



Human Rights Guide



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Introduction

Vale created this Reference Guide to our Global [Human Rights Policy](#) to help our employees, suppliers, and others understand and incorporate the Policy and its principles into day-to-day activities.

As the Policy makes clear, we recognize our responsibility to respect human rights. This means taking into account the risks and potential negative impacts on all stakeholders who may be affected by our activities, whether they are employees, contractors, supply chain workers, local communities, or customers. While our specific expectations may differ between functional units, cultures, and operating contexts, we will always respect local laws. Our goal – to respect human rights in all of our business activities and honor the principles of international human rights norms – does not waver. Meeting that responsibility to respect human rights is a defining principle of how we operate, which we believe brings long-term value to all of our stakeholders and beyond.

We hope this Reference Guide will help reinforce Vale’s respect for human rights, providing context for our Global Human Rights Policy and [Code of Conduct](#). To be clear, this guide does not address all human rights that may be impacted

by our operations, or which may be considered salient risks to Vale or the mining sector. It does not address in any detail, for instance, issues surrounding the environment, local laws and/or cultural aspects, tailings management, or occupational health and safety. These are important areas where Vale continues to learn from past challenges and they are addressed [elsewhere](#). Nor does the guide seek to conform to the requirements expected of human rights reports.

Instead, its purpose is to help provide context to the issues addressed in Vale’s Global Human Rights Policy and the scope is limited to the issues that the Policy addresses. This Reference Guide is organized in two parts. The first section provides background on the concept of human rights and how they are understood and implemented at Vale. The second section introduces the three main areas covered by the Policy – namely, human rights in the workplace, in local communities, and in the supply chain - and shares the key principles and expectations for each.

Background on Human Rights

What are Human Rights?



Human rights are fundamental rights and freedoms that all people enjoy. They apply to everyone, everywhere in the world, regardless of age, ethnicity, skin color, gender, nationality, language, religion or any other condition.

As our Global [Human Rights Policy](#) indicates, human rights are identified and referenced in a number of international standards and institutional commitments (e.g., the [Universal Declaration of Human Rights](#), the [International Bill of Human Rights](#), conventions from the [International Labor Organizations](#), among others). Although traditionally human rights only applied to states, companies have the potential to both positively and negatively impact human rights in their daily interactions with employees, contractors, suppliers, consumers, communities and other parties.

Today, businesses are expected at a minimum to respect human rights throughout their operations and value chains, a commitment Vale has made in its [Human Rights Policy](#).

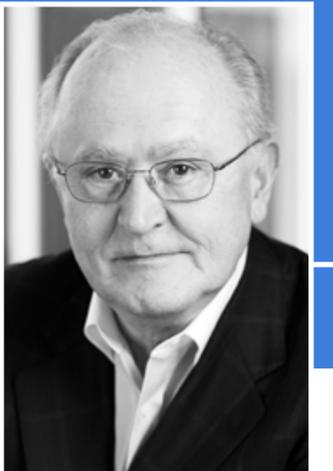
The leading framework to guide companies in respecting human rights is the [UN Guiding Principles on Business and Human Rights](#).

The Guiding Principles have been unanimously endorsed by the UN Human Rights Council and are structured around three core pillars:

Protect: it is the State's duty to guarantee the fulfillment of human rights and to protect them against abuses committed by third parties, including companies.

Respect: it is the responsibility of companies to respect human rights, including in their value chains.

Remedy: all victims of human rights violations must have access to appropriate and effective remedy.



“Business and human rights matter more than ever because progress on this front directly contributes to the transition we all see toward more inclusive and sustainable economic growth.”

Professor [John Ruggie](#), UN Secretary-General's Special Representative for Business and Human Rights

As the UN Guiding Principles explain, respecting human rights includes taking appropriate measures to prevent, mitigate and, if necessary, remedy violations. A company's expected response to a human rights harm can vary depending on whether it **caused** the impact through its own operations, **contributed** to a harm caused by others (e.g., by encouraging the activity that led to the

impact in a situation where it knew or should have known of the risk), or is **directly linked** to the harm through its value chain. The adoption of the Guiding Principles has led companies like Vale to develop policies, processes, and practices to respect human rights, provide remedies for negative impacts, and improve their sustainability in an increasingly demanding and competitive market.

Examples of human rights:

Right to **life, freedom** and personal **security**;

Right to **work, free choice of employment**, just and favorable conditions of work;

Right to **freedom of thought, conscience and religion**;

Right to **associate** and to bargain collectively;

Right to equal protection **against any discrimination**;

Right to **health** and **education**.

Human Rights at Vale

At Vale, we respect human rights throughout all business functions, whether it is health and safety, environment, procurement, risk, human resources, communications, corporate security, or community relations. Human rights are part of Vale's Management System (specifically, technical element 5, requirements 15 and 16 – see sidebar for detail), and we regularly update our processes and practices of work, adopting new tools and techniques to improve our risk management and internal processes.

We seek an approach that aligns with our desire to respect human rights and avoids causing, contributing to or being directly linked to human rights violations. Our steps include robust policies and procedures, risk and impact assessments, and other measures to help detect, prevent, mitigate and, when necessary, remediate human rights harms we may be connected to. In addition, they include due diligence processes, such as supplier screening and transactional assessments, which

help identify rights that may be at potential risk of being impacted. Our processes also include grievance mechanisms, monitoring and reporting on human rights issues, and engaging with stakeholders around human rights risks and impacts.

Vale has developed a process to address allegations of human rights violations when they arise in our activities or supply chain. Pathways to report allegations, including operational [grievance mechanisms](#), are discussed below. After receiving allegations, we will gather relevant facts, assess the concern, and identify outcomes appropriate to each situation. We cooperate with government investigations of potential human rights impacts that we may cause, contribute to, or be directly linked to. We try to engage constructively with anyone who raises a concern and respond with public statements on the Business and Human Rights Resource Center or reports when allegations are made publicly.

VPS – Technical Element

5. Health, Safety, Environment and Communities

5.15. Human rights are respected, protected and promoted in projects and operations, in activities, in partnerships and in the production chain, in the regions where we are present.

5.16. The relationship with the communities is part of Vale's social performance model, built and effective through the management of processes listed below, for which normative documents are established and disseminated. The risks identified in each process are managed according to the risk management technical element.

- Human rights;
- Socio-environmental risks and impacts;
- Health and safety of communities;
- Involuntary resettlement;
- Relations with local communities;
- Relations with indigenous peoples and traditional communities;
- Actions to support local development;
- Socio-environmental investments;
- Conflict with communities.

Human Rights in Interactions with Stakeholders

Vale's [Human Rights Policy](#) references our approach to a number of different stakeholders. These include:

- **Local Communities:** with whom we seek to engage based on principles of respect and trust, sharing knowledge about the enterprise and its impacts, and coexisting in a constructive manner that makes the company the community's partner of choice.
- **Indigenous Peoples and Traditional Communities:** whose cultures, customs, heritages and ways of life we respect, and with whom we seek to leave a positive legacy through actions that contribute to ethno-development and autonomy, including free, prior and informed consultations and consent procedures.
- **Human Rights Defenders:** who are individuals, groups, or associations that act to promote or protect human rights. We seek to engage them through regular and proactive dialogue. We respect and applaud their work when it is performed

constructively, peacefully, and in a manner that respects the rights of others.

- **Government and Society:** with whom we collaborate in developing and implementing sustainable policies and practices, gaining insights into how to best address human rights dilemmas, and understanding the impacts we have in light of the country's social and cultural context. We strive to be transparent in our activities, any impacts we may have on human rights, and measures to prevent, mitigate and remediate human rights harms.
- **Direct Employees:** for whom we strive to create a fair and safe working environment, where diversity is prized and freedom to associate is respected.
- **Security Teams:** who work to protect the safety of individuals, promote the preservation of assets and information, and help maintain the company's production process in a manner that is human rights compatible and prioritizes peaceful solutions consistent with the Voluntary Principles on Security and Human Rights.
- **Customers, Suppliers, and Partners:** who share the same principles and values as Vale and are aligned with our [Code of Conduct](#), [Human Rights Policy](#), [Sustainability Policy](#), and [Anti-Corruption Policy](#).

Vale strives to engage constructively with Human Rights Defenders.

Specifically, we aim:

- To engage in dialogue with Human Rights Defenders in cases involving companies and risks and impacts of both its activities and commercial relationships;
- Not to use or threaten legal proceedings as a method of intimidation;
- Not to attack or undermine the work of Human Rights Defenders;
- Not to use or promote improper use of force against Human Rights Defenders;
- Not to contribute to an environment of hostility or violence towards Human Rights Defenders, but to work with human rights defenders to positively promote human rights wherever we operate.

Human Rights Issues

Vale’s Human Rights Policy undertakes a rights-centered approach that focuses on three main areas: 1) Human Rights in the Workplace, 2) Human Rights in Local Communities, and 3) Human Rights in our Supply Chain.

This section of the Reference Guide provides additional context on these three areas, with an explanation for each area on what Vale believes, expects, and wants from its employees, suppliers, contractors, customers and others with whom we do business.

Vale’s Rights-Centered Approach



1 Human Rights in the Workplace

At Vale, as a fundamental operating principle, we treat each other, and everyone affected by our activities, with respect. Our goal is to create an inclusive workplace, in which every employee is valued and feels valued. We seek to create an environment in which all who work for us are able to achieve their full potential.

Workplace conditions at companies may not always abide by this philosophy. And because of this, companies – in the mining industry and outside of it – have faced human rights dilemmas based on their workplace conditions.



Our Global Human Rights Policy identifies several areas that we pay particular attention to in the workplace, including: creating a conducive and friendly environment; preventing and combatting harassment; avoiding any form of discrimination; and helping ensure freedom of association. Each of these are elaborated in greater detail below. 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.

Conducive and Friendly Environment



We believe in a working environment that is marked by mutual respect, dialogue, and a sense of fairness. These principles, as part of our day-to-day practices, create a friendly working environment conducive to mutual success and productivity. We encourage our leaders and their teams to pursue them in all instances. While we face pressures at work every day, we see acting with transparency, flexibility, and without undue tension as virtues we should all strive to meet. Contributing to a healthy work environment is everyone's responsibility.

We expect that where any employee believes that these principles are not being followed in the workplace by an employee or contractor, they are encouraged to talk constructively to that employee or contractor about their concern. Dialogue is essential for creating and maintaining a pleasant and friendly environment within the company. It allows all of us to clarify and resolve a misunderstanding, preventing it from becoming a more significant conflict.

The conversation should be respectful and based on facts and data, not on personal impressions. If an employee does not feel comfortable having this conversation directly with the person, or if the behavior does not stop, employees are encouraged to speak to their manager, Human Resources, Corporate Integrity, or submit their concern via the [Whistleblower Channel](#), which provides for anonymous reporting.



Facts & Figures

- Vale has more than **149,000 employees**, contractors and third parties worldwide;
- Vale operates in more than **30 countries**;
- In 2019, Vale's formal reporting channel received **3,507 allegations**. Most involve people management and workplace conflicts.

What Vale Wants from You



Work to avoid turning normal pressures into a negative, stressful environment. The demand for results cannot hinder respect for the team.



Follow Vale policies regarding working conditions, such as working hours, compensation and benefits, pay, and occupational safety and health of employees.



If you are having a bad day or are feeling pressure, seek support. Taking out frustrations on others does not help your team or the company.



Create and contribute to an environment guided by dialogue.



Recognize the positive attributes of the team and delegate roles and tasks.



Be transparent about demands, deadlines and results.



Always be aware of the tone of your voice and the specific words you use.

Harassment

We believe that treating each other with respect means we do not engage in harassment or tolerate it from our co-workers. Harassment can occur when the following two factors are present: unwanted attention by a co-worker that is accompanied by conduct or comments known or that should be known as unwelcome or inappropriate. We do not tolerate harassment at Vale.



We expect that our employees and contractors will avoid creating situations or workplace environments where other employees or contractors feel uncomfortable, intimidated, or hostility. We encourage all employees or contractors to raise concerns when they have them, and not let an undesirable situation get worse before steps are taken. Managers and employees must be attentive to issues related to harassment, so that they know how to identify it and speak out when they see others being subjected to it. Vale maintains confidential reporting channels, listed in the [Grievance Mechanism](#) section of this Guide, where harassment concerns can be registered, and concerns can be presented to human resources.

What is harassment?

Harassment can take many different forms. These include rude and inappropriate words or gestures, malicious comments, bigoted or discriminatory insults, bullying, intimidation, rumors and untimely jokes that end up humiliating the employee and distancing him/her from professional relationships.

What can constitute workplace harassment:

- Requesting that someone perform useless, degrading tasks.
- Ridiculing other employees (jokes, nicknames or punishments).
- Ignoring or excluding an employee by talking to them only through other people, creating a degrading or humiliating environment.
- Routinely imposing different work schedules without justification.

What is not workplace harassment:

- Acts performed by managers in the regular exercise of authority. Supervisors are allowed to warn or reprimand employees, advising him/her of the risk of penalty, in a professional and respectful manner consistent with company policies.
- Acts performed by managers to monitor and inspect the employee's performance and targets.
- Routine acts for employee evaluation.

Another form of harassment is sexual harassment. It can occur through unwanted sexual advances, indecent comments or obscene remarks, and can include promising or providing employment, a promotion, compensation or special treatment in return for sexual favors. Sexual harassment can also include inappropriate or unwanted touching, as well as posting or sharing obscene images, objects or materials, even between colleagues without any hierarchy in their reporting.

Pick-up Lines, Flirting, Flattering Words or Sexual Harassment?

Sexual harassment is characterized by unwelcome conduct of a sexual nature. Conduct is unwelcome if the employee did not invite it and considers it undesirable and offensive. The way a person might dress, or general friendliness, does not mean that a sexual advance is welcome. Sexual harassment often occurs by managers or supervisors against employees within their reporting line. But it can also occur when one co-worker acts inappropriately to another co-worker, whether it involves unwanted touching, repeated requests for a personal relationship, or communications of a sexual nature. Sexual harassment is unacceptable at Vale. To avoid your conduct being considered sexual harassment, ask yourself the following questions before you act:

- Could what I am about to say be said in front of others without any embarrassment?
- Will what I am about do or say be welcome by my colleagues or appropriate for the workplace?

If the answer to either of the questions above is “no”, review your attitudes.



Facts & Figures

- Studies show that more than **80% of all women** experience some kind of sexual harassment during their lifetimes.
- In some countries, sexual harassment can lead to criminal penalties.
- Sexual harassment is predominately directed by men toward women, but men can be victims also. Sexual harassment can also be on the basis of sexual orientation or gender identity.

What Vale Wants from You



Treat your co-workers with respect and dignity. We do not tolerate harassment at Vale.



Be aware! Not everything that you are comfortable with will be comfortable for someone else.



If you see another employee being harassed, use one of Vale’s reporting channels or tell human resources. Victims of harassment often are embarrassed to make reports themselves.



Avoid physical contact with co-workers that may cause embarrassment or discomfort. Remember that close proximity and physical contact can be cultural traits that may vary widely between regions and countries. Always be careful when approaching someone to avoid disrespecting the habits and culture of the other.



Even if some conduct does not rise to the level of workplace or sexual harassment, it still can be inappropriate and contrary to Vale’s policies, procedures and values.



Do not blame any incident of harassment on the victim(s).



In some countries harassment and, in particular, sexual harassment, can be a crime, and Vale encourages victims to report cases to relevant authorities.

Discrimination

We believe that inclusivity and diversity within our workforce makes us stronger as a company. We seek to create a work environment where everyone is treated fairly, and where performance is judged on merit. We condemn discrimination against individuals, whether on the basis of race, ethnicity, national origin, gender, sexual orientation or gender identity, religion, trade union affiliation, mental or physical disability, age, HIV status, economic or family status or other common differences between people. We believe diverse perspectives will help create a more resilient company, lead to innovation and creative solutions, and allow us to relate more effectively to each other, to local communities and governments, to suppliers, contractors and customers, and to other key stakeholders. Different backgrounds create healthier workplaces and more just societies.

We expect our employees to help create a welcoming work environment in which everyone feels included. We do not tolerate demonstrations of prejudice or discrimination, whether it is a joke that may seem harmless to those who make it or verbal or physical aggression. We expect that all managers, employees, contractors, suppliers and customers will raise their concerns when they see discrimination, prejudice, a lack of inclusivity, and other attacks on human dignity in connection with any of Vale's activities.



Diversity, Inclusion and Non-Discrimination

We value diversity, inclusivity and non-discrimination in our daily interactions.

Diversity includes the many differences that exist between people, including race, ethnicity, origin, gender, sexual orientation, religion, age, among others.

Inclusion involves everyone feeling welcomed and valued, with equal opportunities for advancement and success, and the ability to contribute to our common objectives.

Discrimination means to distinguish or differentiate. We seek to avoid situations where individuals or groups are treated differently because of a characteristic unrelated to workplace performance.

What is discrimination?

Discrimination can occur in many ways in a workplace. For example, decisions related to hiring and firing, promotions, compensation and benefits, vacation time, work schedules, reporting lines, and job assignments. It can also involve exclusion and isolation in the workplace. We seek to promote a workplace where all employees feel valued, are judged fairly based on their performance, and are treated with respect. We do not tolerate discrimination based on characteristics unrelated to merit or performance. If you see behavior that is not consistent with a workplace defined by dignity and respect, you need to speak up – you are encouraged to raise the issue with the employee acting inappropriately in a courteous and professional manner. If you do not feel comfortable doing this, or if the behavior does not stop, employees are encouraged to speak to their manager, Human Resources, Corporate Integrity, or submit their concern via the [Whistleblower Channel](#), which provides for anonymous reporting.

What are common forms of discrimination?

Discrimination can be based on many different personal characteristics. The table below identifies several common forms and what Vale wants from you.

Gender

One common form of discrimination, particularly in the mining industry, involves gender. We do not discriminate on the basis of gender. We are committed to promoting gender equity and encouraging equality between sexes at work.

What Vale Wants from You



Do not assume or expect that men or women should have certain “feminine” or “masculine” behaviors or skills. Skills, aptitude and work quality are not dependent on gender identities or stereotypes. Any gender-based discrimination has no place in Vale.



Educate yourself on what “gender” means.¹



Do not pressure a person to dress or act more “feminine” or “masculine”.

¹ See, for instance the World Health Organization's discussion: <https://www.who.int/health-topics/gender>.

Sexual Orientation

Another frequent form of discrimination can involve sexual orientation. At Vale, we respect the sexual orientation of our employees and oppose such discrimination in all of its forms.

What Vale Wants from You



Treat everyone with dignity and respect, regardless of sexual orientation.

Do not make jokes, give nicknames, exclude, or treat individuals differently because of their sexual orientation.



Educate yourself on what gender identity and sexual orientation means.



Say “sexual orientation”, not sexual option.



Do not ‘out’ your colleagues or gossip about their sexuality.



Do not distribute materials (print, video or digital) that are homophobic in nature.

People with Disabilities

Discrimination against people with disabilities also occurs regularly. This may include individuals with physical or mental disabilities or individuals who are perceived to have physical or mental disabilities. Vale believes that people with disabilities should be treated with equality and respect, judged on their abilities, provided reasonable accommodations, and given access to work and development opportunities.

What Vale Wants from You



Generally, the preferred term is “people with disabilities,” although be aware that may be different in different places.



To ensure accessibility, Vale’s facilities include visual and tactile signaling of spaces, adequate access for people with mobility difficulties, and other initiatives. If your area is undergoing any renovation, remember to consider these and other aspects of accessibility.



Be careful not to assume, even with the best of intentions, that

a person with a disability is incapable. Do not patronize people with disabilities. Treat people with disabilities with equality and respect.



Never make jokes or disrespectful comments about anyone's physical characteristics, including in connection with a disability.



We encourage employees with disabilities to ask supervisors, managers and human resources for reasonable accommodations that may assist them in effectively performing their jobs.



Facts & Figures

- It is estimated that workplace discrimination can cost society **US\$400 billion per year**.²
- Caste-based discrimination affects an estimated **250 million people** worldwide.³
- Discrimination based on a person's name is also common, given its association with race, ethnicity, gender affiliation, and other characteristics. Some countries make it illegal to view a person's name on a resume when screening for most qualified candidates.
- Studies of different countries show that age discrimination is the most common form of discrimination.⁴

² See https://www.huffpost.com/entry/when-discrimination-costs_b_8855518

³ See <https://web.archive.org/web/20081115074446/http://hrw.org/english/docs/2001/08/29/global1815.htm>

⁴ See <https://www.statista.com/chart/19761/discrimination-experienced-by-respondents-in-the-workplace/>

Race, Ethnicity, National Origin

Discrimination on the basis of race is generally associated with skin color and other visible physical attributes. Ethnicity typically means a group having a common language or culture. It is often associated with origin or nationality, which refers to the location where someone was born or his/her ancestry. Discrimination on the basis of all three characteristics is common around the world and not tolerated at Vale.

We appreciate and respect racial and ethnic diversity, and strictly prohibit discrimination on the basis of race, ethnicity or national origin. We value workers from all over the world, who have many different backgrounds, and unique languages, cultures and traditions. Ethnic and racial diversity and multiculturalism allow us to learn from each other and can help create a stronger and more tolerant company and society.

What Vale Wants from You

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Do not give anyone nicknames because of their skin color, culture, or birthplace.



Do not assume an employee may be inferior in some way, or treat any other employee differently, because of their physical attributes, ancestry, or native language.



Do not doubt the honesty and competence of a person based on their ethnic origin or nationality.



Take an interest in the diverse traditions, customs and habits of the groups that live in the region where you work.



Do your best to understand and learn from each other. Teams with different backgrounds and world views tend to find more innovative solutions.



Consider Vale's multiple nationalities, backgrounds and ethnicities as natural and positive. There are no superior or inferior cultures, origins or ethnicities.

Religion

Discrimination on the basis of religion can also happen. We take a neutral position on religious issues and do not espouse any one religion. However, we operate around the world, and our employees observe numerous religions, worshiping different gods of their choosing or no god at all. While sometimes employees may not fully understand the religious practices of others, we respect the personal beliefs of all our employees and value the rich religious diversity of our workforce. We oppose religious intolerance in all of its forms. Workplace conditions, benefits, or other aspects of employment at Vale are not conditioned on following or not following any certain religion, tradition, or practice.

What Vale Wants from You



Never make jokes or disrespectful comments about anyone's religion.



Treat the religious beliefs and practices of others with respect, even if you do not understand or agree with them.



Do not pressure or coerce your colleagues to partake in any religious rituals or traditions.

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“No one is born hating another person because of the color of his skin, or his background, or his religion. People must learn to hate, and if they can learn to hate, they can be taught to love.”

Nelson Mandela

President of South Africa, from 1994 to 1999, winner of the Nobel Peace Prize in 1993.



Photo: Alessia Pierdomenico/Shutterstock

Freedom of Association and Political Freedom



We believe that individuals should be able to hold their own political beliefs, affiliate with political parties, and associate to bargain collectively. We respect the diversity of political views and the ability of workers to associate and engage with us collectively, including joining associations and unions, consistent with local laws. We consider them to be important considerations for employees and community members, as differing political points of view can lead to stronger and more informed policies and innovative solutions to social problems. Bargaining collectively can result in stronger protections and benefits for workers.

We expect that employees, managers and supervisors will respect the political beliefs and union membership of our workforce and all stakeholders. We are opposed to denying individuals workplace benefits because of the political views they hold or their desire to bargain collectively. However, we do follow the laws of the countries where we operate, which may have different rules related to union recognition and participation. In addition, while we encourage our workforce to be well-informed about laws and public policies that may affect them in different ways, the company is not a place for political campaigns. At work, it is not appropriate to wear politically partisan apparel, distribute political materials, or serve as a platform to advocate for candidates or public policy changes.



Facts & Figures

- In some Vale operations, the percentage of voluntary association with unions exceeds **50% of our workforce**.
- In Vale's total global operations, **96% of our employees** are covered by collective labour agreements and negotiations.
- Across the world, there are thousands of trade unions, representing hundreds of millions of workers.¹

What Vale Wants from You



Do not promote political party activity or propaganda, wear party apparel, or distribute political materials within the company's facilities.



Do not associate the Vale brand with any political party activity without prior authorization from the competent area.



Do not favor an employee for having similar political views as yours or punish an employee for having different views.



Do not use your position to impose political views on others.



Respect individuals' freedom of association and collective bargaining.



Respect the political beliefs of your colleagues.



Talk politely about politics, debating different views in a thoughtful way.

¹ See <https://aflcio.org/about-us/our-unions-and-allies/global-unions#:~:text=It%20is%20currently%20composed%20of,more%20than%2012%20million%20workers.>

2 Human Rights in Local Communities

Mining companies can have both positive and negative impacts on the human rights of local communities and the people who live there. At Vale, our goal is to treat people and communities with the respect and dignity that they deserve. We see them as critical stakeholders. We seek to establish lasting and valued partnerships, founded on open dialogue and mutual transparency, with appreciation for the array of cultures and values in the places where we operate.

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At times, mining companies do not always follow these basic principles, creating tension and hostility with local communities and their members. This has led to conflict and violence, loss of social license to operate, and protracted disputes.

With this in mind, our Global Human Rights Policy has identified several areas related to local communities, including: Indigenous Peoples and Traditional Communities, artisanal and small-scale mining, involuntary resettlement, grievance mechanisms, and human rights defenders. What we believe, expect and want from Vale employees is discussed below. If you believe that employees, suppliers, contractors or customers are not abiding by these standards we encourage you to [report your concerns](#).

Indigenous Peoples and Traditional Communities

We believe that respectful relationships with Indigenous Peoples and Traditional Communities are essential to Vale’s activities and core to the company’s values. With our large territorial presence, the company has broad and diversified connections with the communities who may be directly and indirectly impacted by our activities. 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. We strive to help leave a positive legacy by contributing to ethno-development and autonomy.



Facts & Figures

- The United Nations estimates that there are over **370 million Indigenous People** living in over **70 countries** worldwide, including at least **5000 distinct peoples**.¹

¹ See https://www.un.org/esa/socdev/unpfii/documents/5session_factsheet1.pdf

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.

- Vale has relationships with **32 Indigenous peoples** (14 in Brazil and 18 in other countries) and 48 traditional communities (45 in Brazil - mostly quilombolas and coconut-breakers, and 3 outside the country).

What Vale Wants from You



Treat Indigenous Peoples as key partners and stakeholders for our activities, seeking out continuous engagement, procurement and other business opportunities.



Understand and follow Vale’s guidelines, which have been created with international commitments and references related to Indigenous issues in mind, including the International Council on Mining and Metals (ICMM)’s position on Mining and Indigenous Peoples, ILO Convention No. 169 and the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP).



Seek to maintain open and transparent dialogue to resolve conflicts with Indigenous communities with whom we interact and create programs and projects to benefit those communities.

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Artisanal and Small-Scale Mining

We believe that artisanal and small-scale mining is responsible for generating work and income for thousands of families around the world and plays an important role in the socio-economic development of many countries and regions. Artisanal mining has existed for thousands of years and is a cornerstone of local subsistence and economies around the world.

What Vale Wants from You



Try to understand the history of artisanal mining in your area of operations, including whether it existed before Vale's mining activities or other formal mining operations.



Identify the risk of small-scale and artisanal mining, and where the risk is high, propose an action plan with improvements to reduce those risks and mitigate their impacts.



Avoid intervening directly with illegal mining activities when you observe it; instead, report the activity so the government can get involved.

We expect that our employees, suppliers and partners will engage constructively with artisanal miners in our areas of operation, treating them with the same respect and dignity extended to all external stakeholders. We expect that legal rights of artisanal miners will be honored and that we will seek to exist peacefully and productively alongside them. We recognize the important

distinction between lawful artisanal miners and illegal mining, which also may occur in areas close to or within our operational areas. When illegal mining is discovered, we involve the government so that it can take the necessary measures and, whenever possible, provide support to regularize the activity with the responsible government agencies, and offer to share best practices.



Facts & Figures

- Artisanal mining exists in about **80 countries**.¹
- Artisanal and small-scale mining has existed since the beginning of recorded history.
- Roughly **100 million people** around the world are employed in artisanal or small-scale mining, versus about 7 million people in industrial mining.²

¹ See <https://www.mining.com/infographic-true-costs-artisanal-mining/>

² See <https://www.worldbank.org/en/topic/extractiveindustries/brief/artisanal-and-small-scale-mining>

Involuntary Resettlement

We believe that involuntary resettlement is highly disruptive to individuals, families and communities, and should be avoided whenever possible. While sometimes implementing our projects and undertakings makes this unavoidable, we have procedures aligned with international standards, such as those from the International Finance Corporation (IFC), to minimize impacts and act responsibly and with respect for those affected.

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.

What Vale Wants from You

✓ Be transparent in our approach, and consider the impact on all stakeholders and engage them when defining and implementing relevant measures.

✓ Look for alternatives to avoid or minimize involuntary resettlement wherever possible, and seek alignment with the International Finance Corporation's Performance Standard 5.

✓ Look for solutions that sustain living conditions and economic opportunities equivalent to or better than those in the area of origin.

✓ Monitor the restoration of livelihoods and/or economic performance to gain confidence that they have been restored to levels that are equivalent to or better than origin conditions.

✓ Engage relevant stakeholders through open dialogue.



Facts & Figures

- Indigenous peoples, families, youth and children may face particular risks in connection with resettlement activities.
- IFC Performance Standard 5 has been adopted into the Equator Principles, which are followed by numerous lending institutions.

Grievance Mechanisms

We believe that affected stakeholders should be able to raise their concerns with Vale through channels that are legitimate, accessible, predictable, equitable, transparent, and rights-compatible. Grievance mechanisms can and should be a source of continuous learning for companies, and a means of improving dialogue with community members, employees, contractors, suppliers, customers and all others affected by our operations. We believe grievance mechanisms are an important way to help prevent potential human rights impacts

and violations, and where they may occur, to help remedy them in an equitable, transparent and predictable manner. 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. All complaints received through the channel are treated confidentially and investigated by a specialized internal team.

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. While we assess grievances for their merits, as important are underlying concerns that the grievance may represent, and thus even grievances that lack factual support can reflect important perceptions, sentiments and legitimate concerns. There are multiple pathways through which community members, employees, contractors, suppliers, customers and others can raise grievances and concerns, summarized in the box below.



Facts & Figures

- In 2019, **12,362 community** 'manifestations' (which includes compliments, requests, suggestions, complaints and denunciations) were registered with Vale globally.
- The average response time was 30 days and the average time for treatment and completion of the manifestation was approximately 90 days.

Vale's Whistleblower Channels



By Letter:

Vale's Whistleblower Channel
P.O. Box 521 -
ZIP Code 06320-971
Carapicuíba – São Paulo - Brazil



By Phone:

Brazil - 0800 821 5000
ou 21 3485-3000
ou 823 3000

Canada -
1-844-450-5001

Peru -
0800 51080

Mozambique - Vodacom:
84 5000 (cel phone)
/ Mcel: 82 5000
(cel phone)
/ TMD: 800-005-000

Other countries -
call collect to
+55 21 3485-3000



By Electronic Form:

Available on
www.vale.com.

Human Rights Defenders

We believe that human rights defenders are important stakeholders, seeking to hold companies, governments and other entities accountable for negative human rights impacts. Around the world, human rights defenders can be subject to attacks, including physical attacks, arrests and imprisonment, threats and intimidation, and civil lawsuits. We condemn unjust attacks on human rights defenders, we respect the role they play, and we encourage constructive efforts to promote human rights for affected individuals and communities.

We expect that our employees, contractors, suppliers and customers will engage in good faith with human rights defenders who bring to our attention potential negative human rights impacts connected to our operations. We support regular, proactive, and peaceful interaction with human rights defenders to address common challenges. Even where negative human rights impacts are in the vicinity of our operations, but not connected to our activities, we encourage dialogue with human rights defenders to try to jointly design and implement effective and sustainable solutions. While achieving those solutions may not always be possible, we expect open and positive discussions to try to achieve them. We likewise expect our customers, suppliers, and partners to respect the rights of human rights defenders and avoid unwarranted attacks.

Facts & Figures

- More than **300 human rights** defenders were killed in 2019.¹
- The most dangerous activities for human rights defenders involve land, environment and Indigenous Peoples.
- Human rights defenders often are attacked in connection with mining companies, whether by companies themselves, local governments, suppliers or others.

¹ See <https://www.frontlinedefenders.org/en/news/more-300-human-rights-activists-were-killed-2019-report-reveals>

What Vale Wants from You



Start with the assumption that human rights defenders are acting in good faith to protect the rights of others and will engage constructively.



Do not pursue tactics that are intended to intimidate human rights defenders, or which are likely to be perceived as unwarranted threats or attacks, including through threatened legal actions.



Engage in dialogue with human rights defenders who may be voicing concern with company activities or commercial relationships whenever possible.



Avoid taking steps to delegitimize human rights defenders or undermine their credibility.



Do not use or encourage force against human rights defenders unless strictly necessary and proportional to the threat they may be posing.

3 Human Rights in Supply Chains

Mining companies sit in a unique position within global supply chains. They are generally associated with “upstream” activities, producing minerals and metals that are refined and used in countless ways throughout the world. Therefore, mining companies’ performance and human rights programs are often also linked to the conduct of their suppliers within global supply chains. We respect conflict mineral standards, do not presently operate in conflict-affected regions, and seek to avoid sourcing from companies whose activities help fuel conflicts in affected areas. But mining companies also purchase countless goods and services themselves, and like all businesses, can therefore contribute or be directly linked to human rights violations caused by people or entities in their value chains.

At Vale, we want to engage with suppliers and customers who share our values. Whether we are purchasing or selling materials, we condemn the kinds of human rights abuses that can be seen in supply chains throughout the world. Our Human Rights Policy is clear on this point. This section of the Reference Guide focuses on child exploitation and modern slavery, human trafficking, areas where supply chain human rights risks are often found for companies. What we believe, expect and want from Vale employees is elaborated below, and we encourage all stakeholders to report concerns when they believe our standards are not being followed.

Protecting Children from Sexual Exploitation and Child Labor

We believe that the sexual exploitation of children should be prohibited everywhere and prevented to the maximum extent possible. Sexual exploitation and forced labor of youths and juveniles is both common and intolerable. It can take many different forms and is most often found in the supply chains of global companies. Vale condemns the sexual exploitation and forced labor of children in all of its forms.

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.



Facts & Figures

Child labor is particularly present in Africa and Asia and the Pacific.

48% of all victims of child labor are 5-11 years old.¹

¹ See https://www.ilo.org/global/publications/books/WCMS_575499/lang-en/index.htm



ILO Convention **138** ([available here](#)) established the minimum age for work at 18, with possible exceptions for adapted activities from ages 15 and 13 on. ILO Convention **182** ([available here](#)) establishes the worst forms of child labor that must be eliminated and are not tolerated by Vale.

Exploitation can take several forms

The sexual exploitation of children occurs when an adult engages in sexual activity with a child in exchange for something (e.g., money, gifts, drugs). For purposes of sexual exploitation, the UN Convention on the Rights of the Child defines a “child” as below 18 years of age, unless domestic law defines it as younger. Most countries have criminal laws in place that punish individuals who exploit children for sex, which can include viewing pornography involving minors. Sexual exploitation of children has no place at Vale and is strictly prohibited.

Another common form of exploitation is child labor. While many minors have part time jobs to help support their families or otherwise, the International Labor Organization sets the minimum age for employment at: 15 years old generally; 13 for light, part-time work; and 18 for hazardous work. At global mining companies, child labor risks may be present in the company’s own workforce or its local or foreign suppliers. Vale has policies and procedures to verify the ages of all potential

employees and contractors and performs due diligence on its suppliers. Some countries may have a different definition for the minimum age of employment, may set the minimum age higher or lower, and may define hazardous work in different ways in the context of mining. Vale strives to meet both international standards and the domestic laws in every country where it operates, and we expect the same from our suppliers.

Child labor deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development.

What Vale Wants from You



Our contracts with suppliers and customers are important instruments to ensure respect for human rights. Adopt standard contractual clauses on the subject.



Prioritize business relationships with partners and suppliers who share the same principles, values and management approach as Vale.



Include the risks of child sexual exploitation and child labor in company risk assessments and implement steps to prevent and mitigate risks that are identified.



Identify opportunities for young people to participate in social investments aimed at basic education.



Recognize that any company’s negative impacts can go beyond its operations and include its supply chain. Supervision and management of our contracts is essential to ensure adequate performance and help maintain our commitment to respect human rights.



Report any suspected sexual exploitation of children.

Modern Slavery and Human Trafficking

We believe that every person should have the right to freely choose when, where and how to work, without compulsion or coercion. We are opposed to modern slavery in all of its forms, including forced labor, bonded labor, child labor, prison labor, and trafficked labor.

We expect that all Vale stakeholders will take steps consistent with our policies and procedures to prevent modern slavery. We expect that everybody who is associated with Vale will look for signs of modern slavery in our operations, supply chains, and communities, and if they suspect modern slavery is occurring, will report it. We also expect that our suppliers will prohibit modern slavery in their own supplier or subcontractor networks.

Common examples

Land servitude: Any work or services where people work on the land and have obligation to provide all – or close to all – of their produce for free.

Restriction of freedom of movement: Work or services provided in a situation where workers cannot freely visit other facilities and society outside their working hours.

Retention of documents: Work or services provided in a situation where workers have their personal documents retained by the employers against their will.

Degrading conditions and exhausting labour hours: Work or services provided in a situation where workers are employed in inhumane conditions, or are not afforded reasonable and healthy rest and sleep time and conditions.

Categories of modern slavery

Forced labour: Any work or services people are forced to do against their will under threat of punishment; it can include coercion to work through manipulated debt, retention of identity papers or threats of denunciation to immigration authorities.

Debt bondage/bonded labour: People trapped in poverty borrow money and are forced to work to pay off the debt, losing control over both their employment conditions and the debt.

Descent-based slavery: People are treated as property, and their “slave” status is passed down from their parents.

Slavery of children: When a child is exploited for someone else’s gain. This can include child trafficking, child soldiers, child marriage and child domestic slavery.

Forced and early marriage: When someone is married against their will and cannot leave. Most child marriages can be considered domestic and/or sexual slavery.

Human trafficking: The use of violence, threats or coercion to transport, recruit or harbor people in order to exploit them for purposes such as forced prostitution, labour, criminality, marriage or organ removal.



Facts & Figures

- There are an estimated **40 million people** who are victims of modern slavery each year, including **25 million in forced labor**.¹
- **1 in 4 victims of modern slavery are children**.¹
- Women and girls are disproportionately affected by forced labor, accounting for **99% of victims in the commercial sex industry and 58% in other sectors**.²
- Forced labor happens in every country in the world.

¹ See https://www.ilo.org/wcmsp5/groups/public/@dgreports/@dcomm/documents/publication/wcms_575479.pdf

² See https://www.ilo.org/global/topics/forced-labour/lang-en/index.htm?cms_575479.pdf

What Vale Wants from You



Report any suspicions of modern slavery.



Prioritize business relationships with partners and suppliers who share the same principles and values as Vale.



Our contracts with suppliers and customers are important instruments to ensure respect for human rights. Adopt standard contractual clauses on the subject.



Recognize that any company’s negative impacts can go beyond its operations and include its supply chain. Supervision and management of our contracts is essential to ensure an adequate performance and help maintain our commitment to respect human rights.

