation or project evaluated’. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Describes how risk identification system is triggered by new circumstances: The webpage Suppliers and Customers indicates: ‘In order to build a responsible business model that involves Vale’s entire supply chain, it is necessary to monitor the supplier’s journey, from the registration stage to the end of the contract and demobilization. Before starting a commercial relationship with Vale, all our suppliers undergo a check called Due Diligence, where a reputational assessment is made based on public information and the scope of work to be performed. This verification process is part of Vale’s Ethics &amp; Compliance Program. Furthermore, we request the submission of documents, such as a self-declaration form with information on Health, Safety and Environment, Human Rights and Integrity qualification for suppliers’. However, this seems to focus on individual supplier screening &amp; monitoring. The webpage section Human Rights indicates: ‘In 2022, engagement on ESG practices began with the main operational joint ventures not operated (NOJVs) by Vale, where maturity assessments of practices and multidisciplinary benchmark forums were carried out with Vale and the companies. In the Social aspect, for example, a human rights risk violation assessment was carried out in the companies in which Vale has a stake greater than 10%. Given the nature of the business and the sector in which the assessed NOJVs operate, Vale considers that the existence of human rights risks is inherent to all these companies. The NOJVs responded regarding the Human Rights management practices in their activities, of which 36% indicated to have mitigating measures address violation of human rights risks’. However, this subindicator looks for evidence of how its process to identify human rights risks and impacts are triggered by new country operations, new relationships, new human rights challenges or conflict affecting particular locations. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Describes risks identified in relation to new circumstances</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing human rights risks and impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes assessment process and discloses salient HRs risks: Regarding its Risks Assessed, the webpage section Human Rights indicates: 'The risk themes assessed are: Degrading Work Conditions and Modern Slavery: impact on employees, contractors and/or suppliers due to disrespect for the rights of immigrant workers, excessive working hours, infrastructure and accommodation conditions, illegal wage deductions, document retention, illegal withholding of compensation, vacation and/or leave, as well as restriction of mobility outside the operational area after work shift. Child Labor and Child Sexual Exploitation: impact on children and adolescents resulting from hiring workers under the age of 18 (or below the age required by law) for activities that involve risks to their health and safety or resulting from exploitation of children and adolescents in the vicinity of Vale operations by its employees, contractors and/or suppliers. Human Rights Violations in Labor Relations: impacts on employees, contractors, and suppliers, resulting from inappropriate conduct, discrimination and harassment, inadequate ergonomic working conditions or infrastructure necessary to perform the work (including PPE, places for meals and rest, restrooms, among others); the absence or failure of grievance mechanisms, the absence of training, inadequate compensation; impediment to free association and collective bargaining and/or the failure to monitor certain labor or social security obligations. Large-Scale Human Rights Violations: impacts on people and the environment due to major accidents such as explosion and/or fire in operational structures; leakage or breach of dams, ore, oil and/or gas pipelines; railroad, air, bus / automobile, and ship accidents'. Also, 'Currently, the due diligence process is part of Vale's Human Rights Roadmap and will be carried out in all critical operations and projects within 3 to 5 years, with 3-year cycles, corresponding to approximately 15 due diligence per year. Due diligence is prioritized according to territorial clusters, allowing the process to be optimized by recognizing similar inherent risks and logistical gains'. The 2021 Integrated Report adds: 'In these assessments, we gauge the probability of a risk's occurrence and the severity of its impact'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Describes how process applies to EX BPs: The webpage section Human Rights indicates: 'A macroprocess which consists of assessing potential risks and impacts of mineral research activities, operations, projects, and joint ventures. Consists of an ongoing process focused on identifying, preventing, mitigating, and treating risks and negative impacts on human rights with a focus on people - employees and/or contractors and community members - including indigenous peoples and traditional communities'. Also, 'Currently, the due diligence process is part of Vale's Human Rights Roadmap and will be carried out in all critical operations and projects within 3 to 5 years, with 3-year cycles, corresponding to approximately 15 due diligence per year. Due diligence is prioritized according to territorial clusters, allowing the process to be optimized by recognizing similar inherent risks and logistical gains'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Public disclosure of results of HRs risk assessment: The webpage section Human Rights indicates: 'The relevant Human Rights violation risks identified by Vale in the relationship with contractors and suppliers include: Modern slavery - degrading working conditions, working hours above what is permitted by law, debt bondage, physical and emotional coercion, document retention, among others; Child labor; Child sexual exploitation; Human trafficking; Discrimination and harassment'. The 2022 Integrated Report adds: 'In 2022, 10 human rights due diligences were performed, contemplating a total of 22 operations evaluated by a third party specialized in human rights, in operations in the Southeast and South corridors1. This concluded the external human rights due diligence process in 100% of Vale's active operations in Brazil. The main results indicated salient issues related to impacts around working conditions, harassment, discrimination, and relations with communities. There were no incidents of child or forced labor occurring at or involving Vales's operations and suppliers in the most recent due diligence'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how assessment involved affected stakeholders</li> </ul>
B.2.3	Integrating and acting on human rights risks and	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes system to prevent, mitigate and remediate HRs issues: The webpage section Human Rights indicates that the risk and impact assessment 'Consists of an ongoing process focused on identifying, preventing, mitigating, and</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
	impact assessments		<p>treating risks and negative impacts on human rights with a focus on people - employees and/or contractors and community members - including indigenous peoples and traditional communities. The identification of risks promotes the elaboration and implementation of action plans with preventive and mitigating controls complementary to those already adopted, in order to reduce the exposure of people and risks to the company. Risk mitigation also takes place through a continuous process of engagement with communities and through partnerships with Childhood Brasil and InPacto with preventive and mitigating actions'. The Human Rights Policy adds: 'Vale considers its grievance mechanisms to be fundamental tools for the prevention and remediation of potential human rights impacts and violations'. The Human Rights Guide has a series of human rights issues where it explains for each of them the Company's take of them and what the Company expects both employees and contractors to do. For instance, in the case of Indigenous Peoples and Traditional Communities: 'We expect that our workforce will respect the rights, cultures, customs, heritage, and livelihoods of Indigenous Peoples and Traditional Communities. We seek to promote the development of Indigenous Peoples and their communities. We recognize the right of access to land and water and the value that these natural resources represent; we promote free, prior and informed consultation and consent and undertake assessments of potential human rights risks and impacts. We reject discrimination on the basis of local culture, heritage and other qualities that define Indigenous Peoples and Traditional Communities. We have incorporated issues regarding Indigenous Peoples and Traditional Communities across our internal processes to gauge project risks and feasibility and to help effectively consider their rights and interests in decision-making'. As for involuntary resettlement: 'We expect that when we must resettle individuals, families, and communities, we will comply with local regulations and seek to align with the IFC's Performance Standard 5. This is to mitigate the risks of human rights violations, seek to re-establish standards of living at levels equivalent to or higher than those before the involuntary displacement, and observe lessons learned and share best practices across our business. We also expect that those affected will be treated with the utmost respect, consulted early in the process, and engaged on potential alternative locations. We seek to monitor resettlement activities to be confident that they have been carried out consistent with our standards'. It has similar guidance for harassment, discrimination, freedom of association and collective bargaining, human rights defenders, child labour and child sexual exploitation and modern slavery. [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</p> <ul style="list-style-type: none"> <li>• Met: Describes how global system applies to EX BPs: The webpage section Suppliers and Customers indicates: 'The themes of Environment, Health and Safety and Human Rights permeate our supplier journey with regulations and processes for monitoring, mitigating and eliminating risks, being included in our management system, the VPS (Vale Production System). [...] The integration of the results of these assessments is considered in the company's management in a permanent process of continuous improvement focused on identifying, preventing, mitigating, and dealing with risks and negative impacts on human rights'. The Human Rights Guide has a series of human rights issues where it explains for each of them the Company's take of them and what the Company expects both employees and contractors to do. It has contractor's guidance for harassment, human rights defenders, child labour and child sexual exploitation and modern slavery. In the case of discrimination, freedom of association and collective bargaining the Company indicates it expects contractors to raise their concerns. For instance, in the case of Protecting Children from Sexual Exploitation and Child Labor, it indicates: 'We expect that all employees, contractors and suppliers will follow our policies and procedures, and that customers and partners take similar steps, to prevent, identify, report and address potential issues of sexual exploitation and forced labor of children. We expect that everybody who is associated with Vale will look for signs of child exploitation in our operations, supply chains, and communities, and will report their suspicions of child exploitation through the pathways described in the Grievance Mechanism section of this Guide. As spelled out in our Code of Conduct and Global Human Rights Policy, we expect that our suppliers will not use child labor or take part in the sexual exploitation of children and prohibit any of their suppliers or subcontractors from engaging in such activity'. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Example of actions decided on at least 1 salient HRs issue: Regarding accidents on railways operated by Vale, the webpage section Human Rights indicates: 'The rate of these occurrences has been decreasing over the last few years and is improved when compared to the sector's average. Even so, it is still</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>necessary to maintain the awareness-raising work in the neighboring communities, especially along the railways. At Carajás Railway (EFC) and Vitória-Minas Railway (EFVM), themes related to mobility and risky conduct have prompted Vale's projects to reduce impacts on communities, as well as having internal norms and documents for such occurrences. When accidents do occur, they are monitored by Vale's Accident Prevention and Investigation Commissions'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets all requirements under score 1</li> <li>• Not Met: Describes how stakeholders involved in decisions about actions taken: The webpage section Human Rights indicates: 'Risk mitigation also takes place through a continuous process of engagement with communities and through partnerships with Childhood Brasil and InPacto with preventive and mitigating actions'. It adds: 'The process [human rights due diligence] is carried out by a specialized and independent company which verifies documents and conditions in loco and conducts interviews and focus groups with employees and contractors, community members and Government representatives, academia, and civil society. The results of the evaluation are then shared with Vale's Human Rights area and with each operation or project evaluated'. However, it is not clear if the community engagement, as well as interviews and focus groups, involves decisions about the actions to take in response to its salient human rights issues. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
B.2.4	Tracking the effectiveness of actions to respond to human rights risks and impacts	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes system for evaluation effectiveness of actions: According to the webpage section Human Rights, the risk and impact assessment 'The integration of the results of these evaluations is considered in the company's management in a permanent process of continuous improvement focused on identifying, preventing, mitigating and treating risks and negative impacts on human rights. Controls are monitored in order to analyze their effectiveness both in Vale's activities and in its relations with suppliers and business partners'. However, no description found of the actual process for tracking or monitoring the actions taken in response to human rights risks and impacts and for evaluating whether the actions have been effective or have missed key issues or not produced the desired results. The webpage section Impact to Communities adds: 'Vale, recognizing the Community's perception of its operations' impacts, adopted in its performance management model the reporting of social indicators related to grievances'. The Company discloses graphs' models and tools used by all management levels of the Company to monitor grievances'. However, this subindicator focuses on the system for tracking or monitoring the actions taken in response to human rights risks and impacts [identifies and assessed as a result of a human rights risk assessment rather than grievances raised through the grievance channel] and for evaluating these actions. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Impact to Communities_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Example of lessons learned from evaluation effectiveness of actions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Involves stakeholders in evaluation effectiveness of actions: Regarding Community Relations Plans, the webpage section Impact to Communities indicates: 'In order to engage communities, Vale aims at establishing structured dialogue spaces for the construction of Community Relations Plans. The plans have as their principle the social participation and mobilization in the definition and prioritization of social actions to be implemented in the communities. Moreover, the structuring of the plan aims at sharing responsibilities among company, community and other social players for local development. Relationship Plans are monitored by community relations teams that have a systematic routine in participatory meetings to monitor the performance of actions, assessing adherence and effectiveness of results together with the community. This monitoring is recorded in the Stakeholders, Demands and Issues System (SDI)'. However, it is not clear that these participatory meetings happen in the context of evaluation of whether the actions taken [of a due diligence process, to address Human Rights risks and impacts] have been effective. No further evidence found. [Impact to Communities_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
B.2.5	Communicating on human rights impacts	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provides two examples of comms with stakeholders: Regarding the communications with communities affected by the rupture of the dam in Brumadinho, the webpage section Human Rights indicates: 'Presently, the</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Community Relations team is composed of 11 professionals who work in Brumadinho. The dialogue takes place through field visits, meetings, and forums with the communities, in person and virtually, following all Covid-19 prevention protocols, and aims to bring transparency to the actions and explain how the reparation and compensation processes take place in the territories. The process of active listening in the communities also occurs through daily interaction, whether by teams of professionals dedicated exclusively to the relationship with the communities, or by technicians in water and agriculture, construction, and housing. The agendas are discussed in meetings with representatives of the impacted communities, prosecutors and other public authorities, and with the families of the victims and representatives of the Fire Department on a regular basis'. Another example of communication on Human Rights impacts is found in the 2021 Integration Report: 'The Piquiá de Baixo community, located in the Açailândia Chemical Industrial Park in the state of Maranhão, claims that it is impacted by pollution caused by steel mills installed at the site over 30 years ago. Vale does not own any pig iron mills in Açailândia, but it acts as the main supplier of Iron Ore used to produce steel. In line with its social performance guidelines, the company has supported initiatives such as preparing a socioeconomic diagnosis of the families located in the region in question, and formalizing a partnership between the Vale Foundation and the Piquiá Community Association with the Caixa Econômica Federal Bank, to help construct 312 houses to create a new neighbourhood for the community'. [Human Rights_web, N/A: <a href="#">vale.com</a>] &amp; [Integrated Report 2021, 06/05/2022: <a href="#">vale.com</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes challenges to effective comms and how it is working to address them</li> </ul>

### C. Remedies and Grievance Mechanisms (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance mechanism(s) for workers	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all workers: The webpage section Whistleblower Channel indicates: 'Vale's Whistleblower Channel can be used by anyone, inside or outside the company, who wants to report a suspicion or violation of our Code of Conduct'. The Code of Conduct contains the Company's Human Rights commitments. [Whistleblower Channel_web, N/A: <a href="#">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and workers made aware: The webpage section Human Rights indicates: 'As a deployment of the Global Human Rights Policy, since 2009 Vale has maintained a robust front of training and dissemination of Human Rights content for its employees'. The Policy makes reference to the grievance mechanism. Although the Channel is available in Portuguese and English, it is not clear it is available in all appropriate languages. [Human Rights Policy, 26/11/2019: <a href="#">vale.com</a>]</li> <li>• Met: Describes how workers in EX BPs access grievance mechanism: The Principles of Conduct for Third Parties indicates: 'Vale's Whistleblower Channel is available for anyone – employees and external third parties – to report any concerns about ethical misconduct or failure to apply these Principles of Conduct'. [Principles of Conduct for Third Parties, N/A: <a href="#">vale.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs: See above. The Human Rights Guide indicates: 'we have created a Whistleblower Channel that can be used anonymously by employees, contractors, community members, suppliers, customers or anyone else'. However, this subindicator looks for evidence that the Company expects business partners to convey the same expectation on access to grievance mechanism to their own suppliers [either through the business partners' own mechanism to raise complaints or the Company expects its business partners to require their suppliers to establish a mechanism for their workers to raise such complaints or concerns]. [Principles of Conduct for Third Parties, N/A: <a href="#">vale.com</a>] &amp; [Human Rights Guide, N/A: <a href="#">vale.com</a>]</li> </ul>
C.2	Grievance mechanism(s) for external individuals and communities	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Grievance mechanism accessible to all external individuals and communities: The webpage section Whistleblower Channel indicates: 'Vale's Whistleblower Channel can be used by anyone, inside or outside the company, who wants to report a suspicion or violation of our Code of Conduct'. The Code of Conduct contains the Company's Human Rights commitments. [Whistleblower Channel_web, N/A: <a href="#">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Grievance mechanism available in appropriate languages and affected stakeholders made aware: The Channel is available in Portuguese and English, however, it is not clear it is available in local languages. Moreover, it is not clear how affected external stakeholders at its own operations are aware of it. [Whistleblower Channel_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Describes how external individuals/communities access grievance mechanism: The Whistleblower Channel indicates: 'Vale's Whistleblower Channel can be used by anyone, inside or outside the company, who wants to report a suspicion or violation of our Code of Conduct'. The Human Rights Guide adds: 'We encourage individuals who believe that we or any of our employees, contractors, suppliers or customers have not followed our standards to lodge their concerns through one of the reporting pathways identified in the Grievance Mechanism section of this Guide. [...] There are multiple pathways through which community members, employees, contractors, suppliers, customers and others can raise grievances and concerns, summarized in the box below'. [Whistleblower Channel_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Expects EX BPs to convey expectation to their BPs</li> </ul>
C.3	Users are involved in the design and performance of the mechanism(s)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on design and performance: The Human Rights Policy indicates: 'Vale also provides community relations professionals whose objective is to strengthen dialogue and engagement'. However, no description found of how it engages with potential or actual users on the design and performance of the mechanism(s) (such as on scope, methods of raising grievances, etc). [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Provides user engagement examples (at least two) on design and performance</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes how users engaged on improvement of mechanism</li> <li>• Not Met: Provides user engagement examples (at least two) on improvement</li> </ul>
C.4	Procedures related to the mechanism(s) are equitable, publicly available and explained	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes procedure and timescales for managing complaints or concerns: The webpage section Suppliers and Customers indicates: 'The handling of demands and critical internal issues that may impact or violate Human Rights are addressed at different levels according to their complexity'. However, no description of the procedures for managing the complaints or concerns, including timescales for addressing the complaints or concerns and for informing the complainant found. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Describes technical, financial, advisory support to enable equal access</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describe types of outcome to complainant through use of mechanism</li> <li>• Not Met: Describes escalation to senior levels / independent adjudicators: The webpage section Suppliers and Customers indicates: 'The handling of demands and critical internal issues that may impact or violate Human Rights are addressed at different levels according to their complexity. When the matter cannot be resolved locally, it is submitted to higher levels, including regional, business, and national management committees and even the Executive Board or the Board of Directors and their committees'. However, it is not clear how complaints or concerns for workers and all external individuals and communities may be escalated to more senior levels or independent third party adjudicators or mediators to challenge the process or outcome at the complainant's discretion. [Suppliers and customers_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
C.5	Prohibition of retaliation for raising complaints or concerns	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public statement prohibiting retaliation against workers/stakeholders: The Whistleblower Channel indicates: 'The information is treated with secrecy and confidentiality. Under no circumstances will there be intimidation or retaliation against whistleblowers'. [Whistleblower Channel_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Describes practical measures to prevent retaliation: The Human Rights Guide indicates: 'While most internal concerns can and should be resolved through dialogue with managers or supervisors, or local human resources personnel, we have created a Whistleblower Channel that can be used anonymously by employees, contractors, community members, suppliers, customers or anyone else'. [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Specifies no legal action, firing or violence: The Human Rights Guide indicates: 'We expect that issues lodged through our grievance processes will be taken seriously, and that solutions will be sought through constructive and engaged dialogue. We do not tolerate retaliation of any kind toward individuals who report grievances to Vale in good faith'. The 2022 Form 20F notes: 'Any breaches of our Code of Conduct, policies and standards can be reported by anyone, including employees, contractors, suppliers, members of affected communities and other stakeholders, via our Whistleblower Channel'. However, no further evidence found explicitly indicating that it will not retaliate against workers and stakeholders through the specific ways required by this subindicator. [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Form 20F 2022, 2023: <a href="http://api.mziq.com">api.mziq.com</a>]</li> <li>• Met: Expects EX BPs to prohibit retaliation against workers/stakeholders: The Principles of Conduct for Third Parties indicates: 'Under no circumstances will there be a breach of confidentiality, intimidation or retaliation against whistleblowers'. The Code of Conduct adds: 'Under no circumstances will there be a breach of confidentiality, intimidation or retaliation against whistleblowers'. [Principles of Conduct for Third Parties, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Code of Conduct, 12/11/2020: <a href="http://vale.com">vale.com</a>]</li> </ul>
C.6	Company involvement with state-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Complainants not asked to waive legal rights</li> <li>• Not Met: Does not require confidentiality provisions</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Cooperates with state based non judicial mechanisms: The webpage section Human Rights indicates: 'These grievance mechanisms and Whistleblower channel (which may be anonymous), however, do not prevent access to other judicial or non-judicial mechanisms'. However, it is not clear the process by which it cooperates with state-based non-judicial grievance mechanism on complaints brought against it. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Example of issue resolved (if applicable)</li> </ul>
C.7	Remedying adverse impacts	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes approach taken to remedy adverse HRs impacts: The webpage section Human Rights indicates: 'The rupture of the B1 Dam at Córrego do Feijão in Brumadinho, four years after the collapse of the Fundão Dam, in Mariana, led the company to review the governance and health and safety processes, the operational excellence, the operational risk assessment, the remediation process and the Human Rights governance and management, among others'. Also, 'An important aspect of the reparation process was the expansion of grievance spaces in the communities, social organizations, and neighborhood associations. In February 2021, Vale, the State of Minas Gerais, the Public Defender's Office of the State of Minas Gerais and the Federal and State Public Prosecutors' Offices entered into the Global Settlement for Integral Reparation of Brumadinho with an economic value of R\$ 37.7 billion, which includes socio-economic and socio-environmental reparation projects. On the socioeconomic side, the agreement includes on demand projects and income transfer programs for the affected communities and projects for Brumadinho and the municipalities of the Paraopeba Basin. An important aspect of the reparation process was the expansion of grievance spaces in the communities, social organizations, and neighborhood associations. The participatory construction of projects together with the communities seeks to listen to them and incorporate their expectations into the various reparation initiatives that have been structured and implemented in the territory'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Describes changes to systems, processes and practices to prevent future impacts: The webpage section Human Rights indicates: 'The rupture of the B1 Dam at Córrego do Feijão in Brumadinho, four years after the collapse of the Fundão Dam, in Mariana, led the company to review the governance and health and safety processes, the operational excellence, the operational risk assessment, the remediation process and the Human Rights governance and management, among others'. Also, 'An important aspect of the reparation process was the expansion of grievance spaces in the communities, social organizations, and neighborhood associations'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Describes approach to monitoring/implementing agreed remedy: In the context of Brumadinho, the webpage section Human Rights indicates: 'The participatory construction of projects together with the communities seeks to listen to them and incorporate their expectations into the various reparation</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>initiatives that have been structured and implemented in the territory'. However, although the Company engages with the families, it is not clear its approach to monitoring implementation of the agreed remedy. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to learning from incidents if no adverse impacts identified</li> </ul>
C.8	Communication on the effectiveness of grievance mechanism(s) and incorporating lessons learned	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Discloses number of grievances filed, addressed or resolved and outcomes achieved: The webpage section Human Rights indicates: 'The main grievances received in 2021 were related to social projects, road accessibility, and involuntary removal'. The 2021 Ethics and Compliance Report discloses the whistleblower channel percentages for 2021 according to how reports were received, report outcomes, percentage of accurate and confirmed reports, complaints forwarded for treatment, complaint types both internal and external or third-parties. 25.7% of accurate reports were occupational health and safety related. Regarding external complaint types, 26% were related to labour issues. However, although the Company discloses percentages of reports related to labour issues among its external or third-parties employees, it is not clear the which are the absolute figures (number of grievances). The 2022 Integrated Report notes: 'In 2022, 11,0851 community complaints and requests were registered, of which 99.4% were answered and 84.2% attended to. Of this total, 43.6% were complaints related to accesses, highways and roads, dust, and weeding and pruning'. It adds that the total community complaints and requests in 2022 were 11.085. Although it breaks these figures into different world regions, it is not clear the data for human rights related grievances. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Ethics &amp; Compliance Program Report 2021, 2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Example of how lessons from mechanism improved HRs management system</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes process to evaluate mechanism and changes made as a result</li> <li>• Not Met: Describes procedures to address delays of outcomes agreed with stakeholders</li> </ul>

#### D. Performance: Company Human Rights Practices (25% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Pays living wage or sets time-bound target: The 2022 Integrated Report notes: 'Vale has voluntary partnerships with institutions working on human rights. As part of the programs developed in 2022, with the support of BSR, the company evaluated the level of compensation of all Vale's direct employees. The result showed that 100% of employees receive a living wage, as per global benchmarks of 'living wage' and according to BSR's methodology. [...] Vale pays 100% of its employees a living wage, aimed at establishing compensation standards necessary for the well-being of employees and their families'. A footnote explains: 'To pay a living wage means providing the means for an individual/family to purchase the goods and services necessary to attain a basic standard of living (food, housing, education, transportation, leisure, culture, etc.) aligned with the social and cultural expectations of the community and/or country in which the individual is located'. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Not Met: Describes how living wage determined: The 2021 Integrated Report indicates: 'In Brazil, 46 Collective Labour Agreements were signed, with 13 trade unions, most of which were for benefits, salary readjustment, working hours and profit sharing'. Although the Company indicates that in the context of Brazil, collective agreements help to define salary readjustments, it is not clear how it determines a living wage for the regions where it operates, beyond Brazil, including involvement of relevant trade unions (or equivalent worker bodies where the right to freedom of association and collective bargaining is restricted under law). [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Achieved paying living wage: As indicated above: 'Vale pays 100% of its employees a living wage, aimed at establishing compensation standards necessary for the well-being of employees and their families'. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Not Met: Reviews definition living wage with unions</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Member of EITI: It indicates: 'Vale supports the Extractive Industry Transparency Initiative (EITI) through its membership in the International Council of Mining and Metals (ICMM)'. [EITI_web, N/A: <a href="http://eiti.org">eiti.org</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Reports taxes and revenue by country: Regarding the Tax Transparency Report, the webpage section Ethics, Compliance and Tax Transparency indicates: 'This report details the taxes and royalties paid in Brazil, where most of our operations are located, and those paid globally to all government levels and by project. We highlight the jurisdictions in which we have our mining operations, as our tax contribution plays a key role in supporting the communities, people and governments of the regions where we operate'. The Report discloses data on tax by continent and by country. However, it is not clear it discloses information on its revenue payments. Both reports on taxes and revenue payments should cover all countries it operates. [Ethics Compliance and Tax Transparency_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [Tax Transparency Report 2022, 2023: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Steps taken to promote transparency in non EITI countries</li> <li>• Not Met: Provides example of contracts for terms of exploitation for countries without disclosure requirements</li> </ul>
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Measures to prohibit violence/retaliation against workers for joining trade union: The 2022 Integrated Report notes: 'Our actions are guided by Vale's Code of Conduct, on local labor legislation, on the eight Fundamental Conventions of the International Labor Organization (ILO) and on the guidelines of the Organization for Economic Cooperation and Development (OECD). In the countries where we operate, when local legislation restricts this right, we strive to maintain dialogue with equivalent employee organizations. Considering all the countries where Vale operates, 94% of own employees are covered by collective agreements'. High union recognition, in this case 94% percent, is taken as a proxy for not intimidating or retaliating. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Met: Discloses % of total direct operations covered by CB agreements: The 2022 Integrated Report notes: 'Considering all the countries where Vale operates, 94% of own employees are covered by collective agreements'. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Meets both requirements under score 1: See above.</li> </ul>
D.3.4	Health and safety: Fatalities, lost days, injury, occupational disease rates (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes process to identify H&amp;S risks and impacts: The 2021 Integrated Report indicates: 'Vale's occupational safety management comprises a series of initiatives ranging from mapping and adopting measures for risk mitigation to protocols and requirements for certain activities. [...] They include: Hazard Identification and Risk Analysis (HIRA): a structured process that identifies hazards and analyzes risks, details the causes of the scenarios for process accidents, the existing protections and the criticality of the risks in the people and environment dimensions - during its first cycle (2019 to 2021). In the second cycle (2022 to 2025), critical and very critical operational scenarios with potential business interruption will also be considered. This process also aims to continuously improve the integrity of Vale's critical assets'. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Discloses injury rate or lost days for last reporting period: The 2021 Integrated Report indicates that the total accident rate in 2021 was 1.41 and the high-potential recordable injuries was 29. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Met: Discloses fatalities for last reporting period: The 2021 Integrated Report indicates that the number of fatalities in 2021 was 2. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Discloses occupational disease rate for last reporting period: The 2022 Integrated Report discloses the number of exposures above the Occupational Exposure Limit for 2022: 13.0. It further explains: 'The number of exposures is calculated as the sum of the number of exposures above the Occupational Exposure Limit (OEL) that occurred at Vale Global during the year'. However, this subindicator looks for quantitative information on occupational disease rates for the last reporting period. [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Set targets for H&amp;S performance: The 2022 Integrated Report notes: 'Health and safety goals: Zero fatalities. Reduce the number of exposures to health hazards in the workplace by 50% by 2025. In 2019, we had 23,000 occupational health and safety exposures and ended 2022 with 13,000 - a reduction of 43%. The goal is to reach 11,500 exposures by 2025'. However, it is not clear the targets set for injury rates or lost days (or near miss frequency rate) and occupational disease rates [beyond occupational health and safety exposures] for the last reporting period. [2022 Integrated Report, 2023: <a href="https://www.vale.com">vale.com</a> ]</li> <li>• Met: Met targets or explains why not or actions to improve H&amp;S management systems: The 2021 Integrated Report indicates different initiatives to promote the physical and emotional health and well-being of employees: 'The Technical Standards of Asset Integrity (PNR): standards applicable to the asset's life cycle (engineering, construction, commissioning, operation and decommissioning) that define technical requirements to prevent and mitigate undesired events based on risk scenarios. Metrics for process accidents: guidelines for capturing and investigating process accidents (process safety) were standardized – events involving Vale's productive processes that result in uncontrolled release of energy and/ or materials (toxic or not). In 2021 the pyramid of process events was created. When fully implemented, process accidents will become an important indicator in Vale's safety strategy. Safe Work Permit (SWP): process that assesses risks of routine and non-routine tasks considered critical or very critical. The process starts in the maintenance planning stage, continues with a discussion at the activity site, goes through the execution of the activity and ends with the delivery of the service and closing of the maintenance order. Critical Activity Requirements (RAC): internal compliance standards for the execution of critical and very critical tasks. They are critical requirements for the elimination of fatal accidents in these activities. Exposure to health risks: global corporate guidelines for the management and development of monitoring and control programs for employee occupational health, which includes quantitative objectives for the reduction of health risk scenarios in the medium term'. Also: 'As part of a broad governance review, we implemented the Safety and Operational Excellence Executive Board in 2019, which acts as the second line of defence in managing safety and risks contemplated in our management model, the Vale's integrated management system (VPS). The Office also establishes policies and technical guidelines with the aim to ensure occupational health and safety aligned with ISO 45001 (Occupational Health and Safety Management System) standards'. [Integrated Report 2021, 06/05/2022: <a href="https://www.vale.com">vale.com</a>]</li> </ul>
D.3.5	Indigenous peoples' rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Process to identify/recognise indigenous rights holders: Regarding Indigenous Peoples and quilombola communities it indicates: 'Still within the scope of the Brumadinho reparation process, an Agreement for Collective Full Reparation and Individual Indemnities was signed with the Pataxó and Pataxó Hã-Hã-Hãe indigenous peoples of the Katurãma Village and of the Dona Eline Pataxó group, with negotiations with the Naô Xohã Village and the Gervásio and Antônia groups still pending. [...] With regard to the four quilombola communities affected by the Brumadinho dam failure, the Quilombola Component Studies for the Assessment of Impacts and discussions with the communities were initiated to establish reparation measures'. As for Indigenous peoples and traditional communities: 'The failure of the Fundão dam has impacted the Krenak indigenous people, in the municipality of Aimorés (in Minas Gerais), and the Tupiniquim and Guarani indigenous people, located in the Comboios, Caieiras Velhas II and Tupiniquim Indigenous Lands in the municipality of Aracruz (in Espírito Santo state). The quilombola community of Degredo, located in the municipality of Linhares, was also impacted after fishing was restricted along part of the coast of Espírito Santo. In 2021, comprehensive reparation agreements were signed [...]. In 2022, a negotiating forum was set up to settle disputes in the reparation process and advance the PBAI agenda. Also, during 2022, the Krenak people established their own technical advisory entity, which is in the final stages of registration and formalization. Vale hopes to begin a dialogue to negotiate a full and definitive reparation agreement with the Krenak people during 2023'. However, this subindicator looks for a description of the process by which the Company identifies and recognises indigenous rights holders with whom to engage. [2022 Integrated Report, 2023: <a href="https://www.vale.com">vale.com</a> ]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Not Met: Describes how indigenous communities are engaged during assessment: Regarding its relationship with Indigenous Peoples, the 2021 Human Rights Guide indicates: 'we promote free, prior and informed consultation and consent and undertake assessments of potential human rights risks and impacts'. However, it is not clear it engages directly with indigenous community in carrying out the assessment. The 2021 Integrated Report indicates: 'Currently, the company has relationships with 29 Indigenous Peoples, 13 in Brazil and 16 in other countries, in addition to 57 Traditional Communities in Brazil. The team responsible for conducting this relationship is made up of professionals dedicated to each people/community who have multidisciplinary backgrounds and consistent experience in Indigenous relations. [...] In addition, Vale qualifies the employees and suppliers who interface with these populations in areas impacted by its operations, to maintain consistency in our dealings in the various territories and to hold a qualified dialogue with these stakeholders'. Moreover, the webpage section Indigenous Peoples and Traditional Communities remarks: 'The relationship with Indigenous Peoples and Traditional Communities is conducted by anthropologists and professionals with indigenous experience, dedicated to acting in the territories and to the permanent relationship with these populations'. In the context of Indigenous peoples and traditional communities, the 2022 Integrated Report notes: 'Our team, which includes more than 20 specialists in issues affecting traditional peoples, receives further external support from indigenous and anthropological consultancies'. However, although the Company indicates that it engages directly with indigenous communities and how, and that it has a specialist team, it is not clear it is for carrying out the impact assessment process. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>] &amp; [Indigenous Peoples and Traditional Community, N/A: <a href="http://vale.com">vale.com</a>] Score 2</li> <li>• Not Met: Commitment to FPIC: The 2022 Integrated Report notes: 'As part of Vale's Social Ambition of collaborating with the indigenous communities neighboring all of our operations in the preparation and execution of their plans in pursuit of the rights provided for in the UN Declaration of the Rights of Indigenous Peoples (UNDRIP), the Kayapó are the first people to hold a formalized commitment related to the development of a Consultation Protocol'. It adds on a footnote explaining the Consultation Protocol: 'Community consultation instrument relative to the decision-making process (free, prior, informed consent – FPIC)'. Moreover, the webpage section Indigenous Peoples and Traditional Community states: 'The guidelines for Vale's relationship with Indigenous Peoples are: [...] Encourage the active participation of Indigenous Peoples and Traditional Communities in resolving issues related to Vale's activities, which generate risks and/or impacts on these populations, allowing free, prior and informed consultation and consent, as well as monitoring compliance with measures of control and/or mitigation'. However, it is not clear it commits to free prior and informed consent. The Human Rights Guide adds: 'We are committed to respecting the culture of Indigenous Peoples and Traditional Communities and seeking to follow free, prior and informed consultations and consent procedures'. However, although the Company indicates it 'seeks' follow FPIC procedures, it is not clear it actually is committed to it. [Indigenous Peoples and Traditional Community, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Met: Recent example of obtaining FPIC or not pursuing indigenous people's land/resources: The 2021 Integrated Report indicates: 'In 2021, Vale gave up all mining processes on Indigenous lands in Brazil, as a result of the understanding that mining on Indigenous lands can only be carried out with the free, prior and informed consent (FPIC) of the Indigenous people themselves and legislation that regulates this activity'. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> </ul>
D.3.6	Land rights: Land acquisition (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to identifying land tenure rights holders and negotiating compensation</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Describes approach to compensation including valuation</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• Met: Describes steps to meet IFC PS 5 in state deals: Regarding involuntary resettlement, the Human Rights Guides indicates: 'We expect that when we must resettle individuals, families, and communities, we will comply with local regulations and seek to align with the IFC's Performance Standard 5. This is to mitigate the risks of human rights violations, seek to re-establish standards of living at levels equivalent to or higher than those before the involuntary displacement, and observe lessons learned and share best practices across our business. We also expect that those affected will be treated with the utmost respect, consulted early in the process, and engaged on potential alternative locations. We seek to monitor resettlement activities to be confident that they have been carried out consistent with our standards'. [Human Rights Guide, N/A: <a href="http://vale.com">vale.com</a>]</li> </ul>
D.3.7	Security (in own extractive operations, which includes JVs)	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Describes security implementation (incl. VPs or ICOC) and provides an example: The webpage section Human Rights indicates: 'Vale is a signatory to and applies the Voluntary Principles on Security and Human Rights (VPSHR)'. It also reports: 'In the assessments of potential risks to security requirements, those related to potential human rights violations are included. The management of security teams considers the following aspects: Select employees and closely follow their activities, considering previous experience, technical capacity and emotional stability; To constantly train the professionals to perform their activities following the principles of human rights and the proportional and progressive use of force if necessary; Seek peaceful solutions that ensure the physical integrity of people, as well as the preservation of assets, information, and the maintenance of the production process; Work according to the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officers; Respect the United Nations Code of Conduct on Law Enforcement by Officials; Treat vulnerable people and groups with special care, especially when involving women and children'. Similar explanation is found in the Human Rights Policy. The 2022 Integrated Report notes: 'For corporate teams responsible for Security, 223 of our own employees (100%) and 2,710 contractors (97%) were trained in human rights'. [Human Rights_web, N/A: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> <li>• Not Met: Ensures Business Partners/JVs follow security approach: The Human Rights Policy indicates: 'Vale is a signatory and applies the Voluntary Principles on Security and Human Rights (VPSHR) in its activities. It includes potential human rights violation risks in its risk assessment of security requirements'. The Human Rights Policy remarks: 'All Customers and Suppliers, including other Partners, of Vale and its subsidiaries must know and observe this Policy to guide their conduct and to avoid conflicts and violations'. However, it is not clear how it ensures its business partners implement an equivalent approach to security management that ensures respect for human rights. [Human Rights Policy, 26/11/2019: <a href="http://vale.com">vale.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Security and HRs assessment includes input from local communities</li> <li>• Not Met: Two examples of working with local communities to improve security</li> </ul>
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	0	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes preventative/corrective action plans for water and sanitation risks: The Company has a Water and Water Resources Policy. The 2022 Integrated Report notes: 'The ITV [Vale Institute of Technology] conducts research to improve planning for water risks in the basins where the company operates. We evaluate how landscape changes and climate changes can impact the availability of water resources and identify how these water risks impact watersheds and the communities within them. Some examples of these research results are: Estimates of flow (maximums and water availability) and water production (evapotranspiration) in the Itacaiúnas river basin and the basins along the Carajás Railroad, using hydrological modeling and remote sensing techniques; Calculation of extreme precipitation indices in the Mearim river basin; Developing a database for intensity, duration and frequency of heavy rains in the Itacaiúnas river basin; Environmental quality assessment of headwater basins and springs in the Itacaiúnas river basin; and Mapping areas susceptible to flooding around the cities of Parauapebas, Marabá and Eldorado dos Carajás'. However, although the Company discloses some research carried out, no description found of how it implements preventive and corrective action plans for identified specific risks to the right to water and sanitation in its own operations. [Water and Water Resources Policy, 12/11/2020: <a href="http://vale.com">vale.com</a>] &amp; [2022 Integrated Report, 2023: <a href="http://vale.com">vale.com</a> ]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Sets targets on water stewardship that consider water use by local communities: The 2021 Integrated Report indicates: ‘Aiming to promote water security in the regions where we are present – that is, to ensure water is available in sufficient quantity and quality for human supply, economic activities and aquatic ecosystem conservation – in 2018 we established the Water Target. Our commitment was to reduce by 10% the withdrawal of fresh water for use in our production processes by 2030 compared to 2017 as the base year. To achieve this goal, we invested in (a) expanding our water monitoring network, (b) initiatives to reuse effluents in the company's processes, (c) using rainwater, (d) searching for new technologies, and (e) developing studies to continuously improve our responsible water resource management. In 2021 our global result accumulated since the base year was a 20% reduction, which exceeded our initial goal set for 2030 (a 10% reduction). Highlights were our operations in the Amazon region and part of the operations in southeastern Brazil, which achieved an accumulated reduction of 47%. GRI 303-1 As a guideline of our Water and Water Resources Policy, when we reach our goal, we must define new goals. Thus, new targets based on responsible water resources management and effluents will be published in 2022’. However, it is not clear its targets on water stewardship for the different operations take into consideration water use by local communities and other users in the vicinity of its operations. The 2022 Integrated Report notes: ‘We will release the new target in 2023, with a horizon of 2030. The new goal will broaden the scope beyond specific internal uses and consider local aspects related to availability, quality, access to water, and the ecological health of the watersheds where we operate. For this, we adopted Indicator 6.4.2 of the United Nations 2030 Agenda as a base point. This indicator shows whether water stress exists in the analyzed watershed. It is calculated from the ratio between the total freshwater withdrawn in the watershed and the total water resources available for use’. The webpage section Water Resources and Effluents further explains the new goals: ‘Vale analyzed our entire area of influence – into the sub-basins where we operate. The outcomes of this analysis will then be used to implemented specific regional actions’. However, no further information on the actual targets developed was found. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>] &amp; [Water Resources and Effluents, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Reports progress in meeting targets and trends demonstrating progress: The 2022 Integrated Report notes: ‘In 2021, Vale achieved its New Water specific use reduction target (10% reduction), launched in 2018’. However, as indicated above, it is not clear to what extent do these targets take into consideration water use by local communities and other users in the vicinity of its operations. No further information found in the webpage section Water Resources and Effluents.</li> </ul>
D.3.9	Women’s rights (in own extractive operations, which include JVs)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Describes processes to stop harassment and violence against women</li> <li>• Not Met: Working conditions take into account gender issues: The Company indicates that ‘Vale acts to promote employee health by complying with local legal requirements, considering the World Health Organization (WHO) global agenda to focus on themes such as [...] pregnancy, men's and women's health, [...]’. The webpage section Our People indicates: ‘In the locations in which Vale operates, specific initiatives and training programs are being implemented aimed at preparing women to occupy positions in operational areas and to expand their participation on our sites both in Brazil and in Canada. We created a Professional Training Program in the operation in Brazil and Canada exclusively for women, hiring approximately 500 women. We reduced the voluntary termination rate for women by 33.5%’. However, although there specific initiatives and training programs designed for women, it is not clear how the Company takes into account differential impacts on women and men of working conditions, including to reproductive health. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>] &amp; [Our People_web, N/A: <a href="http://vale.com">vale.com</a>]</li> <li>• Not Met: Measures and steps to address gender pay gap at all levels of employment: The 2021 Integrated Report indicates: ‘Strengthening a culture oriented to diversity, equity and inclusion is a priority. We anticipate to 2025 our commitment to double the representativeness of women in our workforce (from 13% to 26%)’. Also, ‘Vale's compensation adheres to the legislation of each country where it operates, and variations may occur due to employees’ seniority and maturity levels. With regard to base wages, there are no differences between men and women performing the same job’. However, it is not clear how it measures and the steps it takes to address any gender pay gap throughout all levels of employment. [Integrated Report 2021, 06/05/2022: <a href="http://vale.com">vale.com</a>]</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			Score 2 <ul style="list-style-type: none"> <li>• Not Met: Meets all requirements under score 1</li> <li>• Not Met: Provides analysis of trends demonstrating closing gender pay gap</li> </ul>

## E. Performance: Responses to Serious Allegations (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> <li>• Area: Right to Security of persons</li> <li>• Headline: One protester dead at Vale Mozambique coal mine while trying to access to a fence</li> <li>• Story: On July 13th, 2017, farmer Hussene Antonio was shot and killed by police while protesting against the Vale's closure of a fence by in Tete province, Mozambique. Locals who had been resettled away from Vale's area of operation where using the passage to reach grass and bush lands where they could gather firewood and where their livestock could graze. Vale had faced strong opposition to closing off the land. On the 13th July the passage was blocked by a construction machine. Locals gathered to protest and Vale called on the police to intervene. Antonio was shot in the back as he fled. In the wake of his killing locals vandalized the construction machine, a generator and some equipment owned by the company.</li> </ul> <p>On 24 March 2021, Mozambique's Administrative Tribunal (TA) condemned Vale for its refusal to share information of public interest concerning its coal mining activities in the western province of Tete.</p> <p>The Mozambican Bar Association (OAM) had gone to court to oblige Vale to provide information. The OAM demanded that Vale make publicly available the Memorandum of Understanding signed between the government, Vale, and the communities affected by its mine, all the agreements it had reached with local communities, and full details of the compensation paid to people whose interests or livelihoods had been damaged by coal mining. The OAM also wanted a full statement of all taxes Vale had paid to the Mozambican state between 2013 and 2019.</p> <p>On 26 January, the Tete Provincial Court sentenced Vale to pay MZN 14 million (about USD 195,000) to 48 peasants of Chidwe village, in Moatize district, who were unable to reach their fields because of a fence Vale had built illegally around its mine.</p> <p>[All Africa, 31/08/2017, "Mozambique: The Cost of Land Grabbing in Tete Province": <a href="http://allafrica.com">allafrica.com</a>] [Zitamar.com, 19/07/2017, "Protester killed by police at Vale Mozambique Coal Mine": <a href="http://zitamar.com">zitamar.com</a>] [Club of Mozambique, 24/3/2021, "Mozambique: Court orders Vale to provide information – AIM report": <a href="http://clubofmozambique.com">clubofmozambique.com</a>]</p>
E(1).1	The company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: Four days after the death of Hussene Antonio, Vale published a clarification of the incident. Vale's statement said the company has been communicating with the local community since 2013, through Government representatives and community leaders, to tell them that fencing off its mine is essential for the safety of local residents. [Zitamar.com, 19/07/2017: <a href="http://zitamar.com">zitamar.com</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: A detailed response addressing all aspects of the allegation in detail is not publicly available.</li> </ul>
E(1).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: The company supported the funeral ceremonies by providing bags of food, pulse and grain. However, no evidence was found of the Company engaging with the affected stakeholders in order to investigate the underlying causes of the events.</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements: There is no evidence that the company made changes to its management systems following the events and their human rights impacts. Furthermore, Vale has not stopped using the police for security purposes, despite the often disastrous results.</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy: On 26 January, the Tete Provincial Court sentenced Vale to pay 14 million meticaís (about 195,000 US dollars, at current exchange rates) to 48 peasants of Chidwe village, in Moatize district, who were unable to reach their fields because of a fence Vale had built illegally around its mine. However, there is no evidence that the company actually paid these sums. Furthermore, there is no evidence that the company provides remedy to the family members of the murdered protester. [Club of Mozambique, 24/3/2021: <a href="http://clubofmozambique.com">clubofmozambique.com</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(2).0	Serious allegation No 2		<ul style="list-style-type: none"> <li>• Area: Land Rights; Right to a safe, clean, healthy and sustainable environment; Right to security of persons</li> <li>• Headline: Vale's operations in Mozambique criticised by NGO over environmental and human rights violations</li> <li>• Story: On March 11, 2022, Friends of the Earth International (FOEI), an environmental NGO, released a reported entitled "A deadly ring of coal: Vale's poisoned gift to Mozambique" claiming that the company is preparing to leave behind "a destruction" after it has signed an agreement to sell its projects to Vulcan Minerals.</li> </ul> <p>In January 2021, Vale announced it had entered into a binding agreement with Vulcan Minerals, part of the Jindal Group, to sell the Moatize coal mine and the Nacala Logistics. However, FOEI denounced the company's operations in the province of Tete claiming "a worrying pattern of violence, land-grabbing and death".</p> <p>Allegedly, the company had resettled between 2009 and 2010 1,365 families in order to install the Moatize mine. But, the communities and various organisations exposed number of problems such as unsafe housing and land unsuitable for subsistence agriculture.</p> <p>Reportedly, the company used Mozambican Police (PRM), including its Rapid Intervention Unit (UIR) to disperse protesters by beating them up or shooting at them with rubber bullets and even live ammunition, and they have arbitrarily detained local brick makers (known as oleiros) who still seek compensation for their loss of livelihoods. In November 2021, four members of the Nhantchere community whose homes cracked walls caused by the "mine explosions", were detained and remained in prison for three days. Two brick makers were also detained on December 2021 after debating about Vale's refusal to pay compensation.</p> <p>According to the article, the people who lived inside the concession areas were forcefully removed from their homes. They started living in the outskirts of the mine facing water scarcity. The rivers that used to provide them with water for farming, cattle and other basic needs, have either been diverted to supply water to the mine, polluted or buried by tons of sand. The air was reported to be polluted in Moatize due to the dynamites blasted by the mine. The roads, used by Vale's trucks, are a source of dust too.</p> <p>The communities said they suffer from respiratory problems, acute coughs or tuberculosis due to the water and air pollution "caused by the company". According to laboratory analyses carried out on water in the Liberdade neighbourhood, cadmium levels are three times the level admissible by Mozambique and the World Health Organisation.</p> <p>Two legal proceeding have been initiated against the mining company VALE Moçambique regarding access to public interest information: one by Justiça Ambiental (JA!)/Friends of the Earth Mozambique, and the other by the Mozambican Bar Association (OAM). [Friends of the Earth, 11/03/2022, "A deadly ring of coal: VALE's poisoned gift to Mozambique": <a href="http://foei.org">foei.org</a>] [The Standard, 15/01/2022, "Brazilian coal miner leaves</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			cloud of despair in western Mozambique": <a href="http://newsday.co.zw">newsday.co.zw</a> ] [Club of Mozambique, 11/01/2022, "Bar Association demands Vale pay compensation for botched resettlement": <a href="http://clubofmozambique.com">clubofmozambique.com</a> ]
E(2).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: Vale stated it had fulfilled its duties regarding the resettling of those living near its Moatize mine. "The company reiterates that it has fully complied with the approved resettlement plan and other inherent duties, as well as with all the elements subsequently agreed with the Government and with the communities covered in relation to different matters in the social sphere," declares a note. [Africa Press, 17/01/2022, "Mozambique: Vale says it fulfilled its duties in resettling families": <a href="http://africa-press.net">africa-press.net</a>]</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response: Vale said it prefers not to comment on the Mozambican Bar Association's demand, as it deals with "matters under discussion in the competent courts". Thereby, the company did not address the issue of non-compliance with resettlement agreements in detail.</li> </ul> <p>In addition, Vale did not comment on the other allegations of violent repression of protests, arbitrary detention of the oleiros, and environmental and health damage related to water and air pollution caused by its operations. [Africa Press, 17/01/2022: <a href="http://africa-press.net">africa-press.net</a>]</p>
E(2).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: No evidence suggesting that the company engaged with the affected stakeholders was found.</li> <li>• Not Met: Identified cause: The company does not present investigative results on the underlying causes of the events concerned.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Identified and implemented improvements</li> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(2).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Provided remedy: Despite Vale's statement that it has complied with the "duties imposed by law and by the mining contract signed with the government", the company never paid in full the compensation to the households from the Moatize district for the resettlement. In addition, there is no evidence suggesting the company provided remedy to the affected stakeholders for all the physical and psychological damage it has caused them. [Club of Mozambique, 11/01/2022: <a href="http://clubofmozambique.com">clubofmozambique.com</a>]</li> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders</li> <li>• Not Met: Remedy delivered</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(3).0	Serious allegation No 3		<ul style="list-style-type: none"> <li>• Area: Health and Safety; Right to a safe, clean, healthy and sustainable environment</li> <li>• Headline: Samarco dam burst: Vale and BHP's subsidiary, Samarco Mineraço, faced opposition from protesters over resettlements in Brazil</li> <li>• Story: On 5 November 2015, a dam holding back waste water from the Germano iron ore mine in Brazil burst, causing mudslides that engulfed a nearby town and killed at least 16 people. The mine is owned by Samarco, a joint venture between Vale and BHP Billiton.</li> </ul> <p>In February 2016, it was reported that Brazilian authorities had charged the president of Samarco and six others – five Samarco executives and one contractor - with homicide over the dam disaster. An official report by the Brazilian police into the incident concluded that it was caused by excess water in the dam, lack of proper monitoring, faulty equipment and failure of the drainage system. It discarded the possibility of any minor earthquakes during the incident and said that Samarco's emergency plan to warn nearby villagers was insufficient.</p> <p>In March 2018, IndustriALL along with other trade unions filed a OECD complaint with the UK NCP. According to the labour organizations, the companies failed to provide adequate remedy and establish a legitimate remediation process that involves affected communities and workers.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>In March 2018, IndustriALL along with other trade unions filed a OECD complaint with the UK NCP. According to the labour organizations, the companies failed to provide adequate remedy and establish a legitimate remediation process that involves affected communities and workers.</p> <p>In June 25th, 2018, Samarco and parent companies Vale and BHP Billiton have signed a deal with Brazilian authorities to settle a BRL 20 billion (USD 5.3 billion) lawsuit related to Samarco disaster. Under this agreement, the companies agreed to establish a fund for clean-up costs and remediation and for compensation of impacts relating to the Fundão tailings dam failure. The agreement settled the billion Civil Claim, enhances community participation in decisions related to the remediation and compensation programs under the Framework Agreement (Programs), and establishes a process to renegotiate those Programs over two years and to progress settlement of the BRL155 billion (USD 41 billion) Civil Claim (Governance Agreement).</p> <p>In March 2019, court documents have been revealed, alleging that Samarco executives and board members, including BHP and Vale-appointed directors, were aware of significant problems at their jointly-owned Samarco dam years before it burst. These court documents include board meeting minutes and expert reports.</p> <p>On 5 October 2021, the state prosecutors in the state of Minas Gerais filed a lawsuit seeking BRL 2.5 billion (USD 457 million) from miners Vale, Samarco and BHP related to a tailings dam disaster in 2015. The prosecutors alleged that the companies have not fulfilled the obligations outlined in a settlement in 2018, in which the miners agreed to pay damages to the people affected by the disaster.</p> <p>According to the lawsuit, only 30% of the affected people have received compensation so far and the sought funds would benefit 1,300 families.</p> <p>The collapse of the Fundão tailings dam near the town of Mariana in 2015 caused a vast flow of mud and mining waste that buried a nearby village and killed 19 people. It also polluted a major river and is regarded as "Brazil's worst environmental disaster". The Fundão dam is owned by Samarco a joint venture controlled by Vale and BHP.</p> <p>On August 10, 2022, press sources reported that Samarco Mineração, a firm managed by Vale and BHP Billiton, faced opposition from protesters blocking a highway near the site, amid the Samarco dam burst that happened in 2015.</p> <p>Nearly seven years after the dam collapse, the movement, coordinated in conjunction with the Movement of People Affected by Dams (MAB), allegedly brought together residents to protest the resettlement with banners. Reportedly the protesters shouted the following: "Vale kills rivers, kills fish, kills people. It was no accident.", while carrying banners with the phrases: "The house of the affected people is collapsing. We want compensation"; "We want the Rio Doce basin without hunger". Moreover, the MAB allegedly published the following on its social media platform: "Thousands of workers lost their source of income and still haven't been compensated or had the conditions for work returned. The affected people are waiting for reparation measures in relation to health, access to water, besides other problems that arose after 2015."</p> <p>When the Renova Foundation, the entity responsible for the mobilization of the reparation of the damages caused by the collapse of the Fundão/Samarco dam, was contacted, the organization reported that the protests, which have been going on since the end of June 2022, have created roadblocks that have prevented the regular continuation of the construction of the resettlements because workers and materials were unable to access the construction sites. The organization reportedly claimed that the halt also had an impact on the services planned for other families at the construction sites and jeopardized the delivery schedule for relocation.</p> <p>On August 10, 2022, press sources reported that Samarco Mineração, a firm managed by Vale and BHP Billiton, faced opposition from protesters blocking a highway near the site, amid the Samarco dam burst that happened in 2015.</p> <p>Nearly seven years after the dam collapse, the movement, coordinated in conjunction with the Movement of People Affected by Dams (MAB), allegedly</p>

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			<p>brought together residents to protest the resettlement with banners. Reportedly the protesters shouted the following: "Vale kills rivers, kills fish, kills people. It was no accident.", while carrying banners with the phrases: "The house of the affected people is collapsing. We want compensation"; "We want the Rio Doce basin without hunger". Moreover, the MAB allegedly published the following on its social media platform: "Thousands of workers lost their source of income and still haven't been compensated or had the conditions for work returned. The affected people are waiting for reparation measures in relation to health, access to water, besides other problems that arose after 2015."</p> <p>When the Renova Foundation, the entity responsible for the mobilization of the reparation of the damages caused by the collapse of the Fundão/Samarco dam, was contacted, the organization reported that the protests, which have been going on since the end of June 2022, have created roadblocks that have prevented the regular continuation of the construction of the resettlements because workers and materials were unable to access the construction sites. The organization reportedly claimed that the halt also had an impact on the services planned for other families at the construction sites and jeopardized the delivery schedule for relocation.</p> <p>[The Guardian, 13/11/2015, "Brazil's slow-motion environmental catastrophe unfolds": <a href="http://theguardian.com">theguardian.com</a>] [The Sidney Morning Herald, 04/03/2019, "Profit before people: documents allege BHP execs were warned over deadly dam": <a href="http://smh.com.au">smh.com.au</a>] [Mining Weekly, 05/10/2021, "Brazil prosecutors seek \$457m from miners Vale, Samarco, BHP for dam disaster": <a href="http://miningweekly.com">miningweekly.com</a>] [Conectas, 07/11/2022, "Tragedy in Mariana: With no settlement for affected people, companies come under pressure from international investors": <a href="http://conectas.org">conectas.org</a>]</p>
E(3).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Public response: At a press conference after the disaster, the chief executive of and Vale, Murilo Ferreira, offered apologies for the disaster and insisted Vale would honour their obligations as joint owner. On April 8, 2019, Vale provided a response to the BHRRC, on both the Mariana and Brumadinho dam disasters.</li> </ul> <p>However, they offered no comments to reports that Vale had diverted extra water from another mine to the tailings pond behind the dam in the weeks preceding its collapse. [The Guardian, 13/11/2015: <a href="http://theguardian.com">theguardian.com</a>] [Business &amp; Human Rights Resource Centre, 08/04/2019, "Vale response": <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Detailed response</li> </ul>
E(3).2	The company has investigated and taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Not Met: Engaged with stakeholders: Since the disaster, the company engaged with various public bodies of different federative levels for indemnification and emergency financial support issues. However, it is not clear whether these public bodies are legitimate representatives of the affected stakeholders under the CHR Methodology. There is no evidence suggesting that the company engaged directly with the affected stakeholders.</li> <li>• Not Met: Identified cause</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Met: Identified and implemented improvements: Vale chief executive Fabio Schvartsman and several other senior executives resigned after state and federal prosecutors recommended their removal late after the event. In its response to the BHRRC, the company stated that "Vale adopted a set of measures after the Fundão dam break in Mariana, in 2015, aiming to prevent the occurrence of a similar event in its direct operations. Important investments were made for the improvement of processes seeking always the best operational techniques and technologies in order to ensure the stability of the structures. Some of the main actions part of the safety system are:</li> <li>•Periodical Dam Safety Reviews, with specialized companies;</li> <li>•Detailed Emergency Action Plans;</li> <li>•System of alert in events of emergency (sirens);</li> <li>•Detailed dam break studies, with in field data collecting using the high precision equipment;</li> <li>•Registration of populations downstream of structures;</li> <li>•New owned seismological network for assessment of seismicity's;</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>•Hiring of an International and National Specialists Panel with reputed professionals on world Geotechnics and Risk Management</li> <li>•Automated system of dam monitoring with direct communications to the monitoring management system;</li> <li>•Structures information management system to ensure transparency and reliability of information;</li> <li>•Integration of geotechnics systems to ensure automated update of the Plan of Dams Safety."</li> </ul> <p>[The Sidney Morning Herald, 04/03/2019: <a href="http://smh.com.au">smh.com.au</a>] [Business &amp; Human Rights Resource Centre, 08/04/2019: <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Stakeholder input to steps taken</li> </ul>
E(3).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> <li>• Met: Provided remedy: The Fundação Renova was created under the observance of a public agreement among SAMARCO, Vale, BHP and public bodies of different federative levels. The foundation has already spent 745 million Brazilian reais in the Mediated Indemnifications Program and other 845 mi on Emergency Financial Support. In total more than 5.5 billion Brazilian reais were spent, of which 5.06 mi on reparatory measures and 0.43 on compensatory ones. These funds correspond to social-economic (3.55 mi) and to socio-environmental (1.95 mi) programs. Half of all the funds to Fundação Renova come from by Vale itself and the other from BHP.</li> </ul> <p>[Conectas, 07/11/2022: <a href="http://conectas.org">conectas.org</a>] [Business &amp; Human Rights Resource Centre, 08/04/2019, : <a href="http://business-humanrights.org">business-humanrights.org</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy satisfactory to stakeholders: In September 2022, the state governments of Minas Gerais and Espírito Santo, together with the Public Prosecutor's Office and the Public Defender's Offices, formally ended the negotiations over compensation for the tragedy without reaching an agreement. The attempt to reach a deal by the National Justice Council failed because Samarco, Vale and BHP Billiton did not agree to pay the required amounts within the requested period. Only 30% of the affected people have received compensation so far. The companies also refused to pay compensation for future damages from the disaster – those which still cannot be assessed. Although Vale said it would pay both "socio-economic" and "socio-environmental" reparations, funding projects to repair the surrounding environment, including a massive clean-up of the Paraopeba river, so far the company has not fulfilled these obligations.</li> </ul> <p>As a result, the remedy cannot be considered "satisfactory" for the affected stakeholders as many of them are still waiting any form of compensation.</p> <p>[Conectas, 07/11/2022: <a href="http://conectas.org">conectas.org</a>]</p> <ul style="list-style-type: none"> <li>• Not Met: Remedy delivered: Only 30% of the affected people have received compensation so far. The remedy was thus not fully delivered to the affected stakeholders.</li> <li>• Not Met: Independent remedy process used</li> </ul>
E(4).0	Serious allegation No 4		<ul style="list-style-type: none"> <li>• Area: Land Rights; Right to safe, clean, healthy and sustainable environment</li> <li>• Headline: Residents criticize Norte Energia's Belo Monte Hydroelectric Complex for reported socio-environmental impacts in Brazil</li> <li>• Story: Brazil's Parliamentary Commission of Inquiry (CPI) has arranged a public hearing on Norte Energia and Vale's Belo Monte Hydroelectric Complex's reported impacts on communities' lives, livelihoods, and the environment. The project's construction has reportedly flooded and covered 500 square kilometres between 2011 and 2016, and around 10,00 families had to relocate permanently. Allegedly, other issues include the company's failure to fulfill its promises, 3,850 built houses in five resettlement locations that are still without a potable water supply network years since the relocation, 370 families in Lagoa do Independente that suffer from annual flooding, houses that have cracks and roads are not paved, communities that are missing health care centers and schools, and hundreds of families that were relocated to areas that don't support their livelihoods. Also, communities along River Xingu within 100 kilometres distance from the plant are reportedly affected due to reduced water flow affecting the traditional livelihoods of indigenous communities and farmers.</li> </ul>



Indicator Code	Indicator name	Score (out of 2)	Explanation
			[Assembleia Legislativa Do Estado Do Para, 21/11/2021, "CPI VALE - In public hearing, residents denounce suffering caused by Belo Monte": <a href="http://alepa.pa.gov.br">alepa.pa.gov.br</a> ] [Mongabay, 10/12/2018, "Belo Monte dam Xingu River Management Plan violates human rights: finding": <a href="http://news.mongabay.com">news.mongabay.com</a> ] [Mind the Gap, 07/07/2020, "CASE STUDY: NORTE ENERGIA DIVIDED BRAZILIAN INDIGENOUS COMMUNITIES": <a href="http://mindthegap.ngo">mindthegap.ngo</a> ]
E(4).1	The Company has responded publicly to the allegation	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Public response: A response by Vale is not publicly available. Score 2 • Not Met: Detailed response
E(4).2	The company has investigated and taken appropriate action	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Engaged with stakeholders: In 2019, a chamber of conciliation was established to reach an agreement between the Federal Prosecutor's Office, indigenous peoples and Norte Energia. However, it is not clear whether this chamber of conciliation involved the affected stakeholders' legitimate representatives. Moreover, on 10 September 2019, the court affirmed that indigenous organisations have opposed the continuation of the chamber of conciliation.  [Mind the Gap, 07/07/2020: <a href="http://mindthegap.ngo">mindthegap.ngo</a> ] • Not Met: Identified cause Score 2 • Not Met: Identified and implemented improvements • Not Met: Stakeholder input to steps taken
E(4).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	The individual elements of the assessment are met or not as follows: Score 1 • Not Met: Provided remedy: In a 2011 binding agreement with Brazil's federal government, the Norte Energia Consortium agreed to pay US\$1 billion to Altamira residents, including 9 indigenous groups, in compensation for the Belo Monte dam. However, the company has yet to meet the compensation commitments.  In addition, Norte Energia adopted an "Emergency Plan" to address the communities' needs pending implementation of the mandated measures. The Emergency Plan consisted of 30,000 reais (€5,400 approx.) assigned to each indigenous group (called an aldeia), which would be paid in the form of consumer goods chosen by the community. However, this emergency plan cannot be considered as a form of remedy within the meaning of the methodology, aimed at compensating communities for human rights violations. Moreover, affected communities continue to litigate against Norte Energia's failure to provide promised reparations. [Mind the Gap, 07/07/2020: <a href="http://mindthegap.ngo">mindthegap.ngo</a> ] [Mongabay, 12/08/2016, "Promised US\$1 billion in Belo Monte dam compensation largely unpaid?": <a href="http://news.mongabay.com">news.mongabay.com</a> ] • Not Met: Evidence for lack of Impact or link Score 2 • Not Met: Remedy satisfactory to stakeholders • Not Met: Remedy delivered • Not Met: Independent remedy process used
E(5).0	Serious allegation No 5		• Area: Land Rights  • Headline: Vale's S11D mining activities associated with Carajas Railway criticized in Brazil for alleged repeated fatal accidents and other socio-environmental impacts in Brazil  • Story: Vale has been accused of failing to dialogue with communities that live along the company's Carajas Railway, whose trains transport iron ore cargo, used for steel production, from the Carajas S11D mining project in Para, Brazil, to the Port of Ponta da Madeira in Maranhao state. Reportedly, the production chain is criticized for human rights violations. Residents in Maranhao allegedly do not benefit from Vale's activities and community leaders are persecuted. The railway has a long history of issues along its 900 kilometres of extension, such as its alleged negative impacts on health, traditional communities, livestock and fishing, including property damage. Allegedly, it has affected a river, generates constant noise, and pollutes water and air from black dust. Studies reportedly found that 65 percent of community members have respiratory issues while others have eye diseases and skin issues. Some allegedly have burns due to contact with iron slag as the waste area did not have warning signs for safety. Vale was also criticized for

Indicator Code	Indicator name	Score (out of 2)	Explanation
			not building infrastructures for accident prevention for people crossing the railway, leading to multiple accidents and deaths. Income from mining companies is reportedly lost to corruption and embezzlement. Companies in Brazil, on average, reportedly fail to pay US 1.26 billion a year due to tax evasion. [Observatorio da mineracao, 19/05/2022, "In the throat of the future: in Maranhão, Vale trains promise development and deliver a trail of rights violations": <a href="http://observatoriodaminerao.com.br">observatoriodaminerao.com.br</a> ] [Unearthed, 21/07/2022, "In the Brazilian Amazon, an Indigenous community faces down an Iron Giant": <a href="http://unearthed.greenpeace.org">unearthed.greenpeace.org</a> ]
E(5).1	The Company has responded publicly to the allegation	1	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Public response: In response to Observatório da Mineração's questions, Vale sent a statement about its actions on the points raised and the local residents' reports. [Observatorio da mineracao, 19/05/2020: <a href="http://observatoriodaminerao.com.br">observatoriodaminerao.com.br</a>]</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Detailed response: In its statement in response to the report, the company responded in general terms and did not address the issues of damage to ecosystems and public health caused by air, soil and water contamination and persecution of community leaders.</li> </ul>
E(5).2	The company has investigated and taken appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Met: Engaged with stakeholders: In its 2022 Integrated Report, the company shared that it "carried out initiatives and agreements that made it possible to end legal disputes with the Xikrin do Cateté, Kayapó and Gavião (Parkatêjê, Kyikatêjê and Akrãtikatêjê) peoples, and strengthened Vale's relationships with these peoples. In Maranhão, Brazil, [it] maintain[s] [a] relationship with the Guajajara, Awá and Ka'apor peoples through the implementation of the Basic Environmental Plan (PBA)."</li> </ul> In addition, the company said that "Since 1982, Vale has maintained a permanent dialogue with the Gavião people, during the construction of the Carajás Railroad (EFC). The company maintains a specialised team, made up of anthropologists and other professionals exclusively dedicated to interacting with indigenous peoples, respecting their characteristics and current legislation." [Observatorio da mineracao, 19/05/2020: <a href="http://observatoriodaminerao.com.br">observatoriodaminerao.com.br</a> ] [Unearthed, 21/07/2022: <a href="http://unearthed.greenpeace.org">unearthed.greenpeace.org</a> ] [Integrated Report 2022: <a href="http://vale.com">vale.com</a> ] <ul style="list-style-type: none"> <li>Not Met: Identified cause</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Not Met: Identified and implemented improvements</li> <li>Not Met: Stakeholder input to steps taken</li> </ul>
E(5).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> <li>Not Met: Provided remedy: According to Brazilian law, Vale pays the municipalities impacted by infrastructures associated with the mining industry a tax of 1 million to 2 million reais (\$198,000 to \$396,000) a month for financial compensation for mineral exploration. However, this cannot be considered as a direct form of remedy to the stakeholders affected by the railroad's detrimental effects. Furthermore, communities complain that the money paid by the companies to the municipalities has not led to improvements in quality of life and human development.</li> </ul> According to the Unearthed report, the company paid compensation to the Gavião indigenous community. [Observatorio da mineracao, 19/05/2020: <a href="http://observatoriodaminerao.com.br">observatoriodaminerao.com.br</a> ] [Unearthed, 21/07/2022: <a href="http://unearthed.greenpeace.org">unearthed.greenpeace.org</a> ] <ul style="list-style-type: none"> <li>Not Met: Evidence for lack of impact or link</li> </ul> Score 2 <ul style="list-style-type: none"> <li>Met: Remedy satisfactory to stakeholders: There is no evidence suggesting the remedy was not satisfactory to the stakeholders. [Unearthed, 21/07/2022: <a href="http://unearthed.greenpeace.org">unearthed.greenpeace.org</a>]</li> <li>Met: Remedy delivered: According to the Unearthed report, the company paid compensation to the Gavião indigenous community. [Unearthed, 21/07/2022: <a href="http://unearthed.greenpeace.org">unearthed.greenpeace.org</a>]</li> <li>Not Met: Independent remedy process used</li> </ul>
E(6).0	Serious allegation No 6		<ul style="list-style-type: none"> <li>Area: Security of Persons</li> </ul>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> <li>• <b>Headline:</b> Vale's security services denounced for alleged recurring involvement in violent and deadly attacks on farmers in Brazil</li> <li>• <b>Story:</b> The Pastoral Land Commission, the Para Human Rights Defence Society, and other NGOs have accused Vale of being involved in recurring cases of violence in Brazil through its security company Segurpro Vigilancia Patrimonial (Segurpro), a subsidiary of Prosegur. The accusation comes after a Segurpro guard reportedly shot a man in his leg for coming near Vale's Carajas Railway on May 14, 2022. It is reported that the guard, who was temporarily detained by the Civil Police on suspected crimes of bodily injury, might have let the victim die slowly from the gunshot wound without rendering first aid. Other "countless" violent incidents involving Vale's security services allegedly happened in the municipalities of Canaa, Curionopolis, Maraba, and Parauapebas. In June 2020, approximately 50 Segurpro guards reportedly violently attacked farmers that were camping on grounds of a farm known as Lagoa, which was being claimed by Vale. At least 20 individuals, including children and elderly people, allegedly sustained injuries in the incident. In 2017, four Vale security guards were indicted on accusations of attacking a farmer and his son, who were living next to a Vale project. In 2016, Vale guards allegedly injured farmers when expelling 300 families from a property. [Reporter Brasil, 24/05/2022, "Orphan of slaughter, 46-year-old man is killed by vale security in Pará": <a href="https://reporterbrasil.org.br">reporterbrasil.org.br</a>]</li> </ul>
E(6).1	The Company has responded publicly to the allegation	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Met:</b> Public response: Vale issued a statement in response to Repórter Brasil's report, in which the company said: "Vale is following the case, actively collaborating with the authorities and supporting the complete clarification of the facts. The surveillance company was notified and is also collaborating in the investigation. Vale reiterates that it is a signatory to the Voluntary Principles on Security and Human Rights, that it acts in a manner that respects human rights and that it demands the same from its contractors, as well as compliance with legislation and the continuous training of its teams".</li> </ul> <p>About the previous clashes, the company stated that it "provided all information and clarifications, demanding the same action from Segurpro and the competent authorities concluded that there was no illegality in any of the events". [Reporter Brasil, 24/05/2022, "Íntegra das respostas da Vale e da SegurPro": <a href="https://reporterbrasil.org.br">reporterbrasil.org.br</a>]</p> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Detailed response: The company responded in very general terms and did not address the allegation in detail.</li> </ul>
E(6).2	The company has investigated and taken appropriate action	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Engaged with stakeholders: When asked whether it was providing assistance to the victim's family, Vale declined to comment. There is no public evidence suggesting that the company engaged in any way with affected stakeholders.</li> <li>• <b>Not Met:</b> Identified cause: Vale stated that it is collaborating to the investigation. However, the company does not present investigative results on the underlying causes of the events concerned.</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Identified and implemented improvements</li> <li>• <b>Not Met:</b> Stakeholder input to steps taken</li> </ul>
E(6).3	The company has engaged with affected stakeholders to provide for or cooperate in remedy(ies)	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Provided remedy</li> <li>• <b>Not Met:</b> Evidence for lack of Impact or link</li> </ul> <p>Score 2</p> <ul style="list-style-type: none"> <li>• <b>Not Met:</b> Remedy satisfactory to stakeholders</li> <li>• <b>Not Met:</b> Remedy delivered</li> <li>• <b>Not Met:</b> Independent remedy process used</li> </ul>

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