

STATEMENT OF GREENHOUSE GAS (“GHG”) EMISSIONS FOR THE YEAR ENDED DECEMBER 31, 2021

Management of Vistra Corp. (“Vistra” or the “Company”) is responsible for the completeness, accuracy, and validity of the Company’s Statement of GHG Emissions (the “2021 Statement of GHG Emissions”). Management is also responsible for the collection, quantification, and presentation of the 2021 Statement of GHG Emissions and for the selection of the criteria, which management believes provide an objective bases for measuring and reporting. Management of Vistra asserts that the 2021 Statement of GHG Emissions for the year ended December 31, 2021 is presented in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition), published by the World Resources Institute/World Business Council for Sustainable Development (the “GHG Protocol”).

	2021 Metric tonnes of CO ₂ e	Base Year ^{1, 2}
Total Scope 1 GHG Emissions	98,749,588	172,810,588
Total Scope 2 GHG Emissions	242,970	248,611
Total GHG Emissions	98,992,558	-

NOTE TO THE 2021 STATEMENT OF GHG EMISSIONS

Note 1: GHG Reporting Policies

Company background

Vistra (NYSE: VST) is a leading Fortune 275 integrated retail electricity and power generation 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, as well. Serving nearly 4.3 million residential, commercial, and industrial retail customers with electricity and natural gas, Vistra is one of the largest competitive residential electricity providers in the country and offers over 50 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, coal, solar, and battery energy storage facilities. In addition, the Company is a large purchaser of wind power. The Company owns and operates the 400- MW/1,600-MWh battery energy storage system in Moss Landing, California, the largest of its kind in the world. 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 our environmental, social, and governance efforts and read the company's sustainability report² at <https://www.vistracorp.com/sustainability/>.

Basis for preparation and presentation

The 2021 Statement of GHG Emissions has been prepared based on a calendar reporting year that is the same as the Company’s financial reporting period of January 1, 2021 to December 31, 2021. The disclosures included in the 2021 Statement of GHG Emissions for the calendar year ended December 31, 2021 are presented in accordance with the GHG Protocol.

A summary of the key disclosure policies is set out below.

¹ Base year for Scope 1 GHG emissions is 2010 and base year for Scope 2 GHG emissions is 2018

² This information was not subject to review by Deloitte & Touche LLP and, accordingly, Deloitte & Touche does not express a conclusion or any form of assurance on such information.

GHG reporting scope and boundary

The 2021 Statement of GHG Emissions includes Scope 1 and Scope 2 GHG emissions that were reported for operations with the organizational boundary described below.

Specifically:

- Scope 1 GHG emissions includes all relevant GHG emissions emitted directly from the Company's activities, which include fuel combustion in boilers, turbines, and engines used for the production of wholesale electric power. Scope 1 GHG emissions are reported as required under the U.S. EPA's Mandatory Reporting Rule (40 CFR 98) and also may include ancillary boilers and heaters used at the facilities for operations but does not include mobile equipment nor fugitive emissions, as they are not a material source of emissions.
- Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by the Company. Scope 2 GHG emissions are location-based.

GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol. GHG emissions that pertain to the organizational and operational boundaries have been reported for the Company owned buildings and power generation facilities, including facilities that are not required to report direct emissions under the US EPA's Mandatory Reporting Rule, and the Company's real estate financial leases located in the United States. The Company's policy is to exclude Scope 2 GHG emissions from a facility in the year in which the facility is acquired.

Base year GHG emissions

The base year for Scope 1 GHG emissions is 2010, the year Vistra's last thermal asset was constructed and online. The Scope 2 GHG emissions base year is 2018, the first year Vistra calculated Scope 2 GHG emissions. Vistra's emissions reduction target of 60% by 2030 includes Scope 2 GHG emissions, even though these emissions for the base year 2010 are not available. Vistra's Scope 2 GHG emissions are not a material driver of its overall emissions profile, consistently representing less than 0.5% of the total GHG emissions. As such, Vistra's Scope 2 GHG emissions represent an immaterial addition to the target base year's emissions.

Vistra has established a base year emissions recalculation policy, in accordance with the GHG Protocol, with a 5% cumulative Scope 1 and Scope 2 GHG emissions significance threshold applied to structural changes, changes in calculation methodology, or improvements in the accuracy of the emission factors or activity data. This 5% threshold also applies to the restatement of combined Scope 1 and Scope 2 GHG emissions for any reporting year.

Greenhouse gases

GHG emissions are reported in metric tonnes of carbon dioxide equivalents (CO₂e) and include three of the seven greenhouse gases covered by the Kyoto Protocol—carbon dioxide (CO₂), methane (CH₄), and nitrous oxide (N₂O). Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), Sulphur hexafluoride (SF₆), and nitrogen trifluoride (NF₃) emissions have been omitted from our reporting as they are not a material source of greenhouse gases for the business. The table below includes total Scope 1 and Scope 2 GHG emissions by gas in metric tonnes and metric tonnes of CO₂e.

	2021 Metric Tonnes	2021 Metric Tonnes of CO ₂ e
Carbon Dioxide (CO ₂)	98,473,191	98,473,191
Methane (CH ₄)	7,730	193,252
Nitrous Oxide (N ₂ O)	1,095	326,115
Total	98,482,016	98,992,558

Methodology

For Scope 1 GHG emissions, fuel usage, directly monitored emissions and heat input are used to calculate GHG emissions. The primary data is collected in each facility's central Data Acquisition Handling System. The corporate environmental team then calculates the associated GHG emissions through the application of appropriate GHG calculations using emission factors, as described in "GHG emissions factors" below.

For Scope 2 GHG emissions, metered electricity purchases from electricity distribution utilities were collected for each facility by the corporate accounting team. The corporate sustainability team calculates the associated GHG emissions using the emission factors as described in the "GHG emissions factors" below.

Measurement of Scope 1 and Scope 2 GHG emissions includes estimates and assumptions that are subject to inherent measurement uncertainty resulting for example from accuracy and precision of GHG emission factors. The selection of different but acceptable measurement methods, input data, or assumptions may have resulted in materially different amounts or disclosures being reported.

GHG emissions factors

The CO₂e emissions associated with the activities noted above have been determined by directly measured GHG emissions multiplied by appropriate conversion factors or on the basis of measured or estimated energy and fuel use, multiplied by relevant GHG emission factors.

The table below indicates the relevant emission factors applied to current inventories.

Emissions source:	Emission Source Type:	Emissions factor employed:
Scope 1	Natural gas, diesel, coal, propane	All Fuel Types – USA Code of Federal Regulations <ul style="list-style-type: none">• For units who report under the Acid Rain Program, report CO₂ emissions as required under 40 CFR Part 75.64 and convert units from short tons to metric tonnes by dividing by 1.1023.• Table A-1 to 40 CFR 98 Subpart A (7-1-18 Edition) – Global Warming Potentials• Table C-1 to 40 CFR 98 Subpart C (7-1-18 Edition) – Default CO₂ Emission Factors and High Heat Values for Various Types of Fuel• Table C-2 to 40 CFR 98 Subpart C (7-1-18 Edition) – Default CH₄ and N₂O Emission Factors for Various Types of Fuel
Scope 2	Electricity	U.S. Environmental Protection Agency eGRID 2020 GWPs from IPCC Fourth Assessment Report (AR4), 2007

INDEPENDENT ACCOUNTANT'S REVIEW REPORT

Management of Vistra Corp.:

We have reviewed management of Vistra Corp.'s ("Vistra" or the "Company") assertion that the accompanying Statement of Greenhouse Gas ("GHG") Emissions for the year ended December 31, 2021 (the "2021 Statement of GHG Emissions") is presented in accordance with the Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition), published by the World Resources Institute/World Business Council for Sustainable Development (the "GHG Protocol", or "Criteria"). The Company's management is responsible for its assertion. Our responsibility is to express a conclusion on management's assertion based on our review.

Our review was conducted in accordance with attestation standards established by the American Institute of Certified Public Accountants (AICPA) in AT-C section 105, *Concepts Common to All Attestation Engagements*, and AT-C Section 210, *Review Engagements*. Those standards require that we plan and perform the review to obtain limited assurance about whether any material modifications should be made to management's assertion in order for it to be fairly stated. The procedures performed in a review vary in nature and timing from, and are substantially less in extent than, an examination, the objective of which is to obtain reasonable assurance about whether management's assertion is fairly stated, in all material respects, in order to express an opinion. Accordingly, we do not express such an opinion. Because of the limited nature of the engagement, the level of assurance obtained in a review is substantially lower than the assurance that would have been obtained had an examination been performed. We believe that the review evidence obtained is sufficient and appropriate to provide a reasonable basis for our conclusion.

We are required to be independent and to meet our other ethical responsibilities in accordance with the *Code of Professional Conduct* issued by the AICPA. We applied the *Statements on Quality Control Standards* established by the AICPA and, accordingly, maintain a comprehensive system of quality control.

The procedures we performed were based on our professional judgment. In performing our review, we performed analytical procedures and inquiries. For a selection of the amounts, we performed tests of mathematical accuracy of computations, compared amounts to underlying records, or reviewed supporting documentation regarding metering calibration results.

The preparation of the 2021 Statement of GHG Emissions requires management to interpret the Criteria, make determinations as to the relevancy of information to be included, and make estimates and assumptions that affect the reported information. Measurement of Scope 1 and Scope 2 GHG emissions includes estimates and assumptions that are subject to inherent measurement uncertainty resulting, for example, from accuracy and precision of GHG emission factors. Obtaining sufficient, appropriate review evidence to support our conclusion does not reduce the inherent uncertainty in the amounts and disclosures. The selection by management of different but acceptable measurement methods, input data, or assumptions, may have resulted in materially different amounts or disclosures being reported.

Our review was limited to the disclosures within the 2021 Statement of GHG Emissions. Any links or information relating to periods prior to December 31, 2019 for Scope 1 GHG emissions and prior to December 31, 2020 for Scope 2 GHG emissions, was not subject to our review and, accordingly, we do not express a conclusion or any form of assurance on such information.

Based on our review, we are not aware of any material modifications that should be made to management of Vistra's assertion that the accompanying 2021 Statement of GHG Emissions is presented in accordance with the Criteria, in order for it to be fairly stated.



May 16, 2022