



Anti-Bribery and Anti-Corruption Policy

Objective

Vital Energy, Inc. (“Company” or “Vital Energy”) is devoted to conducting its business activities with the utmost integrity and in full compliance with the U.S Foreign Corrupt Practices Act (FCPA). We strictly prohibit all forms of bribery and corruption.

Applicability

This policy applies to all employees including temporary or contract employees and any others supporting Vital Energy, Inc.’s operations.

Definitions

1. For the purposes of this Policy, corruption is defined as a dishonest, fraudulent, or even criminal act of an individual or organization, using entrusted authority or power to make a personal gain or other unethical or illegal benefits.
2. For the purposes of this Policy, bribery is defined as the offering, promising, giving, accepting or soliciting of an advantage as an inducement for an action which is illegal, unethical or a breach of trust. Inducements can take the form of money, gifts, loans, fees, rewards or other advantages (taxes, services, donations, favors etc.). Bribery can be both active and passive. Active bribery can include direct payments for favors (i.e. payment to receive favorable result in an inspection) and indirect bribery can include a payment to a third party for access to information or services that provide an advantage that would have not otherwise occurred (i.e. payment to expedite delivery at the expense of other customers or contract specifications provided ahead of time to specific corporation).
3. **Facilitation Payments** - small sums paid to facilitate or expedite routine, non-discretionary government actions, such as obtaining phone service or an ordinary license. Facilitation payments are different than bribes.

Policy

Improper or illegal payments to, or receipt from, government officials are prohibited, including political contributions that act as a means of bribery and corruption. No employee, officer, director, or any person acting on behalf of our Company, may offer, promise, give, demand, solicit, or accept any bribe, kickback, or illicit payment, directly or indirectly, to influence any act or decision, secure an improper advantage, or induce unfaithful or unlawful conduct.

This prohibition of payments includes any Government official, employees of foreign governments, low-ranking employees or employees of government-controlled entities, as well as political parties and candidates for political office.

Vital Energy recognizes giving and receiving gifts can be part of business protocol. However, all gifts or hospitality must be modest, reasonable, and lawful. Gifts should never be offered or accepted with an expectation of a return favor, particularly if it's intended to influence a business decision. Any gifts should comply with Vital Energy’s policy on gifts described under “Gifts and Entertainment”.

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Vital Energy employees who deal with Government officials or entities should consult with our General Counsel prior to providing anything of value to a government official. Employees involved in transactions with foreign government officials must comply with not only with the laws of the transacting country but also with the U.S. Foreign Corrupt Practices Act. This Act makes it illegal to pay, or promise to pay, money or anything of value to any non-U.S. government official for the purpose of directly or indirectly obtaining or retaining business. This ban on illegal payments and bribes applies to all countries in which Vital operates and applies to all agents or third-party representatives, including consultants, suppliers, and business partners.

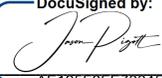
Facilitation payments are defined as small sums paid to facilitate or expedite routine, non-discretionary government actions, such as obtaining phone service or an ordinary license. While a facilitation payment is different than a bribe, neither are permissible for conducting business on behalf of Vital Energy.

All parties subject to this Policy are encouraged to report suspected unethical behavior, bribery, or corruption. Such Policy violations can be reported anonymously, without fear of reprisal, through the Ethics and Compliance Hotline by calling 1.844.732.6240 (See “Ask for Help and Reporting Concerns” section). We assure all employees that any reports made in good faith will be investigated by our Director of Internal Audit and reported to the Board’s Audit Committee and no retaliation will be tolerated.

Non-Compliance

Failure to comply with this Policy can result in severe disciplinary actions, including termination of employment or contract, and may also lead to serious legal consequences. Vital Energy is committed to fostering a culture where corruption and bribery are never accepted, and transparency, honesty, and integrity are always upheld.

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Jason Pigott, President and CEO