



Anti-Discrimination, Anti-Harassment and Anti-Retaliation Policy

Overview

Vital Energy, Inc. (“Vital” or “Company”) prohibits discrimination, harassment, and retaliation of one employee by another employee, supervisor or third party for any reason protected by law including, but not limited to: race, color, religion, national origin, sex, sexual orientation, gender identity, age, disability, military status, veteran status, genetic information or any other status or characteristic protected by law. Discrimination, harassment, and retaliation against third parties by our employees is also prohibited. The purpose of this policy is to ensure that in the workplace, no employee discriminates against, harasses, or retaliates against another for any reason. Violations of this policy are not permitted and may result in disciplinary action, up to and including termination of employment.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature. In order for these actions to be considered sexual harassment, one of the following situations is generally found:

- An individual’s submission to such conduct is made either explicitly or implicitly a term or condition of that individual’s employment.
- An individual’s submission to or rejection of such conduct is used as the basis for employment decisions affecting that individual.
- The conduct has the purpose or effect of unreasonably interfering with an individual’s work performance or creating an intimidating, hostile or offensive work environment.

Other Harassment

Harassment includes verbal or physical conduct that denigrates or shows hostility or aversion toward an individual because of the individual’s status or characteristics, including those listed above. Harassing conduct may include profanity, gestures, slurs, and jokes. To be considered harassment, one of the following situations is generally found:

- The conduct has the purpose or effect of creating an intimidating, hostile or offensive work environment.
- The conduct has the purpose or effect of unreasonably interfering with an individual’s work performance.
- The conduct otherwise adversely affects an individual’s employment opportunities.

Reporting Discrimination or Harassment

Early reporting and intervention are effective methods of resolving actual or perceived incidents of discrimination and harassment. Therefore, if employees have experienced or witnessed conduct that they believe is contrary to this policy or have concerns about such matters, they must immediately report the conduct to any one of the following persons as soon as possible after the incident:

- His/her immediate supervisor;
- Human Resources Representative;
- The Vice President of Human Resources; or

- Any Senior Officer of the Company

Employees may also report an incident anonymously by calling the 24-hour Ethics and Compliance Hotline number at (844) 732-6240. Reports under this policy should include details of the conduct, the name of individual(s) involved and the name(s) of any witnesses.

Do not assume that management is aware of the behavior. It is your responsibility to report any incidents you believe to be discrimination or harassment.

Investigation

The Company considers all reports seriously. Each reported incident will be investigated by a member of the Company’s Human Resources’ management and outside legal counsel, if necessary. The investigation will be done promptly, thoroughly, and impartially. The report of an incident will be kept as confidential as possible, subject to the need to disclose information in the investigation and management response process. Any employee who fails or refuses to cooperate in an investigation is subject to disciplinary action, up to and including termination of employment. The Company considers all reports seriously and will take whatever action is appropriate to stop inappropriate conduct. The Company will investigate all such reports as confidentially as possible.

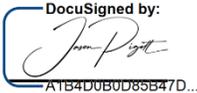
Retaliation is Prohibited

The Company prohibits retaliation against any individual for reporting harassment or discrimination or for participating in an investigation, or who is a relative of the affected employee. Retaliation against an individual for reporting harassment or discrimination, or for participating in an investigation of a claim of harassment or discrimination, is a serious violation of this policy and may subject the person found to have retaliated to disciplinary action, up to and including termination of employment.

If you believe you or a coworker have been retaliated against in violation of this policy, you must immediately report that conduct to Human Resources. Do not assume that management is aware of the behavior.

Appeal Procedure

If a complainant is not satisfied with the results of the investigation or with the discipline or corrective action of the Company, the complainant may submit a written appeal to the Vice President of Human Resources.

ADOPTED: 

DATE: 10/30/2023