

The cover features a background of water ripples in shades of blue and gold. A large, dark blue triangle points from the top left towards the center. A bright green diagonal stripe runs from the bottom left towards the center. The text is positioned within the dark blue triangle and on the white background.

2019

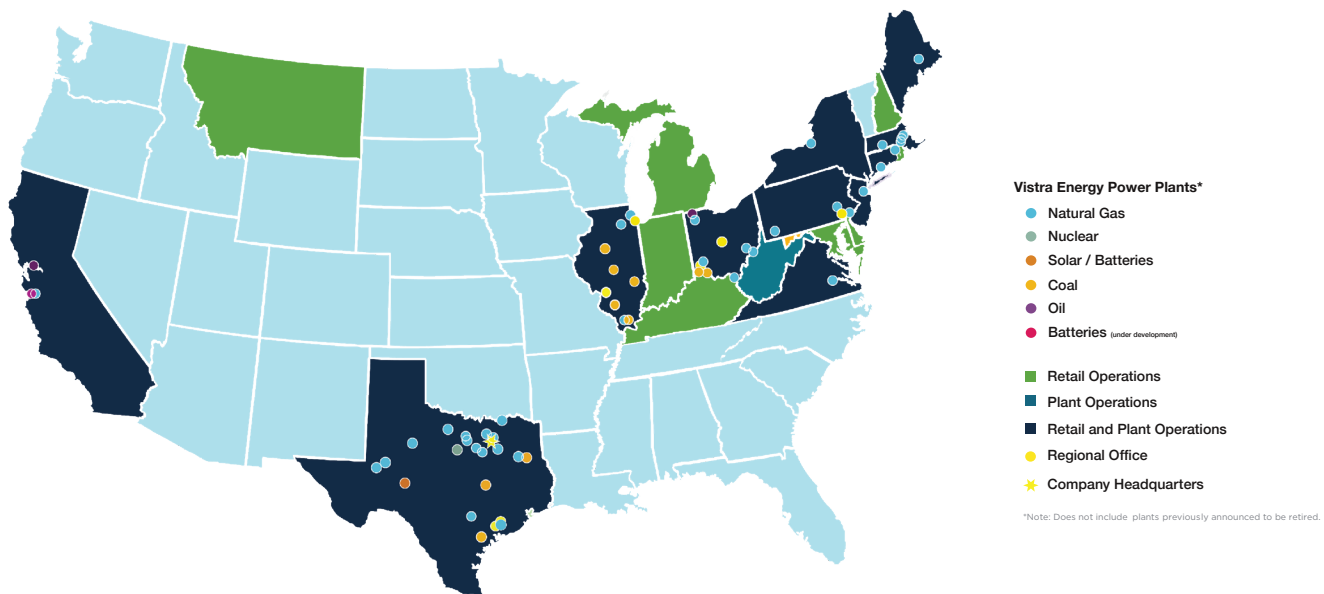
Annual Sustainability Report

VICTRA

June 2020

ABOUT VISTRA

Vistra (NYSE: VST) is a leading, integrated, Fortune 275 energy company based in Irving, Texas, providing essential resources for customers, commerce, and communities. Vistra combines an innovative, customer-centric approach to retail with safe, reliable, diverse, and efficient power generation. The company brings its products and services to market in 20 states and the District of Columbia, including six of the seven competitive wholesale markets in the U.S. and markets in Canada and Japan, as well. Serving nearly 5 million residential, commercial, and industrial retail customers with electricity and natural gas, Vistra is the largest competitive residential electricity provider in the country and offers over 40 renewable energy plans. The company is also the largest competitive power generator in the U.S. with a capacity of approximately 39,000 megawatts powered by a diverse portfolio, including natural gas, nuclear, solar, and battery energy storage facilities. In addition, the company is a large purchaser of wind power. The company is currently constructing a 400-MW/1,600-MWh battery energy storage system in Moss Landing, California, which will be the largest of its kind in the world when it comes online. Vistra is guided by four core principles: we do business the right way, we work as a team, we compete to win, and we care about our stakeholders, including our customers, our communities where we work and live, our employees, and our investors. Learn more about Vistra's environmental, social, and governance efforts and read the company's sustainability report at <https://www.vistraenergy.com/sustainability/>.



OUR BRANDS

Through a variety of retail brands and various marketing channels, Vistra balances the needs and preferences of its customers through a vast portfolio of products and services, including green energy and conservation-focused products.



SUSTAINABILITY AT A GLANCE



MORE THAN

40

RENEWABLE
ENERGY PLANS

\$3.393 BILLION

ONGOING OPERATIONS
ADJUSTED EBITDA FOR 2019



OVER \$3.5M

OF CHARITABLE GIVING
ACROSS 11 STATES*

ANNOUNCED GOALS TO ACHIEVE **50%** REDUCTION IN
SCOPE 1 CO₂e EMISSIONS BY 2030, **80%** REDUCTION BY 2050
WITH SIGHTS SET ON REACHING NET-ZERO CARBON BY 2050



39%
DECREASE

IN GHG EMISSIONS
SINCE 2010



78%

OF 2030 TARGET
ACHIEVED



NEARLY

450 MW

OF BATTERY STORAGE
UNDER DEVELOPMENT
WITH ADDITIONAL
~700-750 MW
OF OPPORTUNITY
AT OUR EXISTING
MOSS LANDING AND
OAKLAND SITES

80,000+

ACRES

OF LAND
RECLAIMED



NEARLY

13,000 MW

OF COAL-FUELED PLANTS
RETIRED SINCE 2010



5,400+
EMPLOYEES



180 MW OF INSTALLED SOLAR
CAPACITY WITH OVER

2,000 MW

OF DEVELOPMENT
OPPORTUNITY
IN THE PIPELINE

13

FACILITIES
WITH OSHA
VPP STAR
RATING



POTENTIAL FOR UP TO **300 MW** OF
UTILITY-SCALE SOLAR PROJECTS AND
UP TO **150 MW** OF ENERGY STORAGE
FACILITIES IN ILLINOIS UNDER THE COAL
TO SOLAR AND ENERGY STORAGE ACT

*Includes \$1.6 million of corporate giving and \$1.92 million from Vistra's Annual Giving Campaign making a direct impact in more than 45 communities in 2019. Excludes \$2 million donated to COVID-19 relief efforts in 2020.

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CORE PRINCIPLES

WE DO BUSINESS THE RIGHT WAY

Every decision we make and action we take will be evidence of the utmost integrity and compliance. Conducting our daily activities within the laws, regulations, and rules is not an option we choose but rather the way we do business that is ingrained in our culture.

WE WORK AS A TEAM

We are committed to each other, in everything we do and to the success of our company. Collaboration, information sharing, and cross-functional teamwork are fundamental to how we conduct our day-to-day activities.

WE COMPETE TO WIN

We will create the leading integrated energy company with an unmatched work ethic, an analysis-driven and disciplined culture with strong leadership and decision-making throughout the organization.

WE CARE ABOUT OUR KEY STAKEHOLDERS

We care about our employees, customers, and communities where we live and do business. We will maintain productive and respectful relationships with our elected officials, regulators and community leaders. We strive to achieve the full value of our enterprise for our investors.

LETTER FROM THE CEO

THE PUBLICATION OF OUR 2019 SUSTAINABILITY REPORT

finds us at a very challenging time as we face the invisible, highly contagious, and dangerous COVID-19 virus. This highly disruptive disease has created unprecedented harm to society that has had a ripple effect on the worldwide economy and threatens the sustainability of businesses across multiple sectors—big and small. Vistra provides an essential product



to businesses and residences—the electricity that powers our lives. Medical equipment and devices, homes, public utilities, and many other critical elements of life do not function without electricity. Most notably, the electricity must be produced by generating plants, which still require people to operate and maintain. Of course, our essential business cannot sustain itself with just these operations alone. We must purchase fuel, buy parts and equipment, pay invoices, collect revenues, account for our business activities and file financials with the Securities and Exchange Commission, pay taxes, maintain cyber security and business systems—just to name a few necessary activities. Since the onset of the COVID-19 virus, we have been focused on keeping our peo-

ple healthy and safe, and maintaining our essential business operations—a difficult balancing act. We have counted well more than 100 new activities and forums that have been mandated by the crisis. To accomplish keeping our people healthy and safe we initiated the following procedures very early on in the advent of COVID-19:

- Conducting questionnaires and temperature testing at the entry point of all facilities—one of the first companies to do so.
- Work from home for all non-location specific employees.
- Physical distancing at all essential sites, separation of shift changes and segregation of critical operators.
- Availability of sanitary supplies to support frequent and proper hygiene.
- Requiring facial coverings at all sites, which were also provided to employees and members of their immediate family.
- Adjusting pay practices for operational facilities in the event of sequestration to maintain reliability and to adhere to the CARES Act.
- Early and consistent adopter of quarantining of suspected infected employees and tracing potential exposed employees.
- Established plans to sequester essential employees, if necessary, including food and sleeping provisions.
- Assistance to customers in need including offering payment plans, deferring late fees, and avoiding disconnects.
- Donating \$2 million to communities in need through donations to non-profits and social service agencies.
- Frequent communication on a company-wide basis stressing these procedures and continued adherence to them.

Our board members have been actively engaged during the COVID-19 crisis, participating in weekly calls led by management

to ensure Vistra is taking appropriate actions to both manage the risks brought on by COVID-19 and also to support our employees, contractors, communities, and other stakeholders during this challenging time.

We are proud that, as of the date of publication of this report, these procedures have contributed to limiting our COVID-19 positive tests to two in a population of approximately 5,500 employees in 20 states and the District of Columbia, including the Northeast, MidAtlantic, and Midwest, and over 3,000 contractors on our sites completing 86 spring power plant maintenance outages—with both of these cases contracted outside of work. Fortunately, both individuals have fully recovered. We are also proud that we have been able to help our customers and communities during this difficult time. It is not just good business, it is the right thing to do.

SINCE OCTOBER 2016, VISTRA SET FORTH ON A STRATEGIC

direction for sustainability built on a strong balance sheet, an integrated business model, low-cost operations, and a leading retail platform. In addition, we embarked on a portfolio optimization effort aimed at investing in assets with long-term staying power filtered by economic value and sensitivity to climate impacts. Our strategic direction has buoyed Vistra through the COVID-19 pandemic and placed the company in a strong position for the future. Now more than ever, Vistra's leadership in the ESG space is critical. As we move into the next decade Vistra is committed to continue:

- Investing in new technologies, ensuring the availability of safe and reliable power while reducing our carbon footprint,
- Prioritizing the health and safety of our employees while supporting the communities we serve, and
- Advancing our governance framework to protect the interests of our stakeholders.

As we detail in the pages that follow, Vistra continued to demonstrate its leadership in these areas throughout 2019, starting with the announcement of our greenhouse gas emissions reduction targets.

Specifically, last year Vistra announced a goal to achieve a greater than 50% reduction in CO₂ equivalent emissions by 2030 with a long-term objective to achieve a greater than 80% reduction in CO₂ equivalent emissions by 2050, each as compared to a 2010 baseline, with our sights set on reaching net-zero carbon emissions by 2050, assuming necessary advancements in technology and supportive market constructs and public policy. This commitment builds on the billions of dollars we have already invested to control emissions, to

make our existing power plant fleet more efficient, and to advance our generation fleet into newer, more efficient, and lower-emitting power plants including renewables, batteries, and state-of-the-art, highly efficient, lower emitting gas-fueled assets.

Also in 2019, Vistra joined the Climate Leadership Council as a founding member, advocating for a carbon fee and dividend approach as the ideal public policy to incentivize investments in carbon-free and carbon-reducing technologies while mitigating the financial impacts on the economically disadvantaged. (See "Letter from the CSO" for more details.)

Our company is well on its way to achieving its 2030 CO₂ equivalent emissions reduction target. Following the merger with Dynegy in April 2018, we meaningfully reduced the percentage of our total generation from coal assets, and our installed capacity is now over 70% low- to no-CO₂-emitting natural gas, nuclear, and renewables and the EBITDA contribution of these low emitting assets along with our retail business is approximately 83%. Since 2010 the combined portfolio has decreased CO₂ equivalent emissions by more than 39%, taking nearly 240 million metric tons of CO₂ equivalent emissions out of the air. In addition, in 2019 we retired four coal plants, totaling approximately 2,000 MW, in Illinois and announced plans to retire a fifth coal plant by year-end 2022. These retirements will further advance our progress toward achieving our long-term emissions reduction targets by reducing CO₂ equivalents an additional approximately 11% compared to a 2010 baseline.

Our retail business has over 40 renewable-based plans available to our customers, and our development team has a pipeline of potential renewable and energy storage projects that will further transition our generation fleet toward low-to-no carbon emitting resources. In fact, we believe it is imperative that we transform our company over the next several years to support our long-term sustainability. Vistra's 10-year view, shown below, provides a glimpse into the potential transformation of our business, forecasting an asset mix that we believe will support electric system reliability while providing customers with cost-effective energy that meets their sustainable preferences and significantly reduces our carbon footprint. Notably, this 10-year view assumes Vistra will retire approximately 7,000 MW of additional coal generation and invest in approximately 6,000 MW of renewables and battery storage between now and 2030. Vistra is focused on becoming a clean energy company with expectations that nearly 20% of its EBITDA and generation capacity will be derived from renewable assets by 2030. We expect we will achieve this transformation of the supply side of our business through approximately \$5 billion dollars of investments

over the next decade. This transformation of our generation portfolio, combined with our existing low-emitting natural gas fleet and leading retail business with significant and growing “green” offerings for our customers, is the Vistra of the future. It is very important to note that natural gas-fueled generation will be a necessary transition resource for many years to come, as a complement to renewables. Natural gas-fueled generation provides cost-effective, flexible, and reliable dispatch of electricity, and will also provide the critical backstop to intermittent renewables. In fact, we have already seen evidence of the critical need for dispatchable resources in the heavy renewable markets of California, Texas, and Germany.

Importantly, we strongly believe these projections are attainable without sacrificing safe, reliable, and cost-effective operations, and without any negative impact to Vistra’s long-term viability. In fact, we believe Vistra’s long-term strategy will position us to be a sustainable industry leader for years to come.

In the near term, our development of the 400-MW/1,600-MWh energy storage system at Moss Landing is on track, and we are nearing final approval to develop a 36.25-MW/145-MWh energy storage system at the site of Luminant’s existing

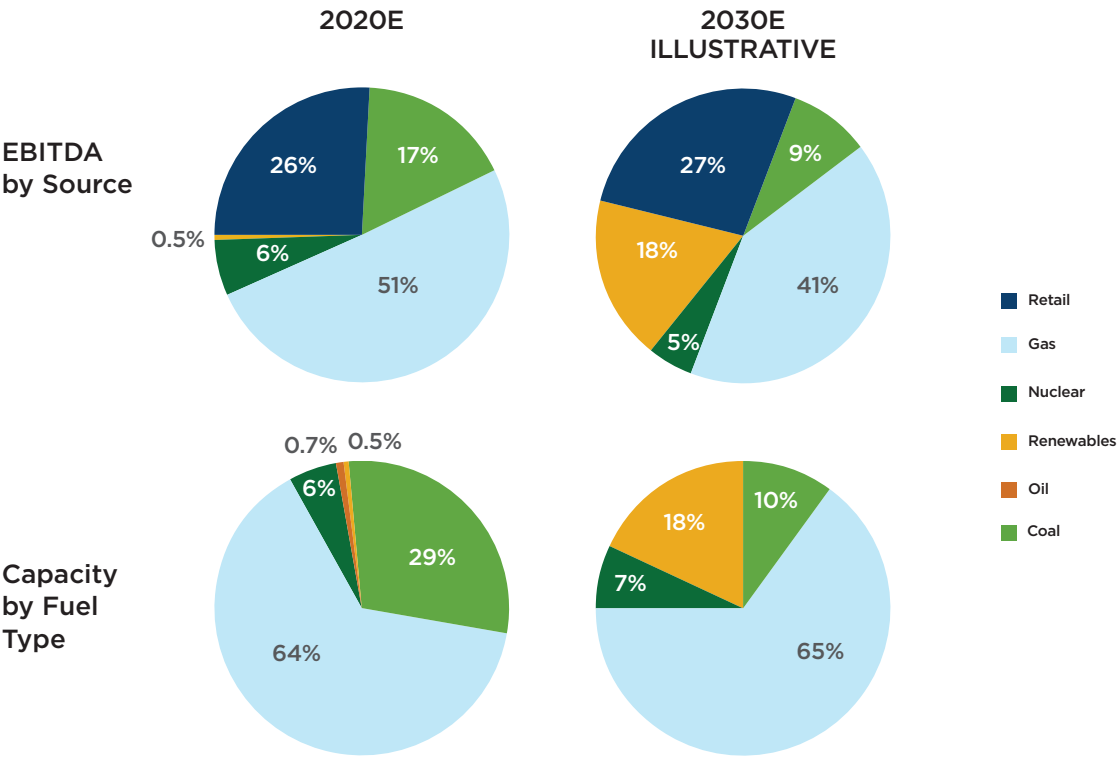
Oakland Power Plant. In Illinois, the proposed Coal to Solar and Energy Storage Act of 2019 would invest in utility-scale solar and battery storage at existing plant sites, resulting in up to 500 MW of new, clean generation. We’re also evaluating nearly 3,000 MW of solar and battery projects in Texas and California for future development.

The development of these projects and the further outlook of our company are dependent on our greatest asset—our people. The safety and wellbeing of our employees is our no. 1 priority. Vistra is not just about making money. We believe corporations have an obligation to a broad set of constituents—including employees, customers, communities, and investors—especially during times like these. In the pages that follow, you will find the results of Vistra’s commitment to the environment, its employees, and the communities we serve.



Curt Morgan
President and CEO

10-YEAR OUTLOOK



LETTER FROM THE CSO

THIS IS AN IMPORTANT YEAR FOR VISTRA'S SUSTAINABILITY

reporting, as we are meaningfully enhancing and expanding our ESG-related disclosures to more appropriately reflect the company's continued growth and evolution.

Vistra became a public company in October 2016. We published our first sustainability report for the calendar year 2017 in the second quarter of 2018 — and later that quarter we closed on our acquisition of Dynegy, more than doubling the size of our business and expanding our operations into 12 states through the addition of Dynegy's young, efficient, and predominantly gas-fueled operations, as well as its retail brands. Our sustainability report for the 2018 calendar year reflected this significant transformation of our business.

Then, in 2019, Vistra grew further with the retail acquisitions of Crius Energy Trust and Ambit Energy. We also formalized our sustainability governance structure, expanding the responsibility of the Risk Committee of the board of directors to include oversight of our sustainability program and naming a chief sustainability officer. In addition, Vistra announced, for the first time, long-term greenhouse gas emissions reduction targets. Now in 2020, a key strategic focus for us will be to enhance our ESG-related disclosures, starting with this 2019 Sustainability Report.

ABOUT THIS REPORT

I am happy to highlight that this report, for the first time, was prepared in accordance with the Global Reporting Initiative (GRI) Standards, Core Option and also includes Sustainability Accounting Standards Board (SASB) disclosures as outlined for Electric Utilities and Power Generators.

Pursuant to the GRI framework, Vistra's Sustainability Committee, which is comprised of team leaders from various functional groups within the organization, conducted an "issues assessment" to identify what we believe are the key, material disclosures pertinent to our organization. As a reflection of this assessment, you will find in our 2019 Sustainability Report and attached GRI Index a discussion of the following sustainability disclosures: Economic Performance, Energy, Water and Effluents, Emissions, Effluents and Waste, Environmental Compliance, Employment, Occupational Health and Safety, Training and Education, and Diversity

and Equal Opportunity. In addition, relevant financial implications, as well as a discussion of risks and opportunities associated with some of these issues, can be found in Part I, Item 1A in our 2019 Form 10-K.

This report follows an annual cycle, covering the reporting period from Jan. 1, 2019 through Dec. 31, 2019, while also discussing some pertinent business updates that have already been implemented in 2020, as well as information regarding a few of our longer-term strategies.

Later in the year we plan to publish a Climate Report in accordance with the Task Force on Climate-related Financial Disclosures (TCFD). As such, please continue to visit Vistra's sustainability website at vistraenergy.com/sustainability, which is frequently updated to include the latest news and events around the company's social, economic, and environmental initiatives.

STAKEHOLDERS

We hope you find these enhanced disclosures helpful, as we recognize the importance of providing complete and transparent information to the many stakeholders who have an interest in our ESG-related activities. The disclosures in this report are informed by interactions and engagement with a diverse set of individuals and organizations throughout 2019, including investors, other financial community participants, employees, recruits, customers, suppliers, local communities, consultants, state and federal governments, regulators, and non-governmental organizations. Some examples of stakeholder engagement activities we undertake on an annual basis include frequent meetings and calls with members of the financial community, regulators, and state, local, and federal government officials; employee town halls; local community town halls; and customer marketing research panels and quality questionnaires.

We strive to make ourselves available to all constituents throughout the year. If you have questions about any of the disclosures in this report or about any of Vistra's ESG-related initiatives, please do not hesitate to reach out to me at molly.sorg@vistraenergy.com.

UNITED NATIONS' SUSTAINABLE DEVELOPMENT GOALS

Vistra's business activities are in alignment with several of the seventeen United Nations Sustainable Development Goals (SDGs). Specifically, our climate strategy predominately supports three of the SDGs: Affordable and Clean Energy, Sustainable Cities and Communities, and Life on Land. Further mapping of Vistra's business activities to the SDGs can be found in the GRI Content Index at the end of this report.



- Upton 2 Solar Power Plant
- Moss Landing and Oakland Energy Storage Projects in California
- Largest wind purchaser in Texas
- Advocates and supports competitive energy markets
- Renewable retail products offered in all retail electricity markets



- Solar developer and provider of solar panels for residential customers
- Power Plant Optimization
- EV Car Charging stations
- Supports city efficiency efforts (City of Dallas)
- TXU Energy AidSM
- Employee wellness program



- 45+ years of Land Reclamation
- 300,000 plus trees provided to Trees Across Texas Program
- TXU Urban Tree Farm and Education Center
- Luminant Environmental Research Program

In addition to our participation in the CLC and the AFCD, Vistra President and CEO Curt Morgan is a member of the Business Roundtable, collaborating with CEOs of America's leading companies that collectively employ more than 15 million people and earn more than \$7 trillion in annual revenues. Vistra was a proud signatory to the Business Roundtable's "Statement on the Purpose of a Corporation," committing to lead our company for the benefit of all stakeholders — customers, employees, suppliers, communities, and shareholders.

Vistra similarly takes an active role in supporting diversity-supplier organizations, with members of senior leadership serving on the boards of directors for the National Minority Supplier Development Council, the Women's Business Enterprise National Council, and the

National Veteran Owned Business Association, among others. We are also an active member of the National Gay & Lesbian Chamber of Commerce and Disability:IN.

In short, we are putting our advocacy efforts directly behind organizations that we believe will have a positive impact on the environment and our global community.

IN CLOSING

Over the last several years, Vistra has greatly accelerated its efforts to reduce its carbon footprint through, among other initiatives, power plant retirements and investing billions of dollars in renewables, energy storage, emissions control equipment, and other energy-efficient technologies. We are committed to being a part of the solution to combat climate change, while continuing to provide safe, reliable, and affordable power to our customers. If we all do our part, we can accelerate the transition to a lower-carbon future while maintaining a prosperous global economy. Vistra is proud to be part of the solution.

A handwritten signature in black ink, appearing to read 'Molly Sorg'.

Molly Sorg,
Chief Sustainability Officer and VP of Investor Relations

ORGANIZATIONS

In addition to our commitment to transparency, Vistra similarly takes its responsibility to lead in the effort to combat climate change very seriously. In 2019, we joined the Climate Leadership Council (CLC) as a founding member, advocating for a consistently applied carbon fee and dividend approach as the ideal public policy solution to appropriately incentivize investments in carbon-free and carbon-reducing technologies while mitigating the financial impacts on the economically disadvantaged. We further committed to contribute \$1 million to Americans for Carbon Dividends (AFCD), the advocacy arm of the CLC. Vistra believes the CLC's bipartisan climate roadmap, which promotes a national carbon dividend framework, is the right public policy solution to facilitate the country's transition to a lower-carbon future while maintaining the strength of the American economy. Additional information about the CLC and the AFCD can be found at clcouncil.org and at afcd.org, respectively.

The CEO of the CLC, Ted Halstead, recently co-authored, with James Baker, III and George Schultz, an article in Foreign Affairs that explains how a well-designed climate policy can transform perceived vulnerabilities into major strategic opportunities—a concept that closely aligns with how Vistra views climate risks and opportunities. The article can be found [here](#).



Vistra is led by a team of industry veterans with expertise across all areas of the energy and retail businesses, including a board of directors with a diverse set of experiences providing oversight and governance. While the board has delegated management of the company's day-to-day operations to its executive officers, the following board committees provide specific review and approval of certain matters:

Board Committees

AUDIT COMMITTEE

The principal purposes of the Audit Committee are to oversee (i) the quality and integrity of Vistra's financial statements, the financial reporting processes, and financial statement audits, (ii) the independent auditor's qualifications and independence, (iii) the performance of the company's internal audit function and independent auditor, the systems of disclosure controls and procedures, and the company's system of internal controls over financial reporting, accounting, legal and regulatory compliance, and ethics. This oversight includes an evaluation of the effectiveness of disclosure controls and controls over processes that could have a significant impact on the financial statements.

The Audit Committee is also charged with fostering open communications among the inde-

pendent auditor, financial and senior management, internal audit, and the board, as well as encouraging continuous improvement and fostering adherence to the company's policies, procedures, and practices at all levels.

COMPENSATION COMMITTEE

The purpose of the Compensation Committee is to discharge the board's responsibilities relating to compensation of directors, the chief executive officer, the company's executive officers (as determined pursuant to U.S. securities laws and regulations), the direct reports to the chief executive officer, and other company leaders. The Compensation Committee reviews and recommends to the board executive compensation and other benefit plans, policies, and programs. It also approves individual executive officer compensation that is intended to attract, retain, and appropriately reward employees in order to motivate their performance in the achievement of the company's business objectives and align their interests with the long-term interests of the company's stockholders.

NOMINATING AND GOVERNANCE COMMITTEE

The Nominating and Governance Committee's purpose is to identify individuals qualified to become board members (consistent with criteria approved by the board), recommend to the board the company's director candidates for election at the annual meeting of stockholders, annually review the corporate governance guidelines of the company, and oversee the annual performance evaluation of the board and its committees. The committee also recommends directors to serve on all committees of the board.

SUSTAINABILITY AND RISK COMMITTEE

In July 2019, Vistra enhanced the governance over the company's sustainability policies and practices by expanding the responsibility of the former Risk Committee to include sustainability oversight. The Risk Committee was renamed the Sustainability and Risk Committee, which now oversees the company's assessment of greenhouse gas-related risks, including risks related to climate change, in addition to its prior oversight of the company's risk management process for the identification, evaluation, and mitigation of enterprise risk. Enterprise risk is management's assessment and prioritization of the key factors with potential to have an impact on the company's business and functional operations.

The purpose of the Sustainability and Risk Committee is to assist the board in discharging its responsibilities with respect to oversight of management's process for the identification, evaluation, and mitigation of enterprise risk, the company's risk related to commodity prices, the company's management of its insurance programs and investment policies, and performance with respect to the company's pension and

nuclear decommissioning programs. In addition, the Sustainability and Risk Committee will serve in an advisory role to management in the development and implementation of the company's sustainability policies and practices and in Vistra's approach to external sustainability reporting. This committee will further oversee and monitor Vistra's compliance with its greenhouse gas emissions reduction targets and progress toward achieving those commitments.

NUCLEAR OVERSIGHT ADVISORY BOARD

Vistra has established a Nuclear Oversight Advisory Board (NOAB), which oversees and provides reports to the board on an as-needed basis, but no less than annually, regarding various risks and strategic considerations related to its ownership and operation of our Comanche Peak nuclear power plant. The chair of NOAB is a former chair of the U.S. Nuclear Regulatory Commission.

Recent Corporate Governance Developments

MAJORITY VOTING

In March 2020, the board approved an amendment to the company's restated bylaws to implement majority voting for directors in uncontested elections. Thus, effective beginning with the 2020 annual meeting of stockholders, director nominees must receive more votes "for" their election than "against" their election to be elected. Previously, director nominees running unopposed were elected with any number of votes "for" their election regardless of how many "against" votes were cast.

The board also amended its corporate governance guidelines to require that any director nominee who does not receive more "for" than "against" votes is required to tender a resignation to the Nominating and Governance Committee. The Nominating and Governance Committee will recommend to the board whether to accept or reject any such resignation within 90 days after certification of the election results. In any contested election, plurality voting for directors will apply whereby the candidate receiving the most "for" votes will be elected.

DECLASSIFIED BOARD

At the most recent annual meeting, the board recommended, and the stockholders approved, a change to Vistra's charter to declassify the board. Prior to the amendment, directors were split into three classes and each class served for a three-year term. Starting with the 2020 annual meeting of stockholders all directors are elected annually for a one-year term.

INCREASED DIVERSITY

Following Vistra's most recent annual meeting of stockholders, our board is comprised of 10 members, three of whom are women and two of whom are minorities. Our two newest board members, both business and energy veterans, bring extensive operational, policy, and regulatory expertise.

Management Committees

There are three standing committees that comprise the primary governance forums for day-to-day management of the company: the Management Committee, Commitments Committee, and Risk Management Committee.

The **Management Committee** consists of the chief executive officer and his direct reports, as well as leaders who represent key business areas and support functions. This bi-weekly meeting forum includes discussion and decision-making related to general strategy and policy items, operational updates, and other items not presented at the other committees listed below. The Management Committee provides the forum for information sharing, prioritization, and cross-business and cross-functional coordination.

We recognize the value of having a diverse team, especially in our senior leadership ranks, and are proud that our Management Committee is comprised of nine women and 14 men. Further, 50% of the CEO's direct reports are women.

The **Commitments Committee** includes, as voting members: president and CEO, chief financial officer, general counsel, chief operating officer, chief administrative officer, chief commercial officer, and the president of retail, and is chaired by the CEO and administered by the CFO organization. The committee's standing invitees include all other direct reports to the CEO as well as other key functional and operational leaders. The committee provides operational oversight of Vistra's commitment activities, ensuring that prior to committing and deploying company resources in connection with a transaction, an appropriate level of analysis and review is performed, and appropriate approvals are obtained. Importantly, all material commitments of company resources must receive sign-off by appropriate businesses and functional units. The committee also approves transactions within transaction authority limits delegated by the Vistra board of directors.

There are three sub-committees of the Commitments Committee that are governed under the Commitments Committee Policy:

- The **Procurement / Third-Party Steering Committee** provides oversight and approval for commercial initiatives related to third-party spend.

- The **Technology Steering Committee** provides oversight and approval for technology initiatives that will commit resources of the company through technology funded capital and/or expense projects.
- The **Operations Performance Improvement Steering Committee** provides oversight for power plant operations improvements and potential investments including the ongoing implementation of initiatives and proliferation of best practices through excellence forums.

The members of the **Risk Management Committee** include: president and CEO, chief financial officer (chair), chief operating officer, chief commercial officer, chief risk officer, president of retail, treasurer, senior vice president of planning and analytics, controller, and vice president of regulatory trading and generation. The Risk Management Committee provides risk management oversight, monitoring, control, and guidance for all risk management activities at Vistra, and it approves risk management activities within limits delegated by the board of directors through the Risk Management Policy and Commitments Committee delegation of authority.

Risk Management

Vistra's governance framework includes a robust enterprise risk analysis, through which all functional groups in the company provide input on key business, regulatory, market, legal, and climate risks, among other potential areas of threat. The risk management process is owned by the chief risk officer, who meets annually with every functional group in the company to review the risk universe for any relevant updates. During the annual review process new risks are added, outdated risks are removed, and the likelihood and severity of all risks are evaluated. The output of this process is then reviewed by Vistra's Risk Management Committee and reported to the Sustainability and Risk Committee of the board.

In addition to this comprehensive annual process, the chief risk officer reviews the risk universe with functional leads on a quarterly basis and on an interim basis as needed to address emerging risks to ensure the risk matrix is current throughout the year. These quarterly and interim updates are also reported to the Sustainability and Risk Committee of the board. Management utilizes the output from the risk framework to anticipate emerging risks, integrate risk into business planning, and take steps to mitigate the potential impact of any identified risks on the operations and performance of the business.

Vistra applies this established risk management process to its evaluation of current and emerging climate change



trends and their associated physical, regulatory, and market risks. Not only does this process identify risks that management actively evaluates and manages, it can also lead to the discovery of growth opportunities for the organization. For example, Vistra is actively evaluating incremental solar and energy storage development opportunities as well as additional renewable retail product offerings, which are business pursuits that fit within Vistra's corporate strategy and have a mitigating impact on the company's climate change profile.

Code of Conduct

Vistra's leadership and employees are committed to exercising the highest level of ethical standards in everything we do. Vistra's Code of Conduct establishes the ethics and compliance standards for employees at all levels across the company, including board members. The Code of Conduct covers human rights and equal employment among a variety of other topics that can be found on our website [here](#). In 2020, Vistra further enhanced its human rights governance by adopting a stand-alone Human Rights Policy, which can be found [online](#). While the Code of Conduct is specifically written for Vistra employees and board members, the company expects contractors, third-party consultants, interns, and others who may be temporarily assigned to perform work or services for the company to follow the Code of Conduct in connection with their work for Vistra. The Audit Committee of the board of directors reviews the Code of Conduct annually and approves all changes Vistra makes. Vistra employees are required to complete a Code of Conduct training on an annual basis. Reflecting our top-down compliance culture, we had 100% completion in 2019. Vistra has also established the Compliance Helpline, a resource available to all employees to anonymously submit any ethical or compliance concerns, including violations of Vistra's Code of Conduct, via phone or online.

Data Privacy and Information Security

Vistra and its board of directors recognize the important social responsibility to protect our customers', employees', and partners' online and offline data. To more effectively

prevent, detect and respond to information security threats, Vistra has a dedicated chief information security officer, whose team is responsible for leading enterprise-wide information security strategy, policy, standards, architecture, and processes. The board regularly receives reports on Vistra's cybersecurity risks and threats, the status of projects to strengthen the Vistra's information security systems, assessments of Vistra's security program, and the emerging threat landscape.

Further, the entire Vistra organization is committed to ensuring strong information protection across our business as it is core to all of our brands, and we monitor and ensure compliance with existing legal obligations to maintain our trusted reputation. Vistra delivers against this responsibility each day through people, processes, and technology designed to continuously detect and mitigate cybersecurity risk. This includes employee training for handling sensitive data and regular email phishing campaigns; a comprehensive Cyber Incident Response Plan (CIRP) and regular third-party audits; cyber protective measures such as multi-factor authentication, anti-virus protection, and continuous system monitoring. Vistra measures its cybersecurity capability levels through various industry metrics such as the National Institute of Standards and Technology (NIST) maturity score.



Vistra understands the impact of our business on the environment and knows we have a social responsibility to combat climate change and reduce our carbon footprint, while still providing safe and reliable energy to our customers. Vistra's Environmental Principles Policy, which can be found on [our website](#), communicates the commitment we have made to improving the environment. Nine environmental principles are described in the policy and all Vistra employees conduct business and make decisions with these environmental principles in mind.

Environmental stewardship is governed by our core principle that we do business the right way — we are committed to continuous improvement of environmental protection measures, building on our strict compliance with environmental laws and regulations. Vistra's corporate environmental team assists and guides compliance at each power plant, where each permit is reviewed to ensure compliance. Roles and responsibilities are determined on a site-by-site basis and all regulatory submittals and due dates are tracked in the company's work order system.

The corporate environmental team also performs internal audits at sites on a regular basis and tracks open items to completion. Permit deviations, spills, or other environmental incidents are tracked in a central reporting system. The environmental team meets with senior

management monthly to discuss compliance items, risks, and environmental planning. Importantly for 2019, Vistra did not have any significant fines resulting from notices of violations (NOVs), which are preliminary allegations from the United States Environmental Protection Agency or a state environmental agency regarding potential noncompliance. Vistra's environmental, legal, and regulatory teams coordinate efforts to ensure that Vistra is adhering and responding to all federal and state environmental regulations.

Environmental Performance

EMISSIONS

As a power producer, Vistra is focused on reducing its Scope 1 emissions that are a byproduct of our electricity generation. In 2019 Vistra announced Scope 1 CO₂e equivalent (CO₂e) emissions reduction targets of 50% by 2030 and 80% by 2050, each as compared to a 2010 baseline, with aspirations to achieve net-zero by 2050 assuming advances in technology and supportive public policy. From our 2010 baseline, Vistra has achieved a 39% reduction in CO₂e emissions through year-end 2019, putting Vistra at a 78% achievement level of our 2030 goal. Importantly, in the fourth quarter of 2019, Vistra retired four coal plants in Illinois, which represented 7.8 million metric tons of CO₂e emissions in 2019. As a result, in 2020 Vistra expects an emission decrease of an additional 7%, which would result in a 43% reduction of CO₂e emissions as compared to Vistra's 2010 baseline.

In addition, our efforts have also resulted in the reduction of criteria air pollutants. Since 2010, Vistra has decreased carbon dioxide (CO₂) emissions by more

than 38%, nitrogen oxide (NO_x) emissions by 49%, and sulfur dioxide (SO₂) emissions by 74%.

Vistra's Scope 2 emissions come from two sources—electricity consumption at Vistra's power plants and Vistra's corporate offices across the nation. Vistra's power plants directly generate most of the power they consume, though they do consume some auxiliary power from the grid. Together with the power consumed at Vistra's corporate offices, as defined in the GRI Index, Vistra's Scope 2 emissions totaled approximately 0.249 million metric tons of CO₂e in 2019. Vistra endeavors to reduce its energy usage through a variety of efforts at its corporate offices which are discussed in the "Facilities" section of this report.

GENERATION AND CARBON INTENSITY

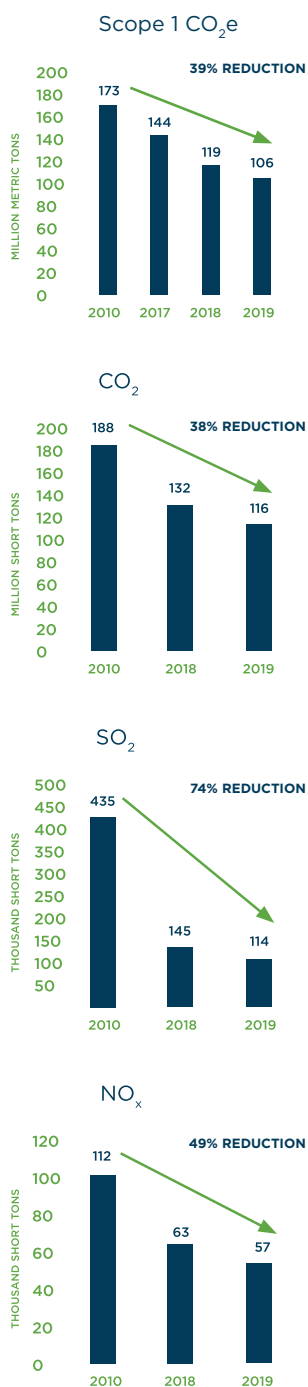
Generating electricity is the primary source of Vistra's air emissions. For 2019, Vistra generated 186,428,605 MWh of power from the generation over which it has operational control, with nearly 65% of the output generated from low- to no-CO₂-emitting natural gas, nuclear, and renewable assets. Reporting just under 116 million short tons of carbon dioxide emissions for 2019 translates to a carbon intensity of 1,240 pounds per MWh produced. As we transition our fleet away from coal generation, invest in additional renewable assets, and work toward achieving our emissions reduction targets, we expect our carbon intensity to decrease between now and 2030 and 2050 consistent with our CO₂e emissions reduction targets.

WATER

Water is a limited, expensive, and shared resource that is essential to everyday life and Vistra's plant operations. Producing electricity utilizes water in several key functions such as producing steam, condensing steam, cooling equipment, pollution control equipment, and in some circumstances, boiler make-up, potable water, cleaning, and other uses. Therefore, water conservation is a primary concern at each of our generating facilities, especially those in areas considered "high stress" or "extremely high stress." Vistra recognizes the value of water resources and is continuously working to refine our water management strategies.

Vistra is a key player in helping to manage national water resources, providing expertise on several official regional and statewide water planning and conservation groups or committees. Each year, we report our water use and conservation activities in our responses to various states' Water Survey/Inventory Programs, and we carefully monitor the quality and impact of any water we return to the waterways.

Vistra has five generating sites in areas identified as "high



stress” or “extremely high stress,” though many of our plants are geographically situated in an area of ample water supply. Across all of our power plants, Vistra practices good stewardship and works to use water efficiently. Where appropriate, we have built large reservoirs to capture water when it is plentiful, allowing it to be reused and recycled repeatedly. When feasible, we find ways to recycle water and to reuse water from one system to another system to reduce our use of freshwater. We also reclaim other types of wastewaters for our purposes and explore new ways to maximize water resources. Technologies such as the use of air-cooled condensers are also prevalent at our plants where water supply is not available. We have continued to invest in low-to-no water use generating assets including wind power, solar power, and combined-cycle generation. Each of these actions helps to reduce the amount of water needed to produce electricity. Based on 2019 data, approximately 98% of the water Vistra withdrew for its operations was recycled or discharged back to the water source.

COAL ASH BYPRODUCT AND OTHER WASTE

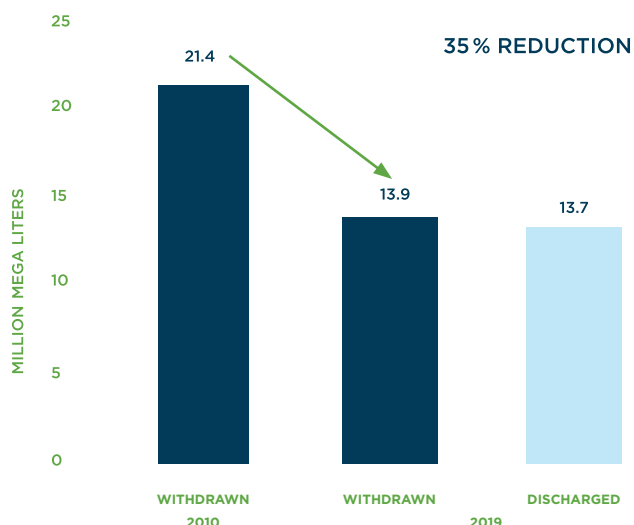
Vistra’s generation fleet recycles more than 60% of ash byproducts from its coal fleet. That equates to over 3.2 million tons of coal combustion byproducts beneficially reused in products, including recycling of fly ash, bottom ash, and gypsum products. Reuse of combustion byproducts, which resulted in nearly \$70 million in revenue for Vistra, is our preferred method of disposal when economically viable. The beneficial use of coal ash also reduces greenhouse gases. For example, for each ton of fly ash used in place of traditional cement, a reduction of slightly less than one ton of carbon dioxide is achieved—the equivalent of about two months of emissions from an automobile. As required under compliance, our coal combustion residual data can be found on Luminant’s website [here](#).

With the exception of nuclear waste, the amount of hazardous waste generated at our power stations is minimal. All waste generated is properly captured, stored and disposed of in approved landfills, recycled, or beneficially reused, as appropriate.

ASSET CLOSURE SEGMENT

In order to ensure that all of the plants and mines we retire are transitioned cost effectively and in a manner that is in compliance with all laws and regulations while taking into account the impacts on the local communities, Vistra has a team led by our vice president of asset closure that is solely dedicated to the decommissioning and reclamation of these retired plants and mines. This separation of duties is designed to ensure the work required to wind down these assets is done properly with focused management attention. Vistra manages these activities under a separate GAAP re-

Water Withdrawn and Discharged



porting segment, ensuring the team remains accountable to the operational and financial plan that has been put in place.

Renewable Resources

As Vistra looks forward, we continue to change the complexion of our fleet for maximum efficiency and environmental performance, while making disciplined investments in new technologies.

In June 2018, Vistra commenced operations of the 180-MW Upton 2 solar facility — Texas’ largest operating solar facility at that time. In conjunction with the solar plant, Vistra developed and constructed a 10-MW/42-MWh lithium-ion battery energy storage system. The battery energy storage system, which went into commercial operations on Dec. 31, 2018, enables Vistra to maximize the amount of power generated at Upton 2, capturing excess solar energy produced at the site to be released in times of high energy demand, which may not be concurrent with peak solar output.

Also in June 2018, Vistra announced that the company entered into a 20-year resource adequacy contract with Pacific Gas and Electric Company (PG&E) for the Phase 1 development and construction of a 300-MW/1,200-MWh, battery energy storage project at its Moss Landing Power Plant site in Moss Landing, California. When the Moss Landing battery project comes online in December 2020, it will be the largest of its kind in the world and will position Vistra as a market leader in utility-scale battery development. In April 2020, Vistra announced the Phase 2 development and construc-



Vistra's Upton 2 solar facility continues to deliver on the company's strategic plan to strengthen and expand its integrated businesses through enhanced retail solar offerings and diversity across its generation fleet. It is also direct evidence that competitive generators will invest in batteries in Texas when supported by market economics.

tion of a 100-MW/400-MWh, battery energy storage project at Moss Landing Power Plant bringing the site to a total of 400-MW/1,600-MWh of battery energy storage.

Continuing battery development in California, in 2019 Vistra entered into a 10-year resource adequacy contract with East Bay Community Energy (EBCE) for the development and construction of a 20-MW/80-MWh battery energy storage project at its Oakland Power Plant site in Oakland, California. In April 2020 the project size was increased to 36.25-MW/145-MWhs.

The Moss Landing and the Oakland battery projects will help increase local electric reliability by turning on quickly when incremental power supply is needed (particularly when California's large solar generation fleet powers down in the evening), and it will assist in curtailing fossil-fueled peaking power plants, lessening California's reliance on fossil-fueled electric generation and associated water requirements.

In addition, Vistra, via its subsidiary Luminant, is a large purchaser of wind-generated electricity to support our retail products. In 2019, Vistra had over 784 MW of wind generated power under power purchase agreements (PPAs) and purchased 6,516,000 wind and solar renewable energy credits (RECs) to meet our retail customer demand.

Over the next 10 years, Vistra will continue to seek out development projects and technologies related to renewables and energy storage. We have development opportunities at our current conventional generation sites, where we can utilize

existing land and infrastructure to enable lower cost and faster development of new renewable generation assets. In the near term, we see potential for further energy storage development in California at our existing sites, we are actively evaluating the development of over approximately 2,000 MW of solar projects in ERCOT, and we are supporting the Illinois Coal to Solar and Energy Storage Act of 2019, which would transition coal plants in Illinois to renewable sources of utility-scale solar and energy storage. Our 10-year view assumes we will invest approximately \$5 billion of equity in renewables and battery storage between now and 2030.

Vistra continues to evaluate and monitor new power facility technologies and we expect to balance investment in these new technologies with Vistra's commitment to providing safe, efficient, and low-cost power.

Environmental Giving

TREE PLANTINGS AND DONATIONS

In 2019, Vistra donated nearly 500 trees and approximately 3,300 liners or seedlings through its tree donation program, in which the company helps create healthy and sustainable communities by partnering with its customer cities, counties, schools, and nonprofits to provide trees for schools, parks, libraries, and various community facilities.

Since 2002, Vistra's flagship retail brand, TXU Energy, has provided nearly 300,000 trees to communities under the company's Trees Across Texas program and through its longstanding partnership with the Texas Trees Foundation. Through these tree donations, TXU Energy has helped generate environmental savings and health benefits for municipalities and residents valued at approximately \$37 million annually during the life of the trees.

For over 15 years, TXU Energy has sponsored the TXU Energy Urban Tree Farm and Education Center, which assists the Texas Trees Foundation (TTF) in their mission to create healthy and sustainable communities. The center serves as a resource for urban forestry operations, volunteer recruitment, and carbon sink and urban heat island mitigation for North Dallas. The nearly 10-acre tree farm at Richland College features state-of-the-art production and irrigation technology with the capacity to produce nearly 1,000 15-gallon and 30-gallon trees per planting season. Trees are offered to the public through TTF programs like NeighborWoods, Tree North Texas, the Cool Schools program, and various com-

Whooping Cranes at Kosse Mines

Over the years, Luminant has received numerous awards and national recognition for its land reclamation activities. Perhaps the best testament of success, however, is the nature and wildlife that thrives on the property once surface mining is complete and the land is restored.

In June 2019, Texas Parks & Wildlife (TPWD) notified Luminant that five juvenile whooping cranes that the agency was tracking via GPS transmitters were in the area of the company's Kosse mine, in the far south side of Limestone County, Texas. The whooping cranes are being tracked as part of what is known as the Louisiana Experimental Population, made up of birds that were raised in captivity and released into the wild as part of a species recovery program. As such, these birds do not migrate north for the summer as do other whooping cranes but rather spend their summers in the Louisiana/Texas region. The mine site took immediate steps to protect the unexpected guests, including posting notice for care and protection, since awareness helps prevent disturbance.

The whooping cranes were seen in the photos (right) foraging in land reclaimed 8-10 years prior—land that is fairly isolated now, with plenty of water and grassland. Based on their past tracked movements, TPWD did not expect the birds to remain in the area for more than a week or two. These birds stayed for about six months.

Whooping cranes, once on the brink of extinction and currently protected under the Migratory Bird Treaty Act, are not the only special visitors to Luminant property. Bald eagle sightings have increased at several mines, with nesting populations returning annually to the Martin Lake Liberty Mine, and interior least terns, a federally listed endangered species, have annually used our reclaimed sites for their nesting at Turlington and Kosse Mines.



munity tree plantings and seedling adoption events. On the third Saturday of each month (except during the hot months of June, July, and August), TTF coordinates a "Tree Tender" volunteer day. Through this event, volunteers log thousands of hours each year mulching, pruning, weeding, cleaning up trash, and installing special projects. Year after year, the TXU Energy Urban Tree Farm and Education Center continues to provide a place for urban forestry education and sharing the importance of trees in our communities.

LAND RECLAMATION

Since mining began more than 49 years ago, Luminant has reclaimed more than 85,000 acres for use as pastures, forests, wildlife habitat, and water resources, and the company has already secured reclamation bond liability releases on over 40,000 acres, demonstrating that it meets or exceeds pre-mine standards.

Over the last 45 years, Luminant has planted more than 42 million native trees as part of its reclamation program, including over 1.1 million in 2019. More than 30,700 acres of the company's reforested land is certified by the American Tree Farm System as sustainably managed woodlands. The Federal Office of Surface Mining has indicated that Luminant plants more trees annually than any mining company in the U.S.

We have created or enhanced more than 6,800 acres of wetlands, ponds, and stream channels on our restored lands, dramatically increasing water resources for the benefit of wildlife and livestock. Luminant has received over 90 awards for reclamation excellence, including an unprecedented five Director's Awards, the highest honor from the U.S. Department of the Interior's Office of Surface Mining. In 2017 Luminant was recognized by the Stephen F. Austin State University Board of Regents for nearly 50 years of commitment to environmental education.

EMPLOYEES



Vistra's no. 1 asset is our people — a talented, dedicated, and diverse group of men and women who work together as One Team to achieve success — and the company's top priority is their safety. Vistra invests in our people, offering numerous training and development opportunities, generous benefits and wellness offerings, and engaging employee programs.

SAFETY



BEST DEFENSE

Everyone wins. No one gets hurt.

In 2019, Vistra's safety team, generation leaders, and corporate communications presented a new name, logo, and motto for the company's mindset around safety: Best Defense. The name was derived from guidance by national workplace safety expert Dr. Todd Conklin, who said, "Safety is not the absence of events. Safety is the presence of defenses."

In her note to plant managers, Vice President of Environmental, Health, and Safety Cynthia Vodopivec wrote, "While we recognize that accidents can happen, it doesn't mean that we shouldn't put forth our best effort — every day — to prevent them. And if they do occur, we want our teams to learn

from events and add defenses so that we can ‘fail safely,’ and minimize the number of Serious Injuries and Fatalities (SIFs) and Potential Serious Injuries and Fatalities (PSIFs).

“The motto,” she added, “is as much a part of the message—‘Everyone wins. No one gets hurt.’—and the three stars on the logo are significant as well. They stand for the three key components of our safety approach: People (Human Performance Initiatives), Process (Behavior Based Safety programs), and Programs (OSHA Voluntary Protection Program).”

Vistra’s safety culture revolves around people and human performance. The company places a high importance on continuous improvement, along with a keen focus on numerous learning and error-prevention tools.

To facilitate a learning environment, the operating plants share their investigations and learnings of all safety events with all operations employees on weekly calls. The information is presented by front-line employees and supported by management. The lessons from each event are shared across the fleet to prevent similar incidents at other locations. In 2019, the team reviewed 81 events where injuries occurred or had the potential to occur.

All personnel at Vistra locations are encouraged to be involved in the safety process. Managers are required to participate in safety engagements with work staff to enable constant communication and interaction. In 2019, leaders documented more than 72,000 engagements in the field, which equates to more than six per leader per month.

SAFETY STATISTICS

Our total recordable injury rate (TRIR) for 2019 was 1.05, which compares to the approximate midpoint of our peers. Vistra’s focus on reducing the severity of injuries for both our employees and contractors who work with us has shown positive results. For 2019, the majority of the injuries were non-serious in nature, with one qualifying as a serious injury or fatality (SIF) event. In comparison to our peers, our SIF rate is in the top quartile. Near-miss reporting at our sites, where no injuries have occurred, has increased since last year, allowing our teams to learn from incidents and to proactively put best defenses in place.

SAFETY TRAINING

All Vistra employees are covered by our safety program. Office employees are assigned safety topics and training as part of our online learning management system. Power plant employees are assigned training based on job function and training is tracked in our central learning management system. For 2019, more than 48,000 safety training

courses were completed by our employees through both computer-based and instructor-led sessions.

SAFETY OF OUR CONTRACTORS AND VENDORS

In 2019, Vistra emphasized the importance of working with safe business partners who share our safety culture. All vendors and contractors who work at our plants are required to meet certain safety standards and managed through a third-party supplier, ISNetworld. All contractors must meet our minimum standards before being allowed to work at our facilities. In addition, Vistra works closely with our suppliers and contractors to ensure our safety practices are upheld. Approximately 2,100 contractors are connected to us in the ISNetworld system and meet our minimum safety requirements.

VOLUNTARY PROTECTION PROGRAM

The Vistra generation fleet has a total of 13 plants that have been awarded the Voluntary Protection Program (VPP) Star designation by the Occupational Safety and Health Administration (OSHA) for superior demonstration of effective safety and health management systems and for maintaining injury and illness rates below the national averages for our industry. VPP Star status is the highest designation of OSHA’s Voluntary Protection Programs. The achievement recognizes employers and workers who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. These sites are self-sufficient in their ability to control workplace hazards and are reevaluated every three to five years.

Diversity

Vistra recognizes the value of having a diverse workforce. Diversity at Vistra includes all the ways we differ—such as age, gender, ethnicity, and physical appearance, as well as underlying differences such as thoughts, styles, religions, nationality, education, and numerous other traits.

Creating and maintaining an environment where differences are valued and respected enhances the company’s ability to recruit and retain the best talent in the marketplace. As Vistra continues to promote and maintain an environment that fosters creativity, productivity, and mutual respect, the company becomes the employer of choice by recognizing and using the value that each individual brings to the workplace.

Vistra’s diversity is evolving and management is leading by example. With regards to gender diversity, women hold 29% of the company’s senior management positions, the

company's management committee consists of 14 men and 9 women, 50% of the CEOs direct reports are women, and 30% of the board of directors are women. You can refer to Vistra's diversity statistics for ethnicity and gender in the GRI index at the end of this report.

Vistra advances diversity through its recruiting efforts, by posting all available jobs to select diversity and military job sites, and through grass roots efforts. Our employees have also initiated affinity groups and events that continue to thrive. Most notable, a Black History Month luncheon organized by our employees has become one of the highlights of the year. Vistra also participates in several local and national organizations that provide opportunities for employees to live diversity. These organizations are referenced in the "Supplier Diversity" section of this report.

Training And Development

Vistra believes that the development of employees at all levels is critical to the current and future success of the company. Specifically, in 2019, the company's Management Committee approved the launch of key programs to develop leaders at all levels of the organization.

The Essentials in Leadership program targets first-time leaders of people and/or front-line leaders of people, a group that primarily consists of supervisors and managers. The program entails one full-day session a month, in person, for five months, with group exercises and discussions in between. The participants' managers attend the first and last sessions and are committed to their employees' successes. Different senior leaders participate in each session as well, either to provide an overview of a business segment or to teach parts of the program. Key components of the program include situational leadership, business acumen, identification of communication styles, and inclusive communication practices. Feedback on the program rates extremely high, and one of the greatest outcomes is the fact that front-line leaders from different parts of the business develop relationships that carry on after the program is complete.

For all employees at the director level and above, the Management Committee holds monthly leader meetings. These meetings consist of around 40 people each month, and all directors and above complete one session during a 12-month timeframe. The curriculum is based on learning the mechanics of the business, developing cross-functional relationships, and spending time getting to know the senior leadership of the company. This program is very well-received. The CEO and his direct reports spend the entire day at each of these sessions with the participants.

Many other training and development programs exist to help grow and develop employees at every level, through programs such as Situational Leadership, Leadership Agility, Behavior-Based Safety, and a variety of online courses available on Vistra's online learning platform and through the company's learning management system. Recorded webinars and presentations provide an opportunity for self-paced development and employee-specific skill training. Thousands of web-based targeted courses are available to all employees, and in 2019 employees collectively spent 700 hours completing 695 courses.

In addition, Vistra supports employees who have continuing education requirements for their various professional licenses, including accounting, legal, and nuclear. Across these teams, Vistra annually supports more than 125 employees completing over 14,500 hours of professional training.

EDUCATIONAL ASSISTANCE PROGRAM

Vistra offers an Educational Assistance Program, available to all employees who have completed a minimum of 90 days of active, continuous service, meet performance requirements, and receive manager approval. Those enrolled in the program will be reimbursed up to \$10,000 annually upon completion of approved courses per the policy. In 2019, 100 employees participated in the program for a total of \$535,793 reimbursed.

PERFORMANCE REVIEW PROGRAM

As part of Vistra's performance review program, all employees receive a performance review, except anyone in a collective bargaining unit, contractors, and temporary employees. The calendar of the performance review process is as follows:

- March-June: Objective setting, as submitted by the employee or assigned by their manager. These objectives should align with the annual corporate objectives, which include climate change initiatives.
- June-August: Mid-year check-ins (quick performance discussion and documentation).
- September-October: 9-box succession planning work and sessions.
- November: Employee self-assessments.
- December: Final performance ratings due.
- February-March: Performance review conversations, discuss potential merit/bonus awards.

OPEN FEEDBACK CULTURE

Every year, all employees across the organization are required to take online training for Vistra's Code of

Conduct. The company has also developed and requires training on Civil Treatment across the organization. Vistra promotes and accommodates an “open door” policy, as well as “skip-level” access to leadership. This policy is facilitated by an open office environment, where employees may easily access leadership across the organization. Vistra also holds quarterly town halls, held at our headquarters and livestreamed across the company. Employees are invited to submit questions or suggest topics anonymously prior to each town hall.

Vistra promotes a “human performance improvement” culture, which focuses on learning from open sharing of mistakes as opposed to placing blame, and we strictly enforce confidentiality and the “no retaliation” provisions of our Code of Conduct. Vistra has also established The Compliance Helpline, a resource available to all employees to submit any ethical or compliance concerns, including violations of Vistra’s Code of Conduct, via phone or online.

TALENT PIPELINE

Vistra conducts a robust 9-Box process annually for directors and above, where more than 470 employees are assessed for promotability and performance. As part of this process, detailed succession planning is performed, identifying employees from across the organization who could develop into other roles within a five-year period. Subsequent development plans are created and play a critical role in the development of a diverse pipeline of leaders.

EMPLOYEE PROGRAMS

Vistra has a variety of employee-initiated and -led programs for individuals to participate in, based on demographics, interests, and purpose. These affinity groups include:

WOMEN’S INFORMATION NETWORK (WIN).



WIN inspires the women of Vistra to develop personally and professionally, reach their fullest leadership potential,

and be champions within the community. WIN aspires to attract, retain, and advance women at Vistra through professional and personal development, with guest speakers and special events.

OPPORTUNITIES FOR PROFESSIONAL ENRICHMENT AND NETWORKING (OPEN).



OPEN participants have the opportunity to network with other professionals and leaders across the organization, enhance their professional advancement potential

through mentoring and education, and empower themselves to succeed.

PARENTS AT WORK (PAW).



PAW is dedicated to providing a supportive, nurturing network for expecting, new, and veteran PAWs to connect and share advice on balancing the joys and challenges of being a working parent. PAW also hosts seminars and other events for parents and/or their families.

TXU GREEN TEAM.



The Green Team promotes environmental stewardship and sustainable practices that reduce our impact on the planet, create value for the business and the community, and continue to make TXU Energy a great place to work.

TOASTMASTERS. The Vistra chapter of the world-leader in communication and leadership development provides a safe, fun environment for people at all levels of the organization to improve their presentation and leadership abilities.



Employee Benefits

Maintaining attractive benefits and pay are important for recruiting and retaining talent. Vistra performs annual salary reviews with a focus on gender equity by employee category level within significant locations of operations. Vistra is committed to maintaining an equitable compensation structure.

Full-time Vistra employees and part-time Vistra employees working a minimum of 20 hours per week are provided the opportunity to enroll in medical, prescription drug (included in medical), dental, vision, life insurance, accidental death & dismemberment, and long-term disability coverage. Regular, full-time employees are eligible for short-term disability benefits, and all employees are eligible for the employee assistance program, parental leave, maternity leave, and the 401(k) plan.

Vistra updated its maternity leave policy in 2019 and created a new parental leave policy for fathers, non-birth parents, and adoptive or foster parents. Birth mothers are entitled to 12 weeks of paid maternity leave, an increase from 6 weeks, while the new parental leave policy provides two paid weeks to fathers or non-birth parents. All new employees are automatically enrolled into Vistra’s 401(k) plan at 3% of base pay contribution and Vistra will match employees contributions up to 6%. While director level employees and above receive

long-term compensation in the form of equity grants with a three-year vesting, employees below director level are eligible for Vistra's deferred profit sharing plan, in which an annual award based on a percentage of the employee's base salary is determined each year based on company performance, and the award is earned and paid to the employee at the conclusion of a three-year retention period.

Wellness

Vistra believes a healthy workforce leads to greater well-being at work and at home. Our employee-led wellness team engages our people to get active and support causes that promote healthy living. Our headquarters includes an 1,800-square-foot fitness center that offers cardio equipment, a selection of free weights, and exercise mats, as well as men's and women's locker rooms and showers, and our Carpenter Freeway Building includes a 1,300-square-foot fitness center, as well. With support from the company, the wellness team covers the registration costs for employees to participate in more than a dozen running events each year. Additionally, the team hosts quarterly blood drives and recruits participants for our cycling and soccer teams. In 2019, our people contributed more than 1,500 hours to wellness initiatives and activities, including walking, running, and cycling events.

In addition to fitness activities, Vistra offers multiple programs to help employees better their health. Examples include diabetes management programs, weight-loss programs, and tobacco cessation programs. These programs are provided free of charge and provide support and equipment for employees to manage their health issues effectively.

Facilities

Vistra's corporate headquarters, located in Irving, Texas, has received the EPA's prestigious Energy Star recognition for the past decade, and a handful of our regional offices have received the honor as well (see above right). As a steward of environmental conservation efforts, Vistra has implemented procedures at its headquarters to reduce power consumption when power is at its peak demand in the Texas summer. If called upon for demand response purposes by ERCOT, our headquarters can contribute 700 kW back to the grid when supply is limited.

In addition, in our Dallas-area corporate facilities, Vistra utilizes building automation systems to optimize start/stop times of HVAC equipment to reduce energy consumption while maintaining thermal comfort requirements. LED lights and occupancy sensors are used in various areas of the buildings and parking garages.

LOCATION	ENERGY STAR	LEED	BOMA 360*
Energy Plaza, Dallas, TX	2008-19	2010 - LEED Gold for Existing Buildings	2012-2019
Mesquite Data Center, Mesquite, TX	2011-19	2013 - LEED Silver for Existing Buildings	2015-2019
Carpenter Freeway Building, Irving, TX	2011-19		2015-2019
Sierra (headquarters) Irving, TX	2009-19	2009 - LEED for Commercial Interiors	2015-2019
312 Walnut St. Cincinnati, OH	2011-19	2017 - LEED Gold for Existing Buildings	
Liberty Place Washington D.C.	2012-19	2016 - LEED Gold for Existing Buildings	

*The Building Owners and Managers Association's BOMA 360 Performance Program takes a holistic approach to evaluating building operations and management, and benchmarks a building's performance against industry standards, recognizing commercial properties that demonstrate best practices. The award takes into consideration a property's sustainability initiatives, safety/security/risk management, training and educations of building personnel, energy management, tenant relations, and community involvement.

DESKSIDE RECYCLING PROGRAMS

Recycling is an easy sustainable practice that Vistra encourages its employees to partake in. Employees are provided with deskside recycle containers for comingled recyclables including paper, plastic, glass, and aluminum. In 2019, we recycled 14 tons of waste through our desk-side recycling program and shredded nearly 322 tons of paper collected in secured bins. We also have annual collections for consumer goods such as batteries and electronics for employees to dispose of these items properly. In 2019, we collected 19,601 pounds of electronics at our Sierra, Energy Plaza, and Carpenter Freeway Building locations.

In addition to its robust deskside recycling program, Vistra's facilities team conducted a print optimization campaign in 2019 that led to a reduction of print devices and electricity usage, demonstrating not only cost savings but environmental stewardship. Vistra has also implemented a green cleaning program for a healthier workforce and reduced environmental footprint.

VEHICLE FLEET

The electrification and use of alternative fuels for vehicles is an evolving development worldwide. Within Vistra's own fleet of vehicles, we look for opportunities to reduce our number of vehicles, transition to electrification, and manage fuel consumption. Electric vehicle charging stations are available at Vistra's headquarters and other locations for employees, contractors, and visitors to use.

SUPPLY CHAIN



Vistra has a very robust, centralized, strategic supply chain organization. We engage suppliers around the world to support our power generation business and our corporate shared services. In 2019, we spent over \$2 billion dollars with approximately 5,000 suppliers. This includes everything from manufacturers of power generation equipment (such as solar panels, utility-grade batteries, generators, and turbines) to power plant maintenance, call center and sales personnel, in addition to ongoing corporate expense business products and services.

In response to the COVID-19 pandemic, supply chain made extra efforts to ensure the continuity of our supply base, including diverse and small businesses, through proactive support and creative sourcing of personal protective equipment (PPE) and sanitizing products to ensure the safety and stability of both the Vistra and contractor workforce. In addition, Vistra supported our communities by donating surplus PPE to hospitals where we operate.

Our suppliers reflect our values and agree to our code of ethics outlined in our annual ethics letter with every purchase order and contractual agreement. The company is currently conducting an economic impact study of the 2019 Vistra supply chain. This study will provide specific data as to where Vistra is directly and indirectly impacting economies by state.



The results will be presented by state based on size and diversity status of suppliers as well as categories of spend.

In addition, we are in the early stages of developing a Supply Chain Sustainability Policy, which could include requiring our suppliers to have their own environmental and sustainability policy that we would monitor and track.

SUPPLY CHAIN DIVERSITY

We have a strong commitment to diversity and inclusion across the company, from our own supply chain and workforce to the supply chain and workforce compositions of our prime suppliers through our multi-tier efforts. We strive to reflect our customer base and the communities in which we live, work, and serve, consistent with the company's core principle of caring about stakeholders, a group that includes our suppliers.

In 2019, we achieved 14.6% spend with Small Business Enterprises and 7.8% spend with Diverse Business Enterprises with third-party certification. These small and diverse suppliers, as well as channel partners, drive costs out of our business, bring innovation, and create market penetration. By growing and developing these small and diverse firms—including businesses certified as being 51% or more owned, controlled, and operated by ethnic minorities, women, veterans, LGBT, and disabled individuals, we are investing in our own business success.

The Vistra Supply Chain Diversity Initiative is led from the top with CEO Curt Morgan serving as the chair of the Supply Chain Diversity Advisory Council, which is comprised of all his direct reports. The council meets annually to drive the strategic direction and senior leadership engagement. Vistra's vice president of supply chain and his leadership team serve as the supply chain diversity working group, which meets monthly to evaluate performance and drive continuous improvement.

Currently, Vistra has members of its senior leadership team serving on the boards of directors for:

- The National Minority Supplier Development Council (www.NMSDC.org).

- The Women's Business Enterprise National Council (www.WBENC.org).
- The National Veteran Owned Business Association (www.NaVOBA.org).
- The Dallas/Fort Worth Minority Business Development Council (www.DFWMSDC.com).
- The Women's Business Council Southwest (wbcsouthwest.org/).

We are also active members of the National Gay & Lesbian Chamber of Commerce (www.NGLCC.org) and Disability:IN (www.DISABILITYIN.org).

Among Vistra's Supply Chain Diversity highlights in 2019:

- Vistra was honored with the [Top Corporation Award](#) from the Women's Business Enterprise National Council (WBENC) for the utilization and development of women's business enterprises.
- Vistra was selected as a "[Best Corporation for Veteran Business Enterprise](#)" by the National Veteran Owned Business Association (NaVOBA).
- Vistra was recognized by the Dallas Fort Worth Minority Supplier Development Council (DFWMSDC) as a "[Buy Those That Buy Us](#)"™ Corporation, recognizing best practices that have achieved real results utilizing certified Minority Business Enterprises and encourages others to include these best practices in their supplier diversity programs.
- Vistra was one of three finalists for the National Minority Supplier Development Council Corporation of the Year, recognized for excellence in the utilization and development of Minority Business Enterprises.



CUSTOMERS



With the acquisition of two retailers, Ambit Energy and Crius Energy Trust, and the launch of two new brands in the northeast, Better Buy Energy and Brighten Energy, Vistra's retail presence grew to 19 states and the District of Columbia in 2019 and in markets in Canada and Japan, as well. Through our 12 individual retail brands and various marketing channels, we balance the needs and preferences of our customers through a vast portfolio of products and services, including green energy and conservation-focused products.

TXU ENERGY RENEWABLE PRODUCTS

In Texas, Vistra's flagship retail brand TXU Energy has been a leader in offering its residential customers renewable products. These products include:

TXU ENERGY FREE NIGHTS & SOLAR DAYSSM.

A first-of-its kind plan, Free Nights & Solar Days offers residential customers 100 percent renewable energy (100 percent wind power at night



and 100 percent solar during the day). As with the initial Free Nights product, this offer capitalizes on low-cost wind-generated energy in Texas. As of 2018, twice as many Texans are enrolled on TXU Energy solar plans than own rooftop solar panels in the competitive Texas market.

TXU ENERGY FREE NIGHTS®. TXU Energy was the first retail electric provider in the state to offer a time-of-use plan



when it rolled out TXU Energy Free Nights in 2012, giving customers a chance to save energy charges by shifting energy-intensive activities to certain hours. The company later enhanced the product offering

to include weekends or other designated times, and it is TXU Energy's highest-rated plan. The product allows Vistra to capitalize on low-cost wind-generated energy in Texas, and, on average, Free Nights customers get nearly 40 percent of their electricity for free.

TXU ENERGY TEXAS CHOICE™. One of our most popular plans, Texas Choice offers 25 percent renewable energy, which is over four times the state's regulatory requirements. Residential customers also earn 3 percent cash-back loyalty rewards on their annual electricity spend.



TXU SOLAR CLUB. This first-of-its-kind, membership-style plan provides residential customers clean energy purchased from Texas solar farms. The shared solar offer gives customers benefits

similar to a rooftop solar array without the cost of installing a system.

TXU SOLAR FROM SUNPOWER. TXU Energy has partnered with SunPower to offer the market's highest-efficiency rooftop solar panels. Residential customers can take advantage of incentives like federal tax credits or rebates through transmission and distribution utilities (TDUs) for installing SunPower's high-performance solar arrays, and they can earn bill credits when their system produces more energy than their home uses.

TXU ENERGY RENEWABLE BUYBACK™. This plan pays customers for their surplus power generated by renewable energy equipment, like solar panels or wind turbines.



energy credits from Texas wind power equal to a customer's total electricity usage, helping increase how much clean energy is produced in Texas.



TXU ENERGY GREENUP™.

We offer our residential and small commercial customers an opportunity to support clean energy by making any of our feature-rich pricing plans "green." With GreenUp, we buy power and renewable

TXU ENERGY PURE

SOLAR™. New in 2020, our residential customers can support clean solar energy with Pure Solar without installing solar panels. We purchase all the power from Texas solar farms equal to the customer's total electricity usage.



TXU I THERMOSTAT™. TXU Energy introduced the first two-way, Internet-enabled thermostat in Texas' competitive electricity market in 2009. The WiFi-enabled thermostat allows customers to set a schedule from their smartphone or the thermostat and remotely adjust settings with the tap of a button.



MYENERGY DASHBOARD.

TXU Energy believes that helping customers better understand how and when they use electricity improves their overall experience and saves them money. The TXU Energy MyEnergy Dashboard is a free tool that allows residential and business customers to examine their electricity usage to reduce energy consumption and, ultimately, lower their electric bills. It also provides a forecast of what their usage and cost could be at the end of the month, based on current usage patterns, giving them valuable insights that can lead to behavioral changes.

TXU REDUCTION REWARDS. TXU Reduction Rewards enables us to support the market and lower business customer's energy costs during times of high demand. When we identify

Cinemark, a movie theater chain and TXU Energy customer in Texas, received Greenback rebates for a LED retrofit of one of their theater parking lots. The partnership between TXU Energy and Cinemark not only allowed Cinemark to reduce power consumption in their parking lot by 70%, but also made their parking lot safer and brighter for their customers.



periods where the market and customers could benefit from lower demand, we notify participating large business customers. If they choose to reduce use, they get paid for doing so.

OTHER RENEWABLE OR SOCIAL-MINDED PRODUCTS

4CHANGE ENERGY. 4Change Energy in Texas was founded on the idea that electricity should be affordable and contribute to where its customers live. 4Change contributes 4% of its profits to the following Texas charities:

- American Cancer Society
- American Red Cross
- Feeding Texas
- Heroes for Children

BRIGHTEN ENERGY. Brighten Energy is a new brand launched in Illinois, Ohio, and Pennsylvania that supplies renewable energy products to socially conscious consumers looking for an affordable way to make a difference.

LARGE BUSINESS CUSTOMERS

Vistra Retail actively partners with our large business customers to help them achieve their sustainability goals. With a diverse offer set, Vistra Retail develops customized solutions that utilize wind PPAs, utility scale solar generation, and other innovative structures for our business customer base.

Additionally, Vistra Retail offers the Greenback program, a self-funded rebate program that helps customers fund their energy efficiency projects. We have awarded approximately \$2 million in Greenbacks each year to our customers to help them install LED lights, convert to solar energy, upgrade their HVAC or make other improvements. Over the life of our program, these investments have helped customers permanently reduce their consumption, for an average annual savings of 39,200,000 kWhs.

CUSTOMER BILL ASSISTANCE

With a collective societal focus on climate change and the transition to renewables, Vistra Retail will continue to evaluate

and develop new products and services to meet our customer's needs for affordable, reliable, and renewable electricity. Though sometimes affordable electricity is not obtainable for customers who may be experiencing financial distress due to crisis events. Vistra Retail is quick to implement programs in crisis situations including COVID-19, extreme weather events, and the early 2019 federal government shutdown. The assistance programs help impacted customers by waiving fees, extending payment dates, or creating deferred payment arrangements. In addition, TXU Energy's established assistance program, TXU Energy AidSM, uses donations from customers, employees, and other Texans for bill-payment assistance year-round. You can read more about TXU Energy AidSM and our other crisis relief efforts in the 'Communities' section.

CUSTOMER EXPERIENCE

Based on learnings from more than 15 years of customer experience measurement for Vistra's flagship brand, TXU Energy, Vistra Retail has established industry-leading methodologies and results-driven approaches that drive value to the bottom line. Through a robust set of ongoing surveys and listening posts across their portfolio of brands, insights are leveraged to optimize experiences and innovate around customer needs, driving dozens of first-to-market product and service launches. Customer feedback is used to pursue a two-pronged approach to customer retention. First, near real-time feedback is leveraged by a variety of customer advocacy channels, including live-agent interactions, offline case management and an Office of the President team, that support our customers through all phases of their journey. Second, underlying insights are used to redesign experiences that mitigate customer losses. Vistra's customer experience metrics have proven to be highly predictive of future customer behavior, allowing us to quantify the impact of our efforts—efforts which have earned TXU Energy a 5-star customer service rating with the Public Utility Commission of Texas, an A+ rating from the Better Business Bureau, and industry-leading customer loyalty ratings.

COMMUNITIES



Commitment to our communities is one of our four core principles. Vistra and our subsidiary companies are committed to strengthening the communities where we do business, where we have customers, where our valued employees live, and where our office, plants, and mines call home.



Key Focus Areas for community involvement are:

- Education
- Community Welfare
- Environment/Sustainability
- Employee Involvement
- Economic Development

Vistra's community affairs team leverages various company programs to promote sales efforts,

serve as a liaison with key opinion leaders, assist with various community issues, and address critical community needs. The team also helps manage relationships with local business leaders and elected officials in Luminant's plant and mine communities.

Community Initiatives and Campaigns

Vistra, Luminant, TXU Energy, and other Vistra Retail brands have a legacy of giving back to the communities. Here are several programs and their 2019 highlights:

CORPORATE GIVING. Vistra donated more than \$1.6 million to nonprofit organizations in 2019, including the Irving Family Advocacy Center, Peoria Promise scholarship fund, Big Brothers and Big Sisters organization, numerous school districts, fire departments in proximity to our power plant operations, food pantries, and more.

ANNUAL GIVING CAMPAIGN. Every year, we come together to support our neighbors in need through our United Way and TXU Energy AidSM campaign, our foremost giving initiative. Employees and the company raised more than \$1.92 million in 2019 and more than \$9 million in the last five years.

TXU ENERGY AIDSM. TXU Energy, Vistra's flagship retail brand in Texas, has one of the most extensive utility and energy assistance programs in the nation. For more than 35 years, TXU Energy AidSM has helped Texas families in need keep their homes powered and safe. Through the support of our employees, customers, and other donors, TXU Energy AidSM helps an average of 20,000 customers each year with bill-payment assistance, supporting social service agency partners across Texas. In total, the program has provided more than \$100 million in bill-payment assistance for 520,000 Texans. TXU Energy AidSM provided \$4.6 million in funds to approximately 80 partner agencies, assisting nearly 16,000 TXU Energy customers in 2019.

BEAT THE HEAT. TXU Energy partners with various social service agencies to promote heat safety awareness and provide cooling fans and air-conditioning units during the hot summer months.

ENERGY ASSISTANCE WORKSHOPS. TXU Energy regularly hosts energy assistance workshops for Texas social service agencies on electricity service, assistance plans, and market information.

LUMINANT ENVIRONMENTAL RESEARCH PROGRAM. Since the company pioneered a unique link between industry and academia 49 years ago, Luminant's Environmental Research

Program has provided graduate students over \$5 million in fellowships for the completion and publication of 110 independent post-graduate studies related to the company's environmental footprint and provided significant economic and environmental benefit to Luminant, its customers, and to the advancement of research, scholarship, as well as student and faculty member development.



ENERGY IN ACTION. This corporate-wide initiative was designed to support our spirit of volunteerism, facilitate and encourage more opportunities to give back to our communities, and recognize employees for their dedication to helping others. In 2019, Vistra employees volunteered nearly 4,400 hours in the communities where we live and work, engaging over 1,200 employees at nearly 75 events. A few of the significant volunteer events include:

- Assembling hundreds of snack packs to support Community Partners of Dallas.
- Participating in the Trinity River Cleanup, benefiting the Trinity River Association.
- Providing meals with inspirational messages through the Salvation Army.
- Assembling over 100 birthday boxes to support Metrocrest Services.
- Encouraging students to explore a new way of learning with "STEM in the Schoolyard," benefiting the United Way of Metropolitan Dallas.

AMBIT CARES. Hunger affects one in nine people in America, and because of that, Ambit Cares is committed to making a difference in the communities we serve. Ambit Cares makes great strides to change the lives of those who face hunger and has been named a Supporting Partner of Feed-

ing America®, the nation's largest organization dedicated to fighting domestic hunger through a network of food banks. In 2019 our dedicated team of volunteers and generous donors volunteered 1,388 hours, aided in the distribution of 215,316 pounds of food and collected \$142,485 in total contributions.

VISTRA VETERANS AND MILITARY SUPPORT

Vistra has a legacy of hiring veterans and providing strategic support to our servicemen and women. The U.S. military employs a diverse, skilled workforce, and we consider veterans a tremendous asset to the company's team. In fact, there's more than 400 veterans, guardsmen, and reservists in the Vistra family, and we salute them for their service. Vistra is proud to partner with numerous veterans and military support organizations, including Carry the Load, Fisher House Foundation, and the United Service Organization, among others.



LOCAL COMMUNITIES

Vistra and our subsidiaries have also undertaken initiatives to engage local communities to address the potential impacts of its operations, including:

- Luminant hosted a community town hall for residents in Robertson County, Texas, to learn about a mine-permit renewal, revision, and expansion application submitted to the Railroad Commission of Texas to develop a new lignite mine. Company representatives were on hand to answer questions, share information, and gather input on the planned mine and its numerous local and statewide benefits.
- Luminant hosted a series of community open houses for all plant communities that have ash storage sites. Company representatives were on hand to answer questions about groundwater testing and mitigation options.

- Luminant holds quarterly emergency response team training and outreach at our largest generating sites. These events involve periodically engaging local fire, EMS, and law enforcement departments at our facilities, familiarizing them with potential hazards they may encounter during a potential emergency response, and coordinating training exercises with Luminant's emergency response team. These exercises also include coordination with emergency management departments at local, state, and federal levels for Comanche Peak Nuclear Power Plant in Glen Rose, Texas.
- Luminant holds Emergency Action Plan (EAP) "table top" meetings for each of the dams near its operations. These meetings are attended by multiple state and local agencies, including emergency officials, in order to inform and coordinate with these stakeholders on our emergency prevention and action plan policies.

The cities and communities where our power plants are located rely on not only the employment opportunities for citizens in the area, but also the taxes that Vistra pays helping fuel the local economy. Vistra pays about \$200 million a year in property tax. Understanding we are an instrumental contributor to local economies, when Vistra decides to retire a power plant, we consider the impact on the surrounding community. With the recent power plant retirements in Texas and Illinois we approached each affected community with a proposal to step-down the value for property taxes over a period of years rather than recognizing the full decrease in the first year. The goal of this proposal was to cushion the near-term impact of the shutdown for the affected communities while also providing certainty for those local government budgets over the next several years. We also support legislation to redevelop these sites into solar and energy storage facilities that further support the future tax base.

COVID-19 RESPONSE AND RELIEF

In March 2020, Vistra announced a \$2 million donation to non-profits and social service agencies, providing direct relief for people in the communities it serves with critical needs resulting from the COVID-19 pandemic. As part of that commitment, Vistra made a \$450,000 donation on behalf of its flagship brand TXU Energy to help communities and individuals meet their most pressing needs, including support for food banks and food pantries, bill-payment assistance, critical needs, and more: a total of \$200,000 went to the United Way of Metropolitan Dallas' Coronavirus Response and Recovery Fund, and \$250,000 went to 34 TXU Energy AidSM partners and other non-profits, many of which have been hit hard with a sharp increase in demand and dwindling supplies.



STORM RELIEF

When severe storms and tornadoes cause devastation and disruption to Vistra Retail's customers, the company works with individual customers impacted. In 2019 in Texas, for instance, there were severe storms in June and a tornado hit the Dallas area in October. TXU Energy worked with customers to waive late fees, extend payment due dates, reduce down payments, and defer balances over equal installments. Additionally, bill-payment assistance was also available through TXU Energy AidSM. The funds, which are donated by the company, its employees, and customers, were allocated to existing TXU Energy AidSM agency partners serving North Texas.

Donations to local communities impacted by the storms include:

- 300 mature trees to replace those lost in City of Dallas parks due to the North Texas tornadoes in October 2019.
- Contribution of \$5,000 to the Salvation Army of DFW to assist with critical needs.
- \$10,000 to the Franklin Tornado Victims Relief Fund and \$10,000 to the Robertson County Cares Food Pantry for tornado relief (Franklin is located near

Luminant's Oak Grove Power Plant, Kosse Mine, and Bremond Mine).

- \$1,500 to Rusk County's Emergency Management department for the Code Red Weather Warning System.

Political Involvement

Vistra takes an active voice on potential or proposed legislation and regulation. The company participates in meetings, provides written letters, and interacts regularly with regulators and policymakers. Vistra also advocates for its business interests with state and federal government officials. Any political participation by Vistra employees and representatives of Vistra is conducted with honesty and integrity and complies with laws that regulate interactions with government entities and officials.

Since 1978, Vistra Leaders PAC and Vistra State Energy Leaders PAC has supported candidates and elected officials, helping Vistra build and maintain relationships at both the state and federal level. Vistra PACs gave over \$280,000 in 2019, supporting the issues that are most important to our company and the industry.

FORWARD-LOOKING STATEMENTS

CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

The information presented herein includes forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements, which are based on current expectations, estimates and projections about the industry and markets in which Vistra Energy Corp. ("Vistra") operates and beliefs of and assumptions made by Vistra's management, involve risks and uncertainties, which are difficult to predict and are not guarantees of future performance, that could significantly affect the financial results of Vistra. All statements, other than statements of historical facts, that are presented herein, or in response to questions or otherwise, that address activities, events or developments that may occur in the future, including such matters as activities related to our financial or operational projections, the potential impacts of the COVID-19 pandemic on our results of operations, financial condition and cash flows, capital allocation, dividend policy, business and sustainability strategy, competitive strengths, goals, future acquisitions or dispositions, development or operation of power generation assets, market and industry developments and the growth of our businesses and operations (often, but not always, through the use of words or phrases, or the negative variations of those words or other comparable words of a future or forward-looking nature, including, but not limited to: "intends," "plans," "will likely," "unlikely," "believe," "confident," "expect," "seek," "anticipate," "estimate," "continue," "will," "shall," "should," "could," "may," "might," "predict," "project," "forecast," "target," "potential," "goal," "objective," "guidance" and "outlook"), are forward-looking statements. Readers are cautioned not to place undue reliance on forward-looking statements. Although Vistra believes that in making any such forward-looking statement, Vistra's expectations are based on reasonable assumptions, any such forward-looking statement involves uncertainties and risks that could cause results to differ materially from those projected in or implied by any such forward-looking statement, including, but not limited to: (i) adverse changes in general economic or market conditions (including changes in interest rates) or changes in political conditions or federal or state laws and regulations; (ii) the ability of Vistra to execute upon the contemplated strategic and performance initiatives and to successfully integrate acquired businesses; (iii) actions by credit ratings agencies; (iv) the severity, magnitude and duration of pandemics, including the COVID-19 pandemic, and the resulting effects on our results of operations, financial condition and cash flows; and (v) those additional risks and factors discussed in reports filed with the Securities and Exchange Commission by Vistra from time to time, including the uncertainties and risks discussed in the sections entitled "Risk Factors" and "Forward-Looking Statements" in Vistra's annual report on Form 10-K for the year ended December 31, 2019 and any subsequently filed quarterly reports on Form 10-Q.

Any forward-looking statement speaks only at the date on which it is made, and except as may be required by law, Vistra will not undertake any obligation to update any forward-looking statement to reflect events or circumstances after the date on which it is made or to reflect the occurrence of unanticipated events. New factors emerge from time to time, and it is not possible to predict all of them; nor can Vistra assess the impact of each such factor or the extent to which any factor, or combination of factors, may cause results to differ materially from those contained in any forward-looking statement.

2019 SASB STANDARDS TABLE

TOPIC	SASB CODE	ACCOUNTING METRIC	2019 DISCLOSURE																		
Greenhouse Gas Emissions and Energy Resource Planning	IF-EU-110a.1	(1) Gross global scope 1 emissions	105,523,364 metric tons of CO ₂ e Emissions are equity adjusted for partial ownership of certain power plants consistent with equity share methodologies as described in GHG Protocol: A Corporate Accounting and Reporting Standard, Revised Edition.																		
		(2) Percentage covered under emissions-limiting regulations	9%																		
		(3) Percentage covered under emissions-reporting regulations	99.99% All of Vistra's power plant facilities report under the EPA mandatory reporting program with the exception of two sites in 2019 whose emissions were insignificant.																		
	IF-EU-110a.3	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Vistra announced emissions reduction targets in October of 2019 for its Scope 1 emissions. Vistra's goal is to achieve a 50% reduction in CO ₂ e emissions by 2030 and an 80% reduction in CO ₂ e emissions by 2050, each as compared to a 2010 baseline. Vistra has an aspiration to achieve net-zero carbon emissions by 2050 if advancements in technology, market constructs, and public policy are supportive. We expect progress towards these goals will include incremental thermal asset retirements, continued investment in solar and battery storage, and the monitoring and potential deployment of new technologies. As of Dec. 31, 2019, Vistra reduced its CO ₂ e emissions by 39% compared to a 2010 baseline—achieving nearly 78% of Vistra's 2030 emissions reduction goal.																		
	IF-EU-110a.4	(1) Number of customers served in markets subject to renewable portfolio standards (RPS)	Vistra operates in retail electric markets that are competitive, allowing the customer to choose the retail electric provider and plan for their electricity needs. Vistra retail offers numerous renewable product offerings if the customer desires to purchase a renewable electricity plan. As of Dec. 31, 2019, of Vistra's ~4.6 million customers, 99.8% of them are in states that have an RPS in place.																		
(2) Percentage fulfillment of RPS target by market																					
Air Quality	IF-EU-120a.1	Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), (2) SO _x , (3) particulate matter (PM ₁₀), (4) lead (Pb), and (5) mercury (Hg); percentage of each in or near areas of dense population	<table><tr><th>Pollutant</th><th>Emissions (metric tons)</th><th>% in or near areas of dense populations</th></tr><tr><td>NO_x</td><td>52,610¹</td><td>75%</td></tr><tr><td>SO_x</td><td>105,743</td><td>81%</td></tr><tr><td>PM₁₀</td><td>5,356</td><td>67%</td></tr><tr><td>Pb</td><td>0.44</td><td>64%</td></tr><tr><td>Hg</td><td>0.47</td><td>65%</td></tr></table> ¹ Includes N ₂ O	Pollutant	Emissions (metric tons)	% in or near areas of dense populations	NO _x	52,610 ¹	75%	SO _x	105,743	81%	PM ₁₀	5,356	67%	Pb	0.44	64%	Hg	0.47	65%
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PM ₁₀	5,356	67%																			
Pb	0.44	64%																			
Hg	0.47	65%																			
Water Management	IF-EU-140a.1	(1) Total water withdrawn, percentage in regions with High or Extremely High Baseline Water Stress	<table><tr><th colspan="2">2019 Total Water Withdrawn</th></tr><tr><th>Water Source</th><th>Total (MegaLiters)</th></tr><tr><td>Groundwater</td><td>430,207</td></tr><tr><td>Surface Water</td><td>13,072,635</td></tr><tr><td>Sea Water</td><td>325,989</td></tr><tr><td>Third Party</td><td>113,751</td></tr><tr><td>Produced</td><td>32</td></tr><tr><td>Total</td><td>13,942,614</td></tr></table> Vistra operates five power plants in areas identified as "High Stress" or "Extremely High Stress." These five plants represent 0.05% of total water withdrawn. See SASB disclosure IF-EU-140a.3 for further discussion.	2019 Total Water Withdrawn		Water Source	Total (MegaLiters)	Groundwater	430,207	Surface Water	13,072,635	Sea Water	325,989	Third Party	113,751	Produced	32	Total	13,942,614		
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TOPIC	SASB CODE	ACCOUNTING METRIC	2019 DISCLOSURE																
Water Management (continued)		(2) Total water consumed, percentage in regions with High or Extremely High Baseline Water Stress	<table><tr><th colspan="2">2019 Total Water Consumed</th></tr><tr><th>Water Source</th><th>Total (MegaLiters)</th></tr><tr><td>Groundwater</td><td>4,831</td></tr><tr><td>Surface Water</td><td>243,867</td></tr><tr><td>Sea Water</td><td>-</td></tr><tr><td>Third Party</td><td>29,716</td></tr><tr><td>Produced</td><td>32</td></tr><tr><td>Total</td><td>278,446</td></tr></table> <p>Substantially all of our water withdrawn is not consumed, rather it is returned to its source or recycled.</p> <p>Vistra operates five power plants in areas identified as "High Stress" or "Extremely High Stress." These five plants represent 2.6% of water consumed. See SASB disclosure IF-EU-140a.3 for further discussion.</p>	2019 Total Water Consumed		Water Source	Total (MegaLiters)	Groundwater	4,831	Surface Water	243,867	Sea Water	-	Third Party	29,716	Produced	32	Total	278,446
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Sea Water	-																		
Third Party	29,716																		
Produced	32																		
Total	278,446																		
IF-EU-140a.2	Number of incidents of non-compliance associated with water quantity and/or quality permits, standards, and regulations	No material fines or violations in 2019.																	
IF-EU-140a.3	Description of water management risks and discussion of strategies and practices to mitigate those risks	<p>Water is a limited, expensive, and shared resource that is essential to Vistra's plant operations. Producing electricity utilizes water in several key functions such as producing steam, condensing steam, cooling equipment, pollution control equipment, and in some circumstances, boiler make-up, potable water, cleaning and other uses. Therefore, water conservation is a primary concern at each of our generating facilities, especially those in high water stress areas.</p> <p>Though many of our plants are geographically situated in an area of ample water supply, Vistra practices environmental stewardship and works to efficiently use water. Where appropriate, we have built large reservoirs to capture water when it is plentiful, allowing it to be reused/recycled repeatedly. When feasible, we find ways to recycle water, to reuse water from one system to another system to reduce our use of freshwater, and to reclaim other types of wastewaters. In fact, Vistra plants only consume 2% of water withdrawn. We are also exploring new ways to maximize water resources and new technologies including wind power, solar power, and combined cycle generation.</p> <p>Vistra has five efficient natural gas fueled generating sites in areas identified as "High Stress" or "Extremely High Stress" in Texas. They are located in regions of the state that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth in the state. Each of these highly efficient natural gas plants utilizes low water demand and has its own site-specific conservation measures: Two have extremely low water demand, one operates as a zero discharge facility, another uses reclaimed water as its primary source, and the last one utilizes low quality water with significant treatment, is able to recycle extensively, and then discharges to a facility that continues to recycle the same water.</p>																	
Coal Ash Management	IF-EU-150a.1	Amount of coal combustion residuals (CCR) generated (metric tons)	5,177,948																
		Percentage recycled (metric tons)	63%																
	IF-EU-150a.2	Total number of coal combustion residual (CCR) impoundments, broken down by hazard potential classification and structural integrity assessment	Vistra has a total of 30 impoundments classified as follows by hazard potential classification: 8 Low, 8 High and 14 Significant. Vistra complies with the US EPA Coal Combustion Residuals (CCR) requirements and reports are publicly available on Luminant's website .																
Workforce Health & Safety	IF-EU-320a.1	(1) Total recordable incident rate (TRIR)	1.05																
		(2) Fatality rate	0.02																
		(3) Near miss rate	4.7																
			All rates are calculated by multiplying the events by 200,000 and dividing by actual worked hours. Near Miss Events are defined by Vistra to be an unplanned event that did not result in any injury, illness or property damage. The near miss rate was calculated from 261 near miss events for 2019.																

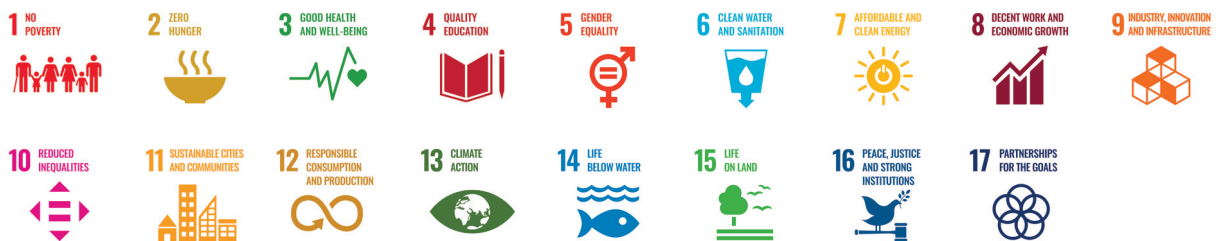
TOPIC	SASB CODE	ACCOUNTING METRIC	2019 DISCLOSURE																								
Nuclear Safety & Emergency Management	IF-EU-540a.1	Total number of nuclear power units, broken down by U.S. Nuclear Regulatory Commission (NRC) Action Matrix Column	<table><tr><th>Reactor Unit</th><th>Action Matrix Column</th></tr><tr><td>Comanche Peak 1</td><td>Licensee Response</td></tr><tr><td>Comanche Peak 2</td><td>Licensee Response</td></tr></table> <p>This information is available on the NRC's website here.</p>	Reactor Unit	Action Matrix Column	Comanche Peak 1	Licensee Response	Comanche Peak 2	Licensee Response																		
	Reactor Unit	Action Matrix Column																									
Comanche Peak 1	Licensee Response																										
Comanche Peak 2	Licensee Response																										
	IF-EU-540a.2	Description of efforts to manage nuclear safety and emergency preparedness	Safety is Vistra's top priority. As a commercial nuclear plant operator, we are licensed by the US NRC. We must comply and follow NRC regulations and programs regarding nuclear operations including their safety culture principles . Vistra's power plant, Comanche Peak, publishes its own emergency information website for the public. In addition, oversight by the Nuclear Oversight Advisory Board (NOAB) ensures routine, periodic independent oversight of nuclear plant performance, including safety metrics.																								
Activity Metric	IF-EU-000.A	Number of residential customers served	Vistra serves 4,595,000 retail customers as of December 2019. This number is representative of RCE's or residential customer equivalent. A single RCE represents 1,000 therms of natural gas or 10,000 kWh of electricity.																								
		Number of commercial customers served																									
		Number of industrial customers served																									
	IF-EU-000.B	Total electricity delivered to residential customers	Vistra delivered 77,600 GWh of power to it is retail electric customers.																								
		Total electricity delivered to commercial customers																									
		Total electricity delivered to industrial customers																									
		Total electricity delivered to all other retail customers																									
		Percentage of wholesale customers																									
	IF-EU-000.D	Total electricity generated, percentage of electricity generated by major energy source, percentage in regulated markets	<table><tr><th colspan="3">2019 Total Electricity Generated</th></tr><tr><th>Fuel</th><th>MWh</th><th>% of Total</th></tr><tr><td>Coal</td><td>66,466,972</td><td>35.7%</td></tr><tr><td>Gas</td><td>100,215,277</td><td>53.8%</td></tr><tr><td>Nuclear</td><td>19,304,817</td><td>10.4%</td></tr><tr><td>Oil</td><td>2,755</td><td>0.0%</td></tr><tr><td>Solar</td><td>438,784</td><td>0.2%</td></tr><tr><td>Total</td><td>186,428,605</td><td></td></tr></table> <p>0% of electricity is generated in regulated markets.</p>	2019 Total Electricity Generated			Fuel	MWh	% of Total	Coal	66,466,972	35.7%	Gas	100,215,277	53.8%	Nuclear	19,304,817	10.4%	Oil	2,755	0.0%	Solar	438,784	0.2%	Total	186,428,605	
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Solar	438,784	0.2%																									
Total	186,428,605																										
	IF-EU-000.E	Total wholesale electricity purchased	2,334 GWh with over 50% attributed to wind purchases.																								

2019 GRI CONTENT INDEX

DISCLOSURE	DESCRIPTION	REFERENCE/SECTION	UN SDG
GRI 102: General Disclosures			
102-1	Name of the organization	Vistra Energy Corp.	
102-2	Activities, brands, products, and services	2019 Annual Report	
102-3	Location of headquarters	Irving, Texas, USA	
102-4	Location of operations	The company brings its products and services to market in 20 states and the District of Columbia, including six of the seven competitive markets in the U.S. and markets in Canada and Japan.	
102-5	Ownership and legal form	Vistra Energy is an investor-owned corporation. Common shares trade on the New York Stock Exchange under the symbol "VST."	
102-6	Markets served	2019 Annual Report	
102-7	Scale of the organization	2019 Annual Report	
102-8	Information on employees and other workers	As of Dec. 31, 2019, Vistra had approximately 5,475 full-time employees. See Disclosure 405-1 - Diversity & Equal Opportunity	
102-9	Supply chain	See our Supply Chain webpage.	
102-10	Significant changes to the organization and its supply chain	2019 Annual Report	
102-11	Precautionary Principle or approach	2019 Annual Report	
102-12	External initiatives	Referenced throughout our Sustainability Report	
102-13	Membership of associations	Sustainability Report: Letter from CSO- Organizations	
102-14	Statement from senior decision-maker	Sustainability Report: CEO's Message	
102-16	Values, principles, standards, and norms of behavior	Sustainability Report: Core Principles Vistra's Code of Conduct	
102-18	Governance structure	Sustainability Report: Governance See our Corporate Governance webpage. 2020 Proxy Statement	
102-40	List of stakeholder groups	Sustainability Report: Letter from CSO- Stakeholders	
102-41	Collective bargaining agreements	As of Dec. 31, 2019, less than 31% of Vistra employees were under collective bargaining agreements.	
102-42	Identifying and selecting stakeholders	Sustainability Report: Letter from CSO- Stakeholders	
102-43	Approach to stakeholder engagement	Sustainability Report: Letter from CSO- Stakeholders	
102-44	Key topics and concerns raised	Sustainability Report: Letter from CSO- About this Report	
102-45	Entities included in the consolidated financial statements	2019 Annual Report	
102-46	Defining report content and topic Boundaries	Sustainability Report: Letter from CSO	
102-47	List of material topics	Sustainability Report: Letter from CSO- About this Report	
102-48	Restatements of information	This is Vistra's first report in accordance with GRI Standards	
102-49	Changes in reporting	This is Vistra's first report in accordance with GRI Standards	
102-50	Reporting period	Calendar year 2019	
102-51	Date of most recent previous report	This is Vistra's first report in accordance with GRI Standards	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Sustainability Report: Letter from CSO- Stakeholders	
102-54	Claims of reporting in accordance with the GRI Standards	Sustainability Report: Letter from CSO- About this Report	
102-55	GRI content index	Sustainability Report: GRI Index	
102-56	External assurance	Vistra retained Deloitte & Touche LLP to conduct limited assurance of Scope 1 GHG Emissions in this report for the year ending Dec. 31, 2019. The full report can be found online .	

DISCLOSURE	DESCRIPTION	REFERENCE/SECTION	UN SDG																
GRI 201: Economic Performance																			
103-1,2,3	Management Approach	2019 Annual Report																	
201-1	Direct economic value generated and distributed	2019 Annual Report	2, 5, 7, 8, 9																
201-2	Financial implications and other risks and opportunities due to climate change	2019 Annual Report Sustainability Report: Risk Management	13																
GRI 302: Energy																			
103-1,2,3	Management Approach	Sustainability Report: Environment Environmental Principles Policy																	
302-1	Energy consumption within the organization	485,009,207 MWh Vistra's total 2019 energy consumption represents the fuel and electricity consumed at its 54 operational power plants and the electricity consumed at its 4 corporate locations in the Dallas,TX metroplex. All fuel was converted to MWh using the U.S. EIA conversion calculators.	7, 8, 12, 13																
302-3	Energy intensity	2.60 Calculated using the total energy consumption from disclosure 302-1 divided by the total MWh of electricity generated for 2019.	7, 8, 12, 13																
302-4	Reduction of energy consumption	Sustainability Report: Facilities	7, 8, 12, 13																
GRI 303: Water and Effluents																			
103-1,2,3	Management Approach	Water is a limited and shared resource that is essential to Vistra's power plant operations. Producing electricity requires water for cooling to condense steam at our generating plants along with boiler make-up, potable water, cleaning and other uses. Therefore, water scarcity is a concern which could negatively impact both operations and revenues especially for plants in high water stress areas. Climate change and seasonal variability could potentially aggravate this impact by disrupting or restricting cooling water supplies. Vistra recognizes that water is a communal resource, and is working to define the scope of this issue and refine our management strategies.																	
303-1	Interactions with water as a shared resource	Sustainability Report: Environment-Water	6, 12																
303-2	Management of water discharge-related impacts	All operating power plants in the Vistra fleet are governed by local, state, and federal permits that control water use and effluent quality. Our facilities meet water quality discharge limitations and sample and report per permit requirements.	3, 6, 12, 14, 15																
303-3	Water withdrawal	<table><tr><th colspan="2">2019 Total Water Withdrawn</th></tr><tr><th>Water Source</th><th>Total (MegaLiters)</th></tr><tr><td>Groundwater</td><td>430,207</td></tr><tr><td>Surface Water</td><td>13,072,635</td></tr><tr><td>Sea Water</td><td>325,989</td></tr><tr><td>Third Party</td><td>113,751</td></tr><tr><td>Produced</td><td>32</td></tr><tr><td>Total</td><td>13,942,614</td></tr></table> Vistra operates 5 power plants in areas identified as "High Stress" or "Extremely High Stress". These 5 plants represent 0.05% of total water withdrawn.	2019 Total Water Withdrawn		Water Source	Total (MegaLiters)	Groundwater	430,207	Surface Water	13,072,635	Sea Water	325,989	Third Party	113,751	Produced	32	Total	13,942,614	6, 12
2019 Total Water Withdrawn																			
Water Source	Total (MegaLiters)																		
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Total	13,942,614																		

U.N. SUSTAINABLE DEVELOPMENT GOALS (SDGS) KEY



DISCLOSURE	DESCRIPTION	REFERENCE/SECTION	UN SDG																
303-4	Water discharge	<table><thead><tr><th colspan="2">2019 Total Water Discharged</th></tr><tr><th>Water Source</th><th>Total (MegaLiters)</th></tr></thead><tbody><tr><td>Groundwater</td><td>425,376</td></tr><tr><td>Surface Water</td><td>12,828,768</td></tr><tr><td>Sea Water</td><td>325,989</td></tr><tr><td>Third Party</td><td>84,035</td></tr><tr><td>Produced</td><td>-</td></tr><tr><td>Total</td><td>13,664,168</td></tr></tbody></table> <p>Vistra operates 5 power plants in areas identified as "High Stress" or "Extremely High Stress". These 5 plants do not discharge water.</p>	2019 Total Water Discharged		Water Source	Total (MegaLiters)	Groundwater	425,376	Surface Water	12,828,768	Sea Water	325,989	Third Party	84,035	Produced	-	Total	13,664,168	6, 12, 14
2019 Total Water Discharged																			
Water Source	Total (MegaLiters)																		
Groundwater	425,376																		
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Sea Water	325,989																		
Third Party	84,035																		
Produced	-																		
Total	13,664,168																		
303-5	Water consumption	<table><thead><tr><th colspan="2">2019 Total Water Consumed</th></tr><tr><th>Water Source</th><th>Total (MegaLiters)</th></tr></thead><tbody><tr><td>Groundwater</td><td>4,831</td></tr><tr><td>Surface Water</td><td>243,867</td></tr><tr><td>Sea Water</td><td>0</td></tr><tr><td>Third Party</td><td>29,716</td></tr><tr><td>Produced</td><td>32</td></tr><tr><td>Total</td><td>278,446</td></tr></tbody></table> <p>Vistra operates 5 power plants in areas identified as "High Stress" or "Extremely High Stress". These 5 plants represent 2.7% of water consumed.</p>	2019 Total Water Consumed		Water Source	Total (MegaLiters)	Groundwater	4,831	Surface Water	243,867	Sea Water	0	Third Party	29,716	Produced	32	Total	278,446	6, 12
2019 Total Water Consumed																			
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Groundwater	4,831																		
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Sea Water	0																		
Third Party	29,716																		
Produced	32																		
Total	278,446																		
GRI 305: Emissions																			
103-1,2,3	Management Approach	Sustainability Report: Environment- Emissions Environmental Principles Policy																	
305-1	Direct (Scope 1) GHG emissions	105,523,364 metric tons of CO ₂ e	3, 12, 13, 14, 15																
305-2	Energy indirect (Scope 2) GHG emissions	249,068 metric tons of CO ₂ e Scope 2 emissions represent the electricity purchased from the grid and consumed at Vistra's 54 operational power plants and its 4 corporate locations in the Dallas, TX metroplex. Reported Scope 2 emissions are location-based and were calculated using the U.S. EPA's eGRID2018 emissions factors.	3, 12, 13, 14, 15																
305-4	GHG emissions intensity	0.57 Calculated using Scope 1 emissions as reported in disclosure 305-1 divided by total MWh of electricity generated in 2019.	13, 14, 15																
305-5	Reduction of GHG emissions	Sustainability Report: Environment- Emissions	13, 14, 15																
305-7	Nitrogen oxides (NO _x), sulfur oxides (SO _x), and other significant air emissions	Sustainability Report: Environment- Emissions	3, 12, 13, 14, 15																
GRI 306: Effluents and Waste																			
103-1,2,3	Management Approach	Environmental Principles Policy																	
306-2	Waste by type and disposal method	Sustainability Report: Environment- Coal Ash Byproduct and Other Waste Sustainability Report: Deskside Recycling	3, 6, 12																
306-3	Significant spills	No significant spills occurred in 2019.	3, 6, 12, 14, 15																
GRI 307: Environmental Compliance																			
103-1,2,3	Management Approach	Sustainability Report: Environment Environmental Principles Policy																	
307-1	Non-compliance with environmental laws and regulations	Sustainability Report: Environment	13, 16																
GRI 401: Employment																			
103-1,2,3	Management Approach	Sustainability Report: Employees See our Careers webpage.																	

DISCLOSURE	DESCRIPTION	REFERENCE/SECTION	UN SDG						
401-1	New employee hires and employee turnover	<table><tr><th>Total Employees as of 12/31/19</th><th>Voluntary Turnover Rate¹</th><th>Overall Turnover Rate¹</th></tr><tr><td>5,475</td><td>6.83%</td><td>7.94%</td></tr></table> <p>¹ 2019 turnover rates reflect employee retirements in higher numbers than previous years. Removing the retirement impact, voluntary and total turnover rates would be 4.81% and 5.92%, respectively.</p>	Total Employees as of 12/31/19	Voluntary Turnover Rate ¹	Overall Turnover Rate ¹	5,475	6.83%	7.94%	5, 8
Total Employees as of 12/31/19	Voluntary Turnover Rate ¹	Overall Turnover Rate ¹							
5,475	6.83%	7.94%							
401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Report: Employees- Employee Benefits	8						
GRI 403: Occupational Health and Safety									
103-1,2,3	Management Approach	Sustainability Report: Safety Vistra is committed to providing safe and reliable power to consumers. We operate our facilities to the highest safety standards and focus on ensuring our employees are putting up their best defenses in order to fail safely. Our safety philosophy revolves around human performance and developing systems where error is accounted for so that failure does not result in serious injuries. We carry out our safety mission by incorporating our core principles.							
403-1	Occupational health and safety management system	<p>Our safety program focuses on three aspects: our people, our processes and our procedures. These are divided up into three processes using Human Performance Initiatives, Behavior Based Safety programs and applying the OSHA Voluntary Protection Program framework for a safety management system.</p> <p>Each Vistra location abides by corporate led safety procedures that meet OSHA requirements. Facilities are required to train on all procedures and records are kept in a central learning management system. All employees and management are engaged in the safety program, performing audits and observing work. Internal and external audits are performed as part of normal business to verify compliance with internal and OSHA procedures and guidance.</p>	3, 8						
403-2	Hazard identification, risk assessment, and incident investigation	<p>Vistra has organized Centers of Excellence (COE) which consist of a cross-functional team of stakeholders committed to the development, sustainability, optimization, and improvement of best practices, processes, standards, and procedures for key functional areas within our fossil generation fleet. Our COEs are divided into groups with an oversight group led by management.</p> <p>Our Hazard Management Center of Excellence (HM COE) mission is to provide standards that clearly state the company's expectations to manage the hazards associated with our industry and to protect our employees and the public. Vistra has created sub-teams under the guidance of the HM COE for certain hazardous processes at its facilities including: Arc Flash, Boiler and Machinery, Combustible Dust, Fire Protection, and Highly Hazardous Chemicals (PSM/Anhydrous Ammonia, Hydrogen, Natural Gas, etc.). These teams are responsible for developing and maintaining programs for their respective hazard across the fleet. The standards created will provide a consistent approach for all sites and facilitate sharing of best practices. The standards provide guidance for assessments and audits for each program, maintenance metrics, team member requirements and quarterly reports to the Executive Oversight Committee.</p>	3, 8						
403-4	Worker participation, consultation, and communication on occupational health and safety	<p>Vistra conducts a team approach to safety where everyone is involved and engaged in the safety process. All managers are required to participate in safety engagements with work staff to enable constant communication and interaction. The corporate safety team develops and distributes monthly safety information to all operations staff and regularly posts information on the intranet. Safety training is accomplished for the entire organization through web based systems to communication on the company's safety management system, injury reporting and emergency preparedness.</p> <p>Each facility holds regular safety meetings with employees and management representatives. The safety committee is responsible for reviewing new procedures, safety observations made at their specific location to determine corrective actions, and lessons learned from incidents that have occurred at other sites. The safety committees are also tasked with managing emergency procedures for each location.</p>	3, 8						
403-5	Worker training on occupational health and safety	Sustainability Report: Safety Training	3, 8						
403-6	Promotion of worker health	Sustainability Report: Wellness	3, 8						
403-8	Workers covered by an occupational health and safety management system	All Vistra employees are covered by our safety program: Best Defense.	3, 8						
403-9	Work-related injuries	Sustainability Report: Safety Statistics	3, 8						
GRI 404: Training and Education									
103-1,2,3	Management Approach	Sustainability Report: Training and Development							
404-1	Average hours of training per year per employee	Sustainability Report: Training and Development	4, 8						

DISCLOSURE	DESCRIPTION	REFERENCE/SECTION	UN SDG																																																																																																																														
404-2	Programs for upgrading employee skills and transition assistance programs	Sustainability Report: Training and Development	4, 5, 8																																																																																																																														
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Report: Performance Review Program	5, 8																																																																																																																														
GRI 405: Diversity and Equal Opportunity																																																																																																																																	
103-1,2,3	Management Approach	Sustainability Report: Diversity																																																																																																																															
405-1	Diversity of governance bodies and employees	<table><tr><th colspan="5">Gender Distribution by Business Unit</th></tr><tr><th></th><th>Overall</th><th>Retail</th><th>Corporate</th><th>Generation</th></tr><tr><td>Male</td><td>80.6%</td><td>45.6%</td><td>62.8%</td><td>91.8%</td></tr><tr><td>Female</td><td>19.4%</td><td>54.4%</td><td>37.2%</td><td>8.2%</td></tr></table> <table><tr><th colspan="5">Corporate Gender Distribution by Employee Category</th></tr><tr><th></th><th>Director+</th><th>Manager</th><th>Indv. Contributor</th><th>Non-Exempt</th></tr><tr><td>Male</td><td>71.7%</td><td>68.9%</td><td>61.0%</td><td>38.3%</td></tr><tr><td>Female</td><td>28.3%</td><td>31.1%</td><td>39.0%</td><td>61.7%</td></tr></table> <table><tr><th colspan="5">Retail Gender Distribution by Employee Category</th></tr><tr><th></th><th>Director+</th><th>Manager</th><th>Indv. Contributor</th><th>Non-Exempt</th></tr><tr><td>Male</td><td>74.0%</td><td>56.9%</td><td>51.8%</td><td>23.3%</td></tr><tr><td>Female</td><td>26.0%</td><td>43.1%</td><td>48.2%</td><td>76.7%</td></tr></table> <table><tr><th colspan="6">Generation Gender Distribution by Employee Category</th></tr><tr><th></th><th>Director+</th><th>Manager</th><th>Indv. Contributor</th><th>Non-Exempt</th><th>Bargaining</th></tr><tr><td>Male</td><td>90.4%</td><td>91.9%</td><td>85.5%</td><td>89.4%</td><td>94.6%</td></tr><tr><td>Female</td><td>9.6%</td><td>8.1%</td><td>14.5%</td><td>10.6%</td><td>5.4%</td></tr></table>	Gender Distribution by Business Unit						Overall	Retail	Corporate	Generation	Male	80.6%	45.6%	62.8%	91.8%	Female	19.4%	54.4%	37.2%	8.2%	Corporate Gender Distribution by Employee Category						Director+	Manager	Indv. Contributor	Non-Exempt	Male	71.7%	68.9%	61.0%	38.3%	Female	28.3%	31.1%	39.0%	61.7%	Retail Gender Distribution by Employee Category						Director+	Manager	Indv. Contributor	Non-Exempt	Male	74.0%	56.9%	51.8%	23.3%	Female	26.0%	43.1%	48.2%	76.7%	Generation Gender Distribution by Employee Category							Director+	Manager	Indv. Contributor	Non-Exempt	Bargaining	Male	90.4%	91.9%	85.5%	89.4%	94.6%	Female	9.6%	8.1%	14.5%	10.6%	5.4%	5, 8																																										
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