

VISTRA CORP.
SUPPLY CHAIN SUSTAINABILITY

I. SCOPE

The Supply Chain Sustainability Policy (this “Policy”) applies to Vistra Corp. and all its subsidiaries (collectively “Company” or “Vistra”). All employees, contractors, consultants, and others performing work on behalf of the Company are expected to support Vistra in adhering to this Policy.

II. PURPOSE

This Policy communicates acceptable business practices related to interactions within the Company’s value chain, illustrates our commitment to our core principles, and is part of the Company’s Sustainability strategy. Through the execution of this Policy, Vistra fosters a responsible, sustainable supply chain process that promotes legal compliance, transparency, management, and leadership of Environmental, Social, and Governance (ESG) criteria throughout the Vistra Supply Chain.

III. POLICY STATEMENT

The focus of the Supply Chain is to provide a continuous supply of cost-effective, quality goods and services with an emphasis on transparency, risk management, and environmental and social responsibility. Specific areas of focus include diversity, safety, ethics, value, human rights, and the environment, which includes Vistra’s impact on climate change, waste, water, and land.

Vistra is committed to ethical, responsible, and sustainable business practices throughout all tiers of the Supply Chain. Ethical business practices are the foundation of the internal Code of Conduct that Vistra employees follow. Vistra maintains a Supplier Code of Conduct and requires its Suppliers to conduct their operations in accordance with it and any applicable professional standards, laws, and regulations. Vistra supports social responsibility in its Supply Chain by following the Universal Declaration of Human Rights and the International Labour Organization standards applicable to our operations. Vistra supports environmental responsibility in its Supply Chain by complying with all applicable environmental laws and regulations.

Vistra will periodically assess our Suppliers’ Sustainability and ESG practices to identify and mitigate possible risks as well as support ethical behavior throughout Vistra’s supply chain. This assessment can include identification, avoidance, and/or mitigation of possible adverse impacts of Supplier activities, aiming for alignment with Vistra’s values and compliance with the law, whether local, national, or international. Through full transparency and intentional engagement with the Company’s Suppliers, Vistra can manage risks, realize efficiencies, and encourage the creation and usage of sustainable products and services while leading the industry in building a responsible culture. Vistra will encourage Suppliers to disclose material sustainability topics through relevant reporting frameworks and standards in order to drive performance and ensure their business practices are in alignment with Vistra’s Supplier Code of Conduct and other Company’s policies.

The administration of this Policy is the responsibility of Vistra’s Supply Chain organization; however, the implementation of this Policy is the responsibility of all organizations throughout the Company. This Policy cannot address every situation related to the title subject. Other relevant material can include, and is not limited to, other policies and principles, Business Unit or work-area procedures, and laws and regulations.

IV. GOVERNANCE \ IMPLEMENTATION

The Company reserves the right to modify this Policy at any time, for any reason, and without prior notice. The Company will make prudent efforts to notify relevant employees when a material change to this Policy has been made, but employees are responsible for their own up-to-date knowledge about Company policies and procedures. Failure to abide by these standards could result in disciplinary action, up to and including termination.

Employees must report any suspected violation of policy. Help is available from, or reports can be made to, a Policy officer, your supervisor or other resources that are described in the Code of Conduct. The Company will not tolerate any retaliation against anyone making any report or complaint in good faith. The Company encourages openness and will support anyone who raises genuine concerns in good faith under this Policy, even if that person turns out to be mistaken.

V. DEFINITIONS \ KEY TERMS

Environmental, Social, and Governance (ESG) - A set of criteria used by socially conscious stakeholders, including investors, current and future employees, customers, suppliers, among others to evaluate a company's impact on society.

Supplier - For the purposes of this Policy, the term "supplier" means any company, entity, business partner - such as franchises and other marketing channels - or legal person, that provides any service and/or product to Vistra.

Supply Chain - An entire system of producing and delivering a product or service, from the very beginning stage of sourcing the raw materials to the final delivery of the product or service to end-users. The supply chain lays out all aspects of the production process, including the activities involved at each stage, information that is being communicated, natural resources that are transformed into useful materials, human resources, and other components that go into the finished product through its end of life.

Sustainability - The consideration and balance of economic, social, and environmental impacts over the long-term.

Reviewed December 4, 2024.