

## **About Vale**

Vale S.A. (“Vale”, “we”, “us” or the “Company”) is one of the world’s leading producers of iron ore, pellets, copper and nickel, with a portfolio that also includes platinum group metals (PGMs), gold, silver, cobalt and, more recently, iron ore briquettes. We are present in 17 countries, and, alongside our mining operations, we manage an extensive network of logistics systems—including railroads, maritime terminals, ports, and distribution centers—that enable us to deliver our iron ore to customers across the globe. Directly, and through associates and joint ventures, we also have investments in the energy business segment.

The locational rigidity of mining activities presents various challenges that must be considered throughout the business life cycle. In this regard, Vale's operations take place in territories with different socioeconomic, environmental, political, and regulatory contexts.

In Brazil, where the company carries out most of its activities, the main challenges include socioeconomic vulnerability and public security issues, which require greater efforts from the company to ensure the safety of people and company assets. It is also necessary to engage with public authorities, including public security agents, to enable coordinated and collaborative work, as well as the potential formalization of partnerships or cooperation instruments.

In other countries where Vale operates, public security tends to prevail over private security, requiring a different relationship with the responsible stakeholders.

## **About Vale’s Integrated Strategy**

In the end of 2024 Vale launched its 100th anniversary strategy: “Vale of the Future” and is preparing for this milestone by reflecting on current business operations and the key factors that will be critical to its success in the upcoming decades. This forward-looking exercise underscores the role of sustainability as a strategic lever for value creation and the longevity of the company.

Our strategic plan embodies this integrated vision by prioritizing the promotion of responsible mining practices, advancing low-carbon solutions while taking a disciplined approach to capital allocation.

To effectively integrate sustainability into our business management practices, we have established a set of commitments that inform our investment priorities and decision-making. We have aligned our long-term goals with the United Nations’ 2030 Agenda for Sustainable Development (SDGs).

## **About our commitment**

Building the Vale of the Future is an ongoing journey of continuous evolution. We built our trajectory based on collective thinking with different actors in society, reflecting on our

learnings, sharing experience, and seeking to act in a transparent, responsible, and coherent way.

Our commitment to human rights is reflected in various norms and policy documents including our Human Rights Global Policy, Ethics & Compliance Program and our cultural transformation journey. Our approach draws on international standards such as the UN Guiding Principles on Business and Human Rights, the ten principles of the UN Global Compact, the Universal Declaration of Human Rights, and the principles and performance expectations from the International Council on Mining and Metals (ICMM) among others.

Vale became a member of the Voluntary Principles Initiative (“VPI”) in November 2016, however, our security activities have been aligned to the principles since 2007, reinforcing our main value: “life matters most”. The implementation of the Voluntary Principles on Security and Human Rights (“VP”) allows a valuable peer learning experience and guidance to our human rights and security programs, procedures, and management.

Spinning off the base metal business, with the creation of Vale Base Metals VBM, led to a major restructuring process throughout our governance. Nevertheless, our commitment to the VPI spreads across the holding function in a pervasive way towards our subsidiaries. The ongoing carveout process included a series of steps to assure that the high standards of security processes management, in line with the VP, were properly handed over and are today in place.

### **About this report**

This report presents the actions Vale has taken in 2024 regarding the VP in Brazil, Canada, Malaysia and Oman<sup>1</sup> – prioritized countries where the company has its biggest mining and logistics operations and where public governance to promote human rights can benefit more from private engagement. Such actions aim to improve Vale’s security procedures and support public practices in security, in a manner that respects human rights. As per VP’s reporting guidelines, this document is divided into four sections:

- A. Vale’s commitment to the VP;
- B. Policies, procedures, and related activities;
- C. Country implementation; and
- D. Lessons and issues.

<sup>1</sup> In June 2024, our subsidiary Vale Canada Limited (VCL) completed the sale of part of its holding in PT Vale Indonesia Tbk (PTVI). VCL continues to maintain significant financial exposure to PTVI, as an affiliate.

## A. Commitment to the Voluntary Principles

### Public Endorsement

Our endorsement of the VP is set forth in our Annual Integrated Report<sup>2</sup>, which is prepared according to Global Reporting Initiative (GRI) directives and aims to keep our stakeholders informed of actions related to the environment and the communities Vale touches.

Our commitment to the VP is also expressed by our Global Human Rights Policy<sup>3</sup>, issued in 2009 and last revised in 2023, that establishes guidelines and principles for our actions regarding respect for human rights in our projects and operations, throughout our activities and in our value chain.

Communicating Vale's policy is also an important step in setting expectations when collaborating with public security providers or engaging with private security companies. By endorsing the VPs, we demonstrate our commitment to human rights standards and the VPI, and the repudiation of the abuse of power and inhumane treatment.

### Engagement in the VP Initiative

In 2024, Vale participated and supported the Brazilian in-country working group as one of the few local companies being a VPI corporate pillar full member. We have also attended the Annual Plenary Meeting, in Washington DC, apart from a series of VP conference calls, which were held virtually throughout the year.

In September 2024, upon VPI's invitation, Vale's Sustainability and Corporate Security senior leadership presented to other Corporate Pillar members, as well as NGOs and government representatives, the overall status of the continuous VP implementation program at Vale. The "Verification Presentation" is one of the criteria which all participants of the initiative are expected to meet and comprises the successes and challenges in implementing of the Voluntary Principles.

Also in September, the VPs were the theme of a panel discussion held in Belo Horizonte (Brazil) at EXPOSIBRAM 2024 – one of Latin America's most prominent mining events. Vale's Socioenvironmental General Manager brought a corporate perspective to the discussion on sharing the company's experience and challenges in implementing the VPs across the company's operations, including in complex areas, while highlighting the importance of establishing meaningful engagement with affected communities. Additionally, emphasized the importance of identifying and mitigating human rights risks associated with corporate security activities, and best practices on interacting with public and security providers.

<sup>2</sup> Please, refer to:

<https://vale.com/documents/44618/430705/Integrated+Report+Vale+2024.pdf/0c82cdc2-0eee-aa5f-1777-cddc02bd917d?version=1.1&t=1744635385577&download=false>

<sup>3</sup> Please, refer to:

[https://vale.com/documents/d/guest/pol-0005-g-human-rights-policy\\_2019?\\_gl=1\\*1k44mz1\\*\\_gcl\\_au\\*MTE5OTA5OTg3OC4xNzQwNjg2MzMz\\*\\_ga\\*MTcyNzkzMDY0Ny4xNjkyODExMTE1\\*\\_ga\\_BNK5C1QYMC\\*czE3NDcwNTQ5MzckbzM0JGcxJHQxNzQ3MDU2NjYyJGo0NiR5MCRoNzQyMzA1MjA1](https://vale.com/documents/d/guest/pol-0005-g-human-rights-policy_2019?_gl=1*1k44mz1*_gcl_au*MTE5OTA5OTg3OC4xNzQwNjg2MzMz*_ga*MTcyNzkzMDY0Ny4xNjkyODExMTE1*_ga_BNK5C1QYMC*czE3NDcwNTQ5MzckbzM0JGcxJHQxNzQ3MDU2NjYyJGo0NiR5MCRoNzQyMzA1MjA1)

### **Promoting awareness of the VP throughout Vale and within the value chain**

Vale's Human Rights Policy states the VP as reference and sets as Vale's principles to "Respect, raise awareness, and promote human rights, preventing potential adverse impacts and violations of Human Rights and, when necessary, mitigating and remediating them, in Vale's activities and along its value chain, through engagement with stakeholders".

Concerning the Company's security teams, including employees and contractors, that policy reinforces that Vale is a signatory and applies the Voluntary Principles on Security and Human Rights (VPSHR) in its activities and highlights that we must include potential human rights violation risks in our risk assessment of security requirements, as well as:

- Selects security Employees and strictly monitors them, considering previous experience, their technical capacity, and emotional stability.
- Regularly trains security professionals to carry out their activities in line with Human Rights principles and with the proportional use of force, treating vulnerable people and groups with special care.
- Seeks peaceful solutions and de-escalation of conflict situations that ensure the physical integrity of people, as well as the preservation of assets, information, and the maintenance of the production process.
- Works in accordance with the United Nations Basic Principles on the Use of Force and Firearms by Law Enforcement Officials and International Humanitarian Law.
- Respects the United Nations Code of Conduct on Law Enforcement by Officers.

From the fundamental principles of the company and its subsidiaries described in our Code of Conduct<sup>4</sup>, we emphasize:

- The seeking to prevent potential impacts and violations and, if necessary, working to mitigate and remedy them in Vale's activities and across our value chain. In this regard, we follow the United Nations Guiding Principles on Business and Human Rights and the laws of each country in which we operate in addition to national and international standards.

The Code of Conduct also states the following:

- Our interactions with Suppliers, which are part of our value chain, are guided by good faith, honesty, ethics and transparency, and the purpose of contributing positively to the economic and social development of the regions in which we operate.
- We seek results that align with our Values. We strive to be recognized as a socially responsible and sustainable company.

Vale's Human Rights Guide<sup>5</sup> focuses on making the company's directives and principles actionable, as set forth in our Policy, through effective initiatives and examples found in Vale's institutional daily routine. The Guide refers to the VP and seeks to provide, in an objective and

<sup>4</sup> Please, refer to:  
<https://vale.com/documents/d/guest/code-of-conduct-1>

<sup>5</sup> Please, refer to:  
[http://www.vale.com/EN/suppliers/code\\_conduct/Documents/human-rights-guide.pdf](http://www.vale.com/EN/suppliers/code_conduct/Documents/human-rights-guide.pdf)

informative manner, guidance and examples that will assist all employees, suppliers, partners and clients, to understand and carry out their actions respecting and promoting Human Rights.

In line with the evolution of its practices, Vale has an internal procedure for the treatment of human rights violation allegations which may eventually be addressed to the Company, ensuring the proper treatment, response and remediation, when applicable.

Vale also commits in responding 100% of the allegations received through the Business and Human Rights Resources Centre (BHRRC), as well as publicizing its position regarding potential controversies.

### **Promoting and advancing implementation of the VP internationally**

Vale believes in the value of the VP Initiative not only as a mechanism to protect and promote Human Rights in the extractive sector, but also as a unique organization to strengthen and support the global Human Rights agenda. The Human Rights theme gains even more prominence and adherence in our value chain when our financial partners, clients, vendors, and stakeholders in general converge to the same principles.

Collaboration strengthens the overall industry, supports more effective action on systemic issues, strategic regulation, innovation and technological development, and helps to foster a sustainable business environment.

## **B. Policies, Procedures and Related Activities**

### **Relevant policies, procedures, and guidelines**

The VP are incorporated into our Global Human Rights Policy, which together with our Code of Conduct, is the main source for our practices in the promotion and respect of human rights. Our employees are required to certify their compliance with our Code of Conduct on a biennial basis. The Human Rights Guide is also an important guiding document to clarify and further explain how to apply the expected behaviors defined by those policies, into employees' daily routine.

Vale provides regular human rights training, educational content, and awareness campaigns for our workforce. Training is mandatory during the onboarding process for both employees and contractors and is delivered in the local language. At year-end 2024, 95% of our employees received human rights training.

Enhanced training is provided to critical functions. For the corporate security function, for instance, we provide training in line with the VPs. At year-end 2024, regarding Iron Ore business, 98.3% of our Corporate Security employees and 99.8% of contractors have been trained in human rights. Regarding Base Metals business, 100% of our Corporate Security employees and contractors were trained on the subject.

Critical human rights updates are disseminated continuously to our employees, suppliers, joint ventures, and clients via email, booklets, bulletin boards and TV Vale. These stakeholders also participate in webinars and in-person meetings on the culture and reality of Indigenous Peoples, inclusive treatment, human rights defenders, resettlement, artisanal and small-scale mining, forced and child labor, sexual exploitation of children and adolescents, collective bargaining, freedom of association, diversity and inclusion.

For engagement with public security forces, security teams follow Vale's Global Anti-Corruption Program, comprised by a Global Anti-Corruption Policy and a Global Anti-Corruption Manual, which contain the rules and procedures that must be followed in any types of relationships with government officials or government authorities, so that such interactions meet the highest ethical standards and comply with the anti-corruption legislation applicable to Vale.

The contractors and subcontractors performing security activities hired by Vale must abide by our values and the principles contained in our Code of Conduct and Global Human Rights Policy. In addition, the Principles of Conduct for Third Parties explain how we implement our values at Vale and apply these values to our relationships with third parties. We seek to work with third parties - suppliers, customers and other types of partners - that understand and comply with all applicable laws and are committed to operating their businesses in a responsible and ethical manner. Suppliers working under contract for Vale must also respect the Company's regulations and procedures as established by the Corporate Security Department, when accessing our sites. Vale also promotes human rights awareness and respect along our value chain, including the adoption of legal contractual clauses on the theme. Contract managers are required to ensure that suppliers comply with Vale's policies (such as our Human Rights Policy, Sustainability Policy, Principles of Conduct for Third Parties) and the legislation of countries where they operate, including verification of adequate workload, remuneration and other legal labor obligations in addition to complying with the Universal Declaration of Human Rights.

In case of potential misconduct of any supplier, partner or customer, we notify the counterpart with requests for additional information on the suspect practice and for the adoption of applicable corrective measures. If the counterpart fails to comply with any of the requests, Vale is entitled to rescind the respective contractual relationship. Violations of human rights are reported to the authorities and contracts with Vale are terminated.

Also, in order to standardize the individual and collective conduct of Corporate Security, covering its own employees and contractors, in situations where there is a need for intervention or contact with people, the Corporate Security department in Brazil defined the Engagement Rules for Corporate Security Actions, an internal document which:

- Establishes the fundamental concepts, principles and guidelines for the proportional use of force, allowed when strictly necessary and only for self-defense against unjust attacks, by security guards and other own agents and contractors that integrates Corporate Security teams.
- Defines, based on the severity of the occurrence, which one of the levels of service and proper types of equipment shall be applied, according to the available teams.

- Prioritizes prevention actions to avoid conflicts, values proportionality and reasonability as central principles, and guides all procedures by respect, empathy, dialogue and Vale's value, *"Life matters most"*;
- Establishes internal requirements for Corporate Security Actions, defines roles and responsibilities, requires periodical training, and reinforces the observance of legal requirements related to Corporate Security Actions, referring, especially, to Brazilian laws, such as:
  - Federal Constitution
  - Penal Code
  - Civil Code
  - Privacy legislation
  - Any other applicable standards
- Establishes mitigatory actions and crisis management orientations.
- Establishes analysis and register procedure of the occurrences.

### **Vale's security and human rights risk assessment**

Vale's Corporate Risk Management Policy establishes guidelines and guidance for corporate risk management, while the Planning, Development and Management Standard defines the global risk measures and the main responsibilities to be applied for Non-Operational Risk Management.

The corporate risk management strategy is to promote the integrated management of all risks to which Vale is exposed, pursuing zero harm to employees and communities, and leaving a positive social, economic, and environmental legacy in territories in which we operate. Socio-environmental diagnostics are carried out to assess potential impacts of risk events, including those related to human rights.

Vale's approach to managing risks, including Human Rights risks, follows the Three Lines of Defense model. Operational and supporting, including Corporate Security, have primary and direct responsibility for identifying, monitoring and managing risks in an integrated manner (1st line). The Human Rights department, as specialists, develop and maintain risk management, internal controls, and compliance processes. They identify and monitor new/emerging risks and ensure continuous improvement and compliance with our risk management framework and applicable laws, regulations and standards (2nd line). This department also provides training and guidance to our operations in identifying risks, and reports on risk management results to the Risk Committee and executive vice presidents. As a final line of defense (3rd line), the Internal Audit and Whistleblowing Channel, both independent from the Board of Directors, conduct assessments and inspections to test controls and investigate whistleblowing reports, respectively.

100% of Vale's operations<sup>6</sup> assess the risk of human rights violations and monitor them periodically along with other business risks. In addition, our operations have to adopt prevention control measures for these risks and mitigatory controls – in case of risk's materialization.

<sup>6</sup> Considers as operations the risk management areas that contemplate the Company's business.



When it comes to the area of Corporate Security specifically, risk controls are implemented, aiming to mitigate the risk of human rights violation through the engagement of multiple operational and corporate areas for the proactive registering and treating of site vulnerabilities which could result in community conflicts.

Risk governance also includes executive risk committees, composed of leaders from different areas, as well as committees directly linked to the company's Board, which are responsible for enabling strategic and integrated risk management, escalating treatment, and providing visibility for business decision-making.

### **Human Rights Due Diligence (HRDD)**

Vale's due diligence process seeks to consider the management of human rights violation risks and the independent human rights due diligence (HRDD) process. Vale's operations assess and register risks of human rights violations in the Company's risk management system. The HRDD is carried out in all operations and critical projects by a specialized independent consulting firm in cycles of three to five years. The process includes document analysis, field inspections, and interviews. Corrective action plans are established by operations, along with monitoring and reporting on actions taken to address identified risks and impacts.

Between 2019 and 2023, 100% of our operations in Brazil (including active, suspended, and decommissioned assets) and in our iron ore operations in Oman and Malaysia.

In 2024, we started the second cycle of HRDD and reassessed our Oman operation and other five operations in Northern Brazil System (Serra Norte, Serra Sul, Serra Leste, Manganês do Azul and Carajás Railroad operations).

In Oman, this process revealed, among other things, that we have enhanced worker safety by providing a "right to refuse unsafe work" channel. We have also made progress in terms of training regarding an inclusive workplace, while improving trust through the Whistleblower Channel and community relations activities. We still have challenges related to the availability and condition of facilities and infrastructure for workers, as well as working relations and conditions for migrant workers.

In Brazil, the main challenges that were identified relate to the working conditions of contractors, infrastructure, management of operational services, property security (specially within the most remote jurisdictions where we operate), sexual harassment and other forms of harassment and discrimination. The lack of public security presence and the local socioeconomic condition impose extra challenges in terms of security of people and assets, as aforementioned.

### **Vale's procedures regarding private security providers**

Vale's background check process, which is applied to any potential providers - including those for private security, follows the Code of Conduct and the Human Rights Policy and is conducted in compliance with local legislation. That screening aims to find out any evidence of human rights violations, among other misconducts (fraud, corruption etc.), globally.



Due diligence are conducted not only for the bidding process, but along the contract's term. Results serve as inputs for building the Supplier Performance Index ("IDF"), Vale's main tool for assessing providers across our operations worldwide. That procedure is applicable to all of our providers in Brazil, Canada, Malaysia and Oman.

In Brazil, due to the exposure of environmental protection institutions and fire departments in some high-level risk sites in the north region, periodic training is provided on the use of operational techniques and human rights, for private security and public security.

### **Independent Human Rights Due Diligence in Security Service Providers – Brazil, 2024**

In 2024, Vale S.A. conducted a comprehensive human rights due diligence process focused on the security service providers responsible for surveillance operations across its sites in Brazil. This initiative was part of the company's ongoing commitment to uphold and promote human rights throughout its supply chain.

The due diligence process encompassed a thorough documentary review of ten contracts with security service providers. In addition, field inspections were carried out across more than 30 municipalities in five Brazilian states where Vale maintains operations and projects. These inspections included visits to worker accommodations and operational sites to assess compliance with minimum working conditions.

Over 210 third-party workers were interviewed as part of the assessment. The evaluation covered a wide range of criteria, including occupational health and safety standards, compliance with labor and social security obligations, adequacy of accommodation and transportation conditions, and the provision of mandatory training for the roles performed. Furthermore, the assessment also examined the extent to which service providers adhered to the Voluntary Principles on Security and Human Rights.

The independent due diligence process was concluded in 2024, with feedback sessions and reporting conducted in 2025. The findings led to the development of action plans, which will be monitored and followed up by Vale S.A. to ensure continuous improvement and accountability.

This initiative underscores the importance of collaboration between companies in enhancing processes and promoting responsible business practices. Such partnerships represent an ongoing journey toward continuous improvement, where shared commitment and transparency are essential to achieving lasting, positive impact.

### **Engagement with public security forces**

The VP implementation plan includes actions to engage with governments to promote best practices and standards of security and human rights, support government efforts and civil society organizations to strengthen public institutions to ensure accountability and respect for human rights and manage interactions with public forces in accordance with VPs, including

holding structured meetings to discuss security and human rights.

Vale's Security team maintains close contact and cooperation with public security forces in Brazil. For example, when public security forces are deployed to respond to events related to our Company, Vale's Security team assesses the at-risk situation and reinforces to law enforcement personnel the need to respect human rights principles.

Additionally, we have settled Memorandum of Understanding (MoUs) and Technical Cooperation Agreements with the public security forces of the main states in which we operate in Brazil<sup>7</sup>. The content of each MoU is negotiated according to the local reality, aiming to contribute with material supply needs, and to sponsor relevant social programs held by public administration (Educational Drug and Violence Resistance Program, for example), and promote environmental protection actions regarding security in conservation unities.

Moreover, the Human Rights, Information Security, Diversity and Inclusion Policies and Conduct Code are inseparable parts of the contractual term on agreements firmed with public security in Brazil, to reassure Vale's commitment, and guiding all the contractual relationship with public organisms by the best practices standards in those agendas.

Considering all those agreements, over R\$5MM were invested in multi-year working plans, benefiting localities in different areas in Brazil. We adopt Human Rights and Anti-corruption and Sanctions clauses in these agreements, reinforcing Vale's commitment to use its leverage to promote human rights best practices in all security actions, especially when taken by public security forces in the Company's interest.

### **Grievance Mechanisms**

Vale encourages employees, third parties, members of communities, suppliers and any other stakeholder to report incidents related to security and human rights.

To better engage with communities regarding our regional activities, Vale has implemented a global model for managing complaints and suggestions, which includes a central channel aimed at receiving grievances and demands from communities as well as the global Whistleblowing Channel, widely available. All mechanisms are grounded in the UN Guiding Principles on Business and Human Rights, which emphasize that such channels must be legitimate, accessible, predictable, fair and transparent. Through this approach, we aim to address grievances and minimize risks associated with our operations. By actively listening to community feedback, we have integrated improvements into our operational and project routines to prevent recurring complaints and maximize positive impacts.

In 2024, we recorded 9,313 community comments, of which 3,995 were complaints. In all, 54.5%

<sup>7</sup> Pará, Maranhão, Minas Gerais, and Espírito Santo.

of these complaints related to issues such as improving access, highways and roads dust control, requests for weeding and pruning, damage to homes and other properties, and noise. Of the total complaints, 99% were acknowledged and 82.2% were resolved.

Considering Corporate Security's activities, incidents are recorded on the "Stakeholders, Demands & Issues" (SDI) system and assessed, treated (preventive and corrective actions) and reported at corporate level and to the local and/or federal authorities, if applicable.

Vale seeks to respond to 100% of allegations submitted by the Business & Human Rights Resource Center (BHRRRC). In 2024, four allegations were received and clarified on this platform. Two of them were related to resettlement and deforestation in Indonesia. Another concerned Vale's inclusion on the Brazilian Labor Ministry's "Dirty List," and a fourth allegation involving social and environmental compensation related to the Mineração Paragominas project in Brazil, which was sold by Vale in 2011.

### **C. Country Implementation**

Since November 2022, the Brazil working group has been meeting quarterly, alternating online and in-person meetings. The group has strong corporate participation from both the mining and oil & gas sectors in Brazil, as well as growing engagement with representatives from several ministries of the Brazilian Government, and civil society.

Vale has promoted awareness of our Human Rights Police and the VP through a variety of mechanisms across the world. We have developed a specific training about Human Rights and Security which is continuously presented to our security personnel in Brazil and abroad. The content of this training refers to the Engagement Rules for Corporate Security Deployment and it aims to guarantee, especially to contractors, the proper acknowledgement of Human Rights concepts, legal and mandatory internal requirements for security actions, also to share good practices and lessons learned, through an interactive theoretical discussion, sharing cases that were widely reported by the media and hypothetical ones about the theme.

Moreover, aligned to Vale's commitment with the promotion of Human Rights and the prioritization of life, Corporate Security increased the efforts to prevent, instead of responding to threats, allowing for more predictable and effective processes. The same way, there were investments in Security's technology park, capacity building, and continuous improvement.

In addition, the Corporate Security department developed a tool for our security guard teams in Brazil. It is a daily checklist that must be answered by security guards before the beginning of each journey. The main objective is to promote self-reflection in each of our partners, especially about their mental health state and real capability to safely execute their tasks that day. The tool – still at a pilot stage – also helps to define standards and to verify all the personal protective equipment needed. Also, if one of the mental or physical aspects is not considered safe by them, the contractor shall exercise their right of refusal and to not carry out the activity. All of this according to our key-behaviors "Open and transparent dialogue" and "Obsession with safety and risk management".

## Engagement with stakeholders on country implementation

Our strategy prioritizes: (i) the definition of terms and agreements for a joint action with public security forces that allows mutual support, the dissemination of respectful practices and clear roles and responsibilities; and (ii) the engagement with NGOs or other potential partners, essential to work with both governments on building capacity for public security authorities.

In this regard, we highlight the following actions carried out:

- Ongoing implementation of an agreement signed in 2022, with public security forces, in Brazil, predicting, among other subjects, the availability of materials to promote awareness in disarmament campaigns and other civil duty actions, besides the availability of educational material to support public security institutions in other kinds of awareness campaigns.

### “Usinas da Paz” in Pará

Vale actively cooperates with stakeholders, aiming to build positive legacy and resilient communities within the territories where we operate. In this context, under the scope of Programa Estrutura Pará (Pará Structure Program) there are 26 major projects ongoing that will expand Pará’s infrastructure and improve the provision of public services, including public security, in many areas across several municipalities. This program is a public policy to which Vale has adhered, allowing mining companies to allocate up to 40% of mineral exploration taxes to infrastructure investments. Of these 26 projects, 23 are units called Usinas da Paz (Peace Factories), which are part of the Territórios pela Paz (Territories for Peace) initiative. The implementation of the Usinas da Paz will be completed by 2026 and aims to strengthen communities, restoring citizenship, and reducing violence through social transformation.

Context: Between 2021 and 2022 — prior to the creation of Programa Estrutura Pará and the selection of Belém to host COP30 — Vale had already donated six units of the Usinas da Paz to the Government of Pará: four of them are in Belém and the other two in Parauapebas and Canaã dos Carajás, where some of Vale’s operations are located. These units were installed in areas of high socioeconomic vulnerability, and recent data has shown that they have contributed to the systematic reduction in crime indicators monitored by the State Secretariat for Public Security and Social Defense.

According to data presented by the Secretariat for Public Security and Social Defense (Segup) through the Adjunct Secretariat for Intelligence and Criminal Analysis (Siac), comparing the period from January 1 to March 31 of 2024 and 2025, there was a 23.73% reduction in robbery crimes in the areas where the Usinas da Paz operate. Additionally, seven neighborhoods in the Metropolitan Region of Belém, as well as the cities of Parauapebas and Canaã dos Carajás, showed a 61.96% reduction in violent and intentional lethal crimes, which include homicide, robbery followed by death, femicide, and bodily injury followed by death, in the first quarter of 2025.

## Communities impacted by dams in emergency situation – Security measures

After Brumadinho's dam collapse, in the state of Minas Gerais, evacuation actions were necessary in some critical locations due to the increased risk level of the structures. Since then, Vale has remained committed to the decharacterization of all upstream tailings' dams. In Minas Gerais state, municipalities of Nova Lima, Itabirito, Ouro Preto and Barão de Cocais, where dam decharacterization projects are taking place, 43 families out of a total of 205 have received final compensation. Another 162 families are receiving provisional support and are awaiting final settlements.

In August 2023, we signed an agreement worth USD 108 million in Barão de Cocais for reparation in the municipality, focusing on the Barão de Cocais Compensation and Development Plan, which is now underway. The agreement encompasses income transfer, support for tourism, culture and security, and measures to strengthen municipal public services, among other demands from the affected communities.

Within the framework of the agreement, a Public Security Program was established with the objective of strengthening emergency preparedness and enhancing community safety. As part of this commitment signed with Civil Defense Department, Vale submitted a detailed work plan focused on the adaptation and maintenance of emergency escape routes associated with the Sul Superior and Sul Inferior dams. The plan incorporates contingency measures for extreme scenarios — including potential simultaneous dam failures — and ensures clear signage and uninterrupted access for at-risk populations. The estimated investment for these measures is USD 2,2 million.

### **Land use conflicts**

Apart from operational areas, Vale protects or helps protect approximately 1 million hectares of its own land and that of third-party partners, either through voluntary actions or in compliance with legislation.

Land use conflicts typically stem from the reliance of third parties, Indigenous People and local communities on areas within Vale's projects and operations for access to natural resources, housing and/or income generation. Vale prioritizes the amicable resolution of conflicts, with dialogue as a guiding principle.

In Brazil, in the state of Pará, we are continuing to negotiate with 569 families occupying a company site designated for the Cristalino Project in Canaã dos Carajás, in accordance with agreements approved by the courts and the State Public Prosecutors' Office. In 2024, the deadline for families to accept the amicable agreement expired. Approximately 62% of the eligible families accepted the agreement, received payment and vacated the area. For the remaining families, Vale is working with the Land Solutions Commission of the Pará State Court of Appeals to mediate a solution.

At the end of 2024, groups of families from the Landless Workers Movement (Movimento de Trabalhadores Rurais sem Terra – MST) occupied an area owned by Vale in Canaã dos Carajás,

Pará, to demand progress in negotiations with the federal government to create new land reform settlements.

In the municipality of Mariana, Minas Gerais, Vale is implementing measures to prevent invasions and unauthorized construction on a company-owned site known as Vale dos Cristais, which has been illegally occupied. These measures include the installation of fencing and signage, as well as enhanced surveillance. In cases of new invasions, the responsible individuals are notified to vacate the premises. If they refuse, legal action is taken to reclaim the property and enforce court decisions. Vale is taking these steps to avoid an increase in the number of families exposed to risks and social vulnerability, while it evaluates a long-term solution for the area.

### **Involuntary resettlement**

Vale strives to adhere to international sustainability standards, such as the International Finance Corporation's (IFC) Performance Standard 5, which provides a primary framework for conducting involuntary resettlement. While we strive to avoid such measures, involuntary displacement may occur when potential impacts are anticipated – whether related to access to third-party areas, risks to community safety, or land tenure reform of company properties. In such cases, displacements are carried out in a planned manner, with the active participation of affected families in decision-making processes. Emergency involuntary resettlement is avoided and are only considered when families face risks to their physical safety.

Prior to any resettlement, thorough surveys are conducted to assess the number of families potentially affected by a project and to identify solutions that avoid or minimize involuntary displacement. When resettlement is necessary, a detailed diagnosis of the situation informs provisional and definitive measures aimed at restoring livelihoods to conditions equal to or better than those prior to displacement. In 2024, 897 families in Brazil were involved in involuntary resettlement processes. There were no involuntary resettlements in the north of the country. Of these, 545 families are evaluating alternatives to minimize displacement, 241 have received provisional assistance, and 111 have been permanently rehoused.

In Itabira, Minas Gerais, a project adjustment made it possible to reduce the number of families involved in involuntary resettlement from 39 to 27 as part of the Pontal System decharacterization project. Additionally, 14 families are receiving temporary assistance until the absence of risk is confirmed. In the same municipality, eight families in the Penha neighborhood are receiving provisional assistance due to operational impacts, and 27 families in the Cubango community are being resettled to enable the expansion of the company's operations.

In the municipalities of Nova Lima, Itabirito, Ouro Preto and Barão de Cocais, where dam decharacterization projects are under way, 43 out of 205 families have received definitive assistance. Another 162 families are receiving provisional assistance and will be permanently rehoused following compensation. Once the new Vitória-Minas Railroad right of way has been approved, the number of displacements required to execute projects in the municipalities of Aimorés, Santana do Paraíso and Belo Horizonte – currently estimated at 57 families – will be finalized.

#### **D. Lessons and Issues**

We acknowledge that our ability to interfere with policies, procedures, and practices varies according to the degree of our leverage *vis-a-vis* our stakeholders; however, even in cases in which our leverage is not strong, we contribute with awareness-raising actions and sharing of good security and human rights practices.

Mining and its value chain imply a high level of interaction with neighboring communities, employees, contractors and stakeholders in general. Therefore, incidents of violence or human rights violations may happen, despite all Vale's efforts and commitments to good corporate practices. In all cases, Vale works to act on them in a manner to mitigate impacts, repair and to prevent new events, in a process of continuous improvement.

#### **Security Incident: Vitória do Mearim – EFC Railway [2024]**

As reported to all VPI members on May 28<sup>th</sup>, a security team patrolling the premises of VALE's EFC railway operation was assaulted by an individual on March 29, 2024 and, after approaching the assailant and several attempts of immobilization, the individual tried to take one of the security guard's weapon. At this moment, amid the physical attack, the other security guard shot the assailant.

Vale's Emergency Brigade and the Military Police were called immediately by the security team. The individual was transported to a nearby hospital, but he did not resist the injuries. The security team reported to the police station and Vale is actively cooperating with the investigation.

Internal incident investigation was concluded and, apart from the challenging environment characteristics which contributed to the incident (high criminality, lack of physical protection along the railroad) the security agents' conduct lacked 'necessity' and 'planning' evaluation. Also, enhancing field training was recommended to embedding learned lessons on physical contact techniques.

Update on the police investigation: the security agents allegedly stated that they act for self-defense. The results of forensic examination on the guns and ammunition are yet to be concluded. More information will be disclosed as the criminal case evolves.

#### **Update on Security Incident: Marabá – EFC Railway [2022]**

On May 14<sup>th</sup>, 2022 during a security occurrence, in Marabá, triggered by the local community members complaints regarding possible criminal offenses, a third-party security guard shot the leg of a man supposedly involved on continuous theft of railway materials. According to the obtained testimony, given by the third-party security guard himself, the injured man ran away in response to that warning shot – as he called it. After activating the help chain and also



emergency and public security services, searches were carried out around the incident area and later the same day the man was found dead with one of his legs apparently injured.

Update on the police investigation: To this date, as a result of the criminal investigation, both security guards were convicted by the first instance court for murder. The contracted company who provides security services – Segurpro – was also filed in the civil instance to provide financial compensation to the family– still ongoing.

In September, 2024, Norges Bank announced its decision to exclude the Spanish Security company Prosegur from the Norwegian Government Pension Fund Global due to an unacceptable risk that the company is contributing to severe violations of human rights. The Marabá case was listed (among other cases) and Vale is also mentioned in the report. The decision was based on the Council on Ethics' recommendation dated from April, 2024.

### **B1 dam failure - Brumadinho**

We will never forget Brumadinho. January 25, 2024, marked five years since the collapse of Dam B1 at Córrego do Feijão Mine in Brumadinho, Minas Gerais. This tragedy resulted in the irreparable loss of 270 lives, including two pregnant women. To this day, two victims remain missing (the 268th victim, Maria de Lurdes da Costa Bueno, was identified in February 2025.) We remain in close contact with the families and continue to support the Minas Gerais Fire Department in its ongoing search efforts. Our commitment to ensure that such an event never occurs again drives our work on people's safety and the risk management of our dams.

In 2024, we made further progress on our programs under Brumadinho's Comprehensive Reparation Agreement. Vale has assumed a total of BRL 64.5 billion (USD 11.9 billion) in commitments and reparations. Of this amount, BRL 36.9 billion (USD 6.8 billion) has already been disbursed, covering spending on the agreement and other related initiatives. Socioeconomic reparation projects are underway, and significant progress has been achieved. Under Vale's obligations to repair harm, the parties to the contract have approved 379 projects, including 19 in Brumadinho and 252 in the 25 other municipalities of the Paraopeba Basin. Of these, 102 projects have been completed, three are finalized and under review by the parties, and 169 are currently being implemented by Vale. All the projects are monitored and supervised by the parties, with technical support from Fundação Getúlio Vargas's socioeconomic audit arm.

As part of the projects for Brumadinho, a new fire department station is currently being developed, under the technical supervision of the Military Fire Department of Minas Gerais (CBMMG) and following best construction practices and standards. Other Terms of Commitment have been incorporated into the Comprehensive Agreement framework, especially those signed with Civil Defense (R\$ 97 million) and the Fire Department (R\$ 71 million), which include obligations aimed at strengthening public safety infrastructure. These efforts will equip these institutions with a total of 12,956 items, including technical and IT equipment, as well as vehicles. All these actions will provide better technical working conditions and enhance the quality of services offered.