



Vistra Corp.

# 2025 CDP Corporate Questionnaire 2025

Word version

**Important: this export excludes unanswered questions**

This document is an export of your organization's CDP questionnaire response. It contains all data points for questions that are answered or in progress. There may be questions or data points that you have been requested to provide, which are missing from this document because they are currently unanswered. Please note that it is your responsibility to verify that your questionnaire response is complete prior to submission. CDP will not be liable for any failure to do so.

[Read full terms of disclosure](#)

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## C1. Introduction

### (1.1) In which language are you submitting your response?

Select from:

☒ English

### (1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ USD

### (1.3) Provide an overview and introduction to your organization.

#### (1.3.2) Organization type

Select from:

☒ Publicly traded organization

#### (1.3.3) Description of organization

*Vistra (NYSE: VST) is a leading Fortune 500 integrated retail electricity and power generation company based in Irving, Texas, that provides essential power resources to customers, businesses, and communities from California to Maine. We combine an innovative, customer-centric approach to retail sales with safe, reliable, diverse, and efficient power generation. Our integrated power generation and wholesale operation allows us to efficiently obtain the electricity needed to serve our customers at the lowest cost. The integrated model enables us to structure products and contracts in a way that offers significant value compared to stand-alone retail electric providers. The Company brings its products and services to market in 18 states and the District of Columbia, including all major competitive wholesale power markets in the U.S. We serve approximately 5 million residential, commercial, and industrial retail customers with electricity and natural gas. Our generation fleet totals approximately 41,000 megawatts of generation capacity powered by a diverse portfolio, including natural gas, nuclear, coal, solar, and battery energy storage facilities. As a leader in the responsible transformation of the country's energy supply, Vistra has made significant progress towards its 2030 and 2050 targets. The company has committed to a 60% reduction of Scope 1 and 2 greenhouse gas emissions by 2030, as compared to our 2010 baseline, and net-zero carbon emissions by 2050, assuming necessary technological advancements and public policy incentives are achieved. Learn more about our environmental, social, and governance efforts and read the company's sustainability report at <https://vistracorp.com/sustainability/>.*

[Fixed row]

**(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.**

**(1.4.1) End date of reporting year**

12/31/2024

**(1.4.2) Alignment of this reporting period with your financial reporting period**

Select from:

☒ Yes

**(1.4.3) Indicate if you are providing emissions data for past reporting years**

Select from:

☒ Yes

**(1.4.4) Number of past reporting years you will be providing Scope 1 emissions data for**

Select from:

☒ 4 years

**(1.4.5) Number of past reporting years you will be providing Scope 2 emissions data for**

Select from:

☒ 4 years

**(1.4.6) Number of past reporting years you will be providing Scope 3 emissions data for**

Select from:

☒ 4 years

[Fixed row]

**(1.4.1) What is your organization’s annual revenue for the reporting period?**

**(1.5) Provide details on your reporting boundary.**

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

**(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?****ISIN code - bond****(1.6.1) Does your organization use this unique identifier?**

Select from:

☒ No**ISIN code - equity****(1.6.1) Does your organization use this unique identifier?**

Select from:

☒ No**CUSIP number****(1.6.1) Does your organization use this unique identifier?**

Select from:

☒ No

## Ticker symbol

### (1.6.1) Does your organization use this unique identifier?

Select from:

☒ Yes

### (1.6.2) Provide your unique identifier

VST

## SEDOL code

### (1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

## LEI number

### (1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

## D-U-N-S number

### (1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

## Other unique identifier

### (1.6.1) Does your organization use this unique identifier?

Select from:

☒ No

[Add row]

### (1.7) Select the countries/areas in which you operate.

Select all that apply

☒ United States of America

### (1.16) In which part of the electric utilities value chain does your organization operate?

Electric utilities value chain

☒ Electricity generation

☒ Electricity purchasing

Other divisions

☒ Battery storage

☒ Coal mining

☒ Gas storage, transmission and distribution

### (1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.

#### Coal - Hard

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

#### (1.16.1.2) Nameplate capacity (MW)

6828

#### (1.16.1.4) Net electricity generation (GWh)

29313

#### (1.16.1.5) Comment

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024.*

### Lignite

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

#### (1.16.1.2) Nameplate capacity (MW)

1600

#### (1.16.1.4) Net electricity generation (GWh)

10932

#### (1.16.1.5) Comment

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024.*

### Oil

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

#### (1.16.1.2) Nameplate capacity (MW)

187

#### (1.16.1.4) Net electricity generation (GWh)

6

#### (1.16.1.5) Comment

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024.*

### Gas

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

#### (1.16.1.2) Nameplate capacity (MW)

24120

#### (1.16.1.4) Net electricity generation (GWh)

109043

#### (1.16.1.5) Comment

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024.*

## Sustainable biomass

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Other biomass

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Waste (non-biomass)

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Nuclear

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

6448

### (1.16.1.4) Net electricity generation (GWh)

**(1.16.1.5) Comment**

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024. Totals as of 2024 reflect the completed acquisition of Energy Harbor PJM assets, including a proforma view of nuclear GWh generation for the entirety of calendar year 2024.*

**Fossil-fuel plants fitted with carbon capture and storage****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

☒ No

**Geothermal****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

☒ No

**Hydropower****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

☒ No

**Wind****(1.16.1.1) Own or control operations which use this power generation source**

Select from:

☒ No

## Solar

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

450

### (1.16.1.4) Net electricity generation (GWh)

757

### (1.16.1.5) Comment

*Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2024. Totals as of 2024 reflect the completed MISO solar projects at Baldwin and Coffeen assets as a part of our Illinois Retire and Renew Initiative.*

## Marine

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Other renewable

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

(1.16.1.4) Net electricity generation (GWh)

0

(1.16.1.5) Comment

Battery Energy Storage Systems (BESS) installations. Reported nameplate capacity is based on year-end, as of December 31, 2024. Totals as of 2024 reflect the completed MISO solar projects at Baldwin and Coffeen assets as a part of our Illinois Retire and Renew Initiative.

Other non-renewable

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

Total

(1.16.1.2) Nameplate capacity (MW)

40657

(1.16.1.4) Net electricity generation (GWh)

202091  
[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:

☒ Yes, we have mapped or are currently in the process of mapping our value chain

### (1.24.2) Value chain stages covered in mapping

Select all that apply

- ☒ Upstream value chain
- ☒ Downstream value chain

### (1.24.3) Highest supplier tier mapped

Select from:

- ☒ Tier 1 suppliers

### (1.24.4) Highest supplier tier known but not mapped

Select from:

- ☒ Tier 2 suppliers

### (1.24.7) Description of mapping process and coverage

*Risk assessment and management within Vistra's supply chain are performed by individual sourcing and category managers based on the supplier. Risk management primarily focuses on "tier one" suppliers, which Vistra groups into relevant categories under supply chain management: IT, shared services, fossil, nuclear, and renewable power generation. In 2024, we continued to use a third-party to evaluate the top 90% of suppliers (by spend) for financial risk and adverse media impacts.*

*[Fixed row]*

**(1.24.1) Have you mapped where in your direct operations or elsewhere in your value chain plastics are produced, commercialized, used, and/or disposed of?**

	Plastics mapping	Primary reason for not mapping plastics in your value chain	Explain why your organization has not mapped plastics in your value chain
	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to within the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority	<i>Not a material source of impact for our company.</i>

[Fixed row]

## C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities

(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?

### Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

5

(2.1.4) How this time horizon is linked to strategic and/or financial planning

*Vistra's short term range of 0-5 years was selected to align with the base framework and scenarios that make up the basis for our climate impact assessment (scenarios as developed by the Network for Greening the Financial System (NGFS)). While not necessarily prescribed, NGFS short term scenarios do support a 5 year time horizon, and this best practice is carried into our climate impact assessment methodology. This 5 year horizon will go on to help inform aspects of our overall enterprise risk management strategy.*

### Medium-term

(2.1.1) From (years)

6

(2.1.3) To (years)

10

(2.1.4) How this time horizon is linked to strategic and/or financial planning

*Vistra's medium term range of 6-10 years was selected to align with the base framework and scenarios that make up the basis for our climate impact assessment (scenarios as developed by the Network for Greening the Financial System (NGFS)). While not necessarily prescribed, a medium-term horizon of 6-10 years is generally supported, and this best practice is carried into our climate impact assessment methodology. This medium-term horizon will go on to help inform aspects of our overall enterprise risk management strategy.*

Long-term

(2.1.1) From (years)

11

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

*Vistra's long term range of 10+ years was selected to align with the base framework and scenarios that make up the basis for our climate impact assessment (scenarios as developed by the Network for Greening the Financial System (NGFS)). While not necessarily prescribed, a long-term horizon of 10+ years is generally supported, and this best practice is carried into our climate impact assessment methodology conducted. This medium-term horizon will go on to help inform aspects of our overall enterprise risk management strategy.*

[Fixed row]

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from:	Select from:

	Process in place	Dependencies and/or impacts evaluated in this process
	<input checked="" type="checkbox"/> Yes	<input checked="" type="checkbox"/> Both dependencies and impacts

[Fixed row]

### (2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both risks and opportunities	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

### (2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.

#### Row 1

##### (2.2.2.1) Environmental issue

Select all that apply

☒ Climate change

#### (2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

*Select all that apply*

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

#### (2.2.2.3) Value chain stages covered

*Select all that apply*

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ Downstream value chain
- ☒ End of life management

#### (2.2.2.4) Coverage

*Select from:*

- ☒ Full

#### (2.2.2.5) Supplier tiers covered

*Select all that apply*

- ☒ Tier 1 suppliers

#### (2.2.2.7) Type of assessment

*Select from:*

- ☒ Qualitative and quantitative

#### (2.2.2.8) Frequency of assessment

*Select from:*

- ☒ Every two years

#### **(2.2.2.9) Time horizons covered**

*Select all that apply*

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

#### **(2.2.2.10) Integration of risk management process**

*Select from:*

- ☒ Integrated into multi-disciplinary organization-wide risk management process

#### **(2.2.2.11) Location-specificity used**

*Select all that apply*

- ☒ Site-specific
- ☒ Local
- ☒ Sub-national

#### **(2.2.2.12) Tools and methods used**

Enterprise Risk Management

- ☒ Enterprise Risk Management

International methodologies and standards

- ☒ Environmental Impact Assessment

Other

- ☒ External consultants
- ☒ Materiality assessment
- ☒ Scenario analysis

### (2.2.2.13) Risk types and criteria considered

#### Acute physical

- ☒ Drought
- ☒ Wildfires
- ☒ Heat waves
- ☒ Heavy precipitation (rain, hail, snow/ice)
- ☒ Flood (coastal, fluvial, pluvial, ground water)
- ☒ Storm (including blizzards, dust, and sandstorms)

#### Chronic physical

- ☒ Changing precipitation patterns and types (rain, hail, snow/ice)
- ☒ Changing temperature (air, freshwater, marine water)
- ☒ Heat stress
- ☒ Increased severity of extreme weather events
- ☒ Water stress

#### Policy

- ☒ Changes to national legislation

#### Market

- ☒ Changing customer behavior
- ☒ Uncertainty in the market signals

#### Reputation

- ☒ Increased partner and stakeholder concern and partner and stakeholder negative feedback
- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- ☒ Stigmatization of sector

#### Technology

- ☒ Transition to lower emissions technology and products

## Liability

- ☒ Exposure to litigation
- ☒ Non-compliance with regulations

### (2.2.2.14) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Local communities
- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators

### (2.2.2.15) Has this process changed since the previous reporting year?

Select from:

- ☒ Yes

### (2.2.2.16) Further details of process

*Dependencies, impacts, risks and opportunities are evaluated as a part of Vistra's overall management strategy, and this is managed through a combination of biennial impact assessments via partnership with a third party consultancy, Environmental and Enterprise Risk Management functions, and annual reviews with the Sustainability and Risk Committee of the Vistra Board of Directors. Vistra utilizes climate scenario planning as a tool to aid our strategy development process. We partner with Business for Social Responsibility (BSR) to explore the strategic implications for Vistra under three climate scenarios through 2050. The scenario analysis process involved multiple steps, and is completed biennially. As a part of the assessment, BSR and Vistra select three climate scenarios, a 1.5°C scenario, 2.0°C scenario and greater than 2.0°C scenario, to provide the base narrative for our climate analysis. Selected climate scenarios are informed by industry best practices and, in part, by our environmental dependencies and impacts to provide the base narratives for Vistra's climate scenario analysis. To identify climate-related risks and opportunities, interviews are conducted across seven diverse functional areas to analyze business impacts of the three scenarios and identify climate-related risks (both transition and physical) and opportunities for Vistra. A cross-functional workshop with internal Vistra stakeholders is then held to validate the risk and opportunity assessment and identify ideas to enhance Vistra's resilience and refine its strategy around risks common across the three scenarios for all assets driving material impact to our business. As a result of this effort, Vistra has five strategic focus areas that may involve climate-related risks and opportunities across all scenarios: 1. Physical impacts to assets; 2. Transition impacts on existing assets; 3. Government regulation; 4. Supply chain; 5. Workforce and Reputation. Analysis results are reviewed by Vistra's ERM function, management team, and board of directors and are used to inform Vistra's strategy and risk management processes. While there are a multitude of climate scenarios available, Vistra and BSR leveraged three climate scenarios developed by the Network for Greening the Financial*

System (NGFS): Net Zero 2050, Delayed Transition, and Current Policies. The impacts of these scenarios were grouped into three timeframes: Short Term (0-5 years), Medium Term (6-10 years) and Long Term (10+ years). All these scenarios have a 2050 horizon year but are differentiated by various assumptions. Additional details for this effort are described in our biennial climate report.

## Row 2

### (2.2.2.1) Environmental issue

Select all that apply

☒ Water

### (2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue

Select all that apply

☒ Dependencies

☒ Impacts

☒ Risks

☒ Opportunities

### (2.2.2.3) Value chain stages covered

Select all that apply

☒ Direct operations

☒ Upstream value chain

☒ End of life management

### (2.2.2.4) Coverage

Select from:

☒ Partial

### (2.2.2.5) Supplier tiers covered

*Select all that apply*

☒ Tier 1 suppliers

#### **(2.2.2.7) Type of assessment**

*Select from:*

☒ Qualitative and quantitative

#### **(2.2.2.8) Frequency of assessment**

*Select from:*

☒ Every two years

#### **(2.2.2.9) Time horizons covered**

*Select all that apply*

☒ Short-term

☒ Medium-term

☒ Long-term

#### **(2.2.2.10) Integration of risk management process**

*Select from:*

☒ Integrated into multi-disciplinary organization-wide risk management process

#### **(2.2.2.11) Location-specificity used**

*Select all that apply*

☒ Site-specific

☒ Local

☒ Sub-national

#### **(2.2.2.12) Tools and methods used**

Commercially/publicly available tools

- ✓ WRI Aqueduct

International methodologies and standards

- ✓ Environmental Impact Assessment

Databases

- ✓ Regional government databases

Other

- ✓ Desk-based research
- ✓ Internal company methods

### (2.2.2.13) Risk types and criteria considered

Acute physical

- ✓ Drought
- ✓ Flood (coastal, fluvial, pluvial, ground water)
- ✓ Heavy precipitation (rain, hail, snow/ice)
- ✓ Toxic spills

Chronic physical

- ✓ Water stress
- ✓ Groundwater depletion
- ✓ Declining water quality
- ✓ Precipitation or hydrological variability
- ✓ Water availability at a basin/catchment level

Policy

- ✓ Increased pricing of water
- ✓ Changes to national legislation
- ✓ Regulation of discharge quality/volumes

- ✓ Changing precipitation patterns and types (rain, hail, snow/ice)
- ✓ Increased levels of environmental pollutants in freshwater bodies

- ✓ Mandatory water efficiency, conservation, recycling, or process standards

- ☒ Increased difficulty in obtaining operations permits
- ☒ Increased difficulty in obtaining water withdrawals permit

#### Reputation

- ☒ Negative press coverage related to support of projects or activities with negative impacts on the environment (e.g. GHG emissions, deforestation & conversion, water stress)
- ☒ Stigmatization of sector

#### Technology

- ☒ Dependency on water-intensive energy sources

#### Liability

- ☒ Non-compliance with regulations

### (2.2.2.14) Partners and stakeholders considered

*Select all that apply*

- |  |  |
|--|--|
| <input checked="" type="checkbox"/> Customers  | <input checked="" type="checkbox"/> Local communities                |
| <input checked="" type="checkbox"/> Employees  | <input checked="" type="checkbox"/> Water utilities at a local level |
| <input checked="" type="checkbox"/> Investors  |  |
| <input checked="" type="checkbox"/> Suppliers  |  |
| <input checked="" type="checkbox"/> Regulators |  |

### (2.2.2.15) Has this process changed since the previous reporting year?

*Select from:*

- ☒ Yes

### (2.2.2.16) Further details of process

*Dependencies, impacts, risks and opportunities are evaluated as a part of Vistra's overall management strategy, and this is managed through a combination of biennial impact assessments via partnership with a third party consultancy, Environmental and Enterprise Risk Management functions, and annual reviews with the Sustainability and Risk Committee of the Vistra Board of Directors. Vistra utilizes climate scenario planning as a tool to aid our strategy development process. We*

partner with Business for Social Responsibility (BSR) to explore the strategic implications for Vistra under three climate scenarios through 2050. The scenario analysis process involved multiple steps, and is completed biennially. As a part of the assessment, BSR and Vistra select three climate scenarios, a 1.5°C scenario, 2.0°C scenario and greater than 2.0°C scenario, to provide the base narrative for our climate analysis. Selected climate scenarios are informed by industry best practices and, in part, by our environmental dependencies and impacts to provide the base narratives for Vistra's climate scenario analysis. To identify climate-related risks and opportunities (including those related to water), interviews are conducted across seven diverse functional areas to analyze business impacts of the three scenarios and identify climate-related risks (both transition and physical) and opportunities for Vistra. A cross-functional workshop with internal Vistra stakeholders is then held to validate the risk and opportunity assessment and identify ideas to enhance Vistra's resilience and refine its strategy around risks common across the three scenarios for all assets driving material impact to our business. As a result of this effort, Vistra has five strategic focus areas that may involve climate (and water) related risks and opportunities across all scenarios: 1. Physical impacts to assets; 2. Transition impacts on existing assets; 3. Government regulation; 4. Supply chain; 5. Workforce and Reputation. Analysis results are reviewed by Vistra's ERM function, management team, and board of directors and are used to inform Vistra's strategy and risk management processes. While there are a multitude of climate scenarios available, Vistra and BSR leveraged three climate scenarios developed by the Network for Greening the Financial System (NGFS): Net Zero 2050, Delayed Transition, and Current Policies. The impacts of these scenarios were grouped into three timeframes: Short Term (0-5 years), Medium Term (6-10 years) and Long Term (10+ years). All these scenarios have a 2050 horizon year but are differentiated by various assumptions. Additional details for this effort are described in our biennial climate report. Additionally, our water risk at the site level is evaluated using the WRI Water risk atlas, using geolocation information of our facilities. This assessment is conducted with our EHS group to identify which generation assets might be operating in areas of increased water stress. Each generation facility is responsible for oversight of water related risks and impacts, with site-specific water management plans in place at each asset.

[Add row]

## **(2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?**

### **(2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed**

Select from:

☒ Yes

### **(2.2.7.2) Description of how interconnections are assessed**

Interconnections between environmental dependencies, impacts, risks and opportunities are assessed in multiple ways, including: a) our Materiality Assessment to determine significance of a potential impact from the stakeholder perspective, b) the ongoing work of our Enterprise Risk Management team, who assess comprehensive enterprise risk for the organization, c) ongoing due-diligence work from our asset environmental teams and d) our biennial climate impact assessment. All four methodologies provide different perspective on various dependencies, impacts, risks and opportunities (both environmental and otherwise), and together assist our management team in forming a comprehensive view of our overall environmental risk profile and appropriate interconnections between dependencies, impacts, risks, and opportunities. Ultimately, this work culminates in our TCFD-aligned climate report, which provides an overall framework for consideration and presentation of these environmental factors.

[Fixed row]

## (2.3) Have you identified priority locations across your value chain?

### (2.3.1) Identification of priority locations

Select from:

☒ No, but we plan to within the next two years

### (2.3.7) Primary reason for not identifying priority locations

Select from:

☒ No standardized procedure

### (2.3.8) Explain why you do not identify priority locations

*Vistra Enterprise Risk Management (ERM) function and biennial climate impact assessment identify broad impacts, risks, and opportunities for the enterprise and fleet as a whole, with applicable risks recognized at the generation asset level. This enterprise level process helps Vistra management strategize how to best approach anticipated risk for the benefit of our fleet, employees, and adjacent communities, however does not yet prioritize assets based on risk level.*

[Fixed row]

## (2.4) How does your organization define substantive effects on your organization?

### Risks

### (2.4.1) Type of definition

Select all that apply

☒ Quantitative

### (2.4.2) Indicator used to define substantive effect

Select from:

☒ EBITDA

### (2.4.3) Change to indicator

Select from:

☒ % decrease

#### (2.4.4) % change to indicator

Select from:

☒ 1-10

#### (2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

#### (2.4.7) Application of definition

*Vistra's Enterprise Risk Management Team leads our risk assessment process annually (which is also informed with climate related factors from our biennial third party climate impact assessment) to consider all inherent risk exposures and any residual risk exposure once mitigations are considered. All risks are evaluated for climate aspects. Through this assessment process, Vistra's Enterprise Risk Management Team collaborates with company leadership to assess the likelihood, severity, inherent, and residual risks to form an overall annual enterprise risk assessment. Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Quantitative factors include our expected future EBITDA and free cash flow (FCF). In assessing the metrics that contribute the a substantive effect (risk or opportunity) on EBITDA, a matrix approach is used internally to classify metric (Frequency, Time Horizon, Likelihood) and the resulting severity as Low, Medium, High, or Very High, with each qualifier assigned a relative financial impact metric.*

### Opportunities

#### (2.4.1) Type of definition

Select all that apply

☒ Quantitative

#### (2.4.2) Indicator used to define substantive effect

Select from:

☒ EBITDA

### (2.4.3) Change to indicator

Select from:

☒ % increase

### (2.4.4) % change to indicator

Select from:

☒ 1-10

### (2.4.6) Metrics considered in definition

Select all that apply

☒ Frequency of effect occurring

☒ Time horizon over which the effect occurs

☒ Likelihood of effect occurring

### (2.4.7) Application of definition

*Vistra's Enterprise Risk Management Team leads our risk assessment process annually (which is also informed with climate related factors from our biennial third party climate impact assessment) to consider all inherent risk exposures and any residual risk exposure once mitigations are considered. All risks are evaluated for climate aspects. Through this assessment process, Vistra's Enterprise Risk Management Team collaborates with company leadership to assess the likelihood, severity, inherent, and residual risks to form an overall annual enterprise risk assessment. Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Quantitative factors include our expected future EBITDA and free cash flow (FCF). In assessing the metrics that contribute the a substantive effect (risk or opportunity) on EBITDA, a matrix approach is used internally to classify metric (Frequency, Time Horizon, Likelihood) and the resulting severity as Low, Medium, High, or Very High, with each qualifier assigned a relative financial impact metric*

## Risks

### (2.4.1) Type of definition

Select all that apply

☒ Qualitative

## (2.4.6) Metrics considered in definition

Select all that apply

- ☒ Frequency of effect occurring
- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring

## (2.4.7) Application of definition

*Vistra's Enterprise Risk Management Team leads our risk assessment process annually (which is also informed with climate related factors from our biennial third party climate impact assessment) to consider all inherent risk exposures and any residual risk exposure once mitigations are considered. All risks are evaluated for climate aspects. Through this assessment process, Vistra's Enterprise Risk Management Team collaborates with company leadership to assess the likelihood, severity, inherent, and residual risks to form an overall annual enterprise risk assessment. Enterprise value is impacted by quantitative and qualitative factors. Qualitative factors include corporate reputation, progress towards ESG goals, safety, and overall value to stakeholders. Climate-related risks would impact both quantitative and qualitative factors. A matrix approach is used internally to classify metric (Frequency, Time Horizon, Likelihood) and the resulting severity as Low, Medium, High, or Very High.*

## Opportunities

## (2.4.1) Type of definition

Select all that apply

- ☒ Qualitative

## (2.4.6) Metrics considered in definition

Select all that apply

- ☒ Frequency of effect occurring
- ☒ Time horizon over which the effect occurs
- ☒ Likelihood of effect occurring

## (2.4.7) Application of definition

*Vistra's Enterprise Risk Management Team leads our risk assessment process annually (which is also informed with climate related factors from our biennial third party climate impact assessment) to consider all inherent risk exposures and any residual risk exposure once mitigations are considered. All risks are evaluated for*

climate aspects. Through this assessment process, Vistra's Enterprise Risk Management Team collaborates with company leadership to assess the likelihood, severity, inherent, and residual risks to form an overall annual enterprise risk assessment. Enterprise value is impacted by quantitative and qualitative factors. Qualitative factors include corporate reputation, progress towards ESG goals, safety, and overall value to stakeholders. Climate-related risks would impact both quantitative and qualitative factors. A matrix approach is used internally to classify metric (Frequency, Time Horizon, Likelihood) and the resulting severity as Low, Medium, High, or Very High.

[Add row]

## **(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?**

### **(2.5.1) Identification and classification of potential water pollutants**

Select from:

☒ Yes, we identify and classify our potential water pollutants

### **(2.5.2) How potential water pollutants are identified and classified**

Water use is vital for the management of our generation assets, and potential water pollutants are identified and managed at each of our facilities which individually manage daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations. Discharge volumes quality are driven by National Pollutant Discharge Elimination System (NPDES) permits, as required under the United States Clean Water Act. The NPDES permit systems our facilities operate under will govern the limits on what can be discharged, set monitoring and reporting requirements, and set additional provisions to ensure discharged pollutants pose no harm to water quality or community health.

[Fixed row]

## **(2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.**

Row 1

### **(2.5.1.1) Water pollutant category**

Select from:

- ☒ Other physical pollutants

#### (2.5.1.2) Description of water pollutant and potential impacts

*Suspended and Dissolved Solids with potential impacts to discharging water body. All discharges are managed under NPDES permits.*

#### (2.5.1.3) Value chain stage

*Select all that apply*

- ☒ Direct operations

#### (2.5.1.4) Actions and procedures to minimize adverse impacts

*Select all that apply*

- ☒ Water recycling
- ☒ Beyond compliance with regulatory requirements
- ☒ Implementation of integrated solid waste management systems
- ☒ Requirement for suppliers to comply with regulatory requirements
- ☒ Industrial and chemical accidents prevention, preparedness, and response
- ☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements
- ☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

#### (2.5.1.5) Please explain

*Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Where appropriate for the region and generation asset, reservoirs were built to capture water when it is plentiful, allowing it to be reused. Management of discharge, effluents, and spills is also an important part of our water management strategy. Discharge amounts are driven by our permitting requirements, done mainly through National Pollutant Discharge Elimination System (NPDES) permits. Any spills or permit exceedances are documented in Vistra's central database with applicable reporting initiated to local, state, and federal entities as required by law.*

### Row 2

#### (2.5.1.1) Water pollutant category

Select from:

☒ Inorganic pollutants

### (2.5.1.2) Description of water pollutant and potential impacts

*Various metals and inorganic compounds with potential impacts to discharging water body. All discharges are managed under NPDES permits.*

### (2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Water recycling

☒ Beyond compliance with regulatory requirements

☒ Implementation of integrated solid waste management systems

☒ Requirement for suppliers to comply with regulatory requirements

☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

### (2.5.1.5) Please explain

*Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Where appropriate for the region and generation asset, reservoirs were built to capture water when it is plentiful, allowing it to be reused. Management of discharge, effluents, and spills is also an important part of our water management strategy. Discharge amounts are driven by our permitting requirements, done mainly through National Pollutant Discharge Elimination System (NPDES) permits. Any spills or permit exceedances are documented in Vistra's central database with applicable reporting initiated to local, state, and federal entities as required by law.*

## Row 3

### (2.5.1.1) Water pollutant category

Select from:

☒ Oil

### (2.5.1.2) Description of water pollutant and potential impacts

*Oil and grease with potential impacts to discharging water body. All discharges are managed under NPDES permits.*

### (2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Water recycling

☒ Beyond compliance with regulatory requirements

☒ Implementation of integrated solid waste management systems

☒ Requirement for suppliers to comply with regulatory requirements

☒ Discharge treatment using sector-specific processes to ensure compliance with regulatory requirements

☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

### (2.5.1.5) Please explain

*Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Where appropriate for the region and generation asset, reservoirs were built to capture water when it is plentiful, allowing it to be reused. Management of discharge, effluents, and spills is also an important part of our water management strategy. Discharge amounts are driven by our permitting requirements, done mainly through National Pollutant Discharge Elimination System (NPDES) permits. Any spills or permit exceedances are documented in Vistra's central database with applicable reporting initiated to local, state, and federal entities as required by law.*

*[Add row]*

## C3. Disclosure of risks and opportunities

**(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?**

### Climate change

#### (3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

### Water

#### (3.1.1) Environmental risks identified

Select from:

☒ Yes, only within our direct operations

#### (3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

#### (3.1.3) Please explain

*We currently lack the internal resources to evaluate the substantive impact of water in our upstream/downstream value chain, however water is has a substantive impact on our direct operations and is thoroughly evaluated for our assets. Water is an essential resource at our generation facilities, and conservation of water at our facilities is a high priority particularly in geographic areas of operation considered "high stress" or "extremely high stress" per Vistra's evaluation of risk using the WRI Water Risk Atlas. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Where appropriate for the*

region and generation asset, reservoirs were built to capture water when it is plentiful, allowing it to be reused. Although Vistra's assets utilize significant amounts of water, most of our sites return the water to onsite reservoirs, allowing this valuable resource to be recycled repeatedly. Vistra also finds ways to recycle water between systems to reduce usage and reclaim other types of wastewaters, when feasible. From 2021 to 2024, Vistra's operational assets consumed on average 1.6% of withdrawn water.

## Plastics

### (3.1.1) Environmental risks identified

Select from:

☒ No

### (3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Not an immediate strategic priority

### (3.1.3) Please explain

Vistra has conducted a materiality assessment and participates in biennial climate impact assessments - in both exercises plastic is not identified as a material issue for our company operations.

[Fixed row]

**(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.**

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk1

### (3.1.1.3) Risk types and primary environmental risk driver

Policy

- ☒ Changes to regulation of existing products and services

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

- ☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

- ☒ United States of America

### (3.1.1.9) Organization-specific description of risk

*Over the last several years, the U.S. Congress has considered and debated several proposals intended to address climate change using different approaches, including a cap on carbon emissions with emitters allowed to trade unused emission allowances (cap-and-trade), a tax on carbon or GHG emissions, incentives for the development of low-carbon technology and federal renewable portfolio standards. In addition, several states have enacted or are considering the enactment of legislation and/or regulations in support of zero carbon emissions electric generation resources and/or the reduction of such emissions. We could be materially and adversely affected if new federal and/or state legislation or regulations are adopted to address global climate change that could require efforts that exceed or are more expensive than our currently planned initiatives or if we are subject to lawsuits for alleged damage to persons or property resulting from GHG emissions. The Company's plan to transition to clean power generation sources and reduce its GHG emissions may not be completed in this timeframe, and we may not otherwise achieve our sustainability and emissions reduction targets as expected. Accordingly, we may be required to accelerate or change our targets, incur additional expenses, and/or adjust or cease certain operations as a result of newly implemented federal and/or state regulations to reduce future carbon emissions.*

### (3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Long-term

#### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

#### (3.1.1.14) Magnitude

Select from:

☒ Medium

#### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business.*

#### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

#### (3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

0

#### (3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

5000000000

#### (3.1.1.25) Explanation of financial effect figure

*Estimated range on the impact to Vistra's enterprise value if there was implementation of federal and/or state regulations that would result in an acceleration of emission reduction targets, causing earlier than expected retirements of Vistra's remaining fossil-fueled assets.*

#### **(3.1.1.26) Primary response to risk**

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

#### **(3.1.1.27) Cost of response to risk**

1500000000

#### **(3.1.1.28) Explanation of cost calculation**

*Represents a 500M investment over 3 years as an example investment to continue to build out low to no carbon generation resources*

#### **(3.1.1.29) Description of response**

*As of late 2024, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at \$500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Continued expansion and fortification of our Vistra Zero portfolio (most recently with the 2024 completion of the acquisition of Energy Harbor) continue to increase our zero-carbon capacity while further reducing our risk.*

### **Water**

#### **(3.1.1.1) Risk identifier**

Select from:

☒ Risk7

#### **(3.1.1.3) Risk types and primary environmental risk driver**

Chronic physical

☒ Water stress

#### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

#### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

#### (3.1.1.7) River basin where the risk occurs

Select all that apply

☒ Other, please specify :Major Basin: Gulf Coast (For more information on water stressed sites please see section 9)

#### (3.1.1.9) Organization-specific description of risk

*Water is essential for producing electricity from thermal generation. Vistra understands that water is a limited, expensive, and shared resource that is essential to life. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered “high stress” or “extremely high stress.” Water is necessary for cooling at our thermal generation plants and in these water stressed areas a subset of our plants operate in if water is not available that could restrict the generation of our facilities.*

#### (3.1.1.11) Primary financial effect of the risk

Select from:

☒ Decreased revenues due to reduced production capacity

#### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

### (3.1.1.14) Magnitude

Select from:

☒ Medium

### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful.*

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

### (3.1.1.26) Primary response to risk

Policies and plans

☒ Other policies or plans, please specify :Enterprise-wide risk assessments and site-specific environmental impact assessments.

### (3.1.1.27) Cost of response to risk

0

### (3.1.1.28) Explanation of cost calculation

*Cost of risk response cannot be reliably calculated.*

### (3.1.1.29) Description of response

Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Where appropriate for the region and generation asset, reservoirs were built to capture water when it is plentiful, allowing it to be reused. Although Vistra's assets utilize significant amounts of water, most of our sites return the water to onsite reservoirs, allowing this valuable resource to be recycled repeatedly. Vistra also finds ways to recycle water between systems to reduce usage and reclaim other types of wastewaters, when feasible. From 2021 to 2024, Vistra's operational assets consumed on average 1.6% of withdrawn water. This historical performance has achieved an overall target of maintaining a rate of water consumption of 2% or less across our generation assets.

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk2

### (3.1.1.3) Risk types and primary environmental risk driver

Reputation

☒ Stigmatization of sector

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

### (3.1.1.9) Organization-specific description of risk

GHG emissions from the combustion of fossil fuels, primarily from our coal/lignite-fueled generation plants, represent the substantial majority of Vistra's total GHG emissions. CO<sub>2</sub>, methane, and nitrous oxide are emitted in this combustion process, with CO<sub>2</sub> representing the largest portion of these GHG emissions. Depending on individual stakeholders' level of acceptance of the utility/power generation sector and/or Vistra's own GHG emission levels and abatement strategy, our reputation

could be harmed and thereby impair or limit our access to new capital or impair our ability to procure sufficient insurance coverage for our fossil assets. Further, Vistra's carbon abatement strategy depends on supportive policies and new technologies. If supportive policies are not implemented and/or the pace of innovation is too slow causing a hindrance to or the unsuccessful achievement of our long-term emission reduction goals and portfolio transformation, increased damage to our reputation could occur and in turn impact our access to capital and/or increase our cost of capital. Insufficient access to new capital or an inability to procure adequate insurance coverage for the fossil assets in our wholesale business, including as a result of sustainability positions taken by investors or insurance companies, may threaten the company's capacity to grow, execute its strategies, and generate future financial returns.

#### **(3.1.1.11) Primary financial effect of the risk**

Select from:

☒ Decreased access to capital

#### **(3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization**

Select all that apply

☒ Long-term

#### **(3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon**

Select from:

☒ About as likely as not

#### **(3.1.1.14) Magnitude**

Select from:

☒ Medium

#### **(3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons**

The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business.

#### **(3.1.1.17) Are you able to quantify the financial effect of the risk?**

Select from:

☒ Yes

### (3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

0

### (3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

5000000000

### (3.1.1.25) Explanation of financial effect figure

*Estimate of impact to Vistra's enterprise value resulting from an insufficient access to insurance coverage or capital for the fossil assets in our wholesale business, including any premium required for capital availability, due to reputational harm.*

### (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

### (3.1.1.27) Cost of response to risk

1500000000

### (3.1.1.28) Explanation of cost calculation

*Represents a 500M investment over 3 years as an example investment to continue to build out low to no carbon generation resources.*

### (3.1.1.29) Description of response

*As of late 2024, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at \$500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they*

retire or reduce their output. Continued expansion and fortification of our Vistra Zero portfolio (most recently with the 2024 completion of the acquisition of Energy Harbor) continue to increase our zero-carbon capacity while further reducing our risk.

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk3

### (3.1.1.3) Risk types and primary environmental risk driver

Reputation

☒ Increased partner and stakeholder concern or negative partner and stakeholder feedback

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

### (3.1.1.9) Organization-specific description of risk

*Vistra is actively transitioning its generation fleet toward low-to-no carbon-intensive sources while supporting its customers and communities and prioritizing a Just Transition. However, this transformation will take time and the various steps the company may take to support all of its stakeholders may not be sufficient to fully address market sentiment on this issue. Some investors perceive risks to the long-term viability of Vistra's wholesale business, specifically its fossil generation assets, as the United States electric grid transitions away from fossil fuel generation toward renewable resources. With this perceived risk, some investors ascribe a low terminal value to Vistra's wholesale business, which in turn reduces the overall estimated value for the company. While Vistra management has a very different view of the long-term viability of its business and operations, including its opportunity to invest in the renewable transition, if financial market participants maintain this bearish view, Vistra will not be able to realize the fundamental value of its impressive cash generation.*

### (3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Decreased access to capital

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ About as likely as not

### (3.1.1.14) Magnitude

Select from:

- ☒ Medium

### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business.*

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

- ☒ Yes

### (3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

0

### (3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

3000000000

### (3.1.1.25) Explanation of financial effect figure

*Vistra's research suggests that sustainability-focused utilities earn as much as 2x or more enterprise value/EBITDA premium as compared to non-sustainability-focused utilities. Management believes Vistra is already facing this stakeholder concern and believes Vistra's enterprise value currently reflects a valuation discount in the range of 0 to approximately 6.5 billion (2X or more of adjusted EBITDA). If management is unsuccessful in addressing this concern in the minds of stakeholders, the company may not be able to realize this higher enterprise valuation.*

### (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

### (3.1.1.27) Cost of response to risk

1500000000

### (3.1.1.28) Explanation of cost calculation

*Represents a 500M investment over 3 years as an example investment to continue to build out low to no carbon generation resources.*

### (3.1.1.29) Description of response

*As of late 2024, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at \$500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Continued expansion and fortification of our Vistra Zero portfolio (most recently with the 2024 completion of the acquisition of Energy Harbor) continue to increase our zero-carbon capacity while further reducing our risk.*

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk4

### (3.1.1.3) Risk types and primary environmental risk driver

Technology

☒ Transition to lower emissions technology and products

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

### (3.1.1.9) Organization-specific description of risk

*Carbon sequestration, hydrogen, and the advancement of low-to-no carbon technologies are needed to achieve net-zero carbon emissions in the utility and power generation sector. Technological advances have improved, and are likely to continue to improve, for existing and alternative methods to produce and store power, including gas turbines, wind turbines, fuel cells, hydrogen, microturbines, photovoltaic cells, batteries, and concentrated solar thermal devices, along with improvements in traditional technologies. Moreover, such technological advances have reduced, and are expected to continue to reduce, the costs of power production or storage, which may result in the obsolescence of certain of our operating assets. Consequently, the value of our more traditional generation assets could be significantly reduced because of these technological advances, which could have a material adverse effect on us and our future success will depend, in part, on our ability to anticipate and successfully adapt to technological changes, to offer services and products that meet customer demands and evolving industry standards. Additionally, increased governmental and consumer focus on energy sustainability efforts, including desire for, or incentives related to, the development, implementation, and usage of low-carbon technology, may result in decreased demand for the traditional generation technologies that we currently own and operate.*

### (3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

#### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Long-term

#### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ Unlikely

#### (3.1.1.14) Magnitude

Select from:

- ☒ Medium

#### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business.*

#### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

- ☒ Yes

#### (3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

0

#### (3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

1000000000

### (3.1.1.25) Explanation of financial effect figure

*Estimated range on the impact to Vistra's enterprise value if new technologies accelerate at a faster pace than we currently expect or have the opportunity to respond, causing earlier than expected retirements of Vistra's remaining fossil-fueled assets.*

### (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

### (3.1.1.27) Cost of response to risk

1500000000

### (3.1.1.28) Explanation of cost calculation

*Represents a 500M investment over 3 years as an example investment to continue to build out low to no carbon generation resources.*

### (3.1.1.29) Description of response

*As of late 2024, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at \$500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Continued expansion and fortification of our Vistra Zero portfolio (most recently with the 2024 completion of the acquisition of Energy Harbor) continue to increase our zero-carbon capacity while further reducing our risk.*

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk5

### (3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Other acute physical risk, please specify :Increase in extreme heat waves and cold waves

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

### (3.1.1.9) Organization-specific description of risk

*Vistra's generation facilities could be subject to extreme weather conditions, including natural disasters and sustained extreme cold or hot temperatures, which could stress our generation facilities and grid reliability, limit our ability to procure adequate fuel supply, or result in outages, damage, or destroy our assets and result in casualty losses that are not ultimately offset by insurance proceeds and could require increased capital expenditures or maintenance costs, including supply chain costs. Moreover, an extreme weather event could disrupt service to customers due to grid outages, downed wires and poles, or damage to other operating equipment, which could result in us foregoing sales of electricity and lost revenue. Extreme weather can also result in (i) unexpected increases in customer load, requiring our retail operation to procure power at wholesale prices above customer sales prices for electricity, (ii) the failure of equipment at our generation facilities, (iii) a decrease in the availability of, or increases in the cost of, fuel sources, including natural gas, diesel and coal, or (iv) unpredictable curtailment of customer load by the applicable ISO/RTO to maintain grid reliability, resulting in the realization of lower wholesale prices or retail customer sales. Climate change may produce changes in weather or other environmental conditions, including temperature or precipitation levels, which may impact consumer demand for electricity.*

### (3.1.1.11) Primary financial effect of the risk

Select from:

☒ Increased direct costs

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

### (3.1.1.14) Magnitude

Select from:

☒ Medium

### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business..*

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

### (3.1.1.19) Anticipated financial effect figure in the short-term – minimum (currency)

0

### (3.1.1.20) Anticipated financial effect figure in the short-term – maximum (currency)

1000000000

### (3.1.1.25) Explanation of financial effect figure

*Estimated range on the impact to Vistra's enterprise value if a physical weather event were to cause reliability issues, limit ability to procure fuel supply, result in outages at our facilities, and/or require us to procure power at higher prices. Vistra experienced an extreme weather event in Texas, Winter Storm Uri, in February of 2021. Vistra is taking risk mitigation efforts to ensure an extreme weather like Uri will not have as big of a financial impact in the future. Additionally, certain markets are developing mechanisms to ensure higher reliability standards.*

### **(3.1.1.26) Primary response to risk**

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

### **(3.1.1.27) Cost of response to risk**

50000000

### **(3.1.1.28) Explanation of cost calculation**

*Estimated range on the impact to Vistra's enterprise value if a physical weather event were to cause reliability issues, limit ability to procure fuel supply, result in outages at our facilities, and/or require us to procure power at higher prices. Vistra experienced an extreme weather event in Texas, Winter Storm Uri, in February of 2021. Vistra is taking risk mitigation efforts to ensure an extreme weather like Uri will not have as big of a financial impact in the future.*

### **(3.1.1.29) Description of response**

*After the events of Winter Storm Uri in 2021, Vistra evaluated its operations and is taking measures to improve its risk profile including: further winterization of its generation fleet, contracting for incremental gas storage, and adding dual fuel capabilities at its steam units, in addition to carrying incremental unhedged generation length into peak periods.*

## **Climate change**

### **(3.1.1.1) Risk identifier**

Select from:

☒ Risk6

### **(3.1.1.3) Risk types and primary environmental risk driver**

Policy

☒ Carbon pricing mechanisms

#### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

#### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

#### (3.1.1.9) Organization-specific description of risk

*Regulatory policy and legislation that is implemented at the national, regional, and state levels can directly impact Vistra's long-term strategy. As such, Vistra takes an active role in the development of potential or proposed legislation and regulation, advocating for appropriate action in response to climate change. The need to compensate fossil-fueled resources appropriately to act as a reliable transition resource as the grid moves to more renewables is imperative to the overall transition of the grid. If energy market structures do not evolve, as federal and/or state clean energy standards are established, to compensate resources appropriately or if market reform does not occur rapidly enough, the asset life of some of our assets could shorten in the long term. In this circumstance, our existing fossil-fueled resources that we consider to be longer-term in our portfolio could earn lower revenues than we currently expect.*

#### (3.1.1.11) Primary financial effect of the risk

Select from:

☒ Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

#### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Long-term

#### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ Unlikely

#### (3.1.1.14) Magnitude

Select from:

☒ Medium

#### (3.1.1.16) Anticipated effect of the risk on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*The effect has not been quantified financially since the level of measurement uncertainty is too high, rendering quantitative information about this risk not useful. Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We do not see an impact to our zero-carbon assets or retail business.*

#### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ Yes

#### (3.1.1.23) Anticipated financial effect figure in the long-term – minimum (currency)

0

#### (3.1.1.24) Anticipated financial effect figure in the long-term – maximum (currency)

1000000000

#### (3.1.1.25) Explanation of financial effect figure

*Estimated range on the impact to Vistra's enterprise value if policies and market structures are not established to compensate resources appropriately for reliability, causing earlier than expected retirements of Vistra's remaining fossil-fueled assets.*

#### (3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☒ Increase environment-related capital expenditure

### (3.1.1.27) Cost of response to risk

1500000000

### (3.1.1.28) Explanation of cost calculation

*Represents a 500M investment over 3 years as an example investment to continue to build out low to no carbon generation resources.*

### (3.1.1.29) Description of response

*As of late 2024, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at \$500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Continued expansion and fortification of our Vistra Zero portfolio (most recently with the 2024 completion of the acquisition of Energy Harbor) continue to increase our zero-carbon capacity while further reducing our risk.*

[Add row]

**(3.1.2) Provide the amount and proportion of your financial metrics from the reporting year that are vulnerable to the substantive effects of environmental risks.**

**Climate change**

### (3.1.2.1) Financial metric

Select from:

☒ Other, please specify :EBITDA

### (3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

5500000000

### (3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ 21-30%

### (3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

5500000000

### (3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ 21-30%

### (3.1.2.7) Explanation of financial figures

*Vistra faces transitional risks primarily on our fossil-fueled generational assets if policy or legislative changes make it economically challenging to operate those assets. Vistra faces physical risks on all of our generational assets with varying degrees of risk based on their location and technology type.*

## Water

### (3.1.2.1) Financial metric

Select from:

☒ Other, please specify :Not Currently Available

### (3.1.2.2) Amount of financial metric vulnerable to transition risks for this environmental issue (unit currency as selected in 1.2)

0

### (3.1.2.3) % of total financial metric vulnerable to transition risks for this environmental issue

Select from:

☒ Less than 1%

#### (3.1.2.4) Amount of financial metric vulnerable to physical risks for this environmental issue (unit currency as selected in 1.2)

0

#### (3.1.2.5) % of total financial metric vulnerable to physical risks for this environmental issue

Select from:

☒ Less than 1%

#### (3.1.2.7) Explanation of financial figures

*This level of financial quantification specific to water risk is not currently available. However, this could be broadly incorporated under the financial risk figured shared above for Climate Change.*

[Add row]

**(3.2) Within each river basin, how many facilities are exposed to substantive effects of water-related risks, and what percentage of your total number of facilities does this represent?**

#### Row 1

##### (3.2.1) Country/Area & River basin

United States of America

☒ St. Lawrence

##### (3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

### (3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

### (3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

### (3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:

☒ Less than 1%

### (3.2.10) % organization's total global revenue that could be affected

Select from:

☒ Less than 1%

### (3.2.11) Please explain

*Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered "high stress" or "extremely high stress." Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk Atlas. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality.*

## Row 2

### (3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin: Rio Grande - Bravo

### (3.2.2) Value chain stages where facilities at risk have been identified in this river basin

Select all that apply

☒ Direct operations

### (3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

### (3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

Select from:

☒ 1-25%

### (3.2.8) % organization's annual electricity generation that could be affected by these facilities

Select from:

☒ Less than 1%

### (3.2.10) % organization's total global revenue that could be affected

Select from:

☒ Less than 1%

### (3.2.11) Please explain

*Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered "high stress" or "extremely high stress." Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk Atlas. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality.*

**Row 3**

### (3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin: Gulf Coast

### (3.2.2) Value chain stages where facilities at risk have been identified in this river basin

*Select all that apply*

☒ Direct operations

### (3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

8

### (3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

*Select from:*

☒ 1-25%

### (3.2.8) % organization's annual electricity generation that could be affected by these facilities

*Select from:*

☒ 1-25%

### (3.2.10) % organization's total global revenue that could be affected

*Select from:*

☒ 1-10%

### (3.2.11) Please explain

*Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered "high stress" or "extremely high stress." Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk*

*Atlas. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality.*

## Row 4

### (3.2.1) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin: North Atlantic Coast

### (3.2.2) Value chain stages where facilities at risk have been identified in this river basin

*Select all that apply*

☒ Direct operations

### (3.2.3) Number of facilities within direct operations exposed to water-related risk in this river basin

1

### (3.2.4) % of your organization's total facilities within direct operations exposed to water-related risk in this river basin

*Select from:*

☒ 1-25%

### (3.2.8) % organization's annual electricity generation that could be affected by these facilities

*Select from:*

☒ Less than 1%

### (3.2.10) % organization's total global revenue that could be affected

*Select from:*

☒ Less than 1%

### (3.2.11) Please explain

*Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered “high stress” or “extremely high stress.” Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk Atlas. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality.*

*[Add row]*

### (3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

#### (3.3.1) Water-related regulatory violations

Select from:

☒ Yes

#### (3.3.2) Fines, enforcement orders, and/or other penalties

Select all that apply

☒ Enforcement orders or other penalties but none that are considered as significant

#### (3.3.3) Comment

*In 2024, Vistra assets experienced 11 instances of non-compliance, resulting in 8 formal enforcement actions. There were no material fines associated with these issues. Vistra’s environmental, legal, and regulatory teams coordinate efforts to ensure that Vistra adheres to and responds to all federal and state environmental regulations.*

*[Fixed row]*

### (3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☒ Yes

**(3.5.1) Select the carbon pricing regulation(s) which impact your operations.**

Select all that apply

☒ California CaT - ETS

☒ Massachusetts state ETS

☒ RGGI - ETS

**(3.5.2) Provide details of each Emissions Trading Scheme (ETS) your organization is regulated by.**

**California CaT - ETS**

**(3.5.2.1) % of Scope 1 emissions covered by the ETS**

2

**(3.5.2.2) % of Scope 2 emissions covered by the ETS**

0

**(3.5.2.3) Period start date**

01/01/2024

**(3.5.2.4) Period end date**

12/31/2024

**(3.5.2.5) Allowances allocated**

7247833

**(3.5.2.6) Allowances purchased**

0

#### (3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

1496131

#### (3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

#### (3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

#### (3.5.2.10) Comment

*Includes facilities owned and operated by Vistra under this program.*

### Massachusetts state ETS

#### (3.5.2.1) % of Scope 1 emissions covered by the ETS

1

#### (3.5.2.2) % of Scope 2 emissions covered by the ETS

0

#### (3.5.2.3) Period start date

01/01/2024

#### (3.5.2.4) Period end date

12/31/2024

#### (3.5.2.5) Allowances allocated

3045740

#### (3.5.2.6) Allowances purchased

0

#### (3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

1019946

#### (3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

#### (3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

#### (3.5.2.10) Comment

*Includes facilities owned and operated by Vistra under this program.*

### RGGI - ETS

#### (3.5.2.1) % of Scope 1 emissions covered by the ETS

12

#### (3.5.2.2) % of Scope 2 emissions covered by the ETS

0

#### (3.5.2.3) Period start date

01/01/2024

(3.5.2.4) Period end date

12/31/2024

(3.5.2.5) Allowances allocated

38227000

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

10416707

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.10) Comment

Includes facilities owned and operated by Vistra under this program.  
[Fixed row]

(3.5.4) What is your strategy for complying with the systems you are regulated by or anticipate being regulated by?

Vistra’s Environmental, Legal, and Regulatory teams coordinate efforts to ensure that Vistra is adhering and responding to all federal and state environmental regulations. For our operational assets that are covered by cap and trade systems, this includes seeking operational efficiencies to manage our carbon emissions at

facilities while also be active participants in carbon allowance auctions in the regulatory regions we are subject to. Our team is dedicated to doing business the right way, and that includes complying with regulatory requirements associated with carbon cap and trade programs that are facilities are subjected to. Specifically regarding carbon pricing regulation, Vistra advocates for and believes a national, economy-wide carbon fee and dividend approach with a border carbon adjustment is 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. At a regional level, Vistra believes market-based solutions such as RGGI are the appropriate way to incentivize investments in lower emitting technologies as opposed to policies that subsidize specific resources.

**(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?**

## Climate change

### (3.6.1) Environmental opportunities identified

Select from:

☒ Yes, we have identified opportunities, and some/all are being realized

## Water

### (3.6.1) Environmental opportunities identified

Select from:

☒ No

### (3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities

Select from:

☒ Not an immediate strategic priority

### (3.6.3) Please explain

Water is essential for producing electricity from thermal generation. Vistra understands that water is a limited, expensive, and shared resource that is essential to life. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered “high stress” or “extremely high stress.” Our team is focused on ensuring continuous, responsible access to water for asset cooling purposes while mitigating the risks posed by our operations (namely discharge impacts).

[Fixed row]

**(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.**

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

☒ Opp1

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Shift in consumer preferences

### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Downstream value chain

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ United States of America

### (3.6.1.8) Organization specific description

*Vistra Retail currently offers more than 50 electricity plans that incorporate renewable energy into the product offer. These products are offered to customers through Vistra's many retail brands leveraging various marketing channels across the U.S. These brands offer renewable energy, carbon offset, and energy management products that help consumers reduce their carbon footprint. Retail customers make decisions on which retail electricity product to buy based on a variety of factors including price, customer service, brand, product choices that meet their needs, bundles, or value-added features. If consumers in the markets where Vistra sells its*

*retail electricity products continue to prioritize renewable energy in their product selection, Vistra, with its diverse portfolio of product offerings appealing to the renewable-conscious customer, will continue to have the opportunity to expand its customer base with these product offerings*

### **(3.6.1.9) Primary financial effect of the opportunity**

*Select from:*

☒ Increased revenues resulting from increased demand for products and services

### **(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization**

*Select all that apply*

☒ Medium-term

### **(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon**

*Select from:*

☒ Likely (66–100%)

### **(3.6.1.12) Magnitude**

*Select from:*

☒ Low

### **(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons**

*Favorable cash flow and EBITDA impact over the expected horizon.*

### **(3.6.1.15) Are you able to quantify the financial effects of the opportunity?**

*Select from:*

☒ Yes

### **(3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)**

### (3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

30000000

### (3.6.1.23) Explanation of financial effect figures

*If Vistra is able to grow its customer count by 0-5% through its renewable retail product offerings, this could translate into an annual adjusted EBITDA uplift in the range of 0 to 30,000,000. The financial impact will depend on the popularity and uptake of each product offered.*

### (3.6.1.24) Cost to realize opportunity

2000000

### (3.6.1.25) Explanation of cost calculation

*The cost to realize the opportunity is the additional cost to serve these products (i.e., IT enhancements, billing, etc.). Vistra estimates the maximum cost to serve and develop these products is less than 1% of total Retail EBITDA.*

### (3.6.1.26) Strategy to realize opportunity

*Vistra's product innovation and customer acquisition efforts are part of its ordinary course of business. After gathering market research, Vistra's Marketing and Product Development teams identify and create innovative products to meet customer wants and needs.*

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Use of low-carbon energy sources

#### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

#### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ United States of America

#### (3.6.1.8) Organization specific description

*Vistra knows how to manage the volatility and risk associated with renewables—and its retail operations serve nearly 5 million retail customers who are increasingly seeking to procure their electricity needs from renewable sources. As a result, Vistra can capture attractive stand-alone returns on these investments, with the opportunity to earn superior integrated returns through the retail value chain. Over the next 10 years, Vistra intends to 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. 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.*

#### (3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased revenues resulting from increased production capacity

#### (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

#### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Very likely (90–100%)

### (3.6.1.12) Magnitude

Select from:

☒ Medium-low

### (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*Favorable cash flow and EBITDA impact over the expected horizon.*

### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

### (3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

500000000

### (3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

1000000000

### (3.6.1.23) Explanation of financial effect figures

*Vistra expects it will grow its zero-carbon generation portfolio with additional development capital planned. This includes our acquisition, closed in Q1 of 2024, of certain nuclear assets formerly owned and operated by Energy Harbor which accelerated the growth of Vistra's zero-carbon operations, adding 4,000 megawatts (MW) of nuclear capacity.*

### (3.6.1.24) Cost to realize opportunity

5000000000

### (3.6.1.25) Explanation of cost calculation

*Vistra's acquisition of Energy Harbor has accelerated the growth of Vistra's zero-carbon operations, adding 4,000 megawatts (MW) of nuclear capacity at a cost of 3 billion cash and a 15% equity interest in Vistra Vision.*

### **(3.6.1.26) Strategy to realize opportunity**

*Additional zero-carbon EBITDA coming from our acquisition of Energy Harbor which accelerates the growth of Vistra's zero-carbon operation, along with additional investment into low-carbon and zero-carbon generation assets over the near horizon.*

## **Climate change**

### **(3.6.1.1) Opportunity identifier**

*Select from:*

☒ Opp3

### **(3.6.1.3) Opportunity type and primary environmental opportunity driver**

Products and services

☒ Other products and services opportunity, please specify :The electrification of the economy, specifically from transport, is expected to increase demand for electricity over the next several decades

### **(3.6.1.4) Value chain stage where the opportunity occurs**

*Select from:*

☒ Direct operations

### **(3.6.1.5) Country/area where the opportunity occurs**

*Select all that apply*

☒ United States of America

### **(3.6.1.8) Organization specific description**

*Under nearly all climate scenarios, demand for electricity is expected to increase between now and 2050 as growth from the electrification of the economy is projected to more than offset any energy efficiency improvements adopted. Vistra's integrated operations are well-positioned to serve this expected increase in*

electricity demand— both on the generation and retail sides of the equation. Vistra’s existing highly efficient, flexible, and low-emitting natural gas fleet will be critical to meet this growing electricity demand, as it is a relatively low-emitting resource and is easily dispatchable to support the growing reliance on intermittent renewable resources. Vistra is also investing in incremental renewable generating assets and owns a highly efficient nuclear plant in Texas, both of which will be critical to the future electric supply. On the retail side, Vistra already serves approximately 5,100,000 retail electricity customers with affordable, reliable power. Vistra is well-positioned to serve future increased demand for electricity. We expect we will be able to grow our retail customer base in the years to come, as Vistra’s integrated operations provide a unique competitive advantage to offer the types of products and services customers require.

#### **(3.6.1.9) Primary financial effect of the opportunity**

Select from:

☒ Increased revenues resulting from increased demand for products and services

#### **(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization**

Select all that apply

☒ Long-term

#### **(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon**

Select from:

☒ Likely (66–100%)

#### **(3.6.1.12) Magnitude**

Select from:

☒ Medium

#### **(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons**

*Favorable cash flow and EBITDA impact over the expected horizon.*

#### **(3.6.1.15) Are you able to quantify the financial effects of the opportunity?**

Select from:

☒ Yes

#### (3.6.1.21) Anticipated financial effect figure in the long-term - minimum (currency)

0

#### (3.6.1.22) Anticipated financial effect figure in the long-term – maximum (currency)

350000000

#### (3.6.1.23) Explanation of financial effect figures

*Estimate of potential annual EBITDA contribution resulting from an increase in electricity volumes consumed, benefiting both our retail and generation businesses.*

#### (3.6.1.24) Cost to realize opportunity

550000000

#### (3.6.1.25) Explanation of cost calculation

*Vistra currently spends 500-600 million annually on capex to maintain its generation facilities. Vistra management does not believe any incremental spend outside of its existing maintenance capex would be required to capitalize on this opportunity.*

#### (3.6.1.26) Strategy to realize opportunity

*To be able to provide electricity when demand is high, Vistra must keep well-maintained facilities ready to generate power when needed.*

### Climate change

#### (3.6.1.1) Opportunity identifier

Select from:

☒ Opp4

#### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Other energy source opportunity, please specify :Use of supportive policy incentives

#### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

#### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ United States of America

#### (3.6.1.8) Organization specific description

*Vistra could be a beneficiary of various supportive policy incentives, including a carbon fee regime and tax incentives for low-carbon development. Vistra is a proponent of an escalating nationwide carbon fee with a dividend and border carbon adjustment as the best public policy to influence the transition to a lower carbon economy. Such a policy would create a level playing field for competitive businesses and appropriately incentivize investments in new technologies. Vistra could be a beneficiary of such a policy as it should incentivize owners of older, higher-heat rate thermal resources to retire those assets given their increased cost. In turn, this should improve the economic returns of Vistra's existing and planned renewable and nuclear assets while maintaining a critical role for Vistra's highly efficient and low-cost natural gas assets. In addition, Vistra can take advantage of tax incentives to develop renewable projects to reduce its future tax and/or tax receivable agreement obligations.*

#### (3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Returns on investment in low-emission technology

#### (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Long-term

#### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ More likely than not (50–100%)

#### (3.6.1.12) Magnitude

Select from:

☒ Medium

#### (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*Favorable cash flow and EBITDA impact over the expected horizon.*

#### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ Yes

#### (3.6.1.21) Anticipated financial effect figure in the long-term - minimum (currency)

0

#### (3.6.1.22) Anticipated financial effect figure in the long-term – maximum (currency)

250000000

#### (3.6.1.23) Explanation of financial effect figures

*The potential financial impact to Vistra of supportive policy incentives such as a national carbon fee program or favorable tax incentives will be highly dependent on the details of any applicable policy. Vistra has evaluated various policy scenarios and believes it is reasonable to assume Vistra's annual EBITDA could improve by 0 to 250 million upon the initial implementation of policy incentives of this type.*

#### (3.6.1.24) Cost to realize opportunity

500000000

### (3.6.1.25) Explanation of cost calculation

*If policy incentives were implemented that improved our expected returns on growth investments by, we could potentially invest up to 500 million more than our committed investment spend.*

### (3.6.1.26) Strategy to realize opportunity

*Vistra advocates for a carbon adjustment fee via the climate leadership council*

## Climate change

### (3.6.1.1) Opportunity identifier

*Select from:*

☒ Opp5

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☒ Other energy source opportunity, please specify :Increased reliance on reliable and flexible generation assets

### (3.6.1.4) Value chain stage where the opportunity occurs

*Select from:*

☒ Direct operations

### (3.6.1.5) Country/area where the opportunity occurs

*Select all that apply*

☒ United States of America

### (3.6.1.8) Organization specific description

*Vistra believes that natural gas-fueled generation will be a necessary transition resource for many years to come, as a complement to renewable and storage resources. 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 reliability need for dispatchable resources in the heavy renewable markets of California, Texas, and Germany. Vistra's highly efficient, flexible, and low-emitting natural gas fleet is well-positioned to meet the electricity demands of U.S. consumers as the country continues to transition to lower-carbon technologies while increasing its demand for electricity. The increased dependency on this critical asset could result in increased revenues if future market compensation structures appropriately value this service.*

#### **(3.6.1.9) Primary financial effect of the opportunity**

*Select from:*

☒ Increased revenues resulting from increased demand for products and services

#### **(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization**

*Select all that apply*

☒ Medium-term

#### **(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon**

*Select from:*

☒ More likely than not (50–100%)

#### **(3.6.1.12) Magnitude**

*Select from:*

☒ Medium-low

#### **(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons**

*Favorable cash flow and EBITDA impact over the expected horizon.*

#### **(3.6.1.15) Are you able to quantify the financial effects of the opportunity?**

*Select from:*

☒ Yes

#### (3.6.1.19) Anticipated financial effect figure in the medium-term - minimum (currency)

0

#### (3.6.1.20) Anticipated financial effect figure in the medium-term - maximum (currency)

100000000

#### (3.6.1.23) Explanation of financial effect figures

*Vistra believes policy changes that would enhance revenue streams designed to maintain the marginal resource required in the market could replace other forms of revenue as markets evolve. Given that Vistra has a fleet of highly efficient CCGTs that can offer reliability and quick start services, changes of this nature could enhance Vistra's enterprise value by up to 100 million.*

#### (3.6.1.24) Cost to realize opportunity

550000000

#### (3.6.1.25) Explanation of cost calculation

*Vistra currently spends 500-600 million annually on capex to maintain its generation facilities.*

#### (3.6.1.26) Strategy to realize opportunity

*Vistra must keep well-maintained facilities ready to generate power when needed. Vistra management does not believe any incremental spend outside of its existing maintenance capex would be required to capitalize on this opportunity.*

*[Add row]*

**(3.6.2) Provide the amount and proportion of your financial metrics in the reporting year that are aligned with the substantive effects of environmental opportunities.**

**Climate change**

### (3.6.2.1) Financial metric

Select from:

☒ Other, please specify :EBITDA

### (3.6.2.2) Amount of financial metric aligned with opportunities for this environmental issue (unit currency as selected in 1.2)

5000000000

### (3.6.2.3) % of total financial metric aligned with opportunities for this environmental issue

Select from:

☒ 1-10%

### (3.6.2.4) Explanation of financial figures

*Vistra's EBITDA could be favorable impacted by the opportunities mentioned driving incremental revenue driven by assets more resilient to climate transitional risk and by greater customer interest in our energy transition strategy.*

[Add row]

## C4. Governance

### (4.1) Does your organization have a board of directors or an equivalent governing body?

#### (4.1.1) Board of directors or equivalent governing body

Select from:

☒ Yes

#### (4.1.2) Frequency with which the board or equivalent meets

Select from:

☒ Quarterly

#### (4.1.3) Types of directors your board or equivalent is comprised of

Select all that apply

☒ Executive directors or equivalent

☒ Independent non-executive directors or equivalent

#### (4.1.4) Board diversity and inclusion policy

Select from:

☒ No

[Fixed row]

### (4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue	Primary reason for no board-level oversight of this environmental issue	Explain why your organization does not have board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes	Select from:	Rich text input [must be under 2500 characters]
Water	Select from: <input checked="" type="checkbox"/> Yes	Select from:	Rich text input [must be under 2500 characters]
Biodiversity	Select from: <input checked="" type="checkbox"/> No, and we do not plan to within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority	N/A

[Fixed row]

**(4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.**

### Climate change

#### (4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☒ Director on board

#### (4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board

Select from:

☒ Yes

#### (4.1.2.3) Policies which outline the positions' accountability for this environmental issue

Select all that apply

- ☒ Board mandate

#### (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

#### (4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Overseeing reporting, audit, and verification processes
- ☒ Approving corporate policies and/or commitments
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets

#### (4.1.2.7) Please explain

*The Vistra Board of Directors (the Board) oversees and has final accountability for environmental issues material to Vistra - including Climate Change. The Board focuses extensively on how we can continuously seek decarbonization opportunities while achieving our operational and financial goals, and take an active role with management to oversee Vistra's long-term corporate strategy. Vistra's Corporate Governance Guidelines outline the committees established within the Board, which in turn hold the responsibility for responsibly executing the the governance mechanisms used to monitor climate change. The Sustainability and Risk Committee is responsible for: 1. Reviewing and discussing the Vistra's strategies, policies, and practices to assist Vistra in addressing public sentiment and shaping policy to manage its sustainability efforts. 2. At least annually, reviewing and discussing with management the Vistra's assessment of greenhouse gas-related risks, including transition, regulatory, reputational, and/or market risks related to climate change, and management's process for the identification, evaluation, and mitigation of transition risks related to climate change. 3. Overseeing and monitoring the Vistra's core vision and values and advise the Board and management on sustainability policies, including Vistra's publicly stated targets and aspirational goals for company-wide reductions of greenhouse gas emissions from its power generation operations. 4. Providing oversight with respect to any sustainability reporting to the public or governmental agencies. overseeing corporate risk management, including the management and tracking of environmental risks and opportunities (including climate change), as well as external sustainability reporting. The Board meets quarterly with topics from the Sustainability and Risk Management Committee and Vistra's environmental compliance on the agenda at each meeting. Sustainability and environmental topics will be discussed with the Board on a more frequent basis as necessary.*

## Water

#### (4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

☒ Board-level committee

#### **(4.1.2.2) Positions' accountability for this environmental issue is outlined in policies applicable to the board**

Select from:

☒ Yes

#### **(4.1.2.3) Policies which outline the positions' accountability for this environmental issue**

Select all that apply

☒ Board mandate

#### **(4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item**

Select from:

☒ Scheduled agenda item in some board meetings – at least annually

#### **(4.1.2.5) Governance mechanisms into which this environmental issue is integrated**

Select all that apply

☒ Overseeing reporting, audit, and verification processes

☒ Approving corporate policies and/or commitments

☒ Monitoring compliance with corporate policies and/or commitments

#### **(4.1.2.7) Please explain**

*Water is overseen at the level of the Vistra Board of Directors (the Board), via the Sustainability and Risk Committee. The Sustainability and Risk Committee is responsible for: 1. Reviewing and discussing the Vistra's strategies, policies, and practices to assist Vistra in addressing public sentiment and shaping policy to manage its sustainability efforts. 2. At least annually, reviewing and discussing with management the Vistra's assessment of greenhouse gas-related risks, including transition, regulatory, reputational, and/or market risks related to climate change, and management's process for the identification, evaluation, and mitigation of transition risks related to climate change. 3. Overseeing and monitoring the Vistra's core vision and values and advise the Board and management on sustainability policies, including Vistra's publicly stated targets and aspirational goals for company-wide reductions of greenhouse gas emissions from its power generation operations. 4. Providing oversight with respect to any sustainability reporting to the public or governmental agencies. overseeing corporate risk management, including the management and tracking of environmental risks and opportunities (including climate change), as well as external sustainability reporting. The Board meets quarterly, with topics from the Sustainability and Risk Management Committee and Vistra's environmental compliance on the agenda at each meeting. Sustainability and environmental topics will be discussed with the Board on a more frequent basis as necessary.*

[Fixed row]

## **(4.2) Does your organization's board have competency on environmental issues?**

### **Climate change**

#### **(4.2.1) Board-level competency on this environmental issue**

*Select from:*

☒ Yes

#### **(4.2.2) Mechanisms to maintain an environmentally competent board**

*Select all that apply*

☒ Having at least one board member with expertise on this environmental issue

#### **(4.2.3) Environmental expertise of the board member**

Experience

☒ Executive-level experience in a role focused on environmental issues

### **Water**

#### **(4.2.1) Board-level competency on this environmental issue**

*Select from:*

☒ Yes

#### **(4.2.2) Mechanisms to maintain an environmentally competent board**

*Select all that apply*

☒ Having at least one board member with expertise on this environmental issue

### (4.2.3) Environmental expertise of the board member

Experience

☒ Executive-level experience in a role focused on environmental issues

[Fixed row]

### (4.3) Is there management-level responsibility for environmental issues within your organization?

	Management-level responsibility for this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

### (4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).

#### Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ Chief Executive Officer (CEO)

#### **(4.3.1.2) Environmental responsibilities of this position**

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Measuring progress towards environmental corporate targets
- ☒ Measuring progress towards environmental science-based targets
- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a business strategy which considers environmental issues
- ☒ Managing acquisitions, mergers, and divestitures related to environmental issues
- ☒ Managing annual budgets related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues

Other

- ☒ Providing employee incentives related to environmental performance

#### **(4.3.1.4) Reporting line**

*Select from:*

- ☒ Reports to the board directly

#### **(4.3.1.5) Frequency of reporting to the board on environmental issues**

*Select from:*

- ☒ More frequently than quarterly

#### **(4.3.1.6) Please explain**

*The Board has delegated management of the Company's day-to-day operations, including all sustainability performance, to Vistra's executive officers. Sustainability and climate-related risks and opportunities are monitored by numerous individuals within the Vista management organization, with direct oversight by the Chief Executive Officer (CEO). The CEO has more than 20 years of experience in the electric industry, providing him with extensive knowledge of the electric grid, competitive markets, regulatory oversight, commercial operations, and emerging technologies. He has been a key leader in Vistra's strategic shift from a coal intensive fleet to a mostly natural gas-powered fleet as the company focuses on reducing its carbon footprint while also investing in zero-carbon assets including renewables, battery energy storage, and nuclear assets. Directly reporting to the CEO is the Chief Strategy & Sustainability Officer and Executive Vice President of Public Affairs (CSO). The CSO manages the Corporate Sustainability team, responsible for Vistra's sustainability reporting and disclosures, and presents to the Sustainability and Risk Committee of the Board at least quarterly, at each regularly scheduled committee meeting. The CSO also leads the Sustainability Management Committee to ensure appropriate company resources and stakeholders are implementing sustainability efforts. Within the Vistra management team, the CSO is a member of Vistra's Executive Committee, which consists of the CEO and his direct reports. The Executive Committee meeting forum includes discussion and decision-making related to general strategy, policy items, and operational updates. There are three standing committees that comprise the primary governance forums for day-to-day management of the company: Executive Committee, Commitments Committee, and Risk Management Committee.*

## Water

### (4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☒ Managing engagement in landscapes and/or jurisdictions

Policies, commitments, and targets

☒ Monitoring compliance with corporate environmental policies and/or commitments

### (4.3.1.4) Reporting line

Select from:

☒ Reports to the Chief Executive Officer (CEO)

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☒ More frequently than quarterly

#### (4.3.1.6) Please explain

*Vistra's Senior Vice President of Environmental Health and Safety, reporting to the Executive Vice President and General Counsel, is responsible for the day-to-day management and oversight of environmental reporting, performance, and compliance (including water regulations) as well as employee safety programs. The SVP of Environmental Health and Safety reports quarterly to the Board of Directors on these topics. The Sustainability team and SVP of Environmental Health and Safety coordinate efforts regarding Vistra's emissions reductions targets and reporting of performance. Vistra's Executive Vice President and General Counsel oversees the governance and compliance of the organization, in addition to all legal matters.*

### Biodiversity

#### (4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ General Counsel

#### (4.3.1.2) Environmental responsibilities of this position

Policies, commitments, and targets

☒ Monitoring compliance with corporate environmental policies and/or commitments

#### (4.3.1.4) Reporting line

Select from:

☒ Reports to the Chief Executive Officer (CEO)

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

☒ Quarterly

#### (4.3.1.6) Please explain

*Vistra's Senior Vice President of Environmental Health and Safety, reporting to the Executive Vice President and General Counsel, is responsible for the day-to-day management and oversight of environmental reporting, performance, and compliance (including with land and biodiversity matters) as well as employee safety programs. The Sustainability team and SVP of Environmental Health and Safety coordinate efforts, often with our asset closure business segment leadership, to ensure appropriate treatment of land and restoration of habitats and biodiversity where appropriate. Vistra seeks to minimize the negative impacts of its operations on land and aim to restore and enhance habitats and biodiversity.*

*[Add row]*

### (4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?

#### Climate change

#### (4.5.1) Provision of monetary incentives related to this environmental issue

Select from:

☒ Yes

#### (4.5.2) % of total C-suite and board-level monetary incentives linked to the management of this environmental issue

10

#### (4.5.3) Please explain

*Throughout 2024 and continuing into 2025, Vistra continued to incorporate stakeholder metrics into our corporate scorecard to align both executive and employee compensation with the company's goals for operational excellence and sustainability. Our stakeholder index is weighted at 10% of the overall corporate scorecard and includes: • Ongoing management of our 2030 and 2050 emission reduction targets • Enhanced employee management strategies, including expanded pipelines for growth opportunities within Vistra and greater transparency on attrition and retention trends • Continued development of a strong and reliable supplier base • Improved approach for engagement with regional colleges, universities, and trade schools to maximize relationships and engage students for future employment*

*opportunities with Vistra We recognize that it takes a culture of teamwork to achieve our organizational goals, ensuring we meet the needs and expectations of all key stakeholders.*

## Water

### (4.5.1) Provision of monetary incentives related to this environmental issue

*Select from:*

☒ No, and we do not plan to introduce them in the next two years

### (4.5.3) Please explain

*Metrics related to water are not currently considered as part of monetary incentives for Vistra's C-suite and board-level members.  
[Fixed row]*

**(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).**

## Climate change

### (4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Corporate executive team

### (4.5.1.2) Incentives

*Select all that apply*

☒ Bonus - % of salary

### (4.5.1.3) Performance metrics

## Targets

- ☒ Progress towards environmental targets
- ☒ Organization performance against an environmental sustainability index

## Emission reduction

- ☒ Reduction in absolute emissions

### (4.5.1.4) Incentive plan the incentives are linked to

Select from:

- ☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

### (4.5.1.5) Further details of incentives

*Throughout 2024 and continuing into 2025, Vistra continued to incorporate stakeholder metrics into our corporate scorecard to align both executive and employee compensation with the company's goals for operational excellence and sustainability. Our stakeholder index is weighted at 10% of the overall corporate scorecard and includes: • Ongoing management of our 2030 and 2050 emission reduction targets (amounting to an overall reduction in absolute emissions for Scope 1 and Scope 2 location-based) • Enhanced employee management strategies, including expanded pipelines for growth opportunities within Vistra and greater transparency on attrition and retention trends • Continued development of a strong and reliable supplier base • Improved approach for engagement with regional colleges, universities, and trade schools to maximize relationships and engage students for future employment opportunities with Vistra We recognize that it takes a culture of teamwork to achieve our organizational goals, ensuring we meet the needs and expectations of all key stakeholders.*

### (4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

*All employees are incentivized to help Vistra achieve our targets through support of efforts to reduce GHG emissions and bring zero-carbon assets online within project timeframes.*

## Climate change

### (4.5.1.1) Position entitled to monetary incentive

#### Senior-mid management

- ☒ Other senior-mid manager, please specify :All Vistra Employees

#### (4.5.1.2) Incentives

Select all that apply

☒ Bonus - % of salary

#### (4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

☒ Organization performance against an environmental sustainability index

Emission reduction

☒ Reduction in absolute emissions

#### (4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

#### (4.5.1.5) Further details of incentives

*Throughout 2024 and continuing into 2025, Vistra continued to incorporate stakeholder metrics into our corporate scorecard to align both executive and employee compensation with the company's goals for operational excellence and sustainability. Our stakeholder index is weighted at 10% of the overall corporate scorecard and includes: • Ongoing management of our 2030 and 2050 emission reduction targets (amounting to an overall reduction in absolute emissions for Scope 1 and Scope 2 location-based) • Enhanced employee management strategies, including expanded pipelines for growth opportunities within Vistra and greater transparency on attrition and retention trends • Continued development of a strong and reliable supplier base • Improved approach for engagement with regional colleges, universities, and trade schools to maximize relationships and engage students for future employment opportunities with Vistra We recognize that it takes a culture of teamwork to achieve our organizational goals, ensuring we meet the needs and expectations of all key stakeholders.*

#### (4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

All employees are incentivized to help Vistra achieve our targets through support of efforts to reduce GHG emissions and bring zero-carbon assets online within project timeframes.

[Add row]

**(4.6) Does your organization have an environmental policy that addresses environmental issues?**

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

[Fixed row]

**(4.6.1) Provide details of your environmental policies.**

**Row 1**

**(4.6.1.1) Environmental issues covered**

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

**(4.6.1.2) Level of coverage**

Select from:

- ☒ Organization-wide

**(4.6.1.3) Value chain stages covered**

Select all that apply

☒ Direct operations

#### (4.6.1.4) Explain the coverage

*Vistra is committed to protecting and improving the environment by serving our customers and our communities through more efficient – and cleaner – applications of energy, including improving our operations and investing in low-to-no carbon or carbon-reducing technologies. We are also committed to improved environmental protection measures, building on our record of compliance with environmental laws and regulations. In addition, we will support and participate in environmentally sound solutions that also help reliably and affordably meet the growing demand for power. Our environmental principles policy is publicly available online and supports these ambitions. The environmental principles policy applies to Vistra corp. and all of its subsidiaries. All employees, suppliers, and other business partners (contractors, consultants, others performing work on behalf of Vistra) are expected to support the implementation of environmental principles. These include commitments from Vistra to: 1) Support cleaner air, water, and land and less waste 2) Support energy efficiency and conservation 3) Source responsibly 4) Advocate for climate change mitigation 5) Seek resource diversity in our generation assets 6) Maintain compliance excellence in environmental management 7) Minimize facility impacts and promote continuous improvement 8) Promote corporate governance and stakeholder dialogue*

#### (4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to avoidance of negative impacts on threatened and protected species
- ☒ Commitment to comply with regulations and mandatory standards

Climate-specific commitments

- ☒ Commitment to net-zero emissions

Water-specific commitments

- ☒ Commitment to control/reduce/eliminate water pollution
- ☒ Commitment to water stewardship and/or collective action

Social commitments

- ☒ Commitment to respect internationally recognized human rights

Additional references/Descriptions

- ☒ Description of membership and financial support provided to organizations that seek to influence public policy

#### (4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals

Select all that apply

☒ No, and we do not plan to align in the next two years

#### (4.6.1.7) Public availability

Select from:

☒ Publicly available

#### (4.6.1.8) Attach the policy

*Environmental Principles Policy.pdf*

[Add row]

### (4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

#### (4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?

Select from:

☒ Yes

#### (4.10.2) Collaborative framework or initiative

Select all that apply

☒ Climate Action 100+

☒ Science-Based Targets Initiative (SBTi)

☒ Task Force on Climate-related Financial Disclosures (TCFD)

☒ Other, please specify :Climate Leadership Council (CLC) Americans for Carbon Dividends Business for Social Responsibility (BSR) Sustainable Supply Chain Alliance (SSCA)

#### (4.10.3) Describe your organization's role within each framework or initiative

*Vistra seeks to foster productive relationships with various environmental collaborative frameworks and initiatives, not only to help drive positive environmental impact within our sector, but to also remain current on industry discussions surrounding environmental responsibility in power generation. Our team engages with Climate Action 100+ through various requests for information and assessments, as well as collaborative investor engagements. In 2024 we also achieved validation of our*

Science Based Target Initiative (SBTi) goals (as further discussed in our corporate sustainability report) and regularly report on our climate risks and opportunities using TCFD disclosure taxonomy with the aid of a biennial TCFD-aligned climate impact assessment. As corporate members of Business for Social Responsibility (BSR) and the Sustainable Supply Chain Alliance (SSCA), our team is able to remain informed on industry best practices while maintaining active engagement in ongoing conversations on environmental risks and opportunities, both in our direct operations and within our supply chain management strategy. Additionally, Vistra is a founding member of the Climate Leadership Council (CLC) and its advocacy arm, Americans for Carbon Dividends. Vistra actively supports the CLC's framework of a consistently applied national carbon fee and dividend approach with a border tax adjustment as the ideal public policy solution to appropriately incentivize investments in carbon-free and carbon-reducing technologies.

[Fixed row]

#### **(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?**

##### **(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment**

Select all that apply

- ☒ Yes, we engaged directly with policy makers
- ☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

##### **(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals**

Select from:

- ☒ No, and we do not plan to have one in the next two years

##### **(4.11.5) Indicate whether your organization is registered on a transparency register**

Select from:

- ☒ Yes

##### **(4.11.6) Types of transparency register your organization is registered on**

Select all that apply

☒ Mandatory government register

#### **(4.11.7) Disclose the transparency registers on which your organization is registered & the relevant ID numbers for your organization**

*United States Lobbying Disclosure Act of 1995; Senate ID #37926-12 United States Lobbying Disclosure Act of 1995; House ID #301440000*

#### **(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan**

*Vistra lobbies by advocating for legislation and regulations that will enhance value for our customers, communities, environment, employees, and shareholders. We recognize that public policy decisions can greatly impact our business and industry — now and in the future. Vistra reviews all lobbying efforts to ensure adherence to applicable laws and Vistra's core principles. Vistra is also a member of and participates in trade groups, associations, and other third-party organizations. We are a founding member of the Climate Leadership Council (CLC) and its advocacy arm, Americans for Carbon Dividends, actively supporting the CLC's framework of a consistently applied national carbon fee and dividend approach with a border tax adjustment as the ideal public policy solution to appropriately incentivize investments in carbon-free and carbon-reducing technologies. Vistra understands and appreciates that its voice can make a difference as state and federal policies supporting climate change are adopted and is committed to advocating for the country's transition to a lower carbon future while providing affordable and reliable electricity.*  
[Fixed row]

#### **(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?**

##### **Row 1**

##### **(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers**

*Affordable Clean Energy Rule / Clean Power Plan, Existing Source Rule 111(d)*

##### **(4.11.1.2) Environmental issues the policy, law, or regulation relates to**

*Select all that apply*

☒ Climate change

##### **(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment**

Environmental impacts and pressures

☒ Emissions – CO2

#### (4.11.1.4) Geographic coverage of policy, law, or regulation

Select from:

☒ National

#### (4.11.1.5) Country/area/region the policy, law, or regulation applies to

Select all that apply

☒ United States of America

#### (4.11.1.6) Your organization's position on the policy, law, or regulation

Select from:

☒ Oppose

#### (4.11.1.7) Details of any exceptions and your organization's proposed alternative approach to the policy, law, or regulation

N/A

#### (4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation

Select all that apply

☒ Other, please specify :Coordination with trade groups

#### (4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement

*Vistra believes that the requirements of this rule are predicated on the assumption of commercially available technology that is not yet present at wide-scale, specifically CCUS. The timelines defined in the new GHG rule would require some existing fossil units to retire by 2032 or be fitted with CCUS. These efforts could jeopardize reliability and affordability of electricity in a period of rising demand.*

#### **(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals**

Select from:

☒ No, we have not evaluated

[Add row]

**(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.**

#### **Row 1**

##### **(4.11.2.1) Type of indirect engagement**

Select from:

☒ Indirect engagement via a trade association

##### **(4.11.2.4) Trade association**

North America

☒ Other trade association in North America, please specify :Nuclear Energy Institute

##### **(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position**

Select all that apply

☒ Climate change

##### **(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with**

Select from:

☒ Consistent

#### (4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

#### (4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

*As an integrated energy company, Vistra operates an innovative, customer-centric retail business and a generation fleet focused on safely, reliably, and efficiently generating power in the communities we serve. Vistra is not a political entity, but we live in a world influenced by politics and participating in the political process is imperative to the ongoing success of the Company. The Nuclear Energy Institute is the member-based policy organization of the leading clean energy source in the United States whose mission is to promote the use and growth of nuclear energy through efficient operations and effective policy. This aligns with our mission to provide reliable, affordable, and sustainable power to our customers. Annually Vistra reviews all its memberships with trade groups, associations, and other third-party organizations to discern whether their positions are materially inconsistent with Vistra's views. If Vistra determines that a group is taking a materially inconsistent position from the Company's views, the Company will advocate within the organization to seek to align our positions and if that is unsuccessful may withdraw from or otherwise disassociate from that organization.*

#### (4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)

2996740

#### (4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment

*Funding represents our annual dues to the organization.*

#### (4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ No, we have not evaluated

Row 3

#### (4.11.2.1) Type of indirect engagement

Select from:

- ☒ Indirect engagement via a trade association

#### (4.11.2.4) Trade association

North America

- ☒ Other trade association in North America, please specify :California Energy Storage Alliance

#### (4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

- ☒ Climate change

#### (4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

- ☒ Consistent

#### (4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

- ☒ No, we did not attempt to influence their position

#### (4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

*As an integrated energy company, Vistra operates an innovative, customer-centric retail business and a generation fleet focused on safely, reliably, and efficiently generating power in the communities we serve. Vistra is not a political entity, but we live in a world influenced by politics and participating in the political process is imperative to the ongoing success of the Company. California Energy Storage Alliance (CESA) is a 501c(6) membership-based advocacy group committed to*

advancing the role of energy storage in the electric power sector. The mission of CESA is to advocate for energy storage as a key resource to achieve a more affordable, efficient, reliable, safe and sustainable electric power system for all Californians. Annually Vistra reviews all its memberships with trade groups, associations, and other third-party organizations to discern whether their positions are materially inconsistent with Vistra's views. If Vistra determines that a group is taking a materially inconsistent position from the Company's views, the Company will advocate within the organization to seek to align our positions and if that is unsuccessful may withdraw from or otherwise disassociate from that organization.

#### **(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)**

51000

#### **(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment**

*Funding represents our annual dues to the organization.*

#### **(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals**

Select from:

☒ No, we have not evaluated

#### **Row 4**

#### **(4.11.2.1) Type of indirect engagement**

Select from:

☒ Indirect engagement via a trade association

#### **(4.11.2.4) Trade association**

North America

☒ Other trade association in North America, please specify :Climate Leadership Council

#### (4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Climate change

#### (4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

#### (4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ Yes, we publicly promoted their current position

#### (4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position

*Vistra is a founding member of the Climate Leadership Council (CLC) and its advocacy arm, Americans for Carbon Dividends. Vistra actively supports the CLC's framework of a consistently applied national carbon fee and dividend approach with a border tax adjustment as the ideal public policy solution to appropriately incentivize investments in carbon-free and carbon-reducing technologies. Vistra believes the CLC's Bipartisan Carbon Roadmap 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. The CLC has estimated that if its plan were to be implemented in 2021, it would cut U.S. CO2 emissions in half by 2035 (as compared to 2005) and far exceed the U.S. Paris commitment. Vistra supports the CLC's engagement to ensure any carbon intensity import fees are fully market-driven policies that internationally reward decarbonization efforts, are clearly defined and transparent, and are developed with broader geopolitical and economic interests in mind.*

#### (4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals

Select from:

☒ Yes, we have evaluated, and it is aligned

#### (4.11.2.12) Global environmental treaties or policy goals aligned with your organization's engagement on policy, law or regulation

Select all that apply

☒ Paris Agreement

#### Row 5

#### (4.11.2.1) Type of indirect engagement

Select from:

☒ Indirect engagement via a trade association

#### (4.11.2.4) Trade association

North America

☒ Other trade association in North America, please specify :Utility Water Act Group

#### (4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position

Select all that apply

☒ Water

#### (4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with

Select from:

☒ Consistent

#### (4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year

Select from:

☒ No, we did not attempt to influence their position

**(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position**

*As an integrated energy company, Vistra operates an innovative, customer-centric retail business and a generation fleet focused on safely, reliably, and efficiently generating power in the communities we serve. Vistra is not a political entity, but we live in a world influenced by politics and participating in the political process is imperative to the ongoing success of the Company. The Utility Water Act Group, UWAG, is a voluntary, non-profit, unincorporated group formed in 1973 and comprised of individual energy companies and two national trade associations of energy companies. Working together as a group, with advice from legal counsel, allows UWAG members to cost-effectively participate in the development and implementation of Clean Water Act-related requirements by federal and state agencies. Annually Vistra reviews all its memberships with trade groups, associations, and other third-party organizations to discern whether their positions are materially inconsistent with Vistra's views. If Vistra determines that a group is taking a materially inconsistent position from the Company's views, the Company will advocate within the organization to seek to align our positions and if that is unsuccessful may withdraw from or otherwise disassociate from that organization.*

**(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)**

216949

**(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment**

*Funding represents our annual dues to the organization.*

**(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals**

Select from:

☒ No, we have not evaluated

[Add row]

**(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?**

Select from:

☒ Yes

**(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.**

## Row 1

### (4.12.1.1) Publication

*Select from:*

☒ In voluntary sustainability reports

### (4.12.1.3) Environmental issues covered in publication

*Select all that apply*

☒ Climate change

☒ Water

☒ Biodiversity

### (4.12.1.4) Status of the publication

*Select from:*

☒ Complete

### (4.12.1.5) Content elements

*Select all that apply*

☒ Strategy

☒ Governance

☒ Emission targets

☒ Emissions figures

☒ Risks & Opportunities

☒ Water pollution indicators

☒ Value chain engagement

☒ Dependencies & Impacts

☒ Biodiversity indicators

☒ Public policy engagement

☒ Water accounting figures

☒ Content of environmental policies

#### (4.12.1.6) Page/section reference

*Throughout the publication.*

#### (4.12.1.7) Attach the relevant publication

*Vistra 2024 Sustainability Report.pdf*

#### (4.12.1.8) Comment

*Vistra's 2024 Sustainability Report was developed with disclosures with reference to the GRI standards and the SASB disclosures for the infrastructure sector 'Electric Utilities & Power Generators' for the reporting period of January 1, 2024 - December 31, 2024.*

### Row 2

#### (4.12.1.1) Publication

*Select from:*

☒ In mainstream reports, in line with environmental disclosure standards or frameworks

#### (4.12.1.3) Environmental issues covered in publication

*Select all that apply*

☒ Climate change

#### (4.12.1.4) Status of the publication

*Select from:*

☒ Underway - previous year attached

#### (4.12.1.5) Content elements

*Select all that apply*

- ☒ Strategy
- ☒ Governance
- ☒ Emission targets
- ☒ Emissions figures
- ☒ Risks & Opportunities

- ☒ Dependencies & Impacts
- ☒ Content of environmental policies

#### (4.12.1.6) Page/section reference

*Throughout the publication*

#### (4.12.1.7) Attach the relevant publication

*VST-Climate-Report-2023.pdf*

#### (4.12.1.8) Comment

*Vistra's most recent climate report at the time of CDP disclosure was published in 2023, and is attached here. In 2025, Vistra underwent a refreshed climate impact assessment with our third party partner, Business for Social Responsibility (BSR), the results of which will be used to develop our next climate report which is expected to be published in Q4 of 2025.*

### Row 3

#### (4.12.1.1) Publication

*Select from:*

- ☒ In other regulatory filings

#### (4.12.1.3) Environmental issues covered in publication

*Select all that apply*

- ☒ Climate change

#### (4.12.1.4) Status of the publication

*Select from:*

☒ Complete

#### (4.12.1.5) Content elements

*Select all that apply*

☒ Governance

☒ Dependencies & Impacts

☒ Risks & Opportunities

☒ Strategy

#### (4.12.1.6) Page/section reference

*Item 1 > Business > Business Strategy & Environmental Regulations and Related Considerations.*

#### (4.12.1.7) Attach the relevant publication

*Vistra\_Corp\_Annual Report\_2025-03-19.pdf*

#### (4.12.1.8) Comment

*Vistra's annual report covering reporting year of 2024. Please visit <https://investor.vistracorp.com/> for additional SEC/regulatory filings.*

*[Add row]*

## C5. Business strategy

(5.1) Does your organization use scenario analysis to identify environmental outcomes?

### Climate change

#### (5.1.1) Use of scenario analysis

Select from:

☒ Yes

#### (5.1.2) Frequency of analysis

Select from:

☒ Every two years

### Water

#### (5.1.1) Use of scenario analysis

Select from:

☒ Yes

#### (5.1.2) Frequency of analysis

Select from:

☒ Every two years

[Fixed row]

(5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

### Climate change

#### (5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 6.0

#### (5.1.1.2) Scenario used    SSPs used in conjunction with scenario

*Select from:*

☒ No SSP used

#### (5.1.1.3) Approach to scenario

*Select from:*

☒ Qualitative

#### (5.1.1.4) Scenario coverage

*Select from:*

☒ Organization-wide

#### (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☒ Acute physical

☒ Chronic physical

☒ Policy

☒ Reputation

#### (5.1.1.6) Temperature alignment of scenario

*Select from:*

☒ 3.5°C - 3.9°C

#### (5.1.1.7) Reference year

2023

#### (5.1.1.8) Timeframes covered

*Select all that apply*

- ☒ 2025
- ☒ 2030
- ☒ 2040
- ☒ 2050

#### (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Climate change (one of five drivers of nature change)

Finance and insurance

- ☒ Cost of capital

Stakeholder and customer demands

- ☒ Consumer sentiment

Regulators, legal and policy regimes

- ☒ Political impact of science (from galvanizing to paralyzing)
- ☒ Other regulators, legal and policy regimes driving forces, please specify :Regulatory volatility

Direct interaction with climate

- ☒ On asset values, on the corporate

#### (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Current Policies - Physical Scenario impact aligned to Representative Concentration Pathway (RCP) 6.0 Emissions have steadily grown over the past three decades, reaching 2°C of warming by 2050. As a result, physical climate impacts have also increased steadily, both in severity and frequency. The world is on a trajectory to see at least 3.3°C of warming by 2100 and there is now no part of the globe where climate risks do not exist. Despite this, investment in low-carbon energy remains slow, there have been limited investments in energy efficiency, and there have been continual coal and oil additions.*

#### **(5.1.1.11) Rationale for choice of scenario**

*Minimal climate-related policy changes fail to diminish rising GHG emissions as physical risks grow in severity and frequency.*

### **Water**

#### **(5.1.1.1) Scenario used**

Water scenarios

☒ WRI Aqueduct

#### **(5.1.1.3) Approach to scenario**

Select from:

☒ Qualitative

#### **(5.1.1.4) Scenario coverage**

Select from:

☒ Organization-wide

#### **(5.1.1.5) Risk types considered in scenario**

Select all that apply

☒ Chronic physical

#### **(5.1.1.7) Reference year**

2024

#### (5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2024

#### (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☒ Changes to the state of nature

#### (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*The WRI Water Risk Atlas is used to assess both the risk of water stress regions on our company assets, as well as the risk our company operations have on water stressed regions. Water is essential for producing electricity from thermal generation. Vistra understands that water is a limited, expensive, and shared resource that is essential to life. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered “high stress” or “extremely high stress.” Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk Atlas.*

#### (5.1.1.11) Rationale for choice of scenario

*WRI Water Risk Atlas provides a consolidated, readable format of data that can be easily used to assess chronic physical risks (i.e. water stress).*

### Climate change

#### (5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 2.6

#### (5.1.1.2) Scenario used    SSPs used in conjunction with scenario

Select from:

☒ No SSP used

### (5.1.1.3) Approach to scenario

Select from:

☒ Qualitative

### (5.1.1.4) Scenario coverage

Select from:

☒ Organization-wide

### (5.1.1.5) Risk types considered in scenario

Select all that apply

☒ Acute physical

☒ Chronic physical

☒ Policy

☒ Reputation

### (5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

### (5.1.1.7) Reference year

2023

### (5.1.1.8) Timeframes covered

Select all that apply

☒ 2025

☒ 2030

☒ 2040

☒ 2050

#### (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☑ Changes to the state of nature
- ☑ Climate change (one of five drivers of nature change)

Finance and insurance

- ☑ Cost of capital

Stakeholder and customer demands

- ☑ Consumer sentiment

Regulators, legal and policy regimes

- ☑ Political impact of science (from galvanizing to paralyzing)
- ☑ Other regulators, legal and policy regimes driving forces, please specify :Regulatory volatility

Direct interaction with climate

- ☑ On asset values, on the corporate

#### (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Net Zero 2050 - Physical Scenario impact aligned to RCP 2.6 The transition to a net-zero economy by 2050 required drastic and coordinated global action, particularly in the 2020s. While the cost of this action in the 2020s was high as some industries were negatively impacted and the location and types of jobs changed, the ongoing climate impacts already being felt in the 2020s and only expected to increase, made clear the cost of inaction.*

#### (5.1.1.11) Rationale for choice of scenario

*Stringent climate policies and innovation, reaching global net zero GHG emissions around 2050.*

### Climate change

#### (5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 2.6

#### (5.1.1.2) Scenario used    SSPs used in conjunction with scenario

*Select from:*

☒ No SSP used

#### (5.1.1.3) Approach to scenario

*Select from:*

☒ Qualitative

#### (5.1.1.4) Scenario coverage

*Select from:*

☒ Organization-wide

#### (5.1.1.5) Risk types considered in scenario

*Select all that apply*

☒ Acute physical

☒ Chronic physical

☒ Policy

☒ Reputation

#### (5.1.1.6) Temperature alignment of scenario

*Select from:*

☒ 1.6°C - 1.9°C

#### (5.1.1.7) Reference year

2023

### (5.1.1.8) Timeframes covered

Select all that apply

- ☒ 2025
- ☒ 2030
- ☒ 2040
- ☒ 2050

### (5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

- ☒ Changes to the state of nature
- ☒ Climate change (one of five drivers of nature change)

Finance and insurance

- ☒ Cost of capital

Regulators, legal and policy regimes

- ☒ Political impact of science (from galvanizing to paralyzing)
- ☒ Other regulators, legal and policy regimes driving forces, please specify :Regulatory volatility

Direct interaction with climate

- ☒ On asset values, on the corporate

### (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*Delayed Transition - Physical Scenario impact aligned to RCP 2.6 A decade of inaction in the 2020s drove mounting public pressure for climate action. What followed was a set of hasty and reactionary policies in the 2030s that sought to rapidly halt GHG emissions and make up for lost time. The disorderly approach came at high social and economic costs but ultimately led to a halving of emissions by 2040 and peak warming at 1.8C by 2050.*

### (5.1.1.11) Rationale for choice of scenario

*Climate policies are delayed, which forces a very aggressive policy response starting in 2030.*

[Add row]

## (5.1.2) Provide details of the outcomes of your organization's scenario analysis.

### Climate change

#### (5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management
- ☒ Strategy and financial planning
- ☒ Resilience of business model and strategy

#### (5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

#### (5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

*Vistra believes the identification of climate-related risks and opportunities is essential in the process of our energy transition and decarbonization pursuit. To this end, Vistra undertakes a biennial climate impact assessment with a third party consultant group to facilitate cross-departmental discussion and insight collection concerning our climate risks and opportunities. As outlined in our 2023 climate report, three climate scenarios as developed by the Network for Greening the Financial System (NGFS) were used in our last completed climate impact assessment to analyze climate risks and opportunities: - Current Policies (RCP 6.0) with a 3 degree Celsius temperature assumption - Net Zero 2050 (RCP 2.6) with a 1.5 degree Celsius temperature assumption - Delayed Transition (RCP 2.6) with a 1.8 degree Celsius temperature assumption The impacts of these scenarios were grouped into three timeframes: - Short Term (0-5 years) - Medium Term (6-10 years) - Long Term (10+ years) Some identified climate impact risks included physical damage to assets from extreme weather patterns, power market price volatility due to prolonged extreme temperatures, and incremental safety and productivity concerns due to heat waves and hard freeze events. These risks are managed as a result through regular operational maintenance and weatherization efforts, informed long-term hedging strategies, and continuous safety learning and assessment programs among our workforce. Some identified climate opportunities included greater power demand for heating and cooling, need for quick dispatch gas fleet units to bridge generation gaps as renewable resources come online, and the potential for incentives, rebates, and grants for low carbon technology investment and deployment - all of which Vistra is in an opportune position to benefit from. Results from our biennial climate impact assessment play a role in informing where our current strategies are effective, highlighting where new approaches might be necessary to manage risk, and revealing where business opportunity for our team is as power profiles continuously gradually shift to zero-carbon profiles.*

### Water

### (5.1.2.1) Business processes influenced by your analysis of the reported scenarios

Select all that apply

- ☒ Risk and opportunities identification, assessment and management

### (5.1.2.2) Coverage of analysis

Select from:

- ☒ Organization-wide

### (5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues

*Vistra believes the identification of climate-related risks and opportunities is essential in the process of our energy transition and decarbonization pursuit. In addition to the biennial climate impact assessment discussed for climate change, Vistra's Environmental, Health and Safety Teams analyze outputs of the WRI Water Risk Atlas to gauge risk of water stress regions on our company assets, as well as the risk our company operations have on water stressed regions. These identified risks further inform our annual risk identification and management process as lead by our Enterprise Risk Management (ERM) team, and provide necessary context on how to manage our water withdrawal, consumption, and discharge at our generation facilities located in water stressed locations.*

[Fixed row]

## (5.2) Does your organization's strategy include a climate transition plan?

### (5.2.1) Transition plan

Select from:

- ☒ No, but we are developing a climate transition plan within the next two years

### (5.2.15) Primary reason for not having a climate transition plan that aligns with a 1.5°C world

Select from:

- ☒ Other, please specify :Vistra has established near-term targets approved by SBTi aligned to a 1.5C pathway. We are reviewing additional potential disclosure for a climate transition plan.

### (5.2.16) Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world

*Vistra has established near-term targets approved by SBTi aligned to a 1.5C pathway. We are reviewing additional potential disclosure for a climate transition plan.*  
[Fixed row]

### **(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?**

#### **(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning**

*Select from:*

☒ Yes, both strategy and financial planning

#### **(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy**

*Select all that apply*

☒ Products and services

☒ Upstream/downstream value chain

☒ Investment in R&D

☒ Operations

[Fixed row]

### **(5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.**

#### **Products and services**

##### **(5.3.1.1) Effect type**

*Select all that apply*

☒ Opportunities

##### **(5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area**

*Select all that apply*

☒ Climate change

### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*Through Vistra's multitude of 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. As consumer preferences change to more climate-focused products, Vistra Retail's Marketing team creates new market-leading, innovative products. For its large business customers who have their own climate goals, Vistra's Business Markets team creates customized solutions that utilize wind PPAs, utility-scale solar generation, and other innovative structures for our business customer base.*

## Upstream/downstream value chain

### (5.3.1.1) Effect type

*Select all that apply*

☒ Risks

### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

*Select all that apply*

☒ Climate change

### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*Vistra relies on natural gas, coal, and oil to fuel the majority of our power generation facilities. Delivery of these fuels to the facilities is dependent upon the continuing financial viability of contractual counterparties as well as upon the infrastructure (including rail lines, rail cars, barge facilities, roadways, riverways and natural gas pipelines) available to serve each generation facility. As a result, we are subject to the risks of disruptions or curtailments in the production of power at our generation facilities if no fuel is available at any price or if a counterparty fails to perform or if there is a disruption in the fuel delivery infrastructure. Vistra's Commercial team evaluates and considers these supply chain risks when entering contracts to hedge portions of purchase and sale commitments. Vistra has a dedicated senior manager of supply chain sustainability and risk to establish a formal policy and develop procedures to establish a firm foundation. In addition to tracking and reporting Supply Chain sustainability performance, Vistra now provides assistance and focused training to develop our value chain. This position is responsible for leading sustainable business practices and mitigating risk collaboratively with internal, cross-functional teams, external supply chain sustainability organizations, and suppliers. We also continued our membership and took a larger leadership role with the Sustainable Supply Chain Alliance (SSCA, formally EUISSCA).*

## Investment in R&D

### (5.3.1.1) Effect type

*Select all that apply*

☒ Opportunities

#### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

#### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*Vistra is not an R&D company, rather Vistra partners with key industry groups, investment firms, suppliers, academic institutions, and government organizations on innovative projects. Vistra has developed relationships with a number of organizations to which Vistra both provides our operational and market expertise and, in return, gains access to valuable insight and collaboration regarding the development and deployment of energy technologies and innovations across the value chain. Utilizing a structured stage-gate review process, Vistra continually evaluates emerging technologies and new business models for commercial deployment through internal working groups and external partnerships with academia, original equipment manufacturers, and start-ups. We focus on multiple technological domains to ensure a reliable, cost-effective power supply for the future. Key innovation efforts include: - Data Centers & Grid Flexibility - Nuclear - Energy Storage - Carbon Capture & Storage - Advanced Geothermal - Hydrogen & Low Carbon Fuels*

### Operations

#### (5.3.1.1) Effect type

Select all that apply

☒ Opportunities

#### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

#### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*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 follows all current environmental compliance and regulations when running its power plants. With long-term CO<sub>2</sub>e emission reduction targets of 60% by 2030 and net-zero carbon emissions by 2050, Vistra must make long-term operations decisions that meet or exceed these goals coupled with adjusting operations to meet any environmental laws and regulations imposed both regionally and nationally as well as*

*meet the reliability needs of the electric grids where we operate. Changes in the asset life, or the operations of a power plant, can change due to the acceleration of renewables in the market it operates, new technologies, and changing regulations.*  
[Add row]

## **(5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.**

### **Row 1**

#### **(5.3.2.1) Financial planning elements that have been affected**

*Select all that apply*

☒ Revenues

#### **(5.3.2.2) Effect type**

*Select all that apply*

☒ Risks

☒ Opportunities

#### **(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements**

*Select all that apply*

☒ Climate change

☒ Water

#### **(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements**

*Vistra evaluates how its revenues could fluctuate based on market or regulatory changes, which climate can influence, as well as based on investments the company intends to make to meet its decarbonization goals. Any anticipated changes to revenues are incorporated into Vistra's five-year financial plan.*

### **Row 2**

#### **(5.3.2.1) Financial planning elements that have been affected**

Select all that apply

- ☒ Direct costs
- ☒ Indirect costs

#### (5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

#### (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

#### (5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

*Direct Costs – Vistra evaluates how its direct costs might change because of direct or indirect climate-related impacts. For example, Vistra’s retail business estimates what its costs will be to procure the power necessary to serve its customers, which can fluctuate based on supply/demand fundamentals. If geographies where we operate are projected to experience more extreme weather events, the electricity demand could rise, tightening the supply/demand balance. Similarly, our generation business estimates what its future costs of fuel procurement will be and executes forward purchases based on these expectations. For example, if the United States were to enact a regulatory change that would ban natural gas fracking, the price of natural gas would likely rise. Vistra hedges its fuel exposure to mitigate the financial impacts of any near-term fluctuations in fuel prices. Any anticipated changes to direct costs are incorporated into Vistra’s five-year financial plan. Indirect Costs – Climate-related risks and opportunities can impact Vistra’s indirect cost structure. For example, as the importance of climate-related reporting has increased meaningfully in recent years, Vistra now engages a third-party auditor to independently verify Vistra’s annual greenhouse gas emissions. Any anticipated changes to indirect costs are incorporated into Vistra’s five-year financial plan.*

### Row 3

#### (5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Capital expenditures
- ☒ Capital allocation

### (5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

### (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

### (5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

*Capital Expenditures – Vistra spends approximately \$500 to 600 million dollars each year on non-growth capital expenditures, which include the maintenance of its generating assets, nuclear fuel purchases, and environmental expenditures. When spending routine capital, Vistra factors in the expected impacts of climate change and climate-related policies, which influence the estimated useful life of its assets. Capital Allocation – Vistra makes capital allocation decisions seeking to invest in growth projects only when those projects meet or exceed Vistra’s internal investment thresholds. Vistra’s capital allocation strategy includes an intent to spend a meaningful portion of our capex annually over next 5 years on growing its carbon-free Vistra Zero generation portfolio.*

## Row 4

### (5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Acquisitions and divestments

### (5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

**(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements**

Select all that apply

☒ Climate change

**(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements**

*Vistra considers climate change and its strategic priority to continue to transition as a low-to-no carbon generator in all of its acquisition and divestment decisions. For example, in 2024, Vistra purchased 4GW of zero-carbon emitted nuclear generation assets from Energy Harbor based on the alignment of our strategic direction for decarbonization.*

**Row 5**

**(5.3.2.1) Financial planning elements that have been affected**

Select all that apply

☒ Access to capital

**(5.3.2.2) Effect type**

Select all that apply

☒ Opportunities

**(5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements**

Select all that apply

☒ Climate change

**(5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements**

*As Vistra continues to transform its company away from coal and lower its emissions intensity, Vistra hopes to gain new investors who have a sustainability focus. Investor preferences for companies that are taking steps to mitigate climate change influence Vistra's strategic decisions, as continued access to capital remains important to the company.*

## Row 6

### (5.3.2.1) Financial planning elements that have been affected

Select all that apply

- ☒ Assets
- ☒ Liabilities

### (5.3.2.2) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

### (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

- ☒ Climate change

### (5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

*Assets – Vistra has significant long-lived assets recorded on its balance sheet. The recorded value of these assets can change for a variety of reasons, including climate-related policy and regulatory actions. Vistra regularly evaluates the recorded value of its assets in light of any pending or enacted regulations. Liabilities – Vistra accounts for all anticipated future costs to retire its generating assets (both plants and mines) on its balance sheet. The net present value of these future anticipated cash flows is reported as Vistra's Asset Retirement Obligation (ARO) liability. In addition, Vistra has a separate reporting segment called the Asset Closure Segment, which is managed internally by a Senior Vice President leading a team with the goal to minimize the cost of decommissioning retired plants and reclaiming closed lignite mines.*

[Add row]

**(5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?**

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: <input checked="" type="checkbox"/> No, but we plan to in the next two years

[Fixed row]

## (5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?

### (5.5.1) Investment in low-carbon R&D

Select from:

☒ Yes

### (5.5.2) Comment

*Vistra has driven investment in R&D of low-carbon products and services in the power generation sector through investments in expanding our zero carbon fleet through Vistra Zero and exploring new and emerging technologies with lower carbon profiles the could have operational potential. Since 2019, Vistra has invested more than \$2.3 billion in new solar and energy storage assets with additional investments of more than \$700 million in capital expenditures planned for 2025. This includes development through Vistra's Retire and Renew Initiative, a dedicated effort to develop an actionable pipeline of utility-scale solar generation and energy storage opportunities at or near our Illinois plant sites. Under the umbrella of our Retire and Renew efforts, two projects were completed under the State of Illinois' innovative Coal to Solar & Energy Storage Initiative in 2024, and a third is targeted for construction in 2025. Our investment focus also includes exploration of new and emerging technologies with potential operational viability, with some projects including: 1) A 2024 partnership with EPRI as a founding member of the DCFlex Initiative exploring how data centers can aid the clean energy transition 2) Exploration of upcoming new nuclear technologies 3) Actively exploring carbon capture opportunities among our fleet 4) Exploration of lower-carbon fuel use cases, including a 2024 study with EPRI exploring hydrogen blending.*

[Fixed row]

**(5.5.7) Provide details of your organization's investments in low-carbon R&D for your sector activities over the last three years.**

**Row 1**

**(5.5.7.1) Technology area**

*Select from:*

☒ Carbon capture, utilization, and storage (CCUS)

**(5.5.7.2) Stage of development in the reporting year**

*Select from:*

☒ Basic academic/theoretical research

**(5.5.7.3) Average % of total R&D investment over the last 3 years**

5

**(5.5.7.5) Average % of total R&D investment planned over the next 5 years**

5

**(5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan**

*Various academic studies on carbon capture*

**Row 2**

**(5.5.7.1) Technology area**

*Select from:*

☒ Battery storage

#### (5.5.7.2) Stage of development in the reporting year

Select from:

☒ Basic academic/theoretical research

#### (5.5.7.3) Average % of total R&D investment over the last 3 years

5

#### (5.5.7.5) Average % of total R&D investment planned over the next 5 years

5

#### (5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

*Various academic studies on battery storage*

### Row 7

#### (5.5.7.1) Technology area

Select from:

☒ Other, please specify :General research in various low-carbon technologies

#### (5.5.7.2) Stage of development in the reporting year

Select from:

☒ Applied research and development

#### (5.5.7.3) Average % of total R&D investment over the last 3 years

70

#### (5.5.7.5) Average % of total R&D investment planned over the next 5 years

### (5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

*Vistra is invested in multiple VC funds focused on early-stage companies that are developing new technologies and service offerings related to Energy Transition, Clean Electronics, Built Environment, Smart Energy, Smart Mobility, Smart Buildings, and Industry 4.0. Furthermore, Vistra funds and executes internal studies and pilots to de-risk and advance low-carbon power generation technologies, such as Carbon Capture, Geothermal, Long-duration energy storage, and Nuclear.*

## Row 8

### (5.5.7.1) Technology area

Select from:

☒ Solar energy generation

### (5.5.7.2) Stage of development in the reporting year

Select from:

☒ Basic academic/theoretical research

### (5.5.7.3) Average % of total R&D investment over the last 3 years

5

### (5.5.7.5) Average % of total R&D investment planned over the next 5 years

5

### (5.5.7.6) Explain how your R&D investment in this technology area is aligned with your climate commitments and/or climate transition plan

*Various academic studies on solar and other renewable generation technologies*

[Add row]

**(5.7) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.**

**Coal – hard**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX below for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

**Lignite**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

### **(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX below for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

## **Oil**

### **(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

### **(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

### **(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX below for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

## **Gas**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

785000000

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

42

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

**Sustainable biomass**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

#### **Other biomass**

##### **(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

##### **(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

##### **(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

#### **Waste (non-biomass)**

##### **(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

##### **(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

## **Nuclear**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

307000000

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

17

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX for 'nuclear' is representative of nuclear fuel spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

## **Geothermal**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

## **Hydropower**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

## Wind

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

## Solar

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

604000000

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

33

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX for 'solar' is representative of both solar and energy storage CAPEX for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

## Marine

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

## Fossil-fuel plants fitted with CCS

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra does not own generation assets that use this fuel source.*

**Other renewable (e.g. renewable hydrogen)**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

0

**(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year**

0

**(5.7.3) CAPEX planned over the next 5 years for power generation from this source as % of total CAPEX planned for power generation over the next 5 years**

0

**(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Vistra includes energy storage as an 'other renewable' technology, with the allocated CAPEX included with the total disclosed on the 'solar' row. Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX for 'solar' is representative of nuclear fuel spend for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*

**Other non-renewable (e.g. non-renewable hydrogen)**

**(5.7.1) CAPEX in the reporting year for power generation from this source (unit currency as selected in 1.2)**

(5.7.2) CAPEX in the reporting year for power generation from this source as % of total CAPEX for power generation in the reporting year

8

(5.7.5) Explain your CAPEX calculations, including any assumptions

*Vistra does not publicly report CAPEX by specific fuel type for confidentiality reasons. The total CAPEX for 'other non-renewable' is representative of both other growth and non-recurring CAPEX for the reporting year of 2024 as reported in Vistra's Fourth Quarter 2024 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.*  
[Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:  
☒ Distributed generation

(5.7.1.2) Description of product/service

*Capital expenditures shared is for multiple categories, including 1) Nuclear & Fossil Maintenance, 2) Nuclear Fuel, 3) Non-Recurring Expenses, 4) Solar & Energy Storage Development, and 5) Other Growth at existing assets. Vistra Retail also offers a variety of renewable product offerings for its customers, including distributed generation. Vistra Retail can offer its residential customers the market's highest-efficiency rooftop solar panels and batteries. Vistra also offers a community solar product in Texas for our residential customers (TXU Solar Club.) For its large business customers, Vistra's Large Business Retail team provides solutions to meet customers' sustainability goals ranging from purchasing renewable energy credits to onsite renewable generation development to energy efficiency and advisory services. Reported CAPEX figures for 2025E (Expected) can be found in our 2024 year end investor presentation, posted publicly on Vistra's Investor Relations website.*

(5.7.1.3) CAPEX planned for product/service

2275000000

**(5.7.1.4) Percentage of total CAPEX planned for products and services**

100

**(5.7.1.5) End year of CAPEX plan**

2025

[Add row]

**(5.9) What is the trend in your organization's water-related capital expenditure (CAPEX) and operating expenditure (OPEX) for the reporting year, and the anticipated trend for the next reporting year?**

**(5.9.1) Water-related CAPEX (+/- % change)**

0

**(5.9.2) Anticipated forward trend for CAPEX (+/- % change)**

0

**(5.9.3) Water-related OPEX (+/- % change)**

0

**(5.9.4) Anticipated forward trend for OPEX (+/- % change)**

0

**(5.9.5) Please explain**

*This metric is not available for disclosure by Vistra.*

[Fixed row]

### (5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Carbon

[Fixed row]

### (5.10.1) Provide details of your organization's internal price on carbon.

#### Row 1

#### (5.10.1.1) Type of pricing scheme

Select from:

☒ Shadow price

#### (5.10.1.2) Objectives for implementing internal price

Select all that apply

☒ Drive low-carbon investment

☒ Influence strategy and/or financial planning

☒ Stress test investments

#### (5.10.1.3) Factors considered when determining the price

Select all that apply

- ☒ Alignment with the price of a carbon tax
- ☒ Alignment with the price of allowances under an Emissions Trading Scheme
- ☒ Benchmarking against peers

#### (5.10.1.4) Calculation methodology and assumptions made in determining the price

*Vistra follows the reported prices of carbon allowances coming from RGGI market auctions, and reports an annual spot price (as of December 31st of the reporting year) in our annual 10K filing.*

#### (5.10.1.5) Scopes covered

*Select all that apply*

- ☒ Scope 1

#### (5.10.1.6) Pricing approach used – spatial variance

*Select from:*

- ☒ Uniform

#### (5.10.1.8) Pricing approach used – temporal variance

*Select from:*

- ☒ Static

#### (5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

0

#### (5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

27

#### (5.10.1.12) Business decision-making processes the internal price is applied to

*Select all that apply*

- ☒ Capital expenditure
- ☒ Product and R&D
- ☒ Risk management
- ☒ Opportunity management

#### (5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

- ☒ Yes, for some decision-making processes, please specify :Financial Planning

#### (5.10.1.14) % total emissions in the reporting year in selected scopes this internal price covers

14

#### (5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

- ☒ Yes

#### (5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

*This carbon price, based off a RGGI price of approximately \$24.13/short ton, which is disclosed in our 10K, converted to approximately \$27.00/metric ton. Our internal processes incentivize investments in low-carbon resources as those resources would be valued with a higher terminal multiple. Using a higher terminal multiple improves the valuation profile of renewable resources making them more attractive investment options as compared to investments in thermal resources.*

[Add row]

#### (5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Customers	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change
Investors and shareholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Other value chain stakeholders	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select all that apply</i> <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water

[Fixed row]

### (5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

#### Climate change

##### (5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment

*Select from:*

☒ Yes, we assess the dependencies and/or impacts of our suppliers

##### (5.11.1.2) Criteria for assessing supplier dependencies and/or impacts on the environment

*Select all that apply*

☒ Contribution to supplier-related Scope 3 emissions

#### **(5.11.1.3) % Tier 1 suppliers assessed**

Select from:

☒ 51-75%

#### **(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment**

*Historically, Vistra has worked closely with the Sustainability Supply Chain Association to create and incorporate 25 sustainability core questions, with additional questions based on the supplier's industry. The results of the annual assessment include a survey of supplier emissions which impact Vistra's scope 3 emissions.*

#### **(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment**

Select from:

☒ 51-75%

#### **(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment**

3500

### **Water**

#### **(5.11.1.1) Assessment of supplier dependencies and/or impacts on the environment**

Select from:

☒ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

[Fixed row]

#### **(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?**

## Climate change

### (5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☒ Yes, we prioritize which suppliers to engage with on this environmental issue

### (5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☒ Material sourcing

☒ Procurement spend

☒ Regulatory compliance

☒ Vulnerability of suppliers

### (5.11.2.4) Please explain

*Risk assessment and management within Vistra's supply chain are performed by individual sourcing and category managers based on the supplier. Risk management primarily focuses on "tier one" suppliers, which Vistra groups into relevant categories under supply chain management: IT, shared services, fossil, nuclear, and renewable power generation. In 2024, we continued to use a third-party to evaluate the top 90% of suppliers (by spend) for financial risk and adverse media impacts. Vistra leverages all these processes to develop our supplier risk matrix, with numerous attributes including: 1. Business ethics 2. Environmental compliance 3. Health and safety 4. Product quality and safety 5. Cybersecurity*

## Water

### (5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☒ Yes, we prioritize which suppliers to engage with on this environmental issue

### (5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☒ Material sourcing

- ☒ Procurement spend
- ☒ Regulatory compliance
- ☒ Vulnerability of suppliers

#### (5.11.2.4) Please explain

*Risk assessment and management within Vistra's supply chain are performed by individual sourcing and category managers based on the supplier. Risk management primarily focuses on "tier one" suppliers, which Vistra groups into relevant categories under supply chain management: IT, shared services, fossil, nuclear, and renewable power generation. In 2024, we continued to use a third-party to evaluate the top 90% of suppliers (by spend) for financial risk and adverse media impacts. Vistra leverages all these processes to develop our supplier risk matrix, with numerous attributes including: 1. Business ethics 2. Environmental compliance 3. Health and safety 4. Product quality and safety 5. Cybersecurity*  
*[Fixed row]*

#### (5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

##### Climate change

#### (5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

- ☒ Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts

#### (5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

- ☒ Yes, we have a policy in place for addressing non-compliance

#### (5.11.5.3) Comment

*As part of the working relationship with Vistra, suppliers are asked to sign and agree to Vistra's Supplier Code of Conduct. The supplier code of conduct expects suppliers to maintain compliance with applicable environmental laws and regulations and to support Vistra's goals to responsibly improve our operations and limit our ecological footprint in accordance with our Environmental Principles Policy. To help achieve this goal, suppliers are asked to support our commitment through efforts of their own like processes to track and minimize or reduce of the impact of their operations on the environment, including greenhouse gas emissions, water, and*

waste. Per the supplier code of conduct, any supplier's failure to accept and honor commitments in the code of conduct could face termination of a business relationship and may constitute a breach of agreements.

## Water

### (5.11.5.1) Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process

Select from:

☒ Yes, suppliers have to meet environmental requirements related to this environmental issue, but they are not included in our supplier contracts

### (5.11.5.2) Policy in place for addressing supplier non-compliance

Select from:

☒ Yes, we have a policy in place for addressing non-compliance

### (5.11.5.3) Comment

*As part of the working relationship with Vistra, suppliers are asked to sign and agree to Vistra's Supplier Code of Conduct. The supplier code of conduct expects suppliers to maintain compliance with applicable environmental laws and regulations and to support Vistra's goals to responsibly improve our operations and limit our ecological footprint in accordance with our Environmental Principles Policy. To help achieve this goal, suppliers are asked to support our commitment through efforts of their own like processes to track and minimize or reduce of the impact of their operations on the environment, including greenhouse gas emissions, water, and waste. Per the supplier code of conduct, any supplier's failure to accept and honor commitments in the code of conduct could face termination of a business relationship and may constitute a breach of agreements.*

[Fixed row]

**(5.11.6) Provide details of the environmental requirements that suppliers have to meet as part of your organization's purchasing process, and the compliance measures in place.**

## Climate change

### (5.11.6.1) Environmental requirement

Select from:

☒ Other, please specify :Supplier Code of Conduct Agreement

#### **(5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement**

*Select all that apply*

☒ Grievance mechanism/ Whistleblowing hotline

☒ Supplier self-assessment

#### **(5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement**

*Select from:*

☒ 100%

#### **(5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement**

*Select from:*

☒ 76-99%

#### **(5.11.6.7) % tier 1 supplier-related scope 3 emissions attributable to the suppliers required to comply with this environmental requirement**

*Select from:*

☒ 76-99%

#### **(5.11.6.8) % tier 1 supplier-related scope 3 emissions attributable to the suppliers in compliance with this environmental requirement**

*Select from:*

☒ 76-99%

#### **(5.11.6.9) Response to supplier non-compliance with this environmental requirement**

*Select from:*

☒ Retain and engage

#### (5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ 100%

#### (5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Providing information on appropriate actions that can be taken to address non-compliance

#### (5.11.6.12) Comment

*In 2024, Vistra introduced the supply chain sustainability policy to ensure responsible sourcing across our operations. This policy is designed to promote ethical, sustainable, and transparent business practices throughout our supply chain. It emphasizes compliance with legal standards, environmental stewardship, social responsibility, and strong governance. By implementing this policy, Vistra aims to manage risk, enhance efficiency, and foster the creation of sustainable products and services – aligning with our commitment to reliability, affordability, and sustainability. We ask that our suppliers reflect our values and incorporate our Supplier Code of Conduct into their business processes. Every purchase order links to our Supplier Code of Conduct through its terms and conditions, and by accepting the purchase order, suppliers agree to abide by the code. This includes Vistra's commitment to responsible sourcing practices. As part of the supplier code of conduct, all contracted suppliers are asked to uphold Vistra's internal policies and goals, including but not limited to our environmental principles policy. Any supplier's failure to accept and honor the commitments outlined in the supplier code of conduct could result in termination of the business relationship and may constitute a breach of agreement.*

### Water

#### (5.11.6.1) Environmental requirement

Select from:

☒ Other, please specify :Supplier Code of Conduct Agreement

#### (5.11.6.2) Mechanisms for monitoring compliance with this environmental requirement

Select all that apply

☒ Grievance mechanism/ Whistleblowing hotline

☒ Supplier self-assessment

#### (5.11.6.3) % tier 1 suppliers by procurement spend required to comply with this environmental requirement

Select from:

☒ 100%

#### (5.11.6.4) % tier 1 suppliers by procurement spend in compliance with this environmental requirement

Select from:

☒ 76-99%

#### (5.11.6.9) Response to supplier non-compliance with this environmental requirement

Select from:

☒ Retain and engage

#### (5.11.6.10) % of non-compliant suppliers engaged

Select from:

☒ 100%

#### (5.11.6.11) Procedures to engage non-compliant suppliers

Select all that apply

☒ Providing information on appropriate actions that can be taken to address non-compliance

#### (5.11.6.12) Comment

*In 2024, Vistra introduced the supply chain sustainability policy to ensure responsible sourcing across our operations. This policy is designed to promote ethical, sustainable, and transparent business practices throughout our supply chain. It emphasizes compliance with legal standards, environmental stewardship, social responsibility, and strong governance. By implementing this policy, Vistra aims to manage risk, enhance efficiency, and foster the creation of sustainable products and services – aligning with our commitment to reliability, affordability, and sustainability. We ask that our suppliers reflect our values and incorporate our Supplier Code of Conduct into their business processes. Every purchase order links to our Supplier Code of Conduct through its terms and conditions, and by accepting the purchase order, suppliers agree to abide by the code. This includes Vistra's commitment to responsible sourcing practices. As part of the supplier code of conduct, all contracted suppliers are asked to uphold Vistra's internal policies and goals, including but not limited to our environmental principles policy. Any supplier's failure to accept and honor the commitments outlined in the supplier code of conduct could result in termination of the business relationship and may constitute a breach of agreement.*

[Add row]

## **(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.**

### **Climate change**

#### **(5.11.7.2) Action driven by supplier engagement**

Select from:

- ☒ Upstream value chain transparency and human rights

#### **(5.11.7.3) Type and details of engagement**

##### Capacity building

- ☒ Provide training, support and best practices on how to measure GHG emissions
- ☒ Provide training, support and best practices on how to set science-based targets
- ☒ Support suppliers to set their own environmental commitments across their operations
- ☒ Other capacity building activity, please specify :We have a growth and capacity building program for our diverse and small businesses to increase their business across Vistra as well as our Prime Suppliers, within our industry, and outside our industry to promote a sustainable and resilient chain.

##### Financial incentives

- ☒ Feature environmental performance in supplier awards scheme

##### Information collection

- ☒ Collect climate transition plan information at least annually from suppliers
- ☒ Collect environmental risk and opportunity information at least annually from suppliers
- ☒ Collect GHG emissions data at least annually from suppliers
- ☒ Collect targets information at least annually from suppliers
- ☒ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

##### Innovation and collaboration

- ☒ Encourage collaborative work in landscapes or jurisdictions

#### (5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

#### (5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 76-99%

#### (5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:

☒ 1-25%

#### (5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

*Vistra is an active member of the Sustainable Supply Chain Alliance, an organization of utilities and suppliers working together to advance sustainable practices in utility supply chains. Through the SSCA, Vistra engages our suppliers in an annual data collection process through The Sustainability Project (TSP) questionnaire, which includes data collection on environmental metrics and processes that suppliers have in place. In addition to this annual data collection process, Vistra also strives to be a source of support for our suppliers that are engaging in their own sustainability journeys by making education and collaboration opportunities available, whether through quarterly calls or posted resources. We have developed a supply chain sustainability website that serves as a central hub to share essential documents, training tools, and templates with our suppliers. By providing these resources, we facilitate seamless communication and collaboration, ensuring all stakeholders are well informed and equipped to meet our sustainability standards. This initiative not only strengthens our supply chain but also reinforces our support for sustainable business practices.*

#### (5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ Yes, please specify the environmental requirement :Engagement with our supply chain on environmental requirements will help further reinforce our own commitments in our Environmental Principles Policy while helping organizations in our supply chain make progress on their own sustainability goals.

#### (5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Unknown

## Water

### (5.11.7.2) Action driven by supplier engagement

*Select from:*

☒ Waste and resource reduction and improved end-of-life management

### (5.11.7.3) Type and details of engagement

#### Capacity building

☒ Provide training, support and best practices on how to mitigate environmental impact

☒ Provide training, support and best practices on how to set science-based targets

☒ Other capacity building activity, please specify :See above

#### Financial incentives

☒ Feature environmental performance in supplier awards scheme

#### Information collection

☒ Collect environmental risk and opportunity information at least annually from suppliers

☒ Collect targets information at least annually from suppliers

#### Innovation and collaboration

☒ Collaborate with suppliers on innovations to reduce environmental impacts in products and services

☒ Collaborate with suppliers on innovative business models and corporate renewable energy sourcing mechanisms

☒ Collaborate with suppliers to develop reuse infrastructure and reuse models

☒ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges

☒ Invest jointly with suppliers in R&D of relevant low-carbon technologies

### (5.11.7.4) Upstream value chain coverage

*Select all that apply*

☒ Tier 1 suppliers

#### (5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 76-99%

#### (5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

*Vistra is an active member of the Sustainable Supply Chain Alliance, an organization of utilities and suppliers working together to advance sustainable practices in utility supply chains. Through the SSCA, Vistra engages our suppliers in an annual data collection process through The Sustainability Project (TSP) questionnaire, which includes data collection on environmental metrics and processes that suppliers have in place. In addition to this annual data collection process, Vistra also strives to be a source of support for our suppliers that are engaging in their own sustainability journeys by making education and collaboration opportunities available, whether through quarterly calls or posted resources. We have developed a supply chain sustainability website that serves as a central hub to share essential documents, training tools, and templates with our suppliers. By providing these resources, we facilitate seamless communication and collaboration, ensuring all stakeholders are well informed and equipped to meet our sustainability standards. This initiative not only strengthens our supply chain but also reinforces our support for sustainable business practices.*

#### (5.11.7.10) Engagement is helping your tier 1 suppliers meet an environmental requirement related to this environmental issue

Select from:

☒ Yes, please specify the environmental requirement :Engagement with our supply chain on environmental requirements will help further reinforce our own commitments in our Environmental Principles Policy while helping organizations in our supply chain make progress on their own sustainability goals.

#### (5.11.7.11) Engagement is helping your tier 1 suppliers engage with their own suppliers on the selected action

Select from:

☒ Unknown

[Add row]

### (5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

#### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

#### (5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

#### (5.11.9.3) % of stakeholder type engaged

Select from:

☒ 1-25%

#### (5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☒ Unknown

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Vistra regularly engages with interested investors and shareholders upon request in conjunction with our in-house investor relations teams. This is done through several channels, including quarterly earnings calls, disclosure of sustainability related risks in annual regulatory filings, participation in investor lead disclosure initiatives (such as climate action 100+, for example), and direct conversation via scheduled calls.*

#### (5.11.9.6) Effect of engagement and measures of success

*Engagement with all stakeholders is crucial to ensuring that Vistra is focusing on the most relevant areas of interest and concern. This helps ensure that we are able to have a collaborative relationship, and in the case of our investors and shareholders ensures that we are able to produce metrics of significance and identify areas of opportunity to further grow in our sustainability journey.*

## Water

### (5.11.9.1) Type of stakeholder

Select from:

☒ Investors and shareholders

### (5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

### (5.11.9.3) % of stakeholder type engaged

Select from:

☒ 1-25%

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Vistra regularly engages with interested investors and shareholders upon request in conjunction with our in-house investor relations teams. This is done through several channels, including quarterly earnings calls, disclosure of sustainability related risks in annual regulatory filings, participation in investor lead disclosure initiatives (such as climate action 100+, for example), and direct conversation via scheduled calls.*

### (5.11.9.6) Effect of engagement and measures of success

*Engagement with all stakeholders is crucial to ensuring that Vistra is focusing on the most relevant areas of interest and concern. This helps ensure that we are able to have a collaborative relationship, and in the case of our investors and shareholders ensures that we are able to produce metrics of significance and identify areas of opportunity to further grow in our sustainability journey.*

[Add row]

## C6. Environmental Performance - Consolidation Approach

**(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.**

### Climate change

#### (6.1.1) Consolidation approach used

Select from:

☒ Equity share

#### (6.1.2) Provide the rationale for the choice of consolidation approach

*Emissions consolidation methodology will follow equity share approach as described in GHG Protocol: A Corporate Accounting and Reporting Standard, Revised Edition. this is done to present accurate analysis in cases of any joint ownership in generation assets. As of time of CDP disclosure, all generation assets for 2024 consolidation were 100% owned by Vistra (with the equity share approach accounting for 100% of the emissions impacts at our generation sites).*

### Water

#### (6.1.1) Consolidation approach used

Select from:

☒ Operational control

#### (6.1.2) Provide the rationale for the choice of consolidation approach

*An operational control consolidation approach is used for our water metrics as our team maintains operational control of water withdrawn, consumed, and discharged under NPDES permits at our generation assets. At the time of CDP disclosure, all assets included in water metrics consolidation were 100% owned by Vistra.*

### Biodiversity

#### (6.1.1) Consolidation approach used

Select from:

☒ Operational control

### (6.1.2) Provide the rationale for the choice of consolidation approach

*An operational control consolidation approach is used for biodiversity-related metrics as any tracked information will be for the aggregate site as a whole. at the time of CDP disclosure, all assets consolidated for reporting are 100% owned by Vistra.*

*[Fixed row]*

## C7. Environmental performance - Climate Change

### (7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

### (7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

#### (7.1.1.1) Has there been a structural change?

Select all that apply

☒ Yes, an acquisition

#### (7.1.1.2) Name of organization(s) acquired, divested from, or merged with

Energy Harbor

#### (7.1.1.3) Details of structural change(s), including completion dates

*In March 2024, Vistra completed the acquisition of Energy Harbor's ~4,000-MW carbon-free nuclear fleet and 1 million retail customers, reinforcing our commitment to responsibly transform our fleet to lower-carbon sources. Vistra now owns the second-largest competitive nuclear fleet in the U.S., enhancing both the reliability and carbonfree aspects of our generation portfolio. Since March, we've successfully integrated Energy Harbor's talented workforce into Vistra's 'One Team' culture and continue to advance strategies that strengthen our competitive edge. Across the company, more than 1,300 initiatives are driving integration activities and process improvements and ensuring operational and financial efficiency targets are met. When the transaction for Energy Harbor closed in March 2024, a 15% minority interest ownership stake was held by Nuveen Asset Management and Avenue Capital Management in Vistra Vision, a segment of our business that includes our zero-carbon nuclear, energy storage, and solar generation assets, as well as our retail business. In late 2024, Vistra acquired this 15% interest in Vistra Vision, simplifying the overall structure and solidifying the company as the sole owner of this valuable subsidiary. We expect to continue seeing the growing value of these zero-carbon assets for our shareholders.*

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply <input checked="" type="checkbox"/> No

[Fixed row]

(7.1.3) Have your organization’s base year emissions and past years’ emissions been recalculated as a result of any changes or errors reported in 7.1.1 and/or 7.1.2?

(7.1.3.1) Base year recalculation

Select from:

☒ No, because the impact does not meet our significance threshold

(7.1.3.3) Base year emissions recalculation policy, including significance threshold

Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. While the GHG Protocol makes no specific recommendations as to what constitutes a significant threshold for baseline recalculation, 5% is comparable with the GHG protocol on materiality where "an error is considered to be materially misleading if its value exceeds 5% of the total inventory for the part of the organization being verified". This threshold applies to structural changes in the reporting organization, changes in emission calculation methodology, or improvements in the accuracy of the emission conversion factors, or improvements in the accuracy of the emissions activity data. Vistra evaluated the impact of our 2024 acquisition on our baseline calculations and determined that the impact did not meet our significance threshold.

(7.1.3.4) Past years’ recalculation

Select from:

☒ No  
[Fixed row]

## **(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

*Select all that apply*

- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- ☒ US EPA Mandatory Greenhouse Gas Reporting Rule
- ☒ US EPA Emissions & Generation Resource Integrated Database (eGRID)

## **(7.3) Describe your organization's approach to reporting Scope 2 emissions.**

### **(7.3.1) Scope 2, location-based**

*Select from:*

- ☒ We are reporting a Scope 2, location-based figure

### **(7.3.2) Scope 2, market-based**

*Select from:*

- ☒ We are reporting a Scope 2, market-based figure

### **(7.3.3) Comment**

*Scope 2 emissions are calculated from both a market and location-based approach and represent purchased electricity across our generation assets and office locations. Vistra follows the Greenhouse Gas Protocol Scope 2 Guidance document for Scope 2 calculations using an equity approach (notably, Vistra hold 100% equity share with all of our current operating assets). Location-based Scope 2 emissions are calculated using emission factors from US EPA Emissions & Generation Resource Integrated Database (eGrid), which are selected based on the appropriate grid region of our operating assets and office facilities. Market-based Scope 2 emissions are calculated using residual mix emission factors from Green-e, with appropriate impact from RECs and EFECs incorporated. Notably, our headquarter*

offices in Irving, Texas operate on 100% Green-E Wind RECs, and our team utilizes nuclear-based EFECs to apply to our generation fleet usage. Together these EACs covered more than 30% of our electricity usage in 2024.

[Fixed row]

**(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?**

Select from:

☒ Yes

**(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure.**

Row 1

**(7.4.1.1) Source of excluded emissions**

Mobile Emissions

**(7.4.1.2) Scope(s) or Scope 3 category(ies)**

Select all that apply

☒ Scope 1

**(7.4.1.3) Relevance of Scope 1 emissions from this source**

Select from:

☒ Emissions are not relevant

**(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents**

0

**(7.4.1.10) Explain why this source is excluded**

*Emissions from mobile equipment are estimated to be 0.01% of total emissions.*

#### **(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents**

*This estimate is based on the approximate amount of volume of fuel purchased to run mobile equipment.*

### **Row 2**

#### **(7.4.1.1) Source of excluded emissions**

*Fugitive Emissions*

#### **(7.4.1.2) Scope(s) or Scope 3 category(ies)**

*Select all that apply*

☒ Scope 1

#### **(7.4.1.3) Relevance of Scope 1 emissions from this source**

*Select from:*

☒ Emissions are not relevant

#### **(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents**

0

#### **(7.4.1.10) Explain why this source is excluded**

*Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), Sulphur hexafluoride (SF 6), and nitrogen trifluoride (NF 3) emissions have been omitted from our reporting as they are not a material source of greenhouse gases for the business.*

#### **(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents**

*Relevant reporting thresholds per the U.S. EPA.*

*[Add row]*

## **(7.5) Provide your base year and base year emissions.**

### **Scope 1**

#### **(7.5.1) Base year end**

12/31/2010

#### **(7.5.2) Base year emissions (metric tons CO2e)**

172810588.0

#### **(7.5.3) Methodological details**

*The base year for Scope 1 GHG emissions is 2010, the year Vistra's last fossil-fueled asset was constructed and online. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. 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.*

### **Scope 2 (location-based)**

#### **(7.5.1) Base year end**

12/31/2018

#### **(7.5.2) Base year emissions (metric tons CO2e)**

248611.0

#### **(7.5.3) Methodological details**

*The Scope 2 GHG emissions base year is 2018, the first year Vistra calculated Scope 2 GHG emissions. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. 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.*

## Scope 2 (market-based)

### (7.5.1) Base year end

12/31/2023

### (7.5.2) Base year emissions (metric tons CO2e)

216477

### (7.5.3) Methodological details

*The Scope 2 market-based GHG emissions base year is 2023, the first year Vistra calculated Scope 2 market-based GHG emissions. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. 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.*

## Scope 3 category 11: Use of sold products

### (7.5.1) Base year end

12/31/2018

### (7.5.2) Base year emissions (metric tons CO2e)

3356717.0

### (7.5.3) Methodological details

*The base year for Scope 3, Category 11 is 2018, the first year Vistra calculated this category of emissions. This calculation accounts for the emissions associated with the use of natural gas sold through our retail markets. Customer-consumed natural gas volume data was collected across our retail brands and converted to metric tons CO2e using an emission factor from the United States EPA GHG Emission Factor Hub.*

*[Fixed row]*

## (7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

### Reporting year

#### (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

86194601

#### (7.6.3) Methodological details

*Vistra Scope 1 emissions are calculated using the equity-share approach following Greenhouse Gas Protocol Guidance for Scope 1 in the Corporate Standard. Activity data represents stationary combustion at our generation assets (inclusive of CO2, CH4, and N2O). Many of our generation assets are subject to mandatory reporting under the US EPA Greenhouse Gas Reporting Program (GHGRP), and consistent calculation methodology is used across our fleet to obtain final Scope 1 calculations.*

### Past year 1

#### (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

86326790

#### (7.6.2) End date

12/31/2023

#### (7.6.3) Methodological details

*Vistra Scope 1 emissions are calculated using the equity-share approach following Greenhouse Gas Protocol Guidance for Scope 1 in the Corporate Standard. Activity data represents stationary combustion at our generation assets (inclusive of CO2, CH4, and N2O). Many of our generation assets are subject to mandatory reporting under the US EPA Greenhouse Gas Reporting Program (GHGRP), and consistent calculation methodology is used across our fleet to obtain final Scope 1 calculations.*

### Past year 2

#### (7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

94785101

### (7.6.2) End date

12/31/2022

### (7.6.3) Methodological details

*Vistra Scope 1 emissions are calculated using the equity-share approach following Greenhouse Gas Protocol Guidance for Scope 1 in the Corporate Standard. Activity data represents stationary combustion at our generation assets (inclusive of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O). Many of our generation assets are subject to mandatory reporting under the US EPA Greenhouse Gas Reporting Program (GHGRP), and consistent calculation methodology is used across our fleet to obtain final Scope 1 calculations.*

## Past year 3

### (7.6.1) Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)

98749588

### (7.6.2) End date

12/31/2021

### (7.6.3) Methodological details

*Vistra Scope 1 emissions are calculated using the equity-share approach following Greenhouse Gas Protocol Guidance for Scope 1 in the Corporate Standard. Activity data represents stationary combustion at our generation assets (inclusive of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O). Many of our generation assets are subject to mandatory reporting under the US EPA Greenhouse Gas Reporting Program (GHGRP), and consistent calculation methodology is used across our fleet to obtain final Scope 1 calculations.*

## Past year 4

### (7.6.1) Gross global Scope 1 emissions (metric tons CO<sub>2</sub>e)

94290023

## (7.6.2) End date

12/31/2020

## (7.6.3) Methodological details

*Vistra Scope 1 emissions are calculated using the equity-share approach following Greenhouse Gas Protocol Guidance for Scope 1 in the Corporate Standard. Activity data represents stationary combustion at our generation assets (inclusive of CO<sub>2</sub>, CH<sub>4</sub>, and N<sub>2</sub>O). Many of our generation assets are subject to mandatory reporting under the US EPA Greenhouse Gas Reporting Program (GHGRP), and consistent calculation methodology is used across our fleet to obtain final Scope 1 calculations.*

*[Fixed row]*

## (7.7) What were your organization's gross global Scope 2 emissions in metric tons CO<sub>2</sub>e?

### Reporting year

#### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO<sub>2</sub>e)

214558

#### (7.7.2) Gross global Scope 2, market-based emissions (metric tons CO<sub>2</sub>e)

165268

## (7.7.4) Methodological details

*Scope 2 calculations follow methodology recommendations from the Greenhouse Gas Protocol Scope 2 Guidance. Scope 2 activity data from consumed electricity at both our generation and non-generation (office buildings, for example) is aggregated for calculation in location and market-based methodologies. Location-based calculations use grid-specific emission factors as provided by United States EPA eGrid to calculate location-based CO<sub>2</sub>e. Market-based activity data incorporates Renewable Energy Certificates (REC) and Emission Free Energy Certificate (EFEC) purchases, with remaining activity data converted into metric tons CO<sub>2</sub>e using a Green-e residual emissions factor.*

### Past year 1

#### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO<sub>2</sub>e)

245785

### (7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

216477

### (7.7.3) End date

12/31/2023

### (7.7.4) Methodological details

*Scope 2 calculations follow methodology recommendations from the Greenhouse Gas Protocol Scope 2 Guidance. Scope 2 activity data from consumed electricity at both our generation and non-generation (office buildings, for example) is aggregated for calculation in location and market-based methodologies. Location-based calculations use grid-specific emission factors as provided by United States EPA eGrid to calculate location-based CO2e. Market-based activity data incorporates Renewable Energy Certificates (REC) and Emission Free Energy Certificate (EFEC) purchases, with remaining activity data converted into metric tons CO2e using a Green-e residual emissions factor.*

## Past year 2

### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

220138

### (7.7.3) End date

12/31/2022

### (7.7.4) Methodological details

*Scope 2 calculations follow methodology recommendations from the Greenhouse Gas Protocol Scope 2 Guidance. Scope 2 activity data from consumed electricity at both our generation and non-generation (office buildings, for example) is aggregated for calculation in location and market-based methodologies. Location-based calculations use grid-specific emission factors as provided by United States EPA eGrid to calculate location-based CO2e.*

## Past year 3

### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

242970

### (7.7.3) End date

12/31/2021

### (7.7.4) Methodological details

*Scope 2 calculations follow methodology recommendations from the Greenhouse Gas Protocol Scope 2 Guidance. Scope 2 activity data from consumed electricity at both our generation and non-generation (office buildings, for example) is aggregated for calculation in location and market-based methodologies. Location-based calculations use grid-specific emission factors as provided by United States EPA eGrid to calculate location-based CO2e.*

## Past year 4

### (7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

333770

### (7.7.3) End date

12/31/2020

### (7.7.4) Methodological details

*Scope 2 calculations follow methodology recommendations from the Greenhouse Gas Protocol Scope 2 Guidance. Scope 2 activity data from consumed electricity at both our generation and non-generation (office buildings, for example) is aggregated for calculation in location and market-based methodologies. Location-based calculations use grid-specific emission factors as provided by United States EPA eGrid to calculate location-based CO2e.*

*[Fixed row]*

## (7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.

### Purchased goods and services

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from purchased goods and services are not considered material to our overall emissions profile.*

## Capital goods

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from purchased goods and services are not considered material to our overall emissions profile.*

## Fuel-and-energy-related activities (not included in Scope 1 or 2)

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO2e)

18740422

### (7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

#### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

#### (7.8.5) Please explain

*The amount of MWhs purchased for the reporting year is obtained from our Commercial Operations team who manages the purchase of power from other power suppliers.*

### Upstream transportation and distribution

#### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

#### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from Upstream transportation and distribution are not considered material to our overall emissions profile.*

### Waste generated in operations

#### (7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

#### (7.8.2) Emissions in reporting year (metric tons CO2e)

86253

### (7.8.3) Emissions calculation methodology

Select all that apply

☒ Waste-type-specific method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) Please explain

Waste generation metrics are collected from Vistra sites by Vistra Environmental Health and Safety teams. Emissions are calculated using factors from the US EPA GHG Emissions Factor Hub specific to material and final disposition.

## Business travel

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO2e)

951

### (7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

100

### (7.8.5) Please explain

*This represents the emissions associated with air travel completed by employees and booked through Vistra's corporate travel agency. Vistra received the log of booked travel and distance from its third-party vendor, and emissions were calculated using factors from the US EPA GHG Emissions Factor Hub.*

## Employee commuting

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO2e)

31688

### (7.8.3) Emissions calculation methodology

Select all that apply

☒ Distance-based method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) Please explain

*Vistra calculated the estimated distance traveled by employees between their mailing address and work location, as registered in our human capital management software, for a sample size of employees that was then extrapolated to the total employee population. Emissions are calculated using factors from the US EPA GHG Emissions Factor Hub.*

## Upstream leased assets

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from Upstream leased assets are not considered material to our overall emissions profile.*

## Downstream transportation and distribution

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from downstream transportation and distribution are not considered material to our overall emissions profile.*

## Processing of sold products

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from processing of sold products are not considered material to our overall emissions profile.*

## Use of sold products

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO2e)

1866457

### (7.8.3) Emissions calculation methodology

*Select all that apply*

☒ Methodology for direct use phase emissions, please specify :This represents the associated emissions from the sale of retail natural gas. The amount of MMBtu sold to our retail customers for the reporting year is obtained from our Accounting team.

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

### (7.8.5) Please explain

*This represents the associated emissions from the sale of retail natural gas. The amount of MMBtu sold to our retail customers for the reporting year is obtained from our accounting team.*

## End of life treatment of sold products

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Vistra does not sell any products requiring end of life treatment.*

## Downstream leased assets

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from downstream leased assets are not considered material to our overall emissions profile.*

## Franchises

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Vistra does not own any franchises.*

## Investments

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Any investments Vistra makes would be included in its Scope 1 and Scope 2 emissions.*

## Other (upstream)

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*There are no other upstream emissions that are material to our overall emissions profile.*

### Other (downstream)

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*There are no other downstream emissions that are material to our overall emissions profile.*

*[Fixed row]*

### (7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance

*[Fixed row]*

**(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Row 1**

**(7.9.1.1) Verification or assurance cycle in place**

Select from:  
☒ Annual process

**(7.9.1.2) Status in the current reporting year**

Select from:  
☒ Complete

**(7.9.1.3) Type of verification or assurance**

Select from:  
☒ Limited assurance

**(7.9.1.4) Attach the statement**

*Vistra GHG Review Report 2024.pdf*

**(7.9.1.5) Page/section reference**

*Page 1 and Page 5 of Deloitte Statement state Scope 1 emissions and attestation standards. Statement of GHG Emissions for the Year Ended December 31, 2024*  
*<https://vistracorp.com/documents/sustainability/reporting-year/2024/Vistra%20GHG%20Review%20Report%202024%20With%20Opinion.pdf>*

**(7.9.1.6) Relevant standard**

Select from:  
☒ Attestation standards established by AICPA (AT105)

**(7.9.1.7) Proportion of reported emissions verified (%)**

**(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.**

**Row 1**

**(7.9.2.1) Scope 2 approach**

Select from:

☒ Scope 2 location-based

**(7.9.2.2) Verification or assurance cycle in place**

Select from:

☒ Annual process

**(7.9.2.3) Status in the current reporting year**

Select from:

☒ Complete

**(7.9.2.4) Type of verification or assurance**

Select from:

☒ Limited assurance

**(7.9.2.5) Attach the statement**

*Vistra GHG Review Report 2024.pdf*

**(7.9.2.6) Page/ section reference**

#### (7.9.2.7) Relevant standard

Select from:

☒ Attestation standards established by AICPA (AT105)

#### (7.9.2.8) Proportion of reported emissions verified (%)

100

### Row 2

#### (7.9.2.1) Scope 2 approach

Select from:

☒ Scope 2 market-based

#### (7.9.2.2) Verification or assurance cycle in place

Select from:

☒ Annual process

#### (7.9.2.3) Status in the current reporting year

Select from:

☒ Complete

#### (7.9.2.4) Type of verification or assurance

Select from:

☒ Limited assurance

#### (7.9.2.5) Attach the statement

(7.9.2.6) Page/ section reference

Page 1 and Page 5 of Deloitte Statement state Scope 2 emissions and attestation standards. Statement of GHG Emissions for the Year Ended December 31, 2024  
<https://vistracorp.com/documents/sustainability/reporting-year/2024/Vistra%20GHG%20Review%20Report%202024%20With%20Opinion.pdf>

(7.9.2.7) Relevant standard

Select from:  
☒ Attestation standards established by AICPA (AT105)

(7.9.2.8) Proportion of reported emissions verified (%)

100  
[Add row]

(7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:  
☒ Decreased

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

163416

(7.10.1.2) Direction of change in emissions

Select from:

☒ Decreased

### (7.10.1.3) Emissions value (percentage)

0.19

### (7.10.1.4) Please explain calculation

*Emissions reductions evidenced in calendar year 2024 is largely attributed to the shift in our generation mix from 2023 to 2024 following the completion of the Energy Harbor nuclear fleet acquisition. In 2024, there was a slight (0.5%) decrease in generation output from our coal assets, combined with a significant (>160%) increase in generation from our zero-carbon assets (nuclear and solar facilities). In calculating the emissions value (percentage) value, the CDP provided formula of  $((\text{Change in Scope 1 + 2 emissions attributed to the reason described in column 1}) / (\text{Previous year Scope 1+2 emissions})) \times 100$  is used. Change in Scope 1 + 2 emissions attributed to change in output = 163416 (t) CO<sub>2</sub>e Previous Year Scope 1 + 2 emissions = 86572575 Scope 2 Location-Based is incorporated into the above totals.*  
[Fixed row]

### (7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Location-based

### (7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

☒ No

### (7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☒ Yes

### (7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

## Row 1

### (7.15.1.1) Greenhouse gas

Select from:

☒ CO2

### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

85836029

### (7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

## Row 2

### (7.15.1.1) Greenhouse gas

Select from:

☒ CH4

### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

154967

### (7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

## Row 3

### (7.15.1.1) Greenhouse gas

Select from:

☒ N2O

#### (7.15.1.2) Scope 1 emissions (metric tons of CO<sub>2</sub>e)

203605

#### (7.15.1.3) GWP Reference

Select from:

☒ IPCC Fifth Assessment Report (AR5 – 100 year)

[Add row]

**(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.**

#### **Fugitives**

##### (7.15.3.1) Gross Scope 1 CO<sub>2</sub> emissions (metric tons CO<sub>2</sub>)

0

##### (7.15.3.2) Gross Scope 1 methane emissions (metric tons CH<sub>4</sub>)

0

##### (7.15.3.3) Gross Scope 1 SF<sub>6</sub> emissions (metric tons SF<sub>6</sub>)

0

##### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO<sub>2</sub>e)

0

#### **(7.15.3.5) Comment**

*Not relevant as Vistra Scope 1 includes only combustion (electric utilities).*

#### **Combustion (Electric utilities)**

##### **(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

85836029

##### **(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

5535

##### **(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0

##### **(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

86194601

#### **(7.15.3.5) Comment**

*The 'Total gross Scope 1 emissions' calculation includes 768 (t) / 203,605 (t) CO2e of Nitrous Oxide (N2O).*

#### **Combustion (Gas utilities)**

##### **(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

0

##### **(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

0

#### (7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

#### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

#### (7.15.3.5) Comment

*Not relevant as Vistra Scope 1 includes only combustion (electric utilities).*

### Combustion (Other)

#### (7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

#### (7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

#### (7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

#### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

#### (7.15.3.5) Comment

*Not relevant as Vistra Scope 1 includes only combustion (electric utilities).*

### Emissions not elsewhere classified

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

0

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0

(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)

0

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

0

(7.15.3.5) Comment

Not relevant as Vistra Scope 1 includes only combustion (electric utilities).  
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
United States of America	86194601

[Fixed row]

(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.

Select all that apply

☒ By business division

**(7.17.1) Break down your total gross global Scope 1 emissions by business division.**

	Business division	Scope 1 emissions (metric ton CO2e)
Row 1	<i>East</i>	<i>41521701</i>
Row 2	<i>Texas</i>	<i>43170456</i>
Row 3	<i>West</i>	<i>1502444</i>

[Add row]

**(7.19) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.**

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	<i>86194601</i>	<i>Related to generation of electricity.</i>

[Fixed row]

**(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.**

**Consolidated accounting group**

#### (7.22.1) Scope 1 emissions (metric tons CO2e)

86194601

#### (7.22.2) Scope 2, location-based emissions (metric tons CO2e)

214558

#### (7.22.3) Scope 2, market-based emissions (metric tons CO2e)

165268

#### (7.22.4) Please explain

*All emissions are in our consolidated accounting group. This aligns with our financial reporting strategy in annual regulatory filings.*

#### **All other entities**

#### (7.22.1) Scope 1 emissions (metric tons CO2e)

0

#### (7.22.2) Scope 2, location-based emissions (metric tons CO2e)

0

#### (7.22.3) Scope 2, market-based emissions (metric tons CO2e)

0

#### (7.22.4) Please explain

*All emissions are already accounted for in our consolidated accounting group. There are no other entities to consider.*

*[Fixed row]*

**(7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?**

*Select from:*

☒ No

**(7.29) What percentage of your total operational spend in the reporting year was on energy?**

*Select from:*

☒ More than 50% but less than or equal to 55%

**(7.30) Select which energy-related activities your organization has undertaken.**

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	<i>Select from:</i> <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

[Fixed row]

**(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

**Consumption of fuel (excluding feedstock)**

**(7.30.1.1) Heating value**

Select from:

☒ HHV (higher heating value)

**(7.30.1.2) MWh from renewable sources**

0

**(7.30.1.3) MWh from non-renewable sources**

403693419

**(7.30.1.4) Total (renewable + non-renewable) MWh**

403693419.00

**Consumption of purchased or acquired electricity**

**(7.30.1.1) Heating value**

Select from:

☒ Unable to confirm heating value

**(7.30.1.2) MWh from renewable sources**

165574

**(7.30.1.3) MWh from non-renewable sources**

343839

(7.30.1.4) Total (renewable + non-renewable) MWh

509413.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.1) Heating value

Select from:

☒ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

165574

(7.30.1.3) MWh from non-renewable sources

404037258

#### (7.30.1.4) Total (renewable + non-renewable) MWh

404202832.00

[Fixed row]

#### (7.30.6) Select the applications of your organization's consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Select from: <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of heat	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of steam	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of cooling	Select from: <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	Select from: <input checked="" type="checkbox"/> No

[Fixed row]

#### (7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

##### Sustainable biomass

#### (7.30.7.1) Heating value

Select from:

☒ Unable to confirm heating value

**(7.30.7.2) Total fuel MWh consumed by the organization**

0

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.8) Comment**

*Not Applicable*

**Other biomass**

**(7.30.7.1) Heating value**

Select from:

☒ Unable to confirm heating value

**(7.30.7.2) Total fuel MWh consumed by the organization**

0

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

#### (7.30.7.8) Comment

*Not Applicable*

### Other renewable fuels (e.g. renewable hydrogen)

#### (7.30.7.1) Heating value

*Select from:*

☒ Unable to confirm heating value

#### (7.30.7.2) Total fuel MWh consumed by the organization

0

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

0

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

#### (7.30.7.8) Comment

*Not Applicable*

### Coal

#### (7.30.7.1) Heating value

*Select from:*

☒ HHV

#### (7.30.7.2) Total fuel MWh consumed by the organization

166701946

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

166701946

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

#### (7.30.7.8) Comment

*Coal is used for generation of electricity at a portion of Vistra generation assets. Coal generation within Vistra's overall generation mix decreased 0.5% in 2024*

### Oil

#### (7.30.7.1) Heating value

Select from:

☒ HHV

#### (7.30.7.2) Total fuel MWh consumed by the organization

859407

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

859407

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

#### (7.30.7.8) Comment

*Includes Distillate Fuel Oil (DFO), which is used to power a small number of generation assets.*

## Gas

### (7.30.7.1) Heating value

Select from:

☒ HHV

### (7.30.7.2) Total fuel MWh consumed by the organization

235596628

### (7.30.7.3) MWh fuel consumed for self-generation of electricity

235596628

### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

### (7.30.7.8) Comment

*Natural gas fuels nearly 54% of all generation across the Vistra fleet.*

## Other non-renewable fuels (e.g. non-renewable hydrogen)

### (7.30.7.1) Heating value

Select from:

☒ HHV

### (7.30.7.2) Total fuel MWh consumed by the organization

26025

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

26025

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

#### (7.30.7.8) Comment

*Jet-A fuel, which is used in 1 generation facility in the Vistra fleet.*

#### Total fuel

#### (7.30.7.1) Heating value

Select from:

☒ HHV

#### (7.30.7.2) Total fuel MWh consumed by the organization

403184006

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

403184006

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

0

#### (7.30.7.8) Comment

*Consumed fuels across the Vistra fleet. All fuel is used for self-generation of electricity within Vistra generation assets.*

*[Fixed row]*

(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

509413

(7.30.16.2) Consumption of self-generated electricity (MWh)

0

(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)

509413.00

[Fixed row]

(7.33) Does your electric utility organization have a transmission and distribution business?

Select from:

☒ No

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

#### (7.45.1) Intensity figure

0.0052

#### (7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

86409159

#### (7.45.3) Metric denominator

Select from:

☒ unit total revenue

#### (7.45.4) Metric denominator: Unit total

17224000000

#### (7.45.5) Scope 2 figure used

Select from:

☒ Location-based

#### (7.45.6) % change from previous year

12

#### (7.45.7) Direction of change

Select from:

☒ Decreased

#### (7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

- ☒ Acquisitions
- ☒ Change in output
- ☒ Change in revenue

#### (7.45.9) Please explain

*Vistra revenue from 2023 to 2024 increased by 17%, and our gross Scope 1 and Scope 2 (Location-Based) increased 3% from 2023 to 2024. Our 17% revenue increase can be attributed to completion of the Energy Harbor acquisition in 2024.*

#### Row 2

#### (7.45.1) Intensity figure

*0.43*

#### (7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

*86409159*

#### (7.45.3) Metric denominator

*Select from:*

- ☒ megawatt hour generated (MWh)

#### (7.45.4) Metric denominator: Unit total

*202091044*

#### (7.45.5) Scope 2 figure used

*Select from:*

- ☒ Location-based

#### (7.45.6) % change from previous year

**(7.45.7) Direction of change***Select from:*☒ Decreased**(7.45.8) Reasons for change***Select all that apply*☒ Acquisitions☒ Change in output**(7.45.9) Please explain**

*From 2023 to 2024, Vistra total generation mega-watt hours increased by 20%, which is largely attributed to the completion of the Energy Harbor acquisition in 2024. The addition of three nuclear plants to Vistra's generation fleet led to a 168% increase in zero-carbon generation in 2024 in comparison to 2023, which further drove down our emissions intensity per generated MWh of electricity.*

*[Add row]*

**(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.**

**Coal – hard****(7.46.1) Absolute scope 1 emissions (metric tons CO2e)**

30649222

**(7.46.2) Emissions intensity based on gross or net electricity generation***Select from:*☒ Net

#### (7.46.4) Scope 1 emissions intensity (Net generation)

1045.58

### Lignite

#### (7.46.1) Absolute scope 1 emissions (metric tons CO2e)

11175381

#### (7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

#### (7.46.4) Scope 1 emissions intensity (Net generation)

1022.26

### Oil

#### (7.46.1) Absolute scope 1 emissions (metric tons CO2e)

6313

#### (7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

#### (7.46.4) Scope 1 emissions intensity (Net generation)

1052.17

### Gas

#### (7.46.1) Absolute scope 1 emissions (metric tons CO2e)

44363685

#### (7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

#### (7.46.4) Scope 1 emissions intensity (Net generation)

406.85

### Nuclear

#### (7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

#### (7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

#### (7.46.4) Scope 1 emissions intensity (Net generation)

0.00

### Solar

#### (7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

#### (7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Other renewable

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

0

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

Total

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

86194601

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

426.51  
[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:  
☒ Other, please specify :Generation Facility Water Consumption (water consumed / water withdrawn)

(7.52.2) Metric value

0.02

(7.52.3) Metric numerator

263,257

(7.52.4) Metric denominator (intensity metric only)

12,398,162

(7.52.5) % change from previous year

27

(7.52.6) Direction of change

Select from:  
☒ Increased

(7.52.7) Please explain

*The percent increase in the water consumption intensity at our generation facilities can be attributed to the addition of generation assets from the completion of the Energy Harbor acquisition, as well as from expected seasonal variance at our generation facilities.*  
[Add row]

## (7.53) Did you have an emissions target that was active in the reporting year?

Select all that apply

☒ Absolute target

### (7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

#### Row 1

##### (7.53.1.1) Target reference number

Select from:

☒ Abs 1

##### (7.53.1.2) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

##### (7.53.1.5) Date target was set

10/10/2020

##### (7.53.1.6) Target coverage

Select from:

☒ Organization-wide

##### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

### (7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

### (7.53.1.9) Scope 2 accounting method

Select from:

☒ Location-based

### (7.53.1.11) End date of base year

12/31/2010

### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

172810588

### (7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

0

### (7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

### (7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

172810588.000

### (7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

**(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

0

**(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**(7.53.1.54) End date of target**

12/31/2030

**(7.53.1.55) Targeted reduction from base year (%)**

60

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

69124235.200

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

86194601

**(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

214558

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

86409159.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

83.33

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Underway

#### (7.53.1.82) Explain target coverage and identify any exclusions

*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.*

#### (7.53.1.83) Target objective

*60% reduction in Scope 1 and Scope 2 CO<sub>2</sub>e emissions by 2030, as compared to a 2010 baseline*

#### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*There are various levers for achieving our reduction target, and we intend to keep these options open for now without committing to any single method, so that we can respond to technological, legal, and market changes over the target timeframe. Emission reductions may be achieved through the retirement of certain of our fossil-fueled assets, to the extent that regulators and policymakers allow those retirements, as well as simultaneous investment in renewable power generation and energy storage assets. Reductions may also be achieved by lowering generation volumes from higher emitting sources or otherwise adjusting fuel carbon intensity mix of our various generations assets to reduce scope 1 emissions. Carbon capture and sequestration (CCS) technologies and additional emission control investments are also being investigated to reduce emissions at fossil plants. Vistra is also exploring potential for reducing electricity usage to various sites through energy efficiency measures. In 2024 we saw incremental progress towards our 2030 goal as we reached 83% of our intended absolute reduction (60% against a 2010 baseline). Our team was proud to see this incremental improvement while at the same time significantly increasing our zero-carbon generation in 2024 by 168%.*

#### (7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ No

## Row 2

### (7.53.1.1) Target reference number

Select from:

☒ Abs 2

### (7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

### (7.53.1.3) Science Based Targets initiative official validation letter

*Vistra Corp\_SBTiv5.1\_Near-Term Approval Letter\_compressed.pdf*

### (7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

### (7.53.1.5) Date target was set

04/08/2024

### (7.53.1.6) Target coverage

Select from:

☒ Organization-wide

### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

#### (7.53.1.8) Scopes

*Select all that apply*

☒ Scope 1

☒ Scope 2

#### (7.53.1.9) Scope 2 accounting method

*Select from:*

☒ Location-based

#### (7.53.1.11) End date of base year

12/31/2018

#### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

118740265

#### (7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

248611

#### (7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

#### (7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

118988876.000

#### (7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

**(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2**

100

**(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

100

**(7.53.1.54) End date of target**

12/31/2028

**(7.53.1.55) Targeted reduction from base year (%)**

58

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

49975327.920

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

86194601

**(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)**

214558

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

86409159.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

47.21

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Underway

#### (7.53.1.82) Explain target coverage and identify any exclusions

*Vistra's SBTi-approved near term target for Scope 1 and 2 reductions encompasses combustion impacts at our generation facilities (scope 1) and purchased electricity across our generation assets and office workspaces (Scope 2).*

#### (7.53.1.83) Target objective

*Vistra Corp. commits to reduce absolute scope 1 and 2 GHG emissions 58% by 2028 from a 2018 base year.*

#### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*There are various levers for achieving our reduction target, and we intend to keep these options open for now without committing to any single method, so that we can respond to technological, legal, and market changes over the target timeframe. Emission reductions may be achieved through the retirement of certain of our fossil-fueled assets, to the extent that regulators and policymakers allow those retirements, as well as simultaneous investment in renewable power generation and energy storage assets. Reductions may also be achieved by lowering generation volumes from higher emitting sources or otherwise adjusting fuel carbon intensity mix of our various generations assets to reduce scope 1 emissions. Carbon capture and sequestration (CCS) technologies and additional emission control investments are also being investigated to reduce emissions at fossil plants. Vistra is also exploring potential for reducing electricity usage to various sites through energy efficiency measures. As of the end of 2024, Vistra is 47% of the way to accomplishing this goal, with approximately 32,500,000 (t) CO<sub>2</sub>e of reductions accomplished since our 2018 base year.*

#### (7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ Yes

### Row 3

#### (7.53.1.1) Target reference number

Select from:

☒ Abs 3

#### (7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

#### (7.53.1.3) Science Based Targets initiative official validation letter

*Vistra Corp\_SBTiv5.1\_Near-Term Approval Letter\_compressed.pdf*

#### (7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

#### (7.53.1.5) Date target was set

04/08/2024

#### (7.53.1.6) Target coverage

Select from:

☒ Organization-wide

#### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

#### (7.53.1.8) Scopes

*Select all that apply*

☒ Scope 1

☒ Scope 3

#### (7.53.1.10) Scope 3 categories

*Select all that apply*

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

#### (7.53.1.11) End date of base year

12/31/2018

#### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

118740265

#### (7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

16540

#### (7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

16540.000

#### (7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

118756805.000

#### (7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

**(7.53.1.37) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target as % of total base year emissions in Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)**

100

**(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

0.5

**(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

97

**(7.53.1.54) End date of target**

12/31/2028

**(7.53.1.55) Targeted reduction from base year (%)**

58

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

49877858.100

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

86194601

#### (7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

15955

#### (7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

15955.000

#### (7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

86210556.000

#### (7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

47.25

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Underway

#### (7.53.1.82) Explain target coverage and identify any exclusions

*Vistra's SBTi-approved target for Scope 1 and Scope 3, Category 3 (Resold Electricity) encompass combustion impacts at our generation facilities (scope 1) and emissions from resold electricity via Scope 3, Category 3.*

#### (7.53.1.83) Target objective

*Vistra Corp commits to reduce absolute scope 1 and 3 GHG emissions from all sold electricity 58% by 2028 from a 2018 base year.*

#### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*There are various levers for achieving our reduction target, and we intend to keep these options open for now without committing to any single method, so that we can respond to technological, legal, and market changes over the target timeframe. Emission reductions may be achieved through the retirement of certain of our fossil-fueled assets, to the extent that regulators and policymakers allow those retirements, as well as simultaneous investment in renewable power generation and energy storage assets. Reductions may also be achieved by lowering generation volumes from higher emitting sources or otherwise adjusting fuel carbon intensity mix of our various generations assets to reduce scope 1 emissions. Carbon capture and sequestration (CCS) technologies and additional emission control investments are also being investigated to reduce emissions at fossil plants. Vistra is also exploring potential for reducing electricity usage to various sites through energy efficiency measures. As of the end of 2024, Vistra is 47% of the way to accomplishing this goal, with approximately 32,500,000 (t) CO2e of reductions accomplished since our 2018 base year.*

#### (7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☒ Yes

#### Row 4

#### (7.53.1.1) Target reference number

Select from:

☒ Abs 4

#### (7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, and this target has been approved by the Science Based Targets initiative

#### (7.53.1.3) Science Based Targets initiative official validation letter

*Vistra Corp\_SBTiv5.1\_Near-Term Approval Letter\_compressed.pdf*

#### (7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

### (7.53.1.5) Date target was set

04/08/2024

### (7.53.1.6) Target coverage

Select from:

☒ Organization-wide

### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

### (7.53.1.8) Scopes

Select all that apply

☒ Scope 3

### (7.53.1.10) Scope 3 categories

Select all that apply

☒ Scope 3, Category 11 – Use of sold products

### (7.53.1.11) End date of base year

12/31/2018

### (7.53.1.24) Base year Scope 3, Category 11: Use of sold products emissions covered by target (metric tons CO2e)

3356717

### (7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

3356717.000

**(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3356717.000

**(7.53.1.45) Base year Scope 3, Category 11: Use of sold products emissions covered by target as % of total base year emissions in Scope 3, Category 11: Use of sold products (metric tons CO2e)**

100

**(7.53.1.52) Base year total Scope 3 emissions covered by target as % of total base year emissions in Scope 3 (in all Scope 3 categories)**

99.5

**(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes**

99.5

**(7.53.1.54) End date of target**

12/31/2028

**(7.53.1.55) Targeted reduction from base year (%)**

42

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

1946895.860

**(7.53.1.69) Scope 3, Category 11: Use of sold products emissions in reporting year covered by target (metric tons CO2e)**

1866457

**(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

1866457.000

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

1866457.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

**(7.53.1.79) % of target achieved relative to base year**

105.71

**(7.53.1.80) Target status in reporting year**

Select from:

☒ Achieved

**(7.53.1.82) Explain target coverage and identify any exclusions**

*Vistra Corp. commits to reduce absolute scope 3 GHG emissions from use of sold products 42% by 2028 from a 2018 base year.*

**(7.53.1.83) Target objective**

*Vistra Corp. commits to reduce absolute scope 3 GHG emissions from use of sold products 42% by 2028 from a 2018 base year.*

**(7.53.1.85) Target derived using a sectoral decarbonization approach**

Select from:

☒ No

### (7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

*There are various levers for achieving our reduction target, and we intend to keep these options open for now without committing to any single method, so that we can respond to technological, legal, and market changes over the target timeframe. Emission reductions may be achieved through the retirement of certain of our fossil-fueled assets, to the extent that regulators and policymakers allow those retirements, as well as simultaneous investment in renewable power generation and energy storage assets. Reductions may also be achieved by lowering generation volumes from higher emitting sources or otherwise adjusting fuel carbon intensity mix of our various generations assets to reduce scope 1 emissions. Carbon capture and sequestration (CCS) technologies and additional emission control investments are also being investigated to reduce emissions at fossil plants. Vistra is also exploring potential for reducing electricity usage to various sites through energy efficiency measures.*

[Add row]

### (7.54) Did you have any other climate-related targets that were active in the reporting year?

Select all that apply

☒ Net-zero targets

#### (7.54.3) Provide details of your net-zero target(s).

##### Row 1

#### (7.54.3.1) Target reference number

Select from:

☒ NZ1

#### (7.54.3.2) Date target was set

09/29/2020

#### (7.54.3.3) Target Coverage

Select from:

☒ Organization-wide

#### (7.54.3.4) Targets linked to this net zero target

Select all that apply

☒ Not applicable

#### (7.54.3.5) End date of target for achieving net zero

12/31/2050

#### (7.54.3.6) Is this a science-based target?

Select from:

☒ No, and we do not anticipate setting one in the next two years

#### (7.54.3.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 2

#### (7.54.3.9) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

☒ Methane (CH4)

☒ Nitrous oxide (N2O)

#### (7.54.3.10) Explain target coverage and identify any exclusions

*Vistra has set a goal of net-zero carbon emissions by 2050, assuming necessary advancements in technology and supportive market constructs and public policy. This is inclusive of Scope 1 and Scope 2 emissions across our entire organization. Though our targets will be difficult to achieve, Vistra is exploring multiple options and opportunities to meet them. Given our significant ambition, we still must be pragmatic and ensure we are balancing efforts to first meet the reliability and affordability needs of our customers.*

#### (7.54.3.11) Target objective

*Vistra has set a goal of net-zero carbon emissions by 2050, assuming necessary advancements in technology and supportive market constructs and public policy. This is inclusive of Scope 1 and Scope 2 emissions across our entire organization. Though our targets will be difficult to achieve, Vistra is exploring multiple options and opportunities to meet them. Given our significant ambition, we still must be pragmatic and ensure we are balancing efforts to first meet the reliability and affordability needs of our customers.*

#### **(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?**

Select from:

☒ Unsure

#### **(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?**

Select from:

☒ No, we do not plan to mitigate emissions beyond our value chain

#### **(7.54.3.17) Target status in reporting year**

Select from:

☒ Underway

#### **(7.54.3.19) Process for reviewing target**

*All of Vistra's decarbonization targets (and the progress or challenges against them) are reviewed annually.*

*[Add row]*

**(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Select from:

☒ Yes

**(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
Under investigation	0	`Numeric input
To be implemented	1	20000000
Implementation commenced	0	0
Implemented	3	219000
Not to be implemented	0	`Numeric input

[Fixed row]

**(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.**

## Row 1

### (7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☒ Solar PV

### (7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

170000

### (7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

### (7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

### (7.55.2.7) Payback period

Select from:

☒ 4-10 years

### (7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ Ongoing

### (7.55.2.9) Comment

*In 2024, Vistra completed construction on solar installations at our Baldwin and Coffeen assets, representing a combined 112 added MWs of solar power generation. Estimate that this 112 MWs of solar generation represents an estimated savings of 170,000 metric tons of Carbon Dioxide.*

## Row 2

### (7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☒ Other, please specify :Renewable Energy Certificate (REC) and Emission-free Energy Certificate (EFEC) Retirement

### (7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

49000

### (7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 2 (market-based)

#### (7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

#### (7.55.2.7) Payback period

Select from:

☒ <1 year

#### (7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ <1 year

#### (7.55.2.9) Comment

*Approximately 243,000 Energy Attribute Certificates (RECs and EFECs) were retired in 2024. Notably, our headquarters offices in Irving, Texas operate on 100% Green-E Wind RECs, and our team utilizes nuclear-based EFECs to apply to our generation fleet usage. Together these EACs covered more than 30% of our electricity usage in 2024.*

[Add row]

### (7.55.3) What methods do you use to drive investment in emissions reduction activities?

#### Row 1

#### (7.55.3.1) Method

Select from:

☒ Compliance with regulatory requirements/standards

#### (7.55.3.2) Comment

*Vistra does business the right way and will maintain strict compliance with environmental laws and regulations. In some cases this means that Vistra must make capital expenditure decisions on the maintenance and upgrades at its existing power generation facilities. In addition, changes to, or development of, legislation that requires the use of clean renewable and alternate fuel sources or mandates the implementation of energy conservation programs that require the implementation of new technologies, could increase our capital expenditures.*

## Row 2

### (7.55.3.1) Method

Select from:

☒ Internal price on carbon

### (7.55.3.2) Comment

*When Vistra evaluates power generation investments, the multiples applied by Vistra's team to value opportunities take into account carbon intensity and useful life. Lower emitting investments are prescribed higher multiples recognizing the higher value of low carbon investments.*

[Add row]

## (7.58) Describe your organization's efforts to reduce methane emissions from your activities.

*Vistra does not own or operate assets with high methane emissions nor does Vistra own natural gas pipelines. However, the majority of our power plants do utilize natural gas fuel which we believe will be a necessary fuel as the country transitions to a renewable-heavy electric grid. Vistra has a robust supplier assessment ensuring all suppliers, including our natural gas suppliers, share our commitment to safety, performance excellence, and ethical business practices. Further, Vistra will evaluate lower-emitting options, such as co-firing hydrogen, renewable natural gas, and new technologies when they are presented.*

## (7.74) Do you classify any of your existing goods and/or services as low-carbon products?

Select from:

☒ Yes

### (7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

## Row 1

### (7.74.1.1) Level of aggregation

Select from:

☒ Group of products or services

#### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ Other, please specify :Internal methodology

#### (7.74.1.3) Type of product(s) or service(s)

Heat

☒ Other, please specify :Green electricity plans, energy efficiency, and demand response products for retail electric customers

#### (7.74.1.4) Description of product(s) or service(s)

*Vistra Retail currently offers dozens of electricity plans that incorporate renewable energy into the product offer. These products are offered to customers through Vistra's many retail brands leveraging various marketing channels across the U.S. These brands offer renewable energy, carbon offset, and energy management products that help consumers reduce their carbon footprint. These products include: Free Nights and Solar Days: With 100% wind power at night and 100% solar during the day, this plan helps customers stay cool and comfortable while easing strain on the electricity grid during peak usage. Customers are encouraged and incentivized to shift their usage to free hours every night. Vistra Retail offers the only plan of its kind in the country that allows customers to charge their EVs for free. Rooftop Solar: TXU Energy is a pioneer in bringing rooftop solar to ERCOT — as the first retail provider with a Net Metering plan (2009). We also offer rooftop solar systems and batteries to our customers through our partnership with Sunrun. Energy Management Tools: TXU Energy has been participating in Residential Demand Response for over a decade and was the first retailer to offer an internet-enabled smart thermostat in ERCOT. Our Connected Conservation program rewards customers for doing their part to reduce both their carbon footprint and strain on the grid by controlling and aggregating their smart thermostats.*

#### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ No

#### (7.74.1.13) Revenue generated from low-carbon product(s) or service(s) as % of total revenue in the reporting year

1

[Add row]

**(7.79) Has your organization retired any project-based carbon credits within the reporting year?**

*Select from:*

☒ No

## C9. Environmental performance - Water security

### (9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☒ Yes

#### (9.1.1) Provide details on these exclusions.

##### Row 1

##### (9.1.1.1) Exclusion

Select from:

☒ Facilities

##### (9.1.1.2) Description of exclusion

*Office buildings*

##### (9.1.1.3) Reason for exclusion

Select from:

☒ Other, please specify :De minimis

##### (9.1.1.7) Percentage of water volume the exclusion represents

Select from:

☒ Less than 1%

##### (9.1.1.8) Please explain

*Vistra office buildings are significantly less than 1% of our total annual water usage. As such, disclosure in this questionnaire will focus on water usage at our generation assets.*

*[Add row]*

## **(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

### **Water withdrawals – total volumes**

#### **(9.2.1) % of sites/facilities/operations**

*Select from:*

☒ 100%

#### **(9.2.2) Frequency of measurement**

*Select from:*

☒ Monthly

#### **(9.2.3) Method of measurement**

*Calculated or metered*

#### **(9.2.4) Please explain**

*Oversight of monthly water withdrawals is done by Vistra's Environmental team. This volume is either calculated or metered using on-site resources.*

### **Water withdrawals – volumes by source**

#### **(9.2.1) % of sites/facilities/operations**

*Select from:*

☒ 100%

#### **(9.2.2) Frequency of measurement**

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Calculated or metered*

### (9.2.4) Please explain

*Oversight of monthly water withdrawals is done by Vistra's Environmental team. This volume is either calculated or metered using on-site resources.*

## Water withdrawals quality

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Sampled and lab-analyzed*

### (9.2.4) Please explain

*Oversight of water withdrawal quality is done by Vistra's Environmental team. Sample collection and lab analysis is completed to determine withdrawal quality.*

## Water discharges – total volumes

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Measured at NPDES - permitted outfalls.*

### (9.2.4) Please explain

*Water discharges are heavily monitored under facility National Pollutant Discharge Elimination System (NPDES) permits. Internal oversight is the responsibility of Vistra's Environmental team to ensure compliance at the facility level.*

## Water discharges – volumes by destination

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Measured at NPDES-permitted outfall.*

### (9.2.4) Please explain

*Water discharges are heavily monitored under facility National Pollutant Discharge Elimination System (NPDES) permits. Internal oversight is the responsibility of Vistra's Environmental team to ensure compliance at the facility level.*

## **Water discharges – volumes by treatment method**

### **(9.2.1) % of sites/facilities/operations**

*Select from:*

☒ Not monitored

## **Water discharge quality – by standard effluent parameters**

### **(9.2.1) % of sites/facilities/operations**

*Select from:*

☒ 100%

### **(9.2.2) Frequency of measurement**

*Select from:*

☒ Monthly

### **(9.2.3) Method of measurement**

*Sampled and lab-analyzed*

### **(9.2.4) Please explain**

*Water discharge quality is heavily monitored under facility National Pollutant Discharge Elimination System (NPDES) permits. Internal oversight is the responsibility of Vistra's Environmental team to ensure compliance at the facility level.*

## **Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)**

### **(9.2.1) % of sites/facilities/operations**

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Sampled and lab-analyzed*

### (9.2.4) Please explain

*Water discharge quality is heavily monitored under facility National Pollutant Discharge Elimination System (NPDES) permits. Internal oversight is the responsibility of Vistra's Environmental team to ensure compliance at the facility level.*

## Water discharge quality – temperature

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Temperature measured at NPDES-permitted outfall.*

### (9.2.4) Please explain

Water discharge quality (including temperature) is heavily monitored under facility National Pollutant Discharge Elimination System (NPDES) permits. Internal oversight is the responsibility of Vistra's Environmental team to ensure compliance at the facility level.

## Water consumption – total volume

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

Calculated

### (9.2.4) Please explain

Oversight of water consumption is done by Vistra's Environmental team. Consumption is monitored at each of our generation assets.

## Water recycled/reused

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Monthly

### (9.2.3) Method of measurement

*Calculated*

### (9.2.4) Please explain

*Oversight of water re-use and recycling is done by Vistra's Environmental team. Reuse and recycling is monitored at each of our generation assets. Substantially, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled*

## The provision of fully-functioning, safely managed WASH services to all workers

### (9.2.1) % of sites/facilities/operations

*Select from:*

☒ 100%

### (9.2.2) Frequency of measurement

*Select from:*

☒ Continuously

### (9.2.3) Method of measurement

*On-site facility management and periodic audits by Vistra Environmental Health and Safety Teams.*

### (9.2.4) Please explain

*Vistra prioritizes the safety of our employees, third party partners (contractors and suppliers), visitors, and communities. This includes ensuring appropriate water resources onsite at our generation assets with fully functioning services available to all employees, third parties, and visitors.*

*[Fixed row]*

**(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?**

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

12398162

(9.2.2.2) Comparison with previous reporting year

Select from:

☒ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Mergers and acquisitions

(9.2.2.4) Five-year forecast

Select from:

☒ Higher

(9.2.2.5) Primary reason for forecast

Select from:

☒ Mergers and acquisitions

(9.2.2.6) Please explain

Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Higher volumes in 2024 are generally driven by assets as part of Energy Harbor acquisition as well as higher generation volumes.

Total discharges

(9.2.2.1) Volume (megaliters/year)

12135229

#### (9.2.2.2) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Mergers and acquisitions

#### (9.2.2.4) Five-year forecast

Select from:

☒ Higher

#### (9.2.2.5) Primary reason for forecast

Select from:

☒ Mergers and acquisitions

#### (9.2.2.6) Please explain

*Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality*

### Total consumption

#### (9.2.2.1) Volume (megaliters/year)

263257

#### (9.2.2.2) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Mergers and acquisitions

#### (9.2.2.4) Five-year forecast

Select from:

☒ Higher

#### (9.2.2.5) Primary reason for forecast

Select from:

☒ Mergers and acquisitions

#### (9.2.2.6) Please explain

*Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Higher volumes in 2024 are generally driven by assets as part of Energy Harbor acquisition as well as higher generation volumes.*

*[Fixed row]*

**(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.**

#### (9.2.4.1) Withdrawals are from areas with water stress

Select from:

☒ Yes

#### (9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

981690

#### (9.2.4.3) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.4.5) Five-year forecast

Select from:

☒ About the same

#### (9.2.4.6) Primary reason for forecast

Select from:

☒ Increase/decrease in business activity

#### (9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

7.92

#### (9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

#### (9.2.4.9) Please explain

*Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Our facilities draw water from a mix of sources across groundwater, surface water, seawater, and third-party municipal water sources. Each facility manages its daily water withdrawal, consumption, and discharge in accordance with local, state, and federal permits and regulations that control water use and effluent quality. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered “high stress” or “extremely high stress.” Our water-related impacts, both internal and external to Vistra, are identified through a combination of approaches: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Biennial corporate climate impact assessments • Evaluation of stressed water locations using the WRI Water Risk Atlas.*

[Fixed row]

#### (9.2.7) Provide total water withdrawal data by source.

**Fresh surface water, including rainwater, water from wetlands, rivers, and lakes**

##### (9.2.7.1) Relevance

Select from:

☒ Relevant

##### (9.2.7.2) Volume (megaliters/year)

11931883

##### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ Higher

##### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Mergers and acquisitions

##### (9.2.7.5) Please explain

*Vistra freshwater withdrawals increased 4% from 2023 to 2024. Multiple factors can account for this slight increase, including: 1) The addition of three nuclear assets following the completion of the 2024 acquisition of Energy Harbor, with these three nuclear assets accounting for ~2% of overall water withdrawn for 2024; 2) General expected variety in water withdrawal. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*

## Brackish surface water/Seawater

### (9.2.7.1) Relevance

Select from:

☒ Relevant

### (9.2.7.2) Volume (megaliters/year)

335927

### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.7.5) Please explain

*Vistra seawater withdrawals decreased by 8% in 2024 in comparison to 2023. Seawater withdrawal is in use for only one of Vistra's generation assets, and this decrease can be attributed to general expected variety in water withdrawal. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*

## Groundwater – renewable

### (9.2.7.1) Relevance

Select from:

☒ Relevant

#### (9.2.7.2) Volume (megaliters/year)

3051

#### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower

#### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.7.5) Please explain

*Vistra groundwater withdrawals decreased by 4% in 2024 in comparison to 2023. This decrease can be attributed to general expected variety in water withdrawal. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*

### Groundwater – non-renewable

#### (9.2.7.1) Relevance

Select from:

☒ Not relevant

#### (9.2.7.5) Please explain

*Vistra has disclosed groundwater withdrawals in the above line for 'groundwater-renewable'.*

### Produced/Entrained water

### (9.2.7.1) Relevance

Select from:

☒ Not relevant

### (9.2.7.5) Please explain

*Vistra does not produce/entrain water.*

## Third party sources

### (9.2.7.1) Relevance

Select from:

☒ Relevant

### (9.2.7.2) Volume (megaliters/year)

107302

### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.7.5) Please explain

*Vistra third-party water withdrawals remained relatively stable year over year, with only a 1% increase seen from 2023 to 2024. Individual plants saw increases and decreases in third party water withdrawal, and this is expected. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*

[Fixed row]

## (9.2.8) Provide total water discharge data by destination.

### Fresh surface water

#### (9.2.8.1) Relevance

Select from:

☒ Relevant

#### (9.2.8.2) Volume (megaliters/year)

11718544

#### (9.2.8.3) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Mergers and acquisitions

#### (9.2.8.5) Please explain

*Vistra freshwater discharges increased 4% from 2023 to 2024. Multiple factors can account for this slight increase, including: 1) The addition of three nuclear assets following the completion of the 2024 acquisition of Energy Harbor, with these three nuclear assets accounting for ~2% of overall water discharges for 2024; 2) General expected variety in water withdrawal. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*

### Brackish surface water/seawater

### (9.2.8.1) Relevance

Select from:

☒ Relevant

### (9.2.8.2) Volume (megaliters/year)

355738

### (9.2.8.3) Comparison with previous reporting year

Select from:

☒ Lower

### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.8.5) Please explain

*Vistra seawater discharges decreased by 8% in 2024 in comparison to 2023. Seawater withdrawal, consumption, and discharge is in use for only one of Vistra's generation assets, and this decrease can be attributed to general expected variety in water discharge. Water discharge from different sources will vary from year to year, due to changing business conditions and weather conditions.*

## Groundwater

### (9.2.8.1) Relevance

Select from:

☒ Not relevant

### (9.2.8.5) Please explain

*Groundwater discharge is negligible across Vistra generation assets.*

Third-party destinations

(9.2.8.1) Relevance

Select from:

☒ Relevant

(9.2.8.2) Volume (megaliters/year)

60947

(9.2.8.3) Comparison with previous reporting year

Select from:

☒ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

*Vistra third-party water discharges decreased 2% from 2023 to 2024. Individual plants saw increases and decreases in third party water withdrawal, and this is expected. Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.*  
[Fixed row]

**(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.**

(9.2.10.1) Emissions to water in the reporting year (metric tons)

### (9.2.10.2) Categories of substances included

Select all that apply

☒ Priority substances listed under the EU Water Framework Directive

### (9.2.10.3) List the specific substances included

*Specific substances will vary depending on the location and activity of the generation asset. All water discharges are heavily monitored for compliance against the United States National Pollutant Discharge Elimination System under the Clean Water Act via NPDES permits.*

### (9.2.10.4) Please explain

*Specific substances will vary depending on the location and activity of the generation asset. All water discharges are heavily monitored for compliance against the United States National Pollutant Discharge Elimination System under the Clean Water Act via NPDES permits. Our water impact management involves engagement with industry and community stakeholders to ensure our teams fully understand the scope of our operational impacts, as well as maintain adequate resources to industry knowledge to help mitigate potentially negative impacts. Vistra's community affairs team partners with local communities where we operate to understand and respond to our climate and water-related impacts.*

[Fixed row]

**(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?**

### Direct operations

#### (9.3.1) Identification of facilities in the value chain stage

Select from:

☒ Yes, we have assessed this value chain stage and identified facilities with water-related dependencies, impacts, risks, and opportunities

#### (9.3.2) Total number of facilities identified

### (9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 1-25

### (9.3.4) Please explain

*In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including:*

- Operation as zero-discharge facilities
- Using reclaimed water as the primary source
- Utilizing low-quality water with significant treatment to recycle extensively

## Upstream value chain

### (9.3.1) Identification of facilities in the value chain stage

Select from:

☒ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

### (9.3.4) Please explain

*This is not an immediate strategic priority in our upstream value chain.*

*[Fixed row]*

**(9.3.1) For each facility referenced in 9.3, provide coordinates, water accounting data, and a comparison with the previous reporting year.**

## Row 1

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 1

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

United States of America

☒ St. Lawrence

### (9.3.1.8) Latitude

0

### (9.3.1.9) Longitude

0

### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

0.93

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0.93

**(9.3.1.21) Total water discharges at this facility (megaliters)**

0.3

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

☒ Lower

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0.3

**(9.3.1.27) Total water consumption at this facility (megaliters)**

0.64

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

☒ Lower

### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

## Row 2

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 2

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

#### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

#### (9.3.1.8) Latitude

0

#### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☒ Coal - hard

#### (9.3.1.13) Total water withdrawals at this facility (megaliters)

567808

#### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

567543

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

265

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

562530

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

☒ Higher

**(9.3.1.23) Discharges to fresh surface water**

562530

#### (9.3.1.24) Discharges to brackish surface water/seawater

0

#### (9.3.1.25) Discharges to groundwater

0

#### (9.3.1.26) Discharges to third party destinations

0

#### (9.3.1.27) Total water consumption at this facility (megaliters)

5278

#### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

#### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

### Row 3

#### (9.3.1.1) Facility reference number

Select from:

☒ Facility 3

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

### (9.3.1.6) Reason for no withdrawals and/or discharges

*Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.*

### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

### (9.3.1.8) Latitude

0

### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☒ Gas

#### (9.3.1.13) Total water withdrawals at this facility (megaliters)

13947

#### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Higher

#### (9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes

0

#### (9.3.1.16) Withdrawals from brackish surface water/seawater

0

#### (9.3.1.17) Withdrawals from groundwater - renewable

0

#### (9.3.1.18) Withdrawals from groundwater - non-renewable

0

#### (9.3.1.19) Withdrawals from produced/entrained water

0

#### (9.3.1.20) Withdrawals from third party sources

13947

#### (9.3.1.27) Total water consumption at this facility (megaliters)

13947

#### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

#### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

#### Row 4

#### (9.3.1.1) Facility reference number

Select from:

☒ Facility 4

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

### (9.3.1.6) Reason for no withdrawals and/or discharges

*Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.*

### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

### (9.3.1.8) Latitude

0

### (9.3.1.9) Longitude

0

**(9.3.1.10) Located in area with water stress**

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

2477

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

#### (9.3.1.19) Withdrawals from produced/entrained water

0

#### (9.3.1.20) Withdrawals from third party sources

2477

#### (9.3.1.27) Total water consumption at this facility (megaliters)

2477

#### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

#### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

### Row 5

#### (9.3.1.1) Facility reference number

Select from:

☒ Facility 5

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

### (9.3.1.8) Latitude

0

### (9.3.1.9) Longitude

0

### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

387282

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Higher

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

387282

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

0

**(9.3.1.21) Total water discharges at this facility (megaliters)**

387047

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

☒ Higher

**(9.3.1.23) Discharges to fresh surface water**

387047

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

0

**(9.3.1.26) Discharges to third party destinations**

0

**(9.3.1.27) Total water consumption at this facility (megaliters)**

235

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

☒ About the same

### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including:*

- Operation as zero-discharge facilities
- Using reclaimed water as the primary source
- Utilizing low-quality water with significant treatment to recycle extensively

### Row 6

#### (9.3.1.1) Facility reference number

Select from:

☒ Facility 6

#### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

#### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

#### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

#### (9.3.1.6) Reason for no withdrawals and/or discharges

*Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.*

#### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

#### (9.3.1.8) Latitude

0

#### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☒ Gas

#### (9.3.1.13) Total water withdrawals at this facility (megaliters)

472

#### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

472

**(9.3.1.27) Total water consumption at this facility (megaliters)**

472

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

☒ Lower

**(9.3.1.29) Please explain**

The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively

## Row 7

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 7

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

### (9.3.1.6) Reason for no withdrawals and/or discharges

Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.

#### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf of Coast

#### (9.3.1.8) Latitude

0

#### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

☒ Gas

#### (9.3.1.13) Total water withdrawals at this facility (megaliters)

2

#### (9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ Much lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0.15

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

2

**(9.3.1.27) Total water consumption at this facility (megaliters)**

2

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

☒ Much lower

**(9.3.1.29) Please explain**

The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively

## Row 8

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 8

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals and discharges

### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

**(9.3.1.8) Latitude**

0

**(9.3.1.9) Longitude**

0

**(9.3.1.10) Located in area with water stress**

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

7172

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Higher

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

7172

**(9.3.1.21) Total water discharges at this facility (megaliters)**

836

**(9.3.1.22) Comparison of total discharges with previous reporting year**

Select from:

☒ Higher

**(9.3.1.23) Discharges to fresh surface water**

0

**(9.3.1.24) Discharges to brackish surface water/seawater**

0

**(9.3.1.25) Discharges to groundwater**

**(9.3.1.26) Discharges to third party destinations**

836

**(9.3.1.27) Total water consumption at this facility (megaliters)**

6336

**(9.3.1.28) Comparison of total consumption with previous reporting year**

Select from:

☒ Higher**(9.3.1.29) Please explain**

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

**Row 9****(9.3.1.1) Facility reference number**

Select from:

☒ Facility 9**(9.3.1.3) Value chain stage**

Select from:

☒ Direct operations

#### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

#### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

#### (9.3.1.6) Reason for no withdrawals and/or discharges

*Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.*

#### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Rio Grande - Bravo

#### (9.3.1.8) Latitude

0

#### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

20

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ About the same

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

20

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

### (9.3.1.20) Withdrawals from third party sources

0

### (9.3.1.27) Total water consumption at this facility (megaliters)

20

### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively*

## Row 10

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 10

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

#### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

- ☒ Impacts
- ☒ Risks

#### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

- ☒ Yes, withdrawals and discharges

#### (9.3.1.7) Country/Area & River basin

United States of America

- ☒ Other, please specify :Major Basin - North Atlantic Coast

#### (9.3.1.8) Latitude

0

#### (9.3.1.9) Longitude

0

#### (9.3.1.10) Located in area with water stress

Select from:

- ☒ Yes

#### (9.3.1.11) Primary power generation source for your electricity generation at this facility

Select from:

- ☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

225

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

**(9.3.1.17) Withdrawals from groundwater - renewable**

0

**(9.3.1.18) Withdrawals from groundwater - non-renewable**

0

**(9.3.1.19) Withdrawals from produced/entrained water**

0

**(9.3.1.20) Withdrawals from third party sources**

225

**(9.3.1.21) Total water discharges at this facility (megaliters)**

83

#### (9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Lower

#### (9.3.1.23) Discharges to fresh surface water

0

#### (9.3.1.24) Discharges to brackish surface water/seawater

0

#### (9.3.1.25) Discharges to groundwater

0

#### (9.3.1.26) Discharges to third party destinations

83

#### (9.3.1.27) Total water consumption at this facility (megaliters)

142

#### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

#### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified*

as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively

## Row 11

### (9.3.1.1) Facility reference number

Select from:

☒ Facility 11

### (9.3.1.3) Value chain stage

Select from:

☒ Direct operations

### (9.3.1.4) Dependencies, impacts, risks, and/or opportunities identified at this facility

Select all that apply

☒ Impacts

☒ Risks

### (9.3.1.5) Withdrawals or discharges in the reporting year

Select from:

☒ Yes, withdrawals only

### (9.3.1.6) Reason for no withdrawals and/or discharges

Facilities reporting no discharge values indicate that all withdrawn water was consumed for operations. Across the Vistra fleet, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled.

### (9.3.1.7) Country/Area & River basin

United States of America

☒ Other, please specify :Major Basin - Gulf Coast

**(9.3.1.8) Latitude**

0

**(9.3.1.9) Longitude**

0

**(9.3.1.10) Located in area with water stress**

Select from:

☒ Yes

**(9.3.1.11) Primary power generation source for your electricity generation at this facility**

Select from:

☒ Gas

**(9.3.1.13) Total water withdrawals at this facility (megaliters)**

2284

**(9.3.1.14) Comparison of total withdrawals with previous reporting year**

Select from:

☒ Lower

**(9.3.1.15) Withdrawals from fresh surface water, including rainwater, water from wetlands, rivers and lakes**

0

**(9.3.1.16) Withdrawals from brackish surface water/seawater**

0

#### (9.3.1.17) Withdrawals from groundwater - renewable

3

#### (9.3.1.18) Withdrawals from groundwater - non-renewable

0

#### (9.3.1.19) Withdrawals from produced/entrained water

0

#### (9.3.1.20) Withdrawals from third party sources

2281

#### (9.3.1.27) Total water consumption at this facility (megaliters)

2284

#### (9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Lower

#### (9.3.1.29) Please explain

*The WRI Aqueduct Tool is used in conjunction with Vistra Sustainability and Environmental Teams to complete a high-level analysis of water stress regions in relation to our generation assets, with 'stressed' regions being those that qualify as "High" or "Extremely High" per the WRI. Vistra also notes one generation asset that falls in an "Arid, Low Water Use" region. This high level identification provides the basis for risk and impact identification, both on our generation assets and on the regions in which we are operating. Geolocation data is maintained internally, but is not disclosed due for confidentiality. In 2024, Vistra had 10 power plants in areas identified as "high stress" or "extremely high stress" water stress zones, and one power plant in an area identified as an "arid & low water use" water stress zone per the WRI Water Risk Atlas. We have experience operating these plants in regions of Texas that are either typically arid, historically susceptible to drought, and/or experiencing higher electricity demands due to significant business development and population growth. These plants represented less than 8% of the water withdrawn across our*

entire fleet. All these plants have low water demand and site-specific conservation measures, including: • Operation as zero-discharge facilities • Using reclaimed water as the primary source • Utilizing low-quality water with significant treatment to recycle extensively  
[Add row]

## **(9.3.2) For the facilities in your direct operations referenced in 9.3.1, what proportion of water accounting data has been third party verified?**

### **Water withdrawals – total volumes**

#### **(9.3.2.1) % verified**

Select from:

☒ Not verified

#### **(9.3.2.3) Please explain**

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

### **Water withdrawals – volume by source**

#### **(9.3.2.1) % verified**

Select from:

☒ Not verified

#### **(9.3.2.3) Please explain**

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

### **Water withdrawals – quality by standard water quality parameters**

#### **(9.3.2.1) % verified**

Select from:

☒ Not relevant

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

## Water discharges – total volumes

### (9.3.2.1) % verified

Select from:

☒ Not verified

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

## Water discharges – volume by destination

### (9.3.2.1) % verified

Select from:

☒ Not verified

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

## Water discharges – volume by final treatment level

### (9.3.2.1) % verified

Select from:

☒ Not relevant

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

### Water discharges – quality by standard water quality parameters

#### (9.3.2.1) % verified

Select from:

☒ Not relevant

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*

### Water consumption – total volume

#### (9.3.2.1) % verified

Select from:

☒ Not verified

### (9.3.2.3) Please explain

*At this time, Vistra engages a third party consultant/auditor for limited assurance of greenhouse gas emissions only.*  
*[Fixed row]*

### (9.5) Provide a figure for your organization's total water withdrawal efficiency.

#### (9.5.1) Revenue (currency)

17224000000

## (9.5.2) Total water withdrawal efficiency

1389.24

## (9.5.3) Anticipated forward trend

*Vistra's water withdrawal efficiency is not entirely correlated with revenue and water withdrawal volumes due to the variety of operations including retail and commercial revenue. However, we generally expect to become more efficient over time given our growing mix of renewable generation assets that require very little water usage.*

*[Fixed row]*

## (9.7) Do you calculate water intensity for your electricity generation activities?

Select from:

☒ Yes

### (9.7.1) Provide the following intensity information associated with your electricity generation activities.

#### Row 1

#### (9.7.1.1) Water intensity value (m3/denominator)

1.3

#### (9.7.1.2) Numerator: water aspect

Select from:

☒ Total water consumption

#### (9.7.1.3) Denominator

Select from:

☒ MWh

#### (9.7.1.4) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.7.1.5) Please explain

*Vistra evaluates total water consumed and withdrawn for our water intensity metrics. In 2023, Vistra disclosed a total water consumption intensity of 1.18m3/MWh. For 2024, the total water consumption intensity is 1.30m3/MWh, resulting in a 10% increase year over year.*

### Row 2

#### (9.7.1.1) Water intensity value (m3/denominator)

61.35

#### (9.7.1.2) Numerator: water aspect

Select from:

☒ Total water withdrawals

#### (9.7.1.3) Denominator

Select from:

☒ MWh

#### (9.7.1.4) Comparison with previous reporting year

Select from:

☒ Lower

#### (9.7.1.5) Please explain

*Vistra evaluates total water consumed and withdrawn for our water intensity metrics. In 2023, Vistra disclosed a total water withdrawal intensity of 70.97m3/MWh. For 2024, the total water consumption intensity is 61.35m3/MWh, resulting in a 14% decrease year over year.*

[Add row]

### (9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

#### (9.13.1) Products contain hazardous substances

Select from:

☒ No

#### (9.13.2) Comment

*Vistra does not produce any products that contain substances classified as hazardous. Additionally, any substances discharged into water sources are strictly regulated by the United States National Pollutant Discharge Elimination System (NPDES).*

[Fixed row]

### (9.14) Do you classify any of your current products and/or services as low water impact?

#### (9.14.1) Products and/or services classified as low water impact

Select from:

☒ Yes

#### (9.14.2) Definition used to classify low water impact

*Evaluation of water withdrawn and volume of water reused or recycled.*

#### (9.14.4) Please explain

*Vistra has developed and is currently developing solar generation sites that use little to no water in their operations to produce electricity. In addition Vistra operates plants in certain areas that use reclaimed water for operations.*

[Fixed row]

## (9.15) Do you have any water-related targets?

Select from:

☒ No, and we do not plan to within the next two years

### (9.15.3) Why do you not have water-related target(s) and what are your plans to develop these in the future?

#### (9.15.3.1) Primary reason

Select from:

☒ Important but not an immediate business priority

#### (9.15.3.2) Please explain

*Water withdrawal amounts in relation to power generation activities will vary from year to year by nature due to fluctuations in operational and business conditions. Across the Vistra fleet, actual total water consumption is low - substantially, 97.9% of our water withdrawn is not consumed, rather it is returned to its source or recycled. We have no plans to set a specific water target in the future, but we remain committed to being overall effective stewards of the environment as outlined in our publicly posted environmental principles policy.*

*[Fixed row]*

## C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

	Actions taken in the reporting period to progress your biodiversity-related commitments
	Select from: <input checked="" type="checkbox"/> No, we are not taking any actions to progress our biodiversity-related commitments

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	Select from: <input checked="" type="checkbox"/> No, we do not use indicators, but plan to within the next two years

[Fixed row]

(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?

Legally protected areas

### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

### (11.4.2) Comment

*Visra reviews its business activities, including development and construction of these projects, for climate risk as part of its enterprise risk management process. In accordance with local, state, and federal permitting guidelines and regulations, Visra has conducted various environmental and social studies to determine potential impacts of ongoing projects and operational generation facilities or mining assets. These studies include, for example, an Environmental Site Assessment, Historic-Age Non Archaeological Resource Reconnaissance Surveys, Archaeological Surveys, Hydrology Studies, Wetland Delineation Studies, Ecological Compliance Assessments, U.S. Fish and Wildlife IPaC Reports, and Habitat Surveys. At project, generation facility or mining sites where biodiversity impact is identified, biodiversity management plans are put in place to protect identified species or habitats.*

## UNESCO World Heritage sites

### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Not assessed

## UNESCO Man and the Biosphere Reserves

### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Not assessed

## Ramsar sites

#### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Not assessed

#### Key Biodiversity Areas

#### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Yes

#### (11.4.2) Comment

*Vistra reviews its business activities, including development and construction of these projects, for climate risk as part of its enterprise risk management process. In accordance with local, state, and federal permitting guidelines and regulations, Vistra has conducted various environmental and social studies to determine potential impacts of ongoing projects and operational generation facilities or mining assets. These studies include, for example, an Environmental Site Assessment, Historic-Age Non Archaeological Resource Reconnaissance Surveys, Archaeological Surveys, Hydrology Studies, Wetland Delineation Studies, Ecological Compliance Assessments, U.S. Fish and Wildlife IPaC Reports, and Habitat Surveys. At project, generation facility or mining sites where biodiversity impact is identified, biodiversity management plans are put in place to protect identified species or habitats.*

#### Other areas important for biodiversity

#### (11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity

Select from:

☒ Not assessed

[Fixed row]

**(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.**

**Row 1**

**(11.4.1.2) Types of area important for biodiversity**

*Select all that apply*

- ☒ Legally protected areas
- ☒ Key Biodiversity Areas

**(11.4.1.3) Protected area category (IUCN classification)**

*Select from:*

- ☒ Unknown

**(11.4.1.4) Country/area**

*Select from:*

- ☒ United States of America

**(11.4.1.5) Name of the area important for biodiversity**

*Various areas*

**(11.4.1.8) Briefly describe your organization's activities in the reporting year located in or near to the selected area**

*Vistra reviews its business activities, including development and construction of these projects, for climate risk as part of its enterprise risk management process. In accordance with local, state, and federal permitting guidelines and regulations, Vistra has conducted various environmental and social studies to determine potential impacts of ongoing projects and operational generation facilities or mining assets. These studies include, for example, an Environmental Site Assessment, Historic-Age Non Archaeological Resource Reconnaissance Surveys, Archaeological Surveys, Hydrology Studies, Wetland Delineation Studies, Ecological Compliance Assessments, U.S. Fish and Wildlife IPaC Reports, and Habitat Surveys. At project, generation facility or mining sites where biodiversity impact is identified, biodiversity management plans are put in place to protect identified species or habitats.*

#### (11.4.1.9) Indicate whether any of your organization's activities located in or near to the selected area could negatively affect biodiversity

Select from:

☒ Yes, but mitigation measures have been implemented

#### (11.4.1.10) Mitigation measures implemented within the selected area

Select all that apply

☒ Operational controls

☒ Restoration

#### (11.4.1.11) Explain how your organization's activities located in or near to the selected area could negatively affect biodiversity, how this was assessed, and describe any mitigation measures implemented

*Vistra reviews its business activities, including development and construction of these projects, for climate risk as part of its enterprise risk management process. In accordance with local, state, and federal permitting guidelines and regulations, Vistra has conducted various environmental and social studies to determine potential impacts of ongoing projects and operational generation facilities or mining assets. These studies include, for example, an Environmental Site Assessment, Historic-Age Non Archaeological Resource Reconnaissance Surveys, Archaeological Surveys, Hydrology Studies, Wetland Delineation Studies, Ecological Compliance Assessments, U.S. Fish and Wildlife IPaC Reports, and Habitat Surveys. At project, generation facility or mining sites where biodiversity impact is identified, biodiversity management plans are put in place to protect identified species or habitats. Please see the 'environmental stewardship' section of our 2024 Sustainability Report at [vistracorp.com/sustainability](https://vistracorp.com/sustainability) for additional information.*

[Add row]

## C13. Further information & sign off

**(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?**

**(13.1.1) Other environmental information included in your CDP response is verified and/or assured by a third party**

Select from:

☒ No, and we do not plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years

**(13.1.2) Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party**

Select from:

☒ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

**(13.1.3) Explain why other environmental information included in your CDP response is not verified and/or assured by a third party**

*At this time, Vistra only peruses external assurance on our Scope 1 and Scope 2 (Location and Market Based) emissions. While not formally externally assured, environmental information as reported in our CDP response is reviewed by Vistra's Internal Audit Team and senior Environmental, Health and Safety leadership.*  
[Fixed row]

**(13.2) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.**

	Additional information
	No additional information to share.

[Fixed row]

**(13.3) Provide the following information for the person that has signed off (approved) your CDP response.**

#### **(13.3.1) Job title**

*Senior Director Sustainability Strategy*

#### **(13.3.2) Corresponding job category**

*Select from:*

☒ Environment/Sustainability manager

[Fixed row]

**(13.4) Please indicate your consent for CDP to share contact details with the Pacific Institute to support content for its Water Action Hub website.**

*Select from:*

☒ No

