



## Human Rights Policy and Labor Standard

Vital Energy, Inc. (“Vital Energy” or “Company”) is committed to ensuring that we uphold all internationally recognized human rights in every aspect of our work and follow all applicable national and local regulations as they pertain to the fundamental rights of all stakeholders. Central to upholding this commitment is ensuring that we operate in a manner that is respectful of human rights in all regards.

This Policy details Vital Energy’s principles in relation to human rights, as well as labor rights, in order to foster an environment in which rights are recognized and respected throughout our Company. This Policy applies to Vital Energy employees, officers, and directors, who are expected to use good business judgment and address known adverse human rights impacts in the conduct of our business. Vital Energy suppliers are expected to comply with the Company’s Code of Conduct and Business Ethics Policy. This Policy is intended to ensure that Vital Energy is not complicit in the violation of human rights.

### Human Rights Policy

Vital Energy’s commitment to human rights aligns with the principles of the UN’s Universal Declaration of Human Rights, the UN’s Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work, and the UN Declaration on the Rights of Indigenous Peoples.

In accordance with the United Nations Guiding Principles on Business and Human Rights, we acknowledge our responsibility to respect human rights, to avoid infringing on the rights of others, and to address adverse human rights impacts with which we may be involved.

We recognize that we have some responsibility for activities we may be indirectly linked and contribute to through our business relationships, including entities in our supply and distribution chains. Our human rights policy and approach will be regularly reviewed to ensure it is relevant and effective in addressing human rights risks and impacts associated with our operations and business relationships.

We encourage all employees, suppliers, and stakeholders to report any concerns or grievances related to potential human rights abuses within our operations. Any such grievances, including whistleblowing and related items, can be submitted anonymously via our Ethics & Compliance Hotline by calling 1.844.732.6240 (See “Ask for Help and Reporting Concerns” section). All 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.

### Security and the Rights of Indigenous People

We do not currently operate on or adjacent to any lands under the governance of indigenous peoples. Should we do so, we would follow all applicable laws and work to engage with those communities to ensure business practices are respectful of their sovereignty, security (including water security and access to resources) and indigenous rights. Vital Energy is committed to respecting traditional livelihoods and the rights of Indigenous Peoples and are committed to constructive engagement with all stakeholders.

We acknowledge that Free, Prior, and Informed Consent (FPIC) is a specific right that pertains to Indigenous Peoples, as recognized in the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP), In accordance with this standard we observe Indigenous Peoples rights to:

- *Free Consent:* Engaging in a manner that is free of coercion, intimidation, or manipulation, including participation in any decision-making processes without any form of pressure or influence.
- *Prior Consent:* We will strive to consult with, and seek consent from effected stakeholders, well in advance of commencing any activities.
- *Informed Consent:* We commit to providing Indigenous Peoples with all relevant information relating to the project in a culturally appropriate and accessible format.
- *Consent:* We understand that consent comprises an Indigenous community's collective decision, reached through its own decision-making processes, to agree to a proposed project or activity.

Our Company is committed to establishing a constructive dialogue and building a relationship based on trust with the Indigenous communities that could potentially be affected by our activities. This includes respecting their rights, culture, and aspirations, and considering their knowledge and perspectives in our decision-making processes.

External stakeholders, including affected Indigenous Peoples can communicate grievance or violations of our policy via our Ethics and Compliance Hotline by calling 1.844.732.6240. Vital Energy is committed to working towards remediating any issues, violations of our policy, or legal infractions.

If resettlements occur, Vital Energy will offer adequate compensation and avoid complicity in forced evictions.

If private security forces are utilized, Vital Energy will ensure that they respect the internationally recognized human rights as outlined in this Policy and will avoid complicity in human rights violations by public security forces including but not limited to police and military forces.

This Policy applies to all our operations and across our supply chains. We expect our business partners to respect this Policy and encourage them to align their operations with its principles.

### **Human Right to Water**

Vital Energy recognizes that access to clean, safe, and sufficient water is a fundamental human right affirmed by the United Nations General Assembly. We recognize that water is a shared natural resource of critical importance and that the actions of companies can impact water quality and quantity. We take great pride in our comprehensive and holistic approach to managing and minimizing our impact on water. We recognize our role in helping protect natural resources, and we know that healthy water is a key component to a healthy planet.

Water is vital to our communities and water management is a key resource for our operational activities. We seek to minimize our impact on freshwater supplies and are continuing to expand our water recycling efforts. Consequently, we are continuing to expand our water recycling efforts and are committed to increasing the amount of recycled water utilized by our operations to decrease the use of potable fresh water.

## Labor Rights Standard

Vital Energy's labor rights standard is informed by the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work. It applies to all employees, officers, and directors. Suppliers are encouraged to align their standards with those outlined in this document, in addition to adhering to the Company's Code of Conduct and Business Ethics Policy.

Vital Energy is committed to upholding the human rights of employees, and to ensuring that they are treated with respect and dignity. The standard applies to all individuals employed by Vital Energy including temporary, migrant, intern, contract, and any other type of employee.

In accordance with the International Labor Organization's (ILO) Fundamental Principles and globally recognized standards on human trafficking:

- Human trafficking: the recruitment, transportation, transfer, harboring or receipt of a person (a woman, man or a child), often over international borders but also frequently within the boundaries of a single country, for the purpose of exploitation by force, fraud, or coercion.
- Child labor: work that deprives children of their childhood, their potential and their dignity, and that is harmful to physical and mental development. The term "child" refers to any person under the age of 15, or under the minimum age for employment in the country, whichever is greatest.
- Forced labor: all work or service which is exacted from any person under the threat of a penalty and for which the person has not offered himself or herself voluntarily. Other forms of forced labor prohibited include prison labor, indentured servitude, and bonded labor
- Wages and compensation: wages must meet all legal requirements, must equal or exceed the minimum wage required by law or the prevailing industry wage, whichever is higher. Employees must be compensated for overtime at rate legally required or at a rate exceeding the regular hourly compensation rate
- Freedom of Association & the Right to Collectively Bargain: Employees' right to form and join organizations of their own choosing without any prior authorization, and to bargain collectively.
- Discrimination & Respect in the Workplace: All employees have the right to equal opportunity and treatment irrespective of race, ethnicity, sex, religion, political opinion, national identity, or social status.

Vital has zero tolerance for human trafficking, child labor, forced labor, or employee exploitation in its supply chain through any means, including, but not limited to coercion, physical threats or restraints, withholding of legal documents, the use of false or misleading recruitment practices, illegal deductions of pay, charging of illicit fees, excessive working hours that exceed the ILO convention on working hours, or the legal limit, whichever is lower, and other trafficking in persons activities as specified below:

- *Document Retention*: We adhere to applicable laws and regulations regarding access to, and retention of, employee information.
- *Excessive Working Hours*: We adhere to applicable laws and regulations regarding working hours and overtime.
- *Illegal Deductions*: Employees should not receive a deduction from their wages if such deductions have not been approved. Any wage deductions are expected to be transparent, agreed upon, and in compliance with local and national laws. We prohibit unlawful deductions from wages for disciplinary or other unauthorized purposes. Deduction limits should be agreed to by all parties.

- *Misleading Recruitment Practices:* When recruitment of employees occurs, we expect accurate and clear information about the terms and conditions of employment to be provided to the employee.
- *Recruitment:* Employees should not bear the cost of recruitment expenses related to potential employment. All recruitment-related fees, charges, or other costs will be borne by Vital Energy, not the employees.
- *Disciplinary Practices:* No employee may be subjected to any physical, psychological, sexual, or verbal harassment or abuse or to fines or penalties as a disciplinary measure. No corporal punishment of any kind will be tolerated.
- Living conditions, if provided by Vital Energy, must include adequate and decent housing accommodation that should not cost the employee more than a reasonable proportion of income and adhere to the ILO conventions, including but not limited to the conditions outlined in ILO Convention 115.

### **Right to Organize**

The rights to organize, freedom of association and collective bargaining are proclaimed in the Universal Declaration of Human Rights and ILO Conventions 87 and 98. We support rights to organize and the rights of our employees to lawfully and peacefully associate, organize and bargain collectively.

We are committed to negotiating agreements that provide attractive and competitive levels of compensation, benefits and working conditions for our employees. We also are committed to ensuring our business operates in a manner that is fair, equitable and competitive in the global market. We expressly prohibit activities that infringe upon an employee's right to organize, including but not limited to intimidation, harassment, wrongful firing, dismissal, or other retribution inflicted on an employee for exercising their right to organize.

### **Our Supply Chain**

Conducting business ethically and in accordance with the law is key to our organization, and we expect the same from our supply chain vendors. As such, all suppliers are subject to the Vital Energy Supplier Management Policy.

We are committed to continuing to align our supply chain policies and procurement process with our Human Rights Policy and Labor Standard and commitment to sustainable practices. We consider the safety of our vendors as paramount as the safety of our employees. As such, the Company's supplier management policy contemplates a vendor's historic safety records and requires vendors meet or exceed certain safety grading in order to be permitted as a vendor of the Company (for more information, see our Supplier Management Policy).

**ADOPTED:** 

**DATE:** 10/30/2023