



Human Rights Policy

1. Scope

At Vista, we acknowledge the importance of upholding and supporting fundamental human rights across our operations, and we extend this commitment to all third parties with whom we engage. Overall, our Vista Way, our Code of Ethics and Conduct, and other Corporate policies, as well as the business strategies we conduct, embrace the principles set out in the United Nation's Universal Declaration of Human Rights and the International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

We adhere to the Guiding Principles of the United Nations Global Compact and its Sustainable Development Goals. Our Code of Ethics and Conduct, their related policies and procedures and all regulations governing our Company's operations are consistent with these Principles and Goals.

2. Guiding Principles

We follow the Voluntary Principles on Security and Human Rights¹, the International Bill of Human Rights², and IPIECA Human rights due diligence guidance for the oil and gas industry (second edition)³.

3. Internal References

Policies, guidelines and standards, including those covering human rights, are approved by the Executive Team. We systematically identify and review policies and procedures across our company, focusing on our human rights priority areas, and update them to ensure alignment with our human rights commitments.

Key policy documents governing human rights include, but are not limited to, our Code of Ethics and Conduct, and related policies. Our internal policies promote diversity, equity and

¹ https://www.voluntaryprinciples.org/wp-content/uploads/2021/11/The-Voluntary-Principles_English.pdf

² <https://www.un.org/en/about-us/universal-declaration-of-human-rights>

³ <https://www.ipieca.org/resources/good-practice/human-rights-due-diligence-guidance/>

inclusion, a workplace free from any kind of harassment or any other offensive or disrespectful behavior towards Vista associates.

4. Our Commitment

We are committed to protecting the health and safety of all individuals engaged in Vista's operations, including contractors, subcontractors and other related third parties. We uphold zero-tolerance to violence in the workplace, do not tolerate working under the influence of drugs or alcohol, any form of discrimination in hiring or employment practices, and we prohibit any use or contract that directly or indirectly, implies modern slavery, human trafficking, child labor or any form of forced labor.

We assess community impact on an annual basis, manage our value chain and establish fair employment practices, including health at the workplace, employment conditions, non-discrimination, freedom of association, and physical and psychological well-being.

We protect people's rights from all actual and potential impacts from all our activities and operations. We comply with the laws, rules and regulations of the countries in which we operate.

5. Specific Issues

While supporting human rights, we focus on the communities and people collaborating with Vista along our whole supply chain.

6. Employees and Third Parties engaged in our operations

Our Code of Ethics and Conduct summarizes our commitment to business ethics and human rights, in particular with respect to:

- Establishing salaries, benefits and other fair and equitable labor conditions under the laws governing our Company
- Acknowledging employee rights to freedom of association
- Ensuring safe labor conditions
- Promoting the health and welfare of all personnel engaged in our operations.
- Prohibiting child labor
- Supporting a discrimination and harassment-free workplace

7. Value Chain

We encourage our suppliers, contractors, partners and customers to act in a socially responsible and ethical manner. Our suppliers must adhere in writing to our Code of Ethics and Conduct to qualify for selection and contracts. Suppliers must comply with the laws, rules and regulations of the countries where they operate.

8. Local Communities

We respect the rights of local communities and their environment, and we work with our customers and suppliers to create shared values, and align roles and responsibilities in human rights issues. We commit to:

- Making our best effort to minimize social risks and impacts
- Fostering economic development in our local communities
- Ensuring that their concerns are given serious consideration

9. Claims

For inquiries or complaints related to this policy, please submit a request through the designated alert channels described in our Code of Ethics and Conduct.

Rev.1

Miguel Galuccio

Chief Executive Officer

Vista Energy S.A.B. de C.V.