



15 West 6th Street // Suite 900 // Tulsa, OK 74119

## Human Capital Management Policy

### Equal Employment Opportunity

Vital Energy, Inc. (“Vital” or “Company”) expects every member of management to abide by this policy of nondiscrimination and equal employment opportunity. All employees are expected to conduct their relations with other employees in a manner consistent with this policy.

Vital operates under a continuing policy that all qualified persons are entitled to equal employment opportunity. As part of this policy, Vital specifically prohibits discrimination against any person or group based on race, color, religion, national origin, sex, sexual orientation, gender identity, age, disability, military status, veteran's status, genetic information or any other status or characteristic protected by applicable law.

As part of this policy, Vital commits to the following:

- Opportunities for employment are and will remain open to all qualified applicants based on experience, abilities, and aptitudes.
- Promotions and advancement are and will remain based on the employee’s achievement, ability, performance, and attitude. In the event that two employees have identical qualifications, Vital may include length of employment as a consideration.

We are committed to providing equal employment opportunities for all our employees and will not tolerate any speech or conduct that is intended to, or has the effect of, discriminating against or harassing any qualified applicant or employee because of his or her race, color, religion, national origin, sex (including pregnancy, childbirth or related medical conditions), sexual orientation, gender identity, age, disability, military status, veteran status, genetic information or any other status or characteristic protected by applicable law.

Not only do we forbid unlawful discrimination, we take affirmative action to ensure that applicants are employed, and employees are treated during employment, without regard to any status or characteristic protected by applicable law.

The Human Resources Department has been assigned specific responsibilities for implementing and monitoring affirmative action and other equal opportunity programs. One of the tenants of this code, however, is that all employees are accountable for promoting equal opportunity practices within our Company. We must do this not just because it is the law, but because it is the right thing to do.

We will not retaliate against any employee for filing a good faith complaint under our anti-discrimination, anti-harassment or anti-retaliation policies or for cooperating in an investigation and will not tolerate or permit retaliation by management, employees or co-workers. To the fullest extent possible, the Company will keep complaints and the terms of their resolution confidential.

If an investigation confirms harassment or discrimination has occurred, the Company will take corrective action against the offending individual, including such discipline up to and including immediate termination of employment, as appropriate.

We strive for zero incidents for both employees and contractors. Accordingly, we remain committed to use of best safety practices, including risk assessments and annual training, pre-job safety meetings, monthly all-field employee safety meetings, on-site contractor management and safety personnel, hazard hunts, biannual external safety audits in accordance with Occupational Safety and Health Administration (OSHA) guidance and regulations, stop work authority, after-action review and root cause analysis. To further emphasize executive commitment to safety, workforce safety performance is a metric in our Short-Term Incentive Program (STIP).

### Pay Transparency

Compensation confidentiality applies to employees with access to compensation information of other employees or applicants as a part of their essential job functions; these employees may not disclose the pay of other employees or applicants to individuals who do not otherwise have access to compensation information. Exceptions to this include: (a) in response to a formal complaint or charge, (b) in furtherance of an internal or external investigation, proceeding, or similar requirement, or (c) consistent with Vital's legal duty to furnish such information.

### Political Activity

We will fully comply with all political contribution laws. Our funds may not be used for contributions of any kind to any political party or committee or to any candidate or holder of any government position (national, state, or local) unless such contribution is permitted by law and complies with our Company policy. Please contact our General Counsel to determine whether a specific Company contribution is permitted.

It is against our policy for you to lobby our other employees on behalf of a political candidate during the workday. It is also against our policy to reimburse an employee for any political contributions or expenditures. Outside normal office hours, employees are free to participate in political campaigns on behalf of candidates or issues of their choosing, as well as make personal political contributions.

Vital does participate in industry trade associations to collaborate with subject matter experts from other companies and help influence the direction of the organization. We have reviewed the climate statements for each trade to ensure their statements are generally aligned with ours.

ADOPTED:  \_\_\_\_\_

DATE: January 9, 2023