

Company Name Vale
Industry Extractives



Overall Score

Theme Score

3.0

11.9

11.7

13.8

15.0

7.1

Out of

10

25

15

20

20

10

For Theme

A. Governance and Policies

B. Embedding Respect and Human Rights Due Diligence

C. Remedies and Grievance Mechanisms

D. Performance: Company Human Rights Practices

E. Performance: Responses to Serious Allegations

F. Transparency

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

Detailed assessment

A. Governance and Policies (10% of Total)

A.1 Policy Commitments (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.1	Commitment to respect human rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: General HRs commitment: The Company is a signatory to the United Nations Global Compact. It states that 'the protection, promotion and awareness of Human Rights in its activities and throughout its supply chain in accordance with the principles of the Universal Declaration of Human Rights'. In addition, Vale's human rights policy principles are to 'respect, protect, promote and create awareness of human rights throughout our activities and along our production chain, in accordance with the UN International Bill of Human Rights'. In its submission to CHRB disclosure platform, the Company states that 'Vale is committed to implement the UN Guiding Principles on Business and Human Rights'. However, this commitment is not (yet) part of a company policy, and/or signed off by an executive. [Vale Human Rights Policy, 29/05/2014 & Vale Human Rights Guide, 01/12/2013] Met: UNGC principles 1 & 2: as above Not met: UDHR Met: International Bill of Rights: The Company Code of Conduct states "we protect, respect and promote human rights and remediate any possible impact throughout our production chain, operations and projects." The Company then discloses their definition of human rights as being " Rights and freedoms of all human beings as described in The International Bill of Human Rights of the United Nations (UN) and the fundamental conventions of the International Labour Organization (ILO)." <p>Score 2</p> <ul style="list-style-type: none"> Not met: UNGPs Not met: OECD

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.1.2	Commitment to respect the human rights of workers	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: ILO Core: The Company's human rights policy includes commitments to respecting freedom of association, collective bargaining, the prohibition of child labour and forced labour and non-discrimination. [Vale Human Rights Policy, 29/05/2014 & Code of Ethics and Conduct Vale, 01/04/2018] • Met: UNGC principles 3-6 • Not met: All four ILO apply to EX BPs: The Company's supplier Code includes prohibition of child labour and forced labour and non-discrimination, but freedom of association and collective bargaining have not been covered. [Code of Ethics and Conduct Vale, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: All 4 ILO Core: The Company's human rights policy includes commitments to respecting freedom of association, collective bargaining, the prohibition of child labour and forced labour and non-discrimination. [Vale Human Rights Policy, 29/05/2014] • Met: Respect H&S of workers: The Company states that 'we maintain a healthy and safe place to work' and the supplier Code includes health and safety commitments for business partners [Vale Human Rights Policy, 29/05/2014] • Met: H&S applies to Ex BPs
A.1.3	Commitment to respect human rights particularly relevant to the industry (EX)	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: VPs participant: The Company is a member of the Voluntary Principles on Security and Human Rights and in 2017 participated in its first Plenary Meeting of Voluntary Principles. [2017 Sustainability Report, 31/12/2017] • Not met: Uses only ICoc members • Met: Respecting indigenous rights: The Company states in its Sustainability report that it 'values culture and respects indigenous peoples and traditional communities. It acts in order to guarantee free, prior and informed consultation and permanent dialogue. Guided by its Sustainability Policy and of the International Council on Mining and Metals (ICMM) on Indigenous Peoples and Mining position, it establishes voluntary agreements focused on ethno development and strong impact management, with the objective of guaranteeing the rights of these communities and peoples, and generate shared earnings.' Vale's human rights policy states that 'we respect and preserve the culture heritage, knowledge and practices of indigenous peoples within our influence area'. The Company has a policy to avoid involuntary resettlements and it states that 'whenever necessary, relocation initiatives should be aligned with Performance Standard 5 (called "acquisition of land and involuntary relocation")', established in the International Finance Corporation (IFC). [2017 Sustainability Report, 31/12/2017 & Vale Human Rights Policy, 29/05/2014] • Not met: ILO 169 • Not met: UNDRIP • Not met: Expects BPs to respect these rights <p>Score 2</p> <ul style="list-style-type: none"> • Met: FPIC for all: The Company is a signatory to the International Council on Mining and Metals (ICMM). [2017 Sustainability Report, 31/12/2017] • Not met: Vol Guidelines on Tenure • Not met: IFC performance standards • Not met: Zero tolerance for land grabs • Met: Respecting the right to water: The right to water and sanitation is included into the commitment to implement impacts management. • Not met: Expects BPs to respect all these rights
A.1.4	Commitment to engage with stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to stakeholder engagement: The Company states in its Human Rights policy that 'we recognize that our ability to interfere with policies, procedures and practices varies based on the degree of our influence with our stakeholders. Even in cases in which our influence capacity is not as strong, we commit to engage with stakeholders together with employees, suppliers, partners, across communities, governments and society to contribute with awareness-raising actions and the promotion of human rights'. The Company also states that it is committed to engaging local, indigenous and traditional communities based on social, cultural, economic and environmental impact assessments. [Vale Human Rights Policy, 29/05/2014] • Met: Regular stakeholder engagement: The Company has disclosed to CHRB "The Social Action Guide presents and describes principles and guidelines for this process at Vale, and guides the application of specific procedures and support tools, throughout the life cycle of the ventures, and across the territories where operates. In the territories where Vale operates, there are community forums for Relationship Plans and environmental Education Programs. They are based on a model of participative management structured which involve community leaders, Vale professionals and, sometimes, public authorities and other partners for discussion." [CHRB Disclosure on BHRRC, 30/04/2018]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Commits to engage stakeholders in design: The Company states that the Social Action Guide details the application of specific procedures and support tools that are based on a model of participate management which involves community leaders. However, it is not clear that potentially and actually affected stakeholders are involved in the design of the Company's human rights approach. [Vale - Submission to CHRB, 01/04/2018] • Not met: Regular stakeholder design engagement
A.1.5	Commitment to remedy	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Commits to remedy: The Company states in their revised Code of Conduct "We protect, respect and promote human rights and remediate any possible impact throughout our production chain, operations and projects. " [Code of Ethical Conduct, 31/08/2018 & Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Not obstructing remedy access • Not met: Collaborating with access initiatives: The Company provides information regarding their Renova Foundation initiative, which is an access initiative to provide remediation for those impacted by the Samarco dam disaster. However, the Company does not have an explicit commitment to collaborating in initiatives that provide access to remedy. [Vale Sustainability Policy, 29/09/2016] • Not met: Work with EX BPs to remedy
A.1.6	Commitment to respect the rights of human rights defenders	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Zero tolerance attacks on HRDs: The Company has disclosed to the CHRB that they are participating in the construction of the ICMMs statement on Human Rights Defenders. However, this is yet to be publicly communicated. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Expects EX BPs HRD commitments

A.1 Board Level Accountability (5% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.1	Commitment from the top	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: CEO or Board approves policy: The Company's CHRB Response that that the Company's Human Rights Policy was approved at the highest level of company management, the Board of Directors. [Vale - Submission to CHRB, 01/04/2018] • Met: Board level responsibility for HRs: The Company states in its Code of Ethics, which incorporates its Human Rights commitment that 'The Executive Board shall ensure and monitor the observance of this Code, and will be responsible for proposing to the Governance and Sustainability Committee and to the Board of Directors recommendations for its improvement, aiming to update it on a regular basis.' [Code of Ethics and Conduct Vale, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Speeches/letters by Board members or CEO: The message from the CEO statement in the 2017 Sustainability Report states "Vale's participation in forums related to subjects such as human rights, fight against corruption, gender equality and environmental protection, among others, evidences our commitment to the principles of the UN Global Compact and reinforces our intention to contribute for society's well-being. " However, no evidence found of CEO's or other board member public speeches in forums or other publications different than company's own reports. [2017 Sustainability Report, 31/12/2017]
A.2.2	Board discussions	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Board/Committee review of salient HRs: The Company discloses in their minutes that "the Company, with the support of its Board of Directors, reaffirms its commitment to the United Nations Global Compact in its Sustainability Report and reports progress in implementing its principles." However, this does not necessarily mean that the company board completes a review of the Company's salient human rights issues. [Vale Minutes, 2018] • Not met: Examples or trends re HR discussion <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both examples and process

Indicator Code	Indicator name	Score (out of 2)	Explanation
A.2.3	Incentives and performance management	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Incentives for 1+ board members: The Company states in its Sustainability Report that it has a broad variable compensation program that impacts the company's own employees, and this incorporates a Health and Safety goal. <p>The Company's response to the CHRB states that "In addition to fixed-sum remuneration, the Executive Directors and other company leaders receive bonuses and incentive payments insofar as they meet individual and collective goals to achieve the company's strategic results, related to financial, operational/ technical and sustainability indicators. The Board and all Vale's leadership have a bonus related to health and safety. The target includes the performance on three indicators:</p> <ul style="list-style-type: none"> - implementation of the Integrated Management System (HSE) - implementation of the Critical Activities Requirements* - this one can be chosen from a list of indicators, being one of the options related to community safety <p>* These activities considered more critical at Vale's operations have very strict procedures and requirements that must be accomplished." [2017 Sustainability Report, 31/12/2017]</p> <ul style="list-style-type: none"> • Not met: 1+ EX risk, beyond employee H&S: Although some of the health and safety incentive indicators apply to community safety, the Company has not clarified that this target extends to workers of extractive business partners. [2017 Sustainability Report, 31/12/2017] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

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

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.1	Responsibility and resources for day-to-day human rights functions	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior responsibility (inc ILO): The Company states in its CHRB Response that 'Human Rights management is part of the Sustainability Executive Area and Director. It has a specific structure with a senior manager and a team of five experts that work in coordination with different departments. Strategic human rights issues, as well as the approval of the Global Human Rights Policy, are addressed in the Board of Directors and in the specific sustainability committee.' [Vale - Submission to CHRB, 01/04/2018 & Code of Ethics and Conduct Vale, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Day-to-day responsibility: In its submission to CHRB Disclosure Platform, the Company indicates that 'the direct structure counts on financial processes and professionals that support the normative processes, qualification, answers to allegations, risk analysis, grievance and due diligence'. However, although the company lists the processes, no description found on how they are allocated. [Vale - Submission to CHRB, 01/04/2018] • Not met: Day-to-day responsibility for EX BRs
B.1.2	Incentives and performance management	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Senior manager incentives for human rights: The Company states in its Sustainability Report that it has a broad variable compensation program that impacts the company's own employees. Vale has stated that 'not only the Executive Board, but also all Vale main executives have sustainability indicators related to incentive payments'. [2017 Sustainability Report, 31/12/2017 & Vale - Submission to CHRB, 01/04/2018] • Met: 1+EX risk beyond employee H&S: In addition it states in its CHRB response that its Sustainability KPIs includes goals related to social issues such as human rights, in 2017 it included a goal related to human rights training. In addition, Resettlement and Relationship with Indigenous Peoples issues were also monitored through indicators in the operations where the processes were applicable. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Performance criteria made public

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.3	Integration with enterprise risk management	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR part of enterprise risk system: The Company states in its CHRB submission that in line with the UN Guiding Principles and its own Human Rights Policy, since 2015 'the company included the human rights aspects in its operational risk management ensuring that such issues are due identified and assessed in the operations. Such approach, strengths Vale's journey towards "zero harm" with no difference between employees and surrounding communities promoting a positive social, economic and environmental legacy allowing our social license to operate. Annually periodic assessments are carried out, in the Integrated Management System scope, in which check of the effectiveness of the risk management is a compulsory part including specifically HR aspects.' [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Audit Ctte or independent risk assessment: The Company states that risks are reviewed at the regular meeting of the Compliance and Risk and Audit committees. 'Audits are carried out by Health and Safety function, aiming to assess the design and operational effectiveness of the EMS processes and data across a sample of our operations including the risk management. One of the outcomes of such process is the creation of detailed management plans to address the identified gaps and the key findings are reported to the Health and Safety Committee including, where appropriate, Risk and Compliance and Audit Committees. Another is the revision of procedures, feeding back into the whole human rights management process.' [Vale - Submission to CHRB, 01/04/2018]
B.1.4.a	Communication/diss emination of policy commitment(s) within Company's own operations	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Comms policy for own operations: All employees need to sign the 'confirmation of Receipt and Commitment to Code' attached at the back of the Code of Ethics and Conduct. Employees also need to sign the 'Annual Renewal Confirmation' of reviewing the Code. The Company states that the Code has been translated into English, Portuguese, Spanish, French, Mandarin, Japanese, Korean and Indonesian/Bahasa. [Code of Ethics and Conduct Vale, 01/04/2018 & Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Stakeholder communication: In addition to making its Human Rights Policy and Code of Ethics available online and across a number of languages, Vale participates in a number of forums and dialogues with stakeholders. In addition, the Community Relations team carries out social dialogue and disseminates policy and project documentation to the communities in which Vale operates. [Vale - Submission to CHRB, 01/04/2018] • Not met: How made accessible to audience
B.1.4.b	Communication/diss emination of policy commitment(s) to business relationships	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Communication plan to BRs: Vale states in its Human Rights Policy under a section for contractors and partners that 'we also seek to disseminate human rights awareness and respect along our value chain, including the adoption of legal contractual clauses and documentation proving legal compliance.' However, supplier's code of conduct does not cover collective bargaining and freedom of association, and all ILO core criteria must be included to meet this indicator - which is not covered by business partners. [Vale Human Rights Policy, 29/05/2014 & Vale - Submission to CHRB, 01/04/2018] • Not met: Including to EX BPs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: How made binding/contractual • Not met: Including on EX BPs

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.1.5	Training on Human Rights	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Trains all workers: The Company has made its Human Rights Policy and Code of Ethics available to all employees. In addition, it states in its 2017 Sustainability Report it carried out 'online training on the Ethics and Integrity Development Trail, with extensive modules on the Code of Ethics and Conduct, Global Anti-corruption program, and Information Security. The initiative involved more than 40,000 employees worldwide. In addition, there was the internal disclosure of the rules established in the Policy and in the Anti-corruption Manual, and improvements to controls, which must be respected by all business units and controlled companies.' <p>The Code of Conduct states that there is mandatory periodic training courses on the Code of Ethical Conduct. However, it is still not clear whether the Company trains all workers within a specific timeframe. [2017 Sustainability Report, 31/12/2017]</p> <ul style="list-style-type: none"> • Met: Trains relevant managers including security personnel: In its CHRB response the company states 'the Human Rights training program reached 400 leaders, managers and directors of operational and corporate areas, as well as around 1500 employees from various locations and areas of the company. Specifically in relation to employees and contractors in the area of business security, the program covered another 1000 professionals and is in line with the action plan for the Voluntary Principles on Security and Human Rights.' [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Training for relevant and all staff
B.1.6	Monitoring and corrective actions	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Monitoring implementation: In 2018, Vale announced the new sustainability structure, which encompasses the Human Rights management of Relations with communities, including a specialized team for the relationship with Indigenous Peoples and Traditional Communities, Socioeconomics Management and Human Rights Management. The existing risk management processes at Vale have in place an auditing model through the HSE Management System. Vale includes human rights aspects as part of the auditing process. [Vale - Submission to CHRB, 01/04/2018] • Not met: Monitoring EX BP's: Vale has a team called NACT (Núcleo de Análise de Contratos com Terceiros - Centre for Contract Assessment in Portuguese) which provides technical service analysis of labour and social security data for Vale contract managers, however the supplier code of conduct does not include all ILO core areas and must include freedom of association and collective bargaining in order to be awarded this indicator. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Describes corrective action process • Met: Example of corrective action: In its 2017 Sustainability report, Vale outlines examples of corrective actions taken on a number of critical incidences including processes taken to rectify labour conditions at its Pico Mine after allegations made by the Ministry of Labour and Employment; and remediation efforts made after the failure of the Samarco dam in November 2015, in Minas Gerais, impacted the communities downstream from the dam and residents of the banks of the Rio Doce. [2017 Sustainability Report, 31/12/2017] • Not met: Discloses % of supply chain monitored
B.1.7	Engaging business relationships	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: HR affects selection extractives business partners: The Company states in its CHRB submission 'Certified suppliers go through assessments/checks on corporate safety, frauds and corruption. And if any irregularity comes to the attention, the issues are investigated and if it is confirmed, supplier lock measures are taken. All the suppliers registered have to sign our Supplier's Code of Ethics and Conduct that addresses some of those points, as follow: All suppliers must provide decent working conditions for their Employees. Working hours, remuneration, benefits and health and safety requirements must comply with the labour legislation of the country in question. In countries where prevailing legislation is inferior to international legislation, the latter's standards must prevail. Regarding the acquisition process, Vale has standard contractual clauses that addresses human rights aspects to be met by Vale's suppliers. [Vale - Submission to CHRB, 01/04/2018] • Not met: HR affects on-going business partner relationships: The Company states 'Vale has a Program to monitor third party contracts regarding labour aspects aiming to minimize the risks exposure to several aspects such as security, exhaustive working day, labour debts, third party rights payments. However, in order to be awarded this indicator the Company needs to demonstrate how this program influences the way in which Vale works with their extractive business partners. [Vale - Submission to CHRB, 01/04/2018]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>Score 2</p> <ul style="list-style-type: none"> • Not met: Both choice and on-going business • Not met: working with business partners to improve performance: The Company states that throughout the past two years, more than 400 suppliers benefited from the Vale-Sebrae Productive Chain Program in the states of Espírito Santo, Maranhão, Minas Gerais, Mato Grosso do Sul, and Pará. Various trainings and consultancies were held, related to financial, contract, and personnel management, quality, customer service, health, safety, and the environment. However, in order to be awarded this indicator, the company needs to demonstrate how this initiative has generated improvement in human rights performance in its supply chain. [Vale - Submission to CHRB, 01/04/2018]
B.1.8	Approach to engagement with potentially affected stakeholders	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Stakeholder process or systems: The Company has a SDI (Stakeholders, Demands, Issues) system, to better organise, manage and address their (local communities, including indigenous peoples) concerns, which is sufficient in identifying stakeholders.' The Company states that 'our main potentially affected stakeholders are local communities and workers'. For engagements with local communities, the Company states that 'to engage with local communities, each operational site has a team of Community Relations which is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by our operations and projects. The interactions occur on a day to day basis, being very regular'. [Vale - Submission to CHRB, 01/04/2018] • Met: Frequency and triggers for engagement: The company states in its CHRB response, 'to engage with local communities, each operational site has a team of Community Relations that is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by our operations and projects. The interactions occur on a day-to-day basis, being very regular. We also have specialized local teams who engage with Indigenous Peoples.' [Vale - Submission to CHRB, 01/04/2018] • Met: workers included in SC • Met: communities in the SC <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Analysis of stakeholder views and companies actions on them: An example of the analysis of stakeholder views and Vale's action on them can be seen through their response to the Samarco Dam disaster. The Company made a final agreement between Samarco, their shareholders, and the Brazilian authorities (including the Federal Public Defenders Office and the State Public Defenders offices of Minas Gerais and Espírito Santo. The Company discloses "The agreement establishes, among other matters, innovations in the governance of the Renova Foundation to ensure a greater participation of the affected people and a process to deal with a possible renegotiation of the programs designated to repair the disruption of the

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.1	Identifying: Processes and triggers for identifying human rights risks and impacts	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Identifying risks in own operations: The Company states in its CHRB response, that Vale adopts the FEL (Front-End Loading) methodology for project management. The methodology, which accompanies all new projects, from the mineral research phase, considers the feasibility / maturity evaluation of the project in several dimensions, including social, economic and environmental technical aspects. In this context, each area has its support procedures / manuals that define the aspects that should be evaluated in each phase of the project. The phases are 3: development, execution and operation. These phases are described as FEL 1, FEL 2 and FEL 3. Each phase of the FEL provides a "gate" that evaluates the degree of maturity of the evaluated aspect. If a critical aspect is incomplete or "poorly evaluated", it may prevent the project from proceeding to the next phase of FEL.' However, the Company has not made clear whether this includes extractive business partners. [Vale - Submission to CHRB, 01/04/2018] • Not met: identifying risks in EX business partners <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Ongoing global risk identification • Met: In consultation with stakeholders: All phases of the FEL approach provide for some aspect of human rights, whether mobility, availability of access to natural resources, indigenous peoples, security aspects, availability of local labour or the need for involuntary removal. All of these aspects are highly sensitive and impact on communities and business decision making. [Vale - Submission to CHRB, 01/04/2018] • Not met: In consultation with HR experts • Not met: Triggered by new circumstances • Not met: Explains use of HRIAs or ESIA (inc HR)

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.2	Assessing: Assessment of risks and impacts identified (salient risks and key industry risks)	2	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Salient risk assessment (and context): Vale states that it conducts human rights impact assessments. Impact assessments are conducted based on country/region, company activities, project phase and stakeholder vulnerabilities. The action plans must include strategies and action proposals to avoid and mitigate human rights impacts that were identified during the risk analysis. The Community Relations Department has a human rights risk analysis tool that is available for all operational areas. [Vale - Submission to CHRB, 01/04/2018 & Vale Human Rights Policy, 29/05/2014] Met: Public disclosure of salient risks: The Company has identified child labour, forced labour, informal small scale mining and involuntary resettlement as major human rights risks for mining sector. [Vale Human Rights Guide, 01/12/2013] Score 2 <ul style="list-style-type: none"> Met: Both process and results of assessment
B.2.3	Integrating and Acting: Integrating assessment findings internally and taking appropriate action	0.5	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Met: Action Plans to mitigate risks: The Company states in its CHRB response, 'Vale has 3 processes that address risk analysis and impact on human rights. FEL (Front-End Loading) methodology that considers human rights aspects in its requirements and action plans. This process is phased, monitors, and evaluates the feasibility of any new project from mineral research, through the implementation phase to the operational phase. The methodology foresees that a critical requirement, if not met in its action plan, does not allow the project to proceed to the next phase. The environmental licensing process is part of the FEL process. Licensing assesses socioeconomic, environmental aspects of the physical and biotic means and identifies all possible impacts. The licensing process follows the legislation of each locality where Vale operates and considers participatory methodologies both in the preparation of impact studies and in proposing mitigation or compensation actions. And finally, the continuous processes of Business and Process Risk Management evaluates Human Rights aspects and are staggered in the company when they present some point of attention or require decision making at higher levels.' It is not clear whether extractives business partners are included in this process. [Vale - Submission to CHRB, 01/04/2018] Met: Example of Actions decided: 'An example of an assessment that identified a significant risk and generated a plan of action and decision making was the possible installation of a construction site with housing in an area near Caru - Maranhão, Brazil. When elaborating the impact study for the expansion works of the Carajás Railroad, the team of anthropologists and environmental experts verified that the planned site lodging would be very close to an indigenous village with recent contact indigenous peoples. After a risk analysis with the participation of human rights teams, relations with indigenous peoples, environment and business security, the case was presented to the Executive Board of the company that decided to change the project and remove the beds with accommodation. The project implemented the use of mobile lodging and the hiring of labour for the expansion of the railway was mainly in the local contracting, not requiring accommodation. Reducing beds made it possible to <ul style="list-style-type: none"> Not met: Including amongst EX BRs Score 2 <ul style="list-style-type: none"> Met: Both process and example of actions
B.2.4	Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts	0	The individual elements of the assessment are met or not as follows: Score 1 <ul style="list-style-type: none"> Not met: System to check if Actions are effective: In its CHRB response the company provides examples where corrective actions have been taken. The Company also states 'the Company has an operational structure to check and monitor the policy and internal controls, with the Board of Directors being the body responsible for approving the Vale risk policies.' However, this indicator needs to demonstrate the Company's systems for tracking the actions taken in response to human rights risk assessments and for evaluating effectiveness of actions. [Vale - Submission to CHRB, 01/04/2018] Not met: Lessons learnt from checking effectiveness: The Company has a document that details the application of lessons learned and best practices with focus on fatality prevention. However, this document is over three years old. [Guidelines for Fatality Prevention Programs, 01/11/2014] Score 2 <ul style="list-style-type: none"> Not met: Both system and lessons learnt

Indicator Code	Indicator name	Score (out of 2)	Explanation
B.2.5	Communicating: Accounting for how human rights impacts are addressed	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Comms plan re identifying risks: The Company indicates that communities are communicated at all stages, including participation in the validation of the Terms and References for the elaboration of impact studies and mitigation actions. It also discloses (see B.2.1) that it has a system to identify human rights risks. However, it is not clear how it demonstrates communication of identification of impacts concerning extractive business partners. [Vale - Submission to CHRB, 01/04/2018] • Met: Comms plan re assessing risks: The Company has disclosed (demonstrates communication) how it assesses human rights issues and has determined which are its human rights salient topics (see B.2.2) • Not met: Comms plan re action plans for risks: Although the Company demonstrates communication by explaining in public sources action plans, no evidence found in public sources of how it does so for business partners (see B.2.3). [Vale - Submission to CHRB, 01/04/2018] • Not met: Comms plan re reviewing action plans • Not met: Including EX BRs <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Responding to affected stakeholders concerns • Not met: Ensuring affected stakeholders can access communications

C. Remedies and Grievance Mechanisms (15% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.1	Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Channel accessible to all workers: Vale has an Ethics and Conduct Office, responsible for receiving and coordinating the investigation of complaints of Vale's internal and external stakeholder. A Reporting Channel is available on Vale's website (www.vale.com) and accessible to all workers and communities to raise complaints or concerns related to the Company, including human rights concerns. The company also offers a communication channel, the Contact Us, for suggestions, information and clarification of questions about human rights among other issues. [Code of Ethics and Conduct Vale, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Number filed, addressed or resolved: The GRI Summary in the Sustainability report provides the number of grievances filed, addressed and resolved through grievance mechanisms. [2017 Sustainability Report, 31/12/2017] • Met: Channel is available in all appropriate languages: All workers (including contractor employees) pass through an on boarding / onboarding process when starting to work for Vale where they are informed about the Human Rights Policy and through a video about the Code of Ethics and Conduct and the ombudsman channels. The channels are available in different languages. Allegations may be made in the official language of the complainant's country. [Vale - Submission to CHRB, 01/04/2018] • Met: Expect EX BPs to have grievance system: Vale subsidiaries, joint ventures and associates use Vale's ombudsman channels and processes and have their own channel and processes as well. When Vale receives complaints related to them, Vale's Ethics and Conduct Office evaluates whether the company has the adequate independency to conduct the investigation. If so, the complaint is directed to the joint venture/associate if not, the investigation process is conducted by Vale. [Vale - Submission to CHRB, 01/04/2018] • Met: Opens own system to EX BP workers
C.2	Grievance channel(s)/mechanism(s) to receive complaints or concerns from external individuals and communities	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Grievance mechanism for community: The Company states that the Ethics and Conduct office is also available for external stakeholders as stated in C1. In addition, the Company states that it also has specialised local teams who engage with indigenous peoples. The Company states that the Ethics and Conduct office is also available for communities. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Describes accessibility and local languages: The Company's Webpage, linking to the use of an Ombudsman NS Vales Ethics and Conduct Channel, is public and accessible to all potentially affected stakeholders. The tool is 'proactive, transparent, independent and impartial.' Tools are also available in local languages. [Code of Ethics and Conduct Vale, 01/04/2018 & Code of Ethics webpage, 20/05/2018] • Met: Expects EX BP community systems • Met: EX BP communities use global system

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.3	Users are involved in the design and performance of the channel(s)/mechanism(s)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages users to create or assess system: Each operational site has a team of Community Relations, which is responsible to identify potentially affected people, engage with them and manage their concerns and impacts caused by our operations and projects. The interactions occur on a day-to-day basis, being very regular. We also have specialized local teams who engage with Indigenous Peoples. To better organize, manage and address their (local communities, including indigenous peoples) concerns there is a tool called SDI - Stakeholder, Demands and Issues, where complaints, demands, issues and stakeholders are registered. It is a management system that integrates seven modules: Stakeholders, Demands, Critical Issues, Visit Planning, Relationship and Social Investment Plan with Priority Communities, Interdictions Events / Railway Shutdowns, and Reports, which aim to support the relationship management processes with communities in the territories. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Engages with users on system performance: The Ethics and Conduct Office conducts research among employees annually. This research includes the perception of employees about the existent channels. Improvements are made according to the results. [Vale - Submission to CHRB, 01/04/2018] • Met: Provides user engagement example on performance: In 2017, the research was applied in Brazil, Canada and Mozambique. [Vale - Submission to CHRB, 01/04/2018] • Met: EX BPs in creation or assessment: As described in C.1 extractives business partners are given access to grievance mechanisms and included in the assessment and engagement processes. [Vale - Submission to CHRB, 01/04/2018]
C.4	Procedures related to the mechanism(s)/channel(s) are publicly available and explained	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Response timescales: The company states that complaints are handled by the Ethics and Conduct Office, and this group reports directly to the Board of Directors. The Company describes how mechanisms are treated in terms of how these issues are classified and escalated, but it does not detail the timescales for responding, or how complainants will be informed. [Code of Ethics and Conduct Vale, 01/04/2018] • Met: How complainants will be informed: The Company discloses " You can submit allegations in five different ways: <p>Important! When making an allegation using the electronic form, by phone or by email, you will receive a protocol number. Access the Ethics and Conduct Office's online platform, platform, insert the protocol number, and check your allegation's status." [Make an Allegation, 31/08/2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Escalation to senior/independent level: As above.
C.5	Commitment to non-retaliation over complaints or concerns made	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Prohibits retaliation: The Code states that 'under no circumstances will reporting any potential violations or possible malfeasance serve as a basis for retaliation or intimidation of any employee.' The Company response to CHRB, as published on the BHRRRC website, states "The Company does not tolerate threats, intimidation or physical attacks against no one representing the human rights cause such as human rights defenders and journalists. Besides that, Vale responds to any allegations through public positioning and, if necessary, legal action. Vale has no intimidating practices, and only seeks the Judiciary to protect its rights against threats and recurrent invasions of its properties and the Railroads. [Code of Ethics and Conduct Vale, 01/04/2018] • Met: Practical measures to prevent retaliation: The Company states that "investigations of allegations are coordinated by the Ethics and Conduct Office, are conducted carefully according to local legislation, and will protect the rights of the whistle-blower and the accused party. Investigations are conducted by the Ethics and Conduct Office, Corporate Security, Audit Department, Corporate Integrity, or other areas that the Ethics and Conduct Office deems relevant to the allegation. The Ethics and Conduct Office is committed to keeping the identity of whistleblowers strictly confidential." [Code of Ethical Conduct, 31/08/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Has not retaliated in practice: The Company describes the following example in their 2017 Annual Report "An event that gained repercussion in the press was recorded in February 2017, when an Environmental Vigilance Inspector retaliated against the aggression of Fazenda Boa Sorte leaders, a band of invaders, on property owned by Vale in Canaã dos Carajás, Pará. The Military Police were deployed and then the case was registered at the Civil Police Station. Subsequently, the case was tried in the local judicial district and filed by the judge." The Company has not provided any more information regarding not retaliating in practice. The Company has disclosed to the CHRB, as published on the BHRRRC website "Vale does not take action in retaliation against third parties who have filed any complaints or cases of human • Not met: Expects EX BRs to prohibit retaliation

Indicator Code	Indicator name	Score (out of 2)	Explanation
C.6	Company involvement with State-based judicial and non-judicial grievance mechanisms	0	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Won't impede state based mechanisms: The Company states it doesn't have an institutionalized process of cooperation with state-based non-judicial grievance mechanisms. However, the company participated already many negotiations with indigenous peoples in cooperation with the Brazilian Indigenous Administrative Body, with or without the participation of the Public Federal Ministry. In order to meet this criteria the Company needs to demonstrate that it has a public commitment, and sets out the process by which it will cooperate with state-based non-judicial grievance mechanism complaints brought against it. [Vale - Submission to CHRB, 01/04/2018] • Not met: Complainants not asked to waive rights <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Will work with state based n.j. mechanisms • Not met: Example of issue resolved (if applicable)
C.7	Remedying adverse impacts and incorporating lessons learned	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Describes how remedy has been provided: The Company describes two salient human rights issues that occurred in Brazil in 2015 and 2016: The Mina do Pico issue and the Samarco accident. These incidences are outlined in the company's Sustainability report. The Samarco incident is described as an unprecedented event in 73 years of Vale's existence. Vale and BHP Billiton own 50% each of Samarco shares. On the 5th of November 2015, Fundão dam failed and part of the tailings reached Santarém Dam, which was used to store water, provoking a partial erosion on the right shoulder of the dam. The material reached Gualaxo do Norte river nearby, then flowed into the Doce river, reaching the sea in Espírito Santo State on November 22nd, 2015. The main impacts were 18 fatalities and 1 missing person, presumed dead, 2,200 hectares impacted along 650 kilometres of the river, temporary suspension of water supply in 16 locations, impact on public and private infrastructure, including 3 communities to be relocated. The shareholders of Samarco, BHP Billiton and Vale, provided immediate support to Samarco to implement emergency rescue and relief actions for victims and, subsequently, social remediation and environmental recovery programs. The three companies immediately launched a series of social, environmental and economic remediation and mitigation actions. An agreement with federal and state authorities was established facilitating the coordination and better efficiency of the remediation measures, including (among other aspects) reparation of the environment and of the communities affected - R\$ 4.4 bi in the first three years (2016-2018) to guarantee the progress of the reparation and compensation actions, and R\$ 240 million per year over 15 years (since the signature of the agreement) for the execution of the compensation projects, and an additional payment of 500 million to fund sanitation initiatives from 2016 to 2018. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Changes introduced to stop repetition: After the incident, a Dam Department was created to assess and improve the dam management processes at Vale, generating action plans and targets. All Vale dams received both internal and external auditing and some action plans have been implemented to increase our level of operational efficiency and security. All Vale dams surpass the security level of any national or international legislation. The company also reviewed its emergency plans, including community engagement and community mobilization in case of an accident. In the 2016 strategic planning cycle, Vale proposed a new guideline to maximize iron ore production with natural moisture, reducing tailings generation, optimizing material disposal, separating the slurry from thick tailings and using pits to dispose of the slurry. This new plan estimates a 600 million metric-ton reduction of generated iron ore tailings by 2030, which means a 32% reduction compared to previous production plans. In 2016, the iron ore production was 60% moist beneficiation and 40% with natural moisture. The beneficiation process is expected to be reversed in the coming years, and may reach 70% beneficiation with natural moisture. New technology is being developed and implemented in various areas. As an example, Vale is implementing a pilot project on an industrial scale with the objective of studying and developing new tailings disposal technologies, aimed at seeking disposal alternatives beyond dams or drainage piles. Vale has boosted its Risk Management. Nowadays Vale has an integrated Risk approach for all types of risk, encompassing business and processes risk. [Vale - Submission to CHRB, 01/04/2018]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> Met: Evaluation of the channel/mechanism: The Company discloses "To measure and monitor the effectiveness of the Ethics and Ombudsman's Channel, the company uses indicators, including, but not limited to, the time taken to reply to the complainant and the average duration of investigations. In addition, monitoring the number and categories of complaints received, investigated and confirmed helps the Ombudsman to develop strategies for improving ethical awareness as well as handling complaints. Furthermore, the area conducts a survey with employees in Brazil, Canada and Mozambique to measure their trust in the Ombudsman's work and to identify key points for improvement. Another way to measure the effectiveness of the channel is the increasing number of complaints received, which demonstrates increased employee trust in the area's independence, the quality of the investigations and the mitigating actions." [Vale Sustainability Policy, 29/09/2016]

D. Performance: Company Human Rights Practices (20% of Total)

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.1	Living wage (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Living wage target timeframe: The Company states 'collective agreements are formalised according to local processes and have a variable duration, for example: in Brazil it is annual and in Canada it lasts 3 to 5 years. In each agreement the mechanism of readjustment, including the duration of the agreement is defined. These agreements are public, and the minimum wage, practiced by Vale, is higher than the living wage defined by law. In addition to the salary, all employees in Brazil receive a "Vale Food Card", which corresponds to about 80% of the Brazilian living wage, thus an increase of up to 50% in the living wage practiced at Vale.' [Vale - Submission to CHRB, 01/04/2018] Met: Describes how living wage determined: The Company discloses "In Brazil, where 77.8% of Vale's workers are based, the national minimum wage is defined as a 'social right that is able to meet the basic needs of the worker and his/her family such as housing, food, education, healthcare, clothing, hygiene, transport, leisure and social security.'" The Company also discloses "Vale's living wages and mechanisms for salary review are negotiated with the relevant trade unions in each country, according to local standards and regulations. All agreements are public instruments." <p>Score 2</p> <ul style="list-style-type: none"> Not met: Pays living wages Met: Reviews living wages definition with unions: The Company states that "Vale's living wages and mechanisms for salary review are negotiated with the relevant trade unions in each country, according to local standards and regulations." This is done in accordance with local standards and regulations, and does not describe whether this is done at all operations (and not just in Brazil where it is mandated).
D.3.2	Transparency and accountability (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Member of EITI: The Company states that 'we support EITI independently since 2014 and we are part of the EITI Coordinating Committee in Mozambique, Peru and Indonesia.' [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> Not met: Reports taxes and revenue by country
D.3.3	Freedom of association and collective bargaining (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Not met: Commits not to interfere with union rights and provides steps to avoid intimidation or retaliation: The Company is committed to respecting the right of freedom of association and collective bargaining. However, it has not described measures to prohibit intimidation or retaliation against workers seeking to exercise these rights. [Vale Human Rights Policy, 29/05/2014] Met: States % covered by collective bargaining: The Company states that 96% of employees are covered by collective bargaining agreements. The 4% not covered work in Australia, Paraguay, Argentina, Canada, Taiwan, the UK and Japan. The Company states that 100% of Vales employees in Brazil are covered by collective agreements. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> Not met: commits not to interfere and disclosure percentage CB

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.4	Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Injury Rate: The Company's total injury rate in 2016 was 1.9/MHW x 1MM. [2017 Sustainability Report, 31/12/2017] • Met: Lost days or near misses: The Lost time injury rate was 0.49/MHW x 1MM. [2017 Sustainability Report, 31/12/2017] • Met: Fatalities: In 2017, four fatalities have occurred during on site activities and one associated with security work. All of them have been submitted to an investigation process with a participation of the HS corporate area resulting in corrective and preventive actions that were properly shared across all the operations. Concerning the fatalities, the results of the investigation process shall be presented on the Board of Directors, and are due applied in the leadership bonus scheme as a penalty. [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Set targets for H&S performance: The Company discloses "In 2017, the Health and Safety goals panel was made up of the following indicators: implementation of the health management system, safety and environment, development of the SGI risk profile, implementation of critical activity requirements (RAC) and evolution of Contract performance." However, it is not clear whether these include targets for injury rates, fatalities and lost days near misses. • Not met: Met targets or explains why not
D.3.5	Indigenous peoples rights and free prior and informed consent (FPIC) (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Process to identify indigenous rights holders: Vale states that 'all licenses that involve projects that have indigenous land in their influence area need an indigenous component study, which is developed in three main phases'. The first phase is conducting a Preliminary Study to identify the existence of indigenous people and/or traditional communities in projects influence area through secondary data review. [Vale - Submission to CHRB, 01/04/2018] • Met: How engages with communities in assessment: In its CHRB response, Vale states that an anthropologist 'talk and listen to all parts of the community including the elders and the children. Then a risk matrix is developed which is discussed with and validated by the indigenous peoples themselves. Also, "An environmental plan is developed and the indigenous component is included as part of the plan. This plan is then discussed with the communities again and agreed with them.' [Vale - Submission to CHRB, 01/04/2018] <p>Score 2</p> <ul style="list-style-type: none"> • Met: Commits to FPIC (or ICMM): The Company is a member of the ICMM. [2017 Sustainability Report, 31/12/2017] • Met: Gives recent example FPIC or dropping deal: The Company discloses "Vale maintains an active relationship with 20 traditional communities and 27 indigenous peoples, and executed 21 agreements with these populations, including the mandatory impact mitigation programs established by the legislation of each country. There are 18 traditional communities in Brazil, two in Malaysia and Peru; and there are 14 Indigenous peoples in Brazil, and 13 abroad (Canada, Indonesia and New Caledonia)....For example, our agreement with the Awá, Ka'apor and Guajajara indigenous peoples invests in structuring actions for the next ten years in territorial protection, natural resources conservation and preservation, economic sustainability and income generation, cultural strengthening, institutional strengthening, health, education, citizenship, and basic sanitation and infrastructure. In addition, in Brazil, income generation projects were prioritized in the traditional communities of Quebradeiras de Coco, Ribeirinhos and Quilombolas in

Indicator Code	Indicator name	Score (out of 2)	Explanation
D.3.6	Land rights (in own extractive operations, which includes JVs)	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: Describes approach if no recent deals: The Company states 'according to internal procedures - NFN 0015 and the document checklist for acquiring the property, Vale performs the verification of the real owner / possessor of the property through the Topographical Register and the Documentation Dossier of the properties.' <p>'The Topographic Register is always accompanied by the owner and includes the survey of all the property with indication of constructions and limits with the owners signature, neighbours, contracted company for doing the analyses and VALE, identifying if there is overlap of area with neighbours, squatters, buildings, among others. In the case of squatters, verification of the legitimacy of the possession is carried out, evaluating all the documentation proving the possession, being the fair title (contract, deed, inheritance), paid accounts, declaration of neighbours, etc. This documentation, together with the Topographic Registry with the signature of the neighbours, will be the documents that will prove the possession or not in the property and will be the documents used by Vale to conduct the process of acquisition or resettlement.' [Vale - Submission to CHRB, 01/04/2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> Met: How valuation and compensation works: The Company has responded to the CHRB "In general, the criteria and compensation values seek to restore the same living conditions and economic production of the affected population at the resettlement site. This includes investments such as the acquisition of houses with the same or higher quality and economic production conditions (including adaptation / construction of productive infrastructures, community and social facilities to provide essential services such as schools and hospitals), social technical support to adapt people in the new place of housing and production, for community social reorganization, productive technical assistance and for replacement / development of livelihoods. <p>Monetary compensation occurs only when the possibility of dialogue towards structured resettlement is exhausted. In this case it is considered an amount corresponding to the value of the property in the real estate market and, depending on the level of historical link with the place, can also be considered amount by time of residence of the family in the place.</p> <p>Other compensation: i) for tenants: prioritize maintenance of links. If impossible, compensate with a value corresponding to six months of rent and search of a new property; ii) for employees: prioritize maintenance of the links. If impossible, value corresponding to six minimum wages and search for a new job placement; iii) for tenants: prioritize maintenance of links. If impossible, support in the search of a new property for production" [CHRB Disclosure on BHRRC, 30/04/2018]</p>
D.3.7	Security (in own extractive operations, which includes JVs)	1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> Met: How implements security (inc VPs or ICOC): The Company is a signatory to the Voluntary Principles on Security and Human Rights. It states 'our risk assessment of security requirements includes human rights violations risks. We rigorously select and monitor our employees and contractors, taking into account prior experience, technical skills and emotional stability. Undertake to engage with public security providers assigned to company operations to the greatest possible extent in order to communicate our policy and demonstrate our commitment to respect civil rights of employees or any members of host communities. Educate and train these security professionals to perform activities in accordance with human rights principles, rejecting the abuse of power and degrading and inhumane treatment and assuring non-discrimination and citizens' privacy. We seek for pacific solutions which ensure the physical integrity of persons, property and information preservation and production process maintenance.' [2017 Sustainability Report, 31/12/2017] Met: Example of respecting HRs in security: An example of how the Company is formalising its security and human rights approach by guiding operational safety practices is the Protocol of Engagement Rules for Security Agents in Land Invasion Occurrences and Railway and Access Interdiction. This document guides the individual and collective conduct of Corporate Security teams, both for own employees and third parties, in situations of defence of Vale's operational assets in events of trespass and interdiction. The objective is the maintenance and/or recovery of the company's land, operations, railways and accesses, whenever possible in a negotiated manner and without use of force, prioritizing human life, according to the company's Values. [Vale - Submission to CHRB, 01/04/2018]

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<ul style="list-style-type: none"> • Met: Ensures Business Partners follow security approach: Its policy apply to all employees, contractors, suppliers and business partners. [Vale Human Rights Policy, 29/05/2014] Score 2 • Not met: Assesses and involves communities: Vale encourages employees, third parties, members of communities, suppliers and any other stakeholder to report incidents related to security and human rights directly to Vale's Corporate Security Control Centre through a hotline available 24-hours per day via phone, internet or e-mail. However, it is not clear whether Vale engages the community with input on security concerns and working with community members to address tensions related to its operations. In the Sustainability Report the Company discloses "The other milestone was Vale's first performance as a member of the Voluntary Principles on Security and Human Rights and its participation in the Plenary Meeting of Voluntary Principles. This membership took place in the form of a work plan that includes the reinforcement of training for employees and third parties, as well as the definition of an engagement strategy for government security forces, mainly in Mozambique and throughout the Nacala Logistics Corridor. This process will enable mutual support, train professionals, share lessons learned, and integrate other actors as partners." However, it is not clear whether 'other actors' includes affected communities. [Vale - Submission to CHRB, 01/04/2018] • Met: Working with local community: It works with the local communities through its Community Relations Team. [Vale - Submission to CHRB, 01/04/2018]
D.3.8	Water and sanitation (in own extractive operations, which includes JVs)	1	<p>The individual elements of the assessment are met or not as follows: Score 1</p> <ul style="list-style-type: none"> • Met: Action to prevent water and sanitation risks: The Company states that 'the water availability of certain region, even during the initial phase of the licensing process, is identified and analysed so that the existing weaknesses are mitigated and that the project is designed with consistency - suitable from the point of view of sustainability. During the licensing process, studies are conducted to help identifying risks related to the project, allowing its mitigation or minimization through socio environmental plans and programs.' <p>In addition, two cases of Vales success regarding the availability of water to communities are described below: Case 1: In Canada, the provision of potable water by mining companies to adjacent communities is common. Vale adopts this practice at its nickel plant in Sudbury, Ontario. There is the capture of water in the Vermillion River that is directed to a treatment plant to obtain the standard of potability and later distributed to the community, serving about 10,000 people. It should be noted that the Canadian government regulates this treatment and distribution system. As a result, this system meets all federal and provincial legal obligations for the treatment and distribution of drinking water to local communities. Case 2: The process of withdrawal of water to advance operations is called Controlled Exploitation of the Aquifers and, part of this resource, when not used for uses in the processes, are made available to the environment or even to water utilities, which supply cities neighbouring our operations. In 2017, the volume of water provided by Vale was around 41 million cubic meters (m³). In a case of Minas Gerais, with the mines of Capão Xavier and Mar Azul, the resource is made available to water distributors. From there, water from the groundwater is made available to the State Sanitation Company (Copasa), which, since 2008, delivery to the population. In the last year, the volume reached 4 million cubic meters. [Vale - Submission to CHRB, 01/04/2018]</p> <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Water targets considering local factors: The Company discloses their KPI for Sustainability Table, which has indicators relating to Water Resources. The Company details whether these indicators had the following status: Challenge overcome Goal Achieved Goal Partially Achieved Goals Not Achieved. However, further details regarding these KPIs and whether they consider local factors is not detailed. [2017 Sustainability Report, 31/12/2017] • Not met: Reports progress and shows trends

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

Indicator Code	Indicator name	Score (out of 2)	Explanation
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Indicator Code	Indicator name	Score (out of 2)	Explanation
E(1).0	Serious allegation No 1		<ul style="list-style-type: none"> • Area: Right to security • Headline: One protester dead at Vale Mozambique coal mine while trying to access to a fence • Sources: CHRB Benchmark, August 2018 - https://chrbenchmark.sharepoint.com/Shared%20Documents/2018%20Revision/Vale/Mozambique%20-%20Clarifications.pdf • Allegation: On July 13th, 2017, farmer Hussene Antonio was shot and killed by police while protesting against the Vale's closure of a fence by in Tete province, Mozambique. Locals who had been resettled away from Vale's area of operation where using the passage to reach grass and bush lands where they could gather firewood and where their livestock could graze. Vale had faced strong opposition to closing off the land. On the 13th July the passage was blocked by a construction machine. Locals gathered to protest and Vale called on the police to intervene. Antonio was shot in the back as he fled. In the wake of his killing locals vandalized the construction machine, a generator and some equipment owned by the company.
E(1).1	The Company has responded publicly to the allegation	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company reports in a detailed way on its position to the case. It also reported it supported the funeral ceremonies by providing bags of food, pulse and grain. The Company has provided a detailed response to the allegations through the CHRB platform in August 2018.
E(1).2	The Company has appropriate policies in place	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The Company's risk assessment of security requirements includes human rights violations risks. The Company has a publicly available statement of policy committing it to respecting human rights in maintaining the safety and security of operations. Vale further states that 'at its Human Rights Policy, Vale establishes its operating guidelines to security teams (employees and contractors) based on the Voluntary Principles on Security and Human Rights', however, the Company is not listed as a corporate participant for the Voluntary Principles.
E(1).3	The Company has taken appropriate action	0.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Not met: Engages with affected stakeholders: Although the Company has indicated it has a plan of dissemination related to security in the area and that it reinforced its community relations processes, it has not however indicated whether it has engaged with affected stakeholders such as other protesters to prevent the recurrence of such events. • Not met: Encourages linked business to engage affected stakeholders • Met: Provides remedies to affected stakeholders: The Company has indicated that it has provided 'assistance' to the relatives of the victim. • Met: Has improved systems and engaged affected stakeholders: The Company has indicated that 'the incident reinforced the need for review and improvement in community relations processes, management of social impacts and social investments'. It adds that the revised actions included management systems to prevent the recurrence of the event, amongst other, it includes: Reinforcement of water supply in neighbourhoods adjacent to the operation; Supply of Firewood; Road construction replacing previous access that passed through the operational area. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).0			<ul style="list-style-type: none"> • Area: Health and safety • Headline: Samarco Dam Burst • Sources: The Guardian, 08/11/2015 and 13/11/2015 - https://www.theguardian.com/business/2015/nov/09/brazil-dam-burst-bhp-boss-to-inspect-disaster-zone-with-dozens-still-missing and https://www.theguardian.com/business/2015/nov/13/brazils-slow-motion-environmental-catastrophe-unfolds BBC News, 17/11/2015 and 23/02/2016 - http://www.bbc.com/news/business-34838000 and http://www.bbc.com/news/business-35645960 The Wall Street Journal, 13/11/2015 - http://www.wsj.com/articles/bhp-billiton-commits-to-release-findings-from-brazil-dam-breach-1450770528 Reuters, 05/11/2015 and 13/11/2015 Samarco report, 05/01/2016 The Australian, 16/11/2015 Australian Financial Review, 14/11/2015 ABC News, 01/12/2015 Deutsche Welle, 27/01/2016 Company press release, 08/01/2016 and 16/11/2015 <p>TO ADD:</p> <p>Business and Human Rights, August 2018 - https://www.business-humanrights.org/en/vale%E2%80%99s-submission-to-the-corporate-human-rights-benchmark-disclosure-platform#c175921 and https://www.business-humanrights.org/sites/default/files/webform/CHRB_Vale_apr2018.pdf</p> <ul style="list-style-type: none"> • Allegation: On 5 November 2015, a dam holding back waste water from the Germano iron ore mine in Brazil burst, causing mudslides that engulfed a nearby town and killed at least 16 people. The mine is owned by Samarco, a joint venture between Vale and BHP Billiton. In February 2016, it was reported that Brazilian authorities had charged the president of Samarco
E(2).1		2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Public response available <p>Score 2</p> <ul style="list-style-type: none"> • Met: Response goes into detail: The Company has responded to the allegations through press releases, reports, joint statements and in the press. Immediately following the accident, Samarco released a statement saying it had not yet determined why the dam burst or the extent of the disaster. <p>Samarco issued a report on 5 January 2016, which stated that competent authorities, such as the Civil Police, were carrying out investigations into the causes of the accident and that Samarco was supplying all the information necessary to expedite the process. Samarco stated: 'In parallel, the Company is counting on the support of international firms, which are working on the investigations and collecting as much information as possible. The objective is for the data obtained – with the participation of experts in geotechnical engineering, geology, seismology and soil mechanics, among others – to explain the causes of the accident and also provide input for potential improvements in the Samarco's production and safety procedures. There is no set date for the completion of the investigations, but in view of the complexity of the accident, it is expected that conclusive reports will be issued within six to twelve months. On 10 November, Vale said that since the incident, it had provided human and material resources to aid Samarco with its rescue and retrieval work for people made homeless by the accident. In the municipality of Acaiaca, one of the districts affected by the mud, the Company set up a pumping system and power generator and dedicated tow trucks to transport water to clean up the area. A water extraction system was also been installed in Barra Longa to serve residents. The Company has also assessed the structural conditions of its 115 most significant tailings dams.</p> <p>Vale and BHP issued a joint statement on 11 November, having visited the site. It included the following: 'As an immediate step, Vale and BHP Billiton pledge to support Samarco in creating an Emergency Fund for rebuilding works and to help the affected families and communities. It is our intention to work with the authorities to get this fund functioning as soon as possible. Vale and BHP Billiton also have health, safety, environment and geotechnical experts onsite supporting Samarco's response. We have also had discussions with Samarco and the authorities about the additional support we can provide. Investigations are continuing and Samarco will provide further updates relating to the response and operations.'</p> <p>In a separate statement, Vale noted that Samarco is an independent company, with its own Board of Directors, but that Vale would be offering support in this situation.</p> <p>The Company has provided further details and documents to CHRB through the Business and Human Rights platform in 2018.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
E(2).2		2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Company policies address the general issues raised • Met: Policies apply to the type of business relationships involved: The Company has a health and safety policy which applies to business relationships. It code states: 'the following conduct is expected (...): not establishing business relationships with companies or individuals that are not in compliance with ethical, health and safety, and human rights standards compatible with those adopted by the company'. <p>Score 2</p> <ul style="list-style-type: none"> • Met: Policies address the specific rights in question: The company has a Health and Safety policy
E(2).3		1.5	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 1</p> <ul style="list-style-type: none"> • Met: Engages with affected stakeholders: In August 2018, the Company has provided publicly, through the CHRB platform, 'The Settlement and Conduct Adjustment Agreement ("TTAC")' which outlines 'the commitment undertaken by the COMPANIES under the TTAC for the full redress of the damages caused by the Fundão Dam's rupture (...), by developing and executing forty-two (42) socioenvironmental and Socio-economic Programs and respective projects and actions'. It includes 'local affected people commissions' and state that affected stakeholders will be consulted throughout the remediation program. • Met: Provides remedies to affected stakeholders: The Company has partly provided compensation that has been accepted by the majority of persons affected by the incident in question. Compensation included payments to the community where this is relevant. However, it should also have cleaned up contamination of the surrounding area to avoid further injuries either to the workforce or wider community. This clean-up must would need to be confirmed by a source independent to the Company. <p>Details provided are as follows:</p> <p>In terms of compensation:</p> <p>Samarco issued a press release on 2 January 2016, which stated: 'Throughout the month of January, each family which had a member who went missing or died as a result of the dam accident will receive BRL 100,000 (GBP 17,500) as a preliminary compensation. The family groups which had to relocate due to losing their homes will receive BRL 20,000, of which 50% will not be considered as an advance compensation. The initiative is part of an agreement signed with the Public Prosecution Service of Minas Gerais, in a hearing held on 23 December in Mariana, which formalized several humanitarian relief actions.'</p> <p>Samarco reported that the families of missing people were receiving psychological support from professionals specialised in risk situations. As with the rest of the communities of the affected areas, they also received other forms of assistance, such as lodging, relocation to rented homes, furniture, food and a monthly allowance. For those that lost a family member as a result of the accident, Samarco states that it has 'paid for all costs of documentation and burial. In the case of outsourced employees, the Company provides lodging for the people who are from other regions and complements the life insurance to cover the costs of funeral expenses.'</p> <p>On 2 March 2016, Samarco and its shareholders, BHP and Vale, announced that they had entered into an agreement with the Federal Attorney General of Brazil, the States of Espírito Santo and Minas Gerais, and certain other Brazilian public authorities for the restoration of the environment and communities affected by the dam failure. The companies will establish a Foundation that will develop and execute environmental and socio-economic programmes to remediate and provide compensation for damage caused. The Foundation will be governed by a seven member Board, with Samarco, BHP Billiton Brasil and Vale each appointing two members and the Brazilian Authorities appointing one member. The Foundation will be assisted by an advisory panel that will include technical experts, regulators and community representatives. The Foundation's activities will be subject to independent external audit. The term of the Agreement is 15 years, renewable for periods of one year successively until all obligations under the Agreement have been performed. Samarco will fund the Foundation and should it not meet its funding obligations, each of Vale and BHP Billiton Brasil is liable in proportion to its 50% shareholding in Samarco. The Agreement is subject to Court Approval. If approved, it will settle the civil public claim commenced on 30 November 2015 by the Brazilian authorities.</p>

Indicator Code	Indicator name	Score (out of 2)	Explanation
			<p>In August 2018, the Company has also provided publicly, through the CHRB platform, 'The Settlement and Conduct Adjustment Agreement ("TTAC")' which outlines 'the commitment undertaken by the COMPANIES under the TTAC for the full redress of the damages caused by the Fundão Dam's rupture (...), by developing and executing forty-two (42) socioenvironmental and Socio-economic Programs and respective projects and actions'.</p> <p>In August 2018, the Company has also provided publicly, through the CHRB platform, 'The Settlement and Conduct Adjustment Agreement ("TTAC")' which outlines 'the commitment undertaken by the COMPANIES under the TTAC for the full redress of the damages caused by the Fundão Dam's rupture (...), by developing and executing forty-two (42) socioenvironmental and Socio-economic Programs and respective projects and actions'.</p> <ul style="list-style-type: none"> • Met: Has reviewed management systems to prevent recurrence: In August 2018, the Company has also provided publicly, through the CHRB platform, further details on this point. It has indicated that 'after the accident, a Dam Department was created to assess and improve the dam management processes at Vale, generating action plans and targets. All Vale dams received both internal and external auditing and some action plans have been implemented to increase our level of operational efficiency and security. All Vale dams surpass the security level of any national or international legislation. The company also reviewed its emergency plans, including community engagement and community mobilization in case of an accident'. It reported on reducing tailings generation and added 'the Samarco accident was a terrible event, nevertheless, it has increased our understanding of risks and impacts. New technology is being developed and implemented in various areas. As an example, Vale is implementing a pilot project on an industrial scale with the objective of studying and developing new tailings disposal technologies, aimed at seeking disposal alternatives beyond dams or drainage piles. Vale has boosted its Risk Management. Nowadays Vale has an integrated Risk approach for all types of risk, encompassing business and processes risk'. <p>Score 2</p> <ul style="list-style-type: none"> • Not met: Remedies are satisfactory to the victims • Met: Has improved systems and engaged affected stakeholders

F. Transparency (10% of Total)

Indicator Code	Indicator name	Score	Explanation
F.1	Company willingness to publish information	3.47	Out of a total of 38 indicators assessed under sections A-D of the benchmark, Vale made data public that met one or more elements of the methodology in 33 cases, leading to a disclosure score of 3.47 out of 4 points.
F.2	Recognised Reporting Initiatives	2	<p>The individual elements of the assessment are met or not as follows:</p> <p>Score 2</p> <ul style="list-style-type: none"> • Met: Company reports on GRI: The Company reports under GRI Reporting Standards. [2017 Sustainability Report, 31/12/2017]
F.3	Demonstrating a forward focus	1.6	<p>Vale met 4 of the 10 thresholds listed below and therefore gets 1.6 out of 4 points for the high quality disclosure indicator.</p> <p>Specificity and use of concrete examples</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.2 : Board discussions • Not met: Score 2 for B.1.6 : Monitoring and corrective actions • Met: Score 2 for C.1 : Grievance channel(s)/mechanism(s) to receive complaints or concerns from workers • Met: Score 2 for C.3 : Users are involved in the design and performance of the channel(s)/mechanism(s) <p>Discussing challenges openly</p> <ul style="list-style-type: none"> • Not met: Score 2 for B.2.4 : Tracking: Monitoring and evaluating the effectiveness of actions to respond to human rights risks and impacts • Met: Score 2 for C.7 : Remedying adverse impacts and incorporating lessons learned <p>Demonstrating a forward focus</p> <ul style="list-style-type: none"> • Not met: Score 2 for A.2.3 : Incentives and performance management • Not met: Score 2 for B.1.2 : Incentives and performance management • Met: Score 1 for D.3.1 : Living wage (in own extractive operations, which includes JVs) • Not met: Score 2 for D.3.4 : Health and safety: Fatalities, lost days, injury rates (in own extractive operations, which includes JVs)

Indicator Code	Indicator name	Score (out of 2)	Explanation
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Disclaimer	A score of zero for a particular indicator does not mean that bad practices are present. Rather it means that we have been unable to identify the required information in public documentation.		
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See the 2018 Key Findings report for more details of the research process.

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As CHRB Ltd, we want to emphasise that the results will always be a proxy for good human rights management, and not an absolute measure of performance. This is because there are no fundamental units of measurement for human rights. Human rights assessments are therefore necessarily more subjective than objective. The Benchmark also captures only a snap shot in time. We therefore want to encourage companies, investors, civil society and governments to look at the broad performance bands that companies are ranked within rather than their precise score because, as with all measurements, there is a reasonably wide margin of error possible in interpretation. We also want to encourage a greater analytical focus on how scores improve over time rather than upon how a company compares to other companies in the same industry today. The spirit of the exercise is to promote continual improvement via an open assessment process and a common understanding of the importance of the UN Guiding Principles on Business and Human Rights.