



Vistra Corp.

CDP Corporate Questionnaire 2026

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.

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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 44,000 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 sustainability 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

12/31/2025

(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:

☒ 2 years

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

Select from:

☒ 2 years

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

Select from:

☒ 2 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: ☒ 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

☒ Smart grids/demand response

(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)

1020

(1.16.1.4) Net electricity generation (GWh)

6719

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025.

Coal - Brown

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

Select from:

☒ Yes

(1.16.1.2) Nameplate capacity (MW)

7723

(1.16.1.4) Net electricity generation (GWh)

35459

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025.

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)

3

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025.

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)

26989

(1.16.1.4) Net electricity generation (GWh)

121763

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025. Includes a full year view of acquired Lotus natural gas assets.

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, 2025.

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

Ocean thermal**(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

Onshore wind

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

Select from:

☒ No

Offshore 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)

650

(1.16.1.4) Net electricity generation (GWh)

1026

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025.

Wave

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

Select from:

☒ No

Tidal

(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)

624

(1.16.1.4) Net electricity generation (GWh)

0

(1.16.1.5) Comment

Battery Battery Energy Storage Systems (BESS) installations. Reported nameplate capacity is based on year-end, as of December 31, 2025.

Other non-renewable

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

Select from:

☒ No

Total

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

Select from:

☒ Yes

(1.16.1.2) Nameplate capacity (MW)

43641

(1.16.1.4) Net electricity generation (GWh)

217231

(1.16.1.5) Comment

Reported nameplate capacity and GWh generation is based on year-end, as of December 31, 2025.

[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 2025, 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]

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. In 2025, Vistra refreshed its climate scenario analysis with the aid of an independent third party; the analysis explored climate-related risks and opportunities for the entirety of its U.S. operations under three NGFS scenarios (Net Zero 2050, Delayed Transition, and Current Policies), grouped impacts into short-, medium-, and long-term timeframes aligned with its enterprise risk management function, and identified risks and opportunities across four focus areas: regulations and compliance, markets and reputation, energy transition and technology, and operational resilience. Vistra scored the severity and likelihood of each identified climate-related risk and opportunity using an approach aligned with its enterprise risk management framework; results were reviewed with senior leadership to validate material risks/opportunities and identify strategic interventions that were then used to inform ongoing strategy and risk management processes.

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. In 2025, Vistra refreshed its climate scenario analysis with the aid of an independent third party; the analysis explored climate-related risks and opportunities for the entirety of its U.S. operations under three NGFS scenarios (Net Zero 2050, Delayed Transition, and Current Policies), grouped impacts into short-, medium-, and long-term timeframes aligned with its enterprise risk management function, and identified risks and opportunities across four focus areas: regulations and compliance, markets and reputation, energy transition and technology, and operational resilience. Vistra scored the severity and likelihood of each identified climate-related risk and opportunity using an approach aligned with its enterprise risk management framework; results were reviewed with senior leadership to validate material risks/opportunities and identify strategic interventions that were then used to inform ongoing strategy and risk management processes.

Long-term

(2.1.1) From (years)

10

(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. In 2025, Vistra refreshed its climate scenario analysis with the aid of an independent third party; the analysis explored climate-related risks and opportunities for the entirety of its U.S. operations under three NGFS scenarios (Net Zero 2050, Delayed Transition, and Current Policies), grouped impacts into short-, medium-, and long-term timeframes aligned with its enterprise risk management function, and identified risks and opportunities across four focus areas: regulations and compliance, markets and reputation, energy transition and technology, and operational resilience. Vistra scored the severity

and likelihood of each identified climate-related risk and opportunity using an approach aligned with its enterprise risk management framework; results were reviewed with senior leadership to validate material risks/opportunities and identify strategic interventions that were then used to inform ongoing strategy and risk management processes.

[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: ☒ Yes	Select from: ☒ 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: ☒ Yes	Select from: ☒ Both risks and opportunities	Select from: ☒ 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:

- ☒ Annually

(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

(2.2.2.15) Risk types and criteria considered

Acute physical

☒ Drought

☒ Heat wave

☒ Wildfires

☒ 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 market signals

Reputation

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

Technology

- ☒ Transition to lower emissions technology and products

Liability

- ☒ Exposure to sanctions and litigation
- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

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

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

Select from:

- ☒ Yes

(2.2.2.18) Further details of process

Dependencies, impacts, risks and opportunities are evaluated as a part of Vistra's overall management strategy, and in 2025 was managed through a combination of 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. 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 identified climate-related risks and opportunities across four key focus areas: - Regulations and compliance - Markets and reputation - Energy transition and technology - Operational resilience 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 the climate section of our annual sustainability 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:

- ☒ 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:

- ☒ Annually

(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

Other

- ☒ Desk-based research
- ☒ Internal company methods
- ☒ Scenario analysis

(2.2.2.15) 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
- ☒ Changing precipitation patterns and types (rain, hail, snow/ice)
- ☒ Increased levels of environmental pollutants in freshwater or marine bodies

- ☒ 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
- ☒ Increased difficulty in obtaining operations permits
- ☒ Increased difficulty in obtaining water withdrawals permits
- ☒ Mandatory water efficiency, conservation, recycling, or process standards

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, excessive bycatch)
- ☒ Stigmatization of sector

Technology

- ☒ Dependency on water-intensive energy sources

Liability

- ☒ Non-compliance with regulations and legislation

(2.2.2.16) Partners and stakeholders considered

Select all that apply

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Suppliers
- ☒ Regulators
- ☒ Local communities
- ☒ Water utilities at a local level

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

Select from:

☒ No

(2.2.2.18) Further details of process

Dependencies, impacts, risks and opportunities are evaluated as a part of Vistra's overall management strategy, and in 2025 was managed through a combination of 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. 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 identified climate-related risks and opportunities across four key focus areas: - Regulations and compliance - Markets and reputation - Energy transition and technology - Operational resilience 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 the climate section of our annual sustainability 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 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. The Board regularly reviews climate-related risks and opportunities and explicitly notes their interconnectedness with capital deployment, business strategy, and other Board decisions. Vistra refreshed its climate scenario analysis in 2025 with third-party support, covering the entirety of U.S. operations under three NGFS/IPCC-aligned scenarios through 2050, and used cross-functional work sessions to identify and score climate-related risks and opportunities; results were reviewed with senior leadership and used to inform ongoing strategy and risk management processes. Vistra's enterprise risk management process is led by the CFO, with the CRO meeting at least annually with every functional group to update the risk universe; risks are evaluated for likelihood and severity/financial impact and the framework is reviewed by a Risk Management Committee and reported to the Board's Sustainability and Risk Committee. Ultimately, this work is reflected in our TCFD report embedded in our sustainability report, as Vistra is shifting to an annual disclosure for its TCFD 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:

☒ Yes, we have identified priority locations

(2.3.2) Value chain stages where priority locations have been identified

Select all that apply

☒ Direct operations

(2.3.3) Types of priority locations identified

Sensitive locations

☒ Areas of limited water availability, flooding, and/or poor quality of water

Locations with substantive dependencies, impacts, risks, and/or opportunities

☒ Locations with substantive dependencies, impacts, risks, and/or opportunities relating to water

(2.3.4) Description of process to identify priority locations

Priority locations related to water-related impacts are identified through two levels: Vistra's annual climate analysis process and annual review of asset locations against water-stress zones as defined in the WRI Water Risk Atlas. Using the WRI Water Risk Atlas, Vistra is able to identify specific locations that are located in "High" or "Extremely High" water stress zones. Per the WRI, water stress evaluation considers baseline water stress measures the ratio of total water demand to available renewable surface and groundwater supplies. Water demand include domestic, industrial, irrigation, and livestock uses. Available renewable water supplies include the impact of upstream consumptive water users and large dams on downstream water availability. Higher values indicate more competition among users. Climate-related physical risks (including water impact risks and opportunities at priority locations) are considered in annual enterprise risk management and climate impact assessment processes, using geographic information system (GIS) analysis across four material factors, including water scarcity and elevated precipitation risks.

(2.3.5) Will you be disclosing a list/spatial map of priority locations?

Select from:

☒ No, we do not have a list/geospatial map of priority locations

[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 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 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. As part of this risk process, opportunities may be identified with follow-up efforts coordinated with internal departments.

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 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 corporate 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 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 corporate 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. As part of this risk process, opportunities may be identified with follow-up efforts coordinated with internal departments
[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) Details of policies and processes in place to identify and classify potential water pollutants

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

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

- ☒ Compliance with discharge permits / regulatory limits

(2.5.1.6) 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

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

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

- ☒ Compliance with discharge permits / regulatory limits

(2.5.1.6) 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

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

☒ Implementation of integrated solid waste management systems

☒ Water recycling

☒ Requirement for suppliers to comply with regulatory requirements

☒ Discharge treatment using sector-specific processes

(2.5.1.5) Indicators for measuring and evaluating the success of the procedure

Select all that apply

☒ Compliance with discharge permits / regulatory limits

(2.5.1.6) 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.

[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

An identified transition risk is additional regulatory and compliance obligations at local, state, and federal levels, primarily in the net zero scenario over the short, medium, and long term and in the delayed transition scenario over the long term. Impacts could include additional disclosure requirements, emissions regulations impacting our fossil-fueled assets, or changes in government incentives and subsidies.

(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

- ☒ Short-term
☒ Medium-term
☒ 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

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

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

7000000000

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

7000000000

(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)

7000000000

(3.1.1.25) Explanation of financial effect figure

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) 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

Engagement

☒ Engage with regulators/policy makers

(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. Additional costs includes engagement efforts with local, state and federal legislators.

(3.1.1.29) Description of response

Mitigation strategies include legislative engagement with state and federal governments and exploration of conversion opportunities for current assets including, but not limited to, coal-to-gas conversion, carbon capture, and nuclear uprates. 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 continue to increase our zero-carbon capacity while further reducing our risk.

Water

(3.1.1.1) Risk identifier

Select from:

☒ Risk6

(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(s): Gulf Coast, Mississippi-Missouri, North Atlantic Coast, Rio Grande-Bravo, St Lawrence (For more information on water stressed sites please see section 9)

(3.1.1.9) Organization-specific description of risk

Water stress is an identified chronic physical risk across all three scenarios over the medium and long term. Chronic water stress could disrupt our operational capability for generation assets that use significant amounts of water.

(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

☒ Short-term

☒ Medium-term

☒ 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.

(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.

(3.1.1.29) Description of response

Mitigation strategies include piloting hybrid or dry cooling systems where water scarcity poses the highest operational risk and continuous revision of drought resilience plans at our sites.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Market

☒ Changing customer behavior

(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

Shifting customer end-use behavior in the electricity markets we serve is an identified transition risk primarily in the net zero scenario over the medium and long term. Impacts could include shifting electricity usage patterns and increased market options for sourcing electricity.

(3.1.1.11) Primary financial effect of the risk

Select from:

☒ Decreased revenues due to reduced demand for products and services

(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

☒ 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

Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We see minimal 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

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

0

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

7000000000

(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)

7000000000

(3.1.1.25) Explanation of financial effect figure

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was a shift on usage patterns.

(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. Additional costs includes engagement efforts with customers to appropriately meet demand.

(3.1.1.29) Description of response

Mitigation strategies include continued leverage of our tenured experience in competitive markets to appropriately meet customer needs, monitoring adoption trends, and extending customer life.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Market

☒ Other market risk, please specify :Supply chain uncertainty

(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

Impacts from key suppliers (e.g. transformers, turbines, uranium) are an identified transition risk and could complicate reliable upstream sourcing in the current and delayed transition scenarios over the short and medium term. These impacts could constrain our ability to grow and operate our fleet.

(3.1.1.11) Primary financial effect of the risk

Select from:

- ☒ Disruption in upstream value chain

(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
☒ Medium-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

Most highly impacted assets would be driven by their GHG intensity starting with coal generation assets, then natural gas assets. We see some impact to our zero-carbon assets and limited impact to 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)

7000000000

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

0

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

7000000000

(3.1.1.25) Explanation of financial effect figure

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was a shift on availability of key upstream value chain partners.

(3.1.1.26) Primary response to risk

Diversification

☒ Increase supplier diversification

(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. Additional costs includes engagement efforts with supplier diversity efforts.

(3.1.1.29) Description of response

Vistra's strategies for mitigating these risks include assessing our supplier base for critical components and diversifying our suppliers to improve resiliency.

Climate change

(3.1.1.1) Risk identifier

Select from:

☒ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Other acute physical risk, please specify :Extreme weather

(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

Extreme weather disruptions are an identified acute physical risk across all three scenarios. Disruptions could impact our operational continuity, impact planned outage efforts, and affect employee safety.

(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

☒ Medium-term

☒ 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

Most highly impacted assets would be driven by their exposure marginal exposure to physical risk based on location and associated climate scenario impacts.

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

Select from:

☒ Yes

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

7000000000

(3.1.1.21) Anticipated financial effect figure in the medium-term – minimum (currency)

0

(3.1.1.22) Anticipated financial effect figure in the medium-term – maximum (currency)

7000000000

(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)

7000000000

(3.1.1.25) Explanation of financial effect figure

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was a shift on commercial availability of our generation 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. Additional costs includes additional maintenance and resiliency efforts on our generation fleet.

(3.1.1.29) Description of response

Mitigation strategies include use of dual fuel at certain generation locations, deploying advanced weather forecasting, advanced planning for inventory resilience, and proactive reviews of safety procedures. In addition the company strives to carry incremental unhedged generation length into peak periods.

[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)

5500000000

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

Select from:

☒ 1-10%

(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:

☒ 1-10%

(3.1.2.7) Explanation of financial figures

This level of financial quantification specific to water risk is an estimate based on limited water risk for our generation assets.

[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

☒ 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 • Annual 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: Mississippi-Missouri

(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:

☒ 1-25%

(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 • Annual 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: 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

2

(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 • Annual 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: 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 • Annual 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 5

(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 • Annual 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 2025, Vistra assets experienced 5 instances of non-compliance, resulting in 2 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

0.87

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

(3.5.2.3) % of Scope 2 emissions covered by the ETS

0

(3.5.2.4) Period start date

01/02/2025

(3.5.2.5) Period end date

01/01/2026

(3.5.2.6) Allowances allocated

0

(3.5.2.7) Allowances purchased

1030000

(3.5.2.8) Verified Scope 1 emissions in metric tons CO2e

809316

(3.5.2.9) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

Includes facilities owned and operated by Vistra under this program. Scope 2 emissions are not covered under our compliance obligations for California CaT - ETS.

Massachusetts state ETS

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

3.02

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

(3.5.2.4) Period start date

01/02/2025

(3.5.2.5) Period end date

01/01/2026

(3.5.2.6) Allowances allocated

0

(3.5.2.7) Allowances purchased

3324349

(3.5.2.8) Verified Scope 1 emissions in metric tons CO2e

2794895

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

Includes facilities owned and operated by Vistra under this program. Scope 2 emissions are not covered under our compliance obligations for Massachusetts state ETS.

RGGI - ETS

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

12.82

(3.5.2.2) Scope 2 emissions approach

Select from:

☒ No compliance obligation for scope 2 emissions

(3.5.2.3) % of Scope 2 emissions covered by the ETS

0

(3.5.2.4) Period start date

01/01/2025

(3.5.2.5) Period end date

12/31/2025

(3.5.2.6) Allowances allocated

0

(3.5.2.7) Allowances purchased

38843000

(3.5.2.8) Verified Scope 1 emissions in metric tons CO2e

11875436

(3.5.2.10) Details of ownership

Select from:

☒ Facilities we own and operate

(3.5.2.11) Comment

*Includes facilities owned and operated by Vistra under this program. Scope 2 emissions are not covered under our compliance obligations for RGGI - ETS.
[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. Vistra uses a corporate Environmental Management System (EMS), led by the corporate environmental team with executive oversight, informed by stakeholder engagement, and aligned with ISO 14001 best practices. The EMS includes compliance obligation reviews, internal audits, corrective actions, tracking of regulatory submittals and due dates in a work order system, and role-relevant annual environmental training (with additional training based on regulatory developments for applicable personnel). Vistra's governance oversight for sustainability and risk includes Board-level committees (including the Sustainability and Risk Committee and the Generation and Safety Oversight Committee) that oversee enterprise risk management and, among other matters, safety and environmental performance. The Board receives periodic reports and reviews an annual enterprise risk report, with quarterly reviews of significant changes to enterprise risk assessment by the Sustainability and Risk Committee. For our operational assets that are covered by carbon cap and trade systems, we seek operational efficiencies to manage our carbon emissions at facilities while also being active participants in carbon allowance auctions in the regulatory regions we are subject to. Vistra reports material regulatory uncertainty and a monitoring approach regarding shifting federal regulatory actions and executive orders, including January 2025 executive orders directing agencies to review existing regulations (including certain EPA rules) and Vistra's intention to monitor implementation and related agency actions. 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. In lieu of a nation-side carbon fee program, at a regional level, Vistra believes market-based solutions such as RGGI are a way to incentivize investments in lower emitting technologies.

(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?

	Environmental opportunities identified
Climate change	Select from: ☒ Yes, we have identified opportunities, and some/all are being realized
Water	Select from: ☒ Yes, we have identified opportunities, and some/all are being realized

[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

Reputational capital

☒ Strengthened social license to operate

(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

An identified market opportunity is use of active policy engagement to enhance the value of our integrated business model primarily in the net zero/delayed transition scenarios in the short and medium term.

(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

- ☒ Short-term
☒ Medium-term

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

Select from:

- ☒ About as likely as not (33–66%)

(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

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

0

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

3500000000

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

3500000000

(3.6.1.23) Explanation of financial effect figures

Estimated range on the impact to Vistra's enterprise value (0-5% as of end of 2025) if there was recognition for continued value for Vistra's integrated model and balanced portfolio of assets across all markets

(3.6.1.24) Cost to realize opportunity

100000

(3.6.1.25) Explanation of cost calculation

\$100K represents an approximate value for additional lobbying and political engagement

(3.6.1.26) Strategy to realize opportunity

To capitalize on this opportunity, Vistra can elevate policy engagement with key stakeholders to highlight our balanced approach to growing zero-carbon generation with a focus on reliability and affordability.

Water

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp5

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☒ Reduced water usage and consumption

(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

An identified opportunity is our ability to use reclaimed water across all three scenarios. Using reclaimed instead of surface water can mitigate long-term drought exposure and reduce operational disruptions – stabilizing output and improving asset value in water-stressed regions.

(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

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

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

Select from:

- ☒ About as likely as not (33–66%)

(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:

- ☒ No

(3.6.1.26) Strategy to realize opportunity

Vistra's strategies for capitalizing on this opportunity include evaluating scalability of reclaimed water systems across Vistra's fleet and building partnerships with local water districts.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Markets

☒ Stronger competitive advantage

(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

An identified market opportunity is our ability to utilize a first mover advantage given Vistra's scale primarily in the net zero/delayed transition scenarios over the short and medium term. By leveraging our healthy balance sheet and geographic reach, we can quickly support growth in our markets.

(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

☒ Short-term

☒ Medium-term

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

Select from:

☒ About as likely as not (33–66%)

(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

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

7000000000

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

7000000000

(3.6.1.23) Explanation of financial effect figures

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was an opportunity for opportunistic M&A or development project.

(3.6.1.24) Cost to realize opportunity

1000000000

(3.6.1.25) Explanation of cost calculation

\$1B represents an placeholder value for a medium size M&A opportunity or development project.

(3.6.1.26) Strategy to realize opportunity

Vistra's strategies for capitalizing on this opportunity include targeted pilots, opportunistic M&A, and right-sizing operations in various markets.

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

☒ Ability to diversify business activities

(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

Visstra's large and diverse fleet is an identified opportunity across the current and delayed transition scenarios. Strategies include leveraging optional life extensions of both existing fossil and nuclear plants as an affordable pathway for continued generation.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Increased value of fixed assets

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

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

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

Select from:

☒ About as likely as not (33–66%)

(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

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

0

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

7000000000

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

7000000000

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

7000000000

(3.6.1.23) Explanation of financial effect figures

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was an opportunity for extension of our existing assets or repowering with low-to no carbon fuels.

(3.6.1.24) Cost to realize opportunity

1000000000

(3.6.1.25) Explanation of cost calculation

\$100M represents an placeholder value for a medium size life extension effort or fuel conversion effort

(3.6.1.26) Strategy to realize opportunity

We have an active strategy to utilize our large footprint and existing interconnects to repower existing plants with different fuels. Additional efforts include the ability to develop new units at existing sites from a wide variety of generation technologies.

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☒ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Increased sales of existing products and services

(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

Growth in electricity demand from manufacturing, data centers, and transportation is an identified opportunity across all three scenarios. This demand would drive optionality for Vistra to support growing customer needs.

(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

☒ Short-term

☒ Medium-term

☒ 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-high

(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

(3.6.1.17) Anticipated financial effect figure in the short-term - minimum (currency)

0

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

7000000000

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

7000000000

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

7000000000

(3.6.1.23) Explanation of financial effect figures

Estimated range on the impact to Vistra's enterprise value (0-10% as of end of 2025) if there was an opportunity for load growth across the various markets we serve.

(3.6.1.24) Cost to realize opportunity

1000000000

(3.6.1.25) Explanation of cost calculation

\$100M represents an placeholder value for a medium size life variable cost increase to support additional load growth

(3.6.1.26) Strategy to realize opportunity

Strategies for capitalizing on this opportunity include enhanced capital allocation efforts to expand capacity, investments to extend asset life, and leveraging our long-term hedging programs.

[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)

5500000000

(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.

Water

(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)

5500000000

(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: ☒ Yes		
Water	Select from: ☒ Yes		
Biodiversity	Select from: ☒ No, and we do not plan to within the next two years	Select from: ☒ 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
- ☒ Chief Executive Officer (CEO)
- ☒ 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
- ☒ Overseeing the setting of corporate targets
- ☒ Monitoring progress towards corporate targets
- ☒ Approving and/or overseeing employee incentives

(4.1.2.7) Please explain

The Vistra Board of Directors (the Board) oversees for environmental issues material to Vistra - including Climate Change through the Sustainability and Risk Committee. The Board reviews decarbonization opportunities while achieving our operational and financial goals and takes 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 provide advice and assistance in developing climate change and sustainability policies and practices. The Sustainability and Risk Committee is responsible for: 1. Reviewing and discussing 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 Vistra's assessment of climate-related risks, including physical, transition, regulatory, reputational, and/or market risks, and management's process for the identification, evaluation, and mitigation of risks related to climate change. 3. Overseeing and monitoring Vistra's core vision and values and advising the Board and management on sustainability policies, including Vistra's publicly stated targets and aspirational goals for company-wide management of greenhouse gas emissions. 4. Providing oversight with respect to any sustainability reporting to the public or governmental agencies. The Sustainability and Risk Committee of the Board meets quarterly, and Vistra's environmental compliance with applicable regulations and permits is on the agenda at each quarterly meeting with the Generation Safety and oversight committee.

Water

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

Select all that apply

- ☒ Director on board
- ☒ Chief Executive Officer (CEO)
- ☒ 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 every board meeting (standing agenda item)

(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 Generation and Safety Oversight Committee. In addition to other responsibilities listed in the committee's policy, the committee is responsible for reviewing and monitoring the Company's compliance with environmental permits, laws and

regulations, including any significant changes thereto and how such changes might impact operations or expected performance, and significant matters before environmental regulatory agencies.

[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: ☒ Yes
Water	Select from: ☒ Yes
Biodiversity	Select from: ☒ 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:

- ☒ 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 strategy 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 Leadership Team, which consists of the CEO and his direct reports. The Executive Leadership Team 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 Leadership Team, 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:

☒ 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 Generation and Safety Oversight Committee of the Board of Directors on these topics and the Executive Vice President and General Counsel reports on certain environmental metrics to the Audit Committee of the Board of Directors. The Sustainability team and SVP of Environmental Health and Safety coordinate efforts regarding Vistra's emissions reductions targets and reporting of performance and also cover these matters quarterly with the Sustainability and Risk Committee of the Board of Directors. 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 aims to restore and enhance habitats and biodiversity. These matters are covered in discussions with the Sustainability and Risk Committee of the Board of Directors on a periodic basis and in connection with Vistra's annual sustainability report which is publicly available on the company's website.

[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

In 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. To align management's compensation with the Company's important sustainability goals, the metrics comprising the Stakeholder Index are defined and assessed qualitatively and include: GHG emissions reduction targets tracking to achieve 60% reduction by 2030 and net-zero by 2050; the Company's Science Based Targets initiative; employee initiatives, including supplier engagement to support integration of the PJM nuclear fleet and increase the Company's reliable and diverse supplier base, and a talent pipeline growth initiative to engage with colleges and trade schools.

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

In 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. To align management's compensation with the Company's important sustainability goals, the metrics comprising the Stakeholder Index are defined and assessed qualitatively and include: GHG emissions reduction targets tracking to achieve 60% reduction by 2030 and net-zero by 2050; the Company's Science Based Targets initiative; employee initiatives, including supplier engagement to support integration of the PJM nuclear fleet and increase the Company's reliable and diverse supplier base, and a talent pipeline growth initiative to engage with colleges and trade schools. Vistra's Generation index includes core processes (such as operating our zero carbon assets) that lead to consistent and safe operations while also driving the Generation portion of Vistra's financial metrics.

(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 and in-line with customer demand to support power reliability, affordability, and sustainability in our market areas.

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

In 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. To align management's compensation with the Company's important sustainability goals, the metrics comprising the Stakeholder Index are defined and assessed qualitatively and include: GHG emissions reduction targets tracking to achieve 60% reduction by 2030 and net-zero by 2050; the Company's Science Based Targets initiative; employee initiatives, including supplier engagement to support integration of the PJM nuclear fleet and increase the Company's reliable and diverse supplier base, and a talent pipeline growth initiative to engage with colleges and trade schools. Vistra's Generation index includes core processes (such as operating our zero carbon assets) that lead to consistent and safe operations while also driving the Generation portion of Vistra's financial metrics.

(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 and in-line with customer demand to support power reliability, affordability, and sustainability in our market areas.
[Add row]

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

	Does your organization have any environmental policies?
	Select from: ☒ 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) Develop renewable energy and new technologies 4) Source responsibly 5) Advocate for climate change mitigation 6) Seek resource diversity in our generation assets 7) Maintain compliance excellence in environmental management 8) Minimize facility impacts and promote continuous improvement 9) 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
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

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

Vistra Corp - Environmental Principles.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. Vistra has carbon reduction goals in place and regularly reports on climate risks and opportunities using TCFD disclosure taxonomy via our annual Sustainability Report. 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

Yes

- ☒ 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, my organization is registered

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

Select all that apply

☒ Mandatory government register

☒ Non-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 Influence Map Various ESG Third Party Ratings Agencies (including, but not limited to, Sustainalytics, MSCI, ISS, Bloomberg ESG, etc.)

(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 takes a strong leadership role in advocacy efforts by supporting public policies that advance the country's progress toward lowering GHG emissions while balancing the need for grid reliability amongst shifting generation resources and growing demand. We believe competitive markets offer the best solution to supporting demand growth while balancing reliability, affordability, and sustainability. Vistra advocates for its business interests with state and federal government officials, as outlined in Vistra's lobbying and political contributions policy. As such, all political activity and contributions promote Vistra's business interests, without regard to personal political views of company executives. Vistra actively engages with potential or proposed legislation and regulations which have a material impact on our business by participating in meetings, providing written letters, and interacting frequently with regulators and policymakers. Vistra's key business interests include: • Retail electric and generation policy and regulations • Environmental, sustainability, climate change mitigation, and other climate policy and regulations • Tax policy, regulations, and rules • The health, safety, and welfare of our employees Vistra reviews all lobbying efforts to ensure adherence to applicable laws and Vistra's core principles. Political disclosures for reporting year 2025 can be found in our 2025 Supplemental Disclosure Appendix, available at <https://vistracorp.com/sustainability/reporting/>.

[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

Unleashing American Energy Executive Order

(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

☒ Emissions – other GHGs

☒ Other environmental impacts and pressures, please specify :Coal Combustion Residuals (CCR)

(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:

☒ Support with no exceptions

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

Select all that apply

☒ Other, please specify :Discussion with EPA staff and other policy makers in coordination with trade associations

(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

In January 2025, President Trump issued a series of executive orders, including an order titled Unleashing American Energy (the Order) that ordered that all federal agencies are to review all existing regulations, orders, and other actions for consistency with the administration's policy goals, and develop an action plan within 30 days to resolve any policy inconsistencies. The Order requires the EPA to review the GHG, CSAPR, Legacy CCR, and ELG rules. Additionally, the Order states the U.S. Attorney General may request a stay of the litigation involving these rules while the EPA conducts its reviews. In addition to that Order, in April 2025, President Trump issued a series of additional executive orders on energy and deregulation priorities for his administration. We will monitor implementation and any agency actions related to those and other executive orders.

(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

Row 2

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

Clean Air Act standards for existing coal-fired and new natural gas-fired power plants

(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

We are participating in an industry coalition challenging the rule.

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

Select all that apply

☒ Other, please specify :Advocacy with the EPA on rulemaking and coordination with trade associations

(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

We are participating in an industry coalition challenging the rule. Oral argument on the merits of the legal challenges to the rule was held in December 2024 before the D.C. Circuit Court. The D.C. Circuit Court has granted the EPA's motion for an abeyance of the case and status reports are due at 90-day intervals. In June 2025, the EPA published a proposed repeal of GHG emission standards for fossil fuel-fired electric generation units, which could moot this case if the proposal is finalized and would result in no further federal regulation of GHGs at electric generating units. Additionally, in February 2026, the EPA issued a rule that repeals the agency's

prior 2009 endangerment finding for all GHG emission standards for light-, medium-, and heavy-duty vehicles. The rescission of the endangerment finding does not impact power plants, however, the EPA has also stated that, for other rules that have relied on the endangerment finding, it intends to initiate other rulemakings to address any overlapping issues. Several environmental groups have filed a challenge to the EPA's repeal of the endangerment finding in the D.C. Circuit Court.

(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

☒ Solar Energy Industries Association (SEIA)

(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. As such, Vistra is a member of, and participates in, trade groups, associations, and other third-party organizations that may take positions on policy matters and may engage in lobbying activities. 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. If that is unsuccessful, the company may withdraw from or otherwise disassociate from that organization. The Solar Energy Industries Association® (SEIA) works with its 1,200 member companies and other strategic partners to fight for policies that create jobs in every community and shape fair market rules that promote competition and the growth of reliable, low-cost solar power.

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

71200

(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 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 2

(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 / Americans for Carbon Dividends

(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 had been 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.

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

500000

(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 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:

☒ 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 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 :Utility Water Activities 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. As such, Vistra is a member of, and participates in, trade groups, associations, and other third-party organizations

that may take positions on policy matters and may engage in lobbying activities. 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. If that is unsuccessful, the company may withdraw from or otherwise disassociate from that organization. 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.

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

236000

(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 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 :Utility Solid Waste Activities 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

☒ 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

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. As such, Vistra is a member of, and participates in, trade groups, associations, and other third-party organizations that may take positions on policy matters and may engage in lobbying activities. 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. If that is unsuccessful, the company may withdraw from or otherwise disassociate from that organization. The Utility Solid Waste Activities Group is a voluntary, non-profit, unincorporated group. USWAG is responsible for addressing waste, byproduct, and chemical management issues on behalf of the utility industry. Formed in 1978, USWAG is a trade association of over 130 utility operating companies, energy companies, and industry associations, including the National Rural Electric Cooperative Association (NRECA), the American Public Power Association (APPA), and the American Gas Association (AGA). Vistra participates as members of the organization to develop policy positions. USWAG's core mission is to support the industry's efforts to comply with federal environmental regulations, protect the environment, and serve its customers.

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

152900

(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 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 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 :Power Generators Air Coalition (Pgen)

(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

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. As such, Vistra is a member of, and participates in, trade groups, associations, and other third-party organizations that may take positions on policy matters and may engage in lobbying activities. 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. If that is unsuccessful, the company may withdraw from or otherwise disassociate from that organization. The Power Generators Air Coalition (PGen) was incorporated in January 2021 as a nonprofit 501(c)(6) organization whose members are diverse electric generating companies – public power, rural electric cooperatives, and investor-owned utilities – with a mix of solar, wind, hydroelectric, nuclear, and fossil generation. PGen is a collaborative effort of electric generators to share information and expertise in the interest of effectively managing air emissions to meet and exceed environmental laws and regulations and in the interest of informing sound regulation and public policy. Our members include leaders in the fundamental transition to cleaner energy that is currently occurring in the industry. Vistra participates as members of the organization to develop policy positions. The main activities of PGen are: (a) to keep abreast of developments in the air and climate fields and how those developments are impacting power generators, and (b) to help its members communicate their perspective on these issues in the regulatory process. PGen as an organization does not participate in legislative lobbying or litigation.

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

140000

(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 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

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

☒ GRI

☒ IFRS

☒ TCFD

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- | | |
|--|--|
| ☒ Strategy | ☒ Public policy engagement |
| ☒ Governance | ☒ Climate-related targets |
| ☒ Risks & Opportunities | ☒ Water accounting figures |
| ☒ Value chain engagement | ☒ Greenhouse gas emissions figures |
| ☒ Dependencies & Impacts | |

(4.12.1.7) Page/section reference

Throughout the publication.

(4.12.1.8) Attach the relevant publication

VST-sustainability-report-2025.pdf

(4.12.1.9) Comment

Vistra has adopted globally accepted sustainability frameworks and standards to provide transparent disclosures to all stakeholders. We report disclosures through multiple resources, including this report. In our reporting, we commit to providing credible and meaningful disclosures to assess our progress on sustainability goals and strategy. This report highlights Vistra's sustainability progress in fiscal year 2025 (Jan. 1 – Dec. 31, 2025) and is presented on behalf of Vistra Corp. and its subsidiaries. Disclosures are prepared with guidance from the Sustainability Accounting Standards Board (SASB) industry standards for electric utilities and power generators, the Global Reporting Initiative (GRI) topic standards, and the Task Force on Climate-Related Financial Disclosures (TCFD) framework.

Row 2

(4.12.1.1) Publication

Select from:

- ☒ In other regulatory filings

(4.12.1.2) Is your publication in line with a standard or framework?

Select from:

- ☒ Yes

(4.12.1.3) Standard or framework the publication is in line with

Select all that apply

- ☒ Other, please specify :Vistra's Annual Report - Completed in-line with US SEC requirements.

(4.12.1.4) Environmental issues covered in publication

Select all that apply

- ☒ Climate change

(4.12.1.5) Status of the publication

Select from:

- ☒ Complete

(4.12.1.6) Content elements

Select all that apply

- ☒ Governance
☒ Public policy engagement
☒ Dependencies & Impacts
☒ Risks & Opportunities

☒ Strategy

(4.12.1.7) Page/section reference

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

(4.12.1.8) Attach the relevant publication

2025 VST Annual Report.pdf

(4.12.1.9) Comment

Vistra's annual report covering reporting year 2025. Please visit <https://investor.vistracorp.com/financials> for more information.
[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:

☒ Annually

Water

(5.1.1) Use of scenario analysis

Select from:

☒ Yes

(5.1.2) Frequency of analysis

Select from:

☒ Annually

[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 1.9

(5.1.1.2) 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

☒ Policy

☒ Market

☒ Liability

☒ Reputation

☒ Technology

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

(5.1.1.7) Reference year

2025

(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 - The transition to a net-zero economy required drastic and coordinated global action beginning in the 2020s. The cost of action was initially high but warming peaks at 1.6°C in 2060 and then declines to 1.4°C by 2100. This scenario assumes that ambitious climate policies are introduced immediately. CDR is used to accelerate the decarbonization but kept to the minimum possible and broadly in line with sustainable levels of bioenergy production. Net CO2 emissions reach zero around 2050, giving at least a 50 % chance of limiting global warming to below 1.5 °C by the end of the century, with limited overshoot (< 0.2 °C) of 1.5 °C in earlier years. Physical risks are relatively low but transition risks are high.

(5.1.1.11) Rationale for choice of scenario

Stringent climate policies and innovation, reaching global net zero GHG emissions around 2050. More information on our climate assessment process can be found in our annual sustainability report online at <https://vistracorp.com/documents/sustainability/reporting-year/2025/VST-sustainability-report-2025.pdf>

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

(5.1.1.8) Timeframes covered

Select all that apply

☒ Other, please specify :2025

(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). More information on our climate assessment process can be found in our annual sustainability report online at <https://vistracorp.com/documents/sustainability/reporting-year/2025/VST-sustainability-report-2025.pdf>

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 2.6

(5.1.1.2) 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

☒ Policy

☒ Market

☒ Liability

☒ Reputation

☒ Technology

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2025

(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

Delayed Transition - Assumes global annual emissions do not decrease until 2030. Strong policies are then needed to limit warming to below 2 °C. Negative emissions are limited. This scenario assumes new climate policies are not introduced until 2030 and the level of action differs across countries and regions based on currently implemented policies. The availability of CDR technologies is assumed to be low pushing carbon prices higher than in a scenario with similar climate ambition such as Below 2 °C. As a result, emissions exceed the carbon budget temporarily and decline more rapidly than in Below 2 °C after 2030 to ensure a 67 % chance of limiting global warming to below 2 °C. This leads to both higher transition and physical risks than the Net Zero 2050 and Below 2 °C scenarios.

(5.1.1.11) Rationale for choice of scenario

Climate policies are delayed, which forces a very aggressive policy response starting in 2030. More information on our climate assessment process can be found in our annual sustainability report online at <https://vistracorp.com/documents/sustainability/reporting-year/2025/VST-sustainability-report-2025.pdf>

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☒ RCP 4.5

(5.1.1.2) 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

☒ Policy

☒ Market

☒ Liability

☒ Reputation

☒ Technology

☒ Acute physical

☒ Chronic physical

(5.1.1.6) Temperature alignment of scenario

Select from:

☒ 2.5°C - 2.9°C

(5.1.1.7) Reference year

2025

(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

Current Policies assumes that only currently implemented policies are preserved, leading to high physical risks. Emissions grow until 2080 leading to about 3 °C of warming and severe physical risks. This includes irreversible changes like higher sea level rise. This scenario can help central banks and supervisors consider the long-term physical risks to the economy and financial system if we continue on our current path to a “hot house world”.

(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. More information on our climate assessment process can be found in our annual sustainability report online at <https://vistracorp.com/documents/sustainability/reporting-year/2025/VST-sustainability-report-2025.pdf>

[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 influence of the scenario analysis on the selected business processes

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 an annual climate impact assessment to facilitate cross-departmental discussion and insight collection concerning our climate risks and opportunities. In 2025, Vistra refreshed its climate scenario analysis with the aid of an independent third party, including multiple work sessions with more than two dozen participants across multiple business functions to analyze impacts across Vistra’s full U.S. operations (retail, commercial, and generation). Vistra’s 2025

climate scenario analysis explored three scenarios developed by the Network for Greening the Financial System (NGFS) with IPCC Representation Concentration Pathway (RCP's): - Current Policies (RCP 4.5 -> 2.8°C+) - Net Zero 2050 (RCP 1.9 -> 1.4°C with a 1.6° peak) - Delayed Transition (RCP 2.6 -> 1.6°C with a 1.8° peak) The impacts of these scenarios were grouped into three timeframes: - Short Term (0-5 years) - Medium Term (6-10 years) - Long Term (10+ years) Vistra identified climate-related risks and opportunities across four key focus areas: (1) Regulations and compliance, (2) Markets and reputation, (3) Energy transition and technology, and (4) Operational resilience. 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 annual 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. Physical risks in the 2025 assessment were evaluated at the asset level using GIS analysis across four material factors: evolving wildfire, water scarcity, heatwaves, and elevated precipitation risks; highest relative risk was concentrated in Texas, and reduced physical risk was modeled under delayed transition and net-zero scenarios versus current policies. Vistra does not see material incremental risk from the physical risk analysis, with results viewed as affirmation of risks already occurring, and intends to use the effort to review facility practices/procedures and prioritize mitigation efforts as needed. Operational resilience risks and mitigations identified include extreme weather disruptions as an acute physical risk across all three scenarios; mitigation strategies include dual fuel capability at certain sites, advanced weather forecasting, inventory resilience planning, and proactive safety procedure reviews. Scenario analysis outputs are integrated with enterprise risk management and include scoring of severity and likelihood of each climate-related risk/opportunity, with results reviewed in a cross-functional workshop with senior leadership to validate material risks/opportunities and identify strategic interventions that inform ongoing strategy and risk management.

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
- ☒ 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 influence of the scenario analysis on the selected business processes

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 annual climate impact assessment discussed for climate change, Vistra analyzes 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. Water stress is identified as a chronic physical risk across all three scenarios over the medium and long term for generation assets that use significant amounts of water; mitigation strategies include piloting hybrid or dry cooling systems where water scarcity poses the highest operational risk and continuous revision of drought resilience plans at our sites. An identified opportunity across all three scenarios is the use of reclaimed water to mitigate long-term drought exposure and reduce operational disruptions; strategies include evaluating scalability of reclaimed water systems across the fleet and building partnerships with local water districts.

[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

(5.2.20) 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.

(5.2.21) 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

- ☒ Transition risks
☒ 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

Consumer end-use behavior concerning power sources could shift over the decades, and could include different usage patterns and options for electricity sourcing. However, Vistra is primed to pivot and move quickly based on customer demand. Our diverse generation fleet allows us to deliver reliable power across competitive markets from nearly every type of generation source including natural gas, coal, nuclear, and solar. This variety of generation sources enable Vistra's retail team to play a pivotal role in clean energy, supporting customers interested in our comprehensive suite of products and services (including RECs and EFECs). By leveraging our healthy balance sheet and geographic reach, we can quickly support growth in our markets.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

- ☒ Transition risks
- ☒ 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 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 EUISCA).

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 operates in dynamic markets and competes for customers, necessitating innovation and investments in modern technologies. Future projections of energy demand, coupled with the anticipated impacts of climate change across all evaluated scenarios, show the necessity for increased energy capacity. This presents an opportunity for Vistra to provide innovative energy solutions for the benefit of our customers and stakeholders in the coming decades. 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 focus areas include: - Data Centers and Grid Flexibility - Nuclear Generation - Energy Storage - Carbon Capture and Storage (CCS) - Advanced Geothermal - Hydrogen and Low-Carbon Fuels

Operations

(5.3.1.1) Effect type

Select all that apply

- ☒ Physical risks
- ☒ Transition risks
- ☒ 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
- ☒ Water

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

Extreme weather disruptions are an identified acute physical risk across all three scenarios. Disruptions could impact our operational continuity, impact planned outage efforts, and affect employee safety. Mitigation strategies include use of dual fuel at certain generation locations, deploying advanced weather forecasting, advanced planning for inventory resilience, and proactive reviews of safety procedures. Water stress is an identified chronic physical risk across all three scenarios over the medium and long term. Chronic water stress could disrupt our operational capability for generation assets that use significant amounts of water. Mitigation strategies include recycling water as appropriate, exploring potential for hybrid or dry cooling systems where water scarcity poses the highest operational risk and continuous revision of drought resilience plans at our sites. An identified opportunity is our ability to use reclaimed water across all three scenarios. Using reclaimed

instead of surface water can mitigate long-term drought exposure and reduce operational disruptions – stabilizing output and improving asset value in water-stressed regions.

[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

☒ Physical risks

☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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

- ☒ Physical risks
- ☒ Transition 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 2025, Vistra acquired ~2,600MW of efficient, modern natural gas generation to support growing customer demand while continuing to invest in highly efficient fuel assets that resulted in a negligible overall impact on our fleet Scope 1 carbon intensity per generated MWh.

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

- ☒ Physical risks
- ☒ Transition 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 recommissioning 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: ☒ 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. 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. Some of these developments include potential for applied research. Our investment focus also includes exploration of new and emerging technologies with potential operational viability, with some projects including: 1) An ongoing 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 geothermal lower-carbon fuel use cases, including multiple studies across 2024 and 2025 in partnership with EPRI.

Vistra also invests in funds with Energy Impact Partners and the Westley Group to ensure we have access to early stage innovation that could potentially be commercialized in our industry.
[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

15

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

15

(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 and EPC evaluations 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

10

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

10

(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 and evaluations on battery storage technologies

Row 3

(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

60

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

60

(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 4

(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 for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend, non-recurring, and other growth for the reporting year of 2025 as reported in Vistra's Fourth Quarter 2025 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending

Coal - Brown

(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 for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend, non-recurring, and other growth for the reporting year of 2025 as reported in Vistra's Fourth Quarter 2025 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 for 'gas' is encompassing of nuclear and fossil-fuel maintenance spend, non-recurring, and other growth for the reporting year of 2025 as reported in Vistra's Fourth Quarter 2025 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)

1224000000

(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

57

(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

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2025

(5.7.5) Explain your CAPEX calculations, including any assumptions

In September 2025, Vistra announced the next phase of its capital plan to support grid reliability in Texas, announcing a final investment decision to build two new advanced natural gas power units, together totaling 860 MW, on-site at the Permian Basin Power Plant. 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, non-recurring, and other growth for the reporting year of 2025 as reported in Vistra's Fourth Quarter 2025 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)

305000000

(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

14

(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

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2026

(5.7.5) Explain your CAPEX calculations, including any assumptions

In January of 2026, Vistra announced that, as a component of Nuclear PPA Agreements signed with Meta, that an additional 433 MW of combined power output increases (uprates) will be completed at our nuclear assets. The uprate project will be the largest nuclear uprate initiative supported by a corporate customer in the United States (<https://investor.vistracorp.com/2026-01-09-Vistra-and-Meta-Announce-Agreements-to-Support-Nuclear-Plants-in-PJM-and-Add-New-Nuclear-Generation-to-the-Grid>). 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 2025 as reported in Vistra's Fourth Quarter 2025 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.

Ocean thermal

(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.

Onshore 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.

Offshore 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)

635000000

(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

29

(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

(5.7.4) Most recent year in which a new power plant using this source was approved for development

2024

(5.7.5) Explain your CAPEX calculations, including any assumptions

The most recent year a solar development project was announced by Vistra was 2024 with the announced acquisition of the Deer Creek solar project in the CAISO market. Vistra's current solar capacity pipeline can be found in our annual investor presentation, presented in Q1 of each year and posted publicly at investor.vistracorp.com 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 2025 as reported in Vistra's Fourth Quarter 2025 Results Presentation. Vistra does not provide public 5 year forecasts of anticipated CAPEX spending.

Wave

(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.

Tidal

(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 does not own generation assets that use this fuel source.

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)

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.

[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:
☒ Other, please specify :Total Planned CAPEX

(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. Reported CAPEX figures for 2026E (Expected) can be found in our 2025 year end investor presentation, posted publicly on Vistra's Investor Relations website.

(5.7.1.3) CAPEX planned for product/service

2525000000

(5.7.1.4) Percentage of total CAPEX planned for products and services

100

(5.7.1.5) End year of CAPEX plan

2026
[Add row]

(5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing for this environmental externality	Primary reason for not pricing this environmental externality	Explain why your organization does not price this environmental externality
Carbon	Select from: ☒ Yes		
Water	Select from: ☒ No, and we do not plan to in the next two years	Select from: ☒ Not an immediate strategic priority	Setting an internal price on water is not an immediate strategic priority.
Other	Select from: ☒ No, and we do not plan to in the next two years		

[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

(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)

28.47

(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

13

(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 \$25.83/short ton, which is disclosed in our 10K, converted to approximately \$28.47/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> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Water
Customers	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change
Investors and shareholders	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ Water
Other value chain stakeholders	<i>Select from:</i> ☒ Yes	<i>Select all that apply</i> ☒ Climate change ☒ 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:

☒ 1-25%

(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

58

Water

(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

☒ Other, please specify :Vistra collects and evaluates supplier water-related information, including water withdrawal, discharge, reuse, and water management targets, to better understand water impacts within its upstream value chain.

(5.11.1.3) % Tier 1 suppliers assessed

Select from:

☒ 1-25%

(5.11.1.4) Define a threshold for classifying suppliers as having substantive dependencies and/or impacts on the environment

Suppliers are considered to have substantive water dependencies or impacts when water use is identified as a material sustainability issue, when water performance metrics (withdrawal, discharge, reuse) are reported, or when water-related targets and management programs have been established. Vistra uses supplier sustainability assessment data to identify these suppliers and prioritize engagement accordingly.

(5.11.1.5) % Tier 1 suppliers meeting the threshold for substantive dependencies and/or impacts on the environment

Select from:

☒ 26-50%

(5.11.1.6) Number of Tier 1 suppliers meeting the thresholds for substantive dependencies and/or impacts on the environment

38

[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

- ☒ In line with the criteria used to classify suppliers as having substantive dependencies and/or impacts relating to climate change
- ☒ Material sourcing
- ☒ Procurement spend
- ☒ Regulatory compliance
- ☒ Suppliers' exposure or vulnerability to physical risks

(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. Vistra conducts supplier screenings to identify suppliers that present elevated environmental, social, governance, or business continuity risks. Screening is performed using desk-based, third party data and considers a combination of risk factors and business relevance considerations, including supplier spend, criticality to operations, and exposure to sector- and service-specific risks. This screening process is applied to tier one suppliers and is used to identify significant suppliers for further risk assessment, monitoring, and engagement, including participation in sustainability assessments and audits where appropriate. In 2025, Through SSCA engagement via the TSP (The Sustainability Project) assessment, Vistra assessed 79% of our supply chain spend with 55% of those suppliers further undergoing third party desktop audits. 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

- ☒ Suppliers' exposure or vulnerability to physical risks

(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. Vistra conducts supplier screenings to identify suppliers that present elevated environmental, social, governance, or business continuity risks. Screening is performed using desk-based, third party data and considers a combination of risk factors and business relevance considerations, including supplier spend, criticality to operations, and exposure to sector- and service-specific risks. This screening process is applied to tier one suppliers and is used to identify significant suppliers for further risk assessment, monitoring, and engagement, including participation in sustainability assessments and audits where appropriate. In 2025, Through SSCA engagement via the TSP (The Sustainability Project) assessment, Vistra assessed 79% of our supply chain spend with 55% of those suppliers further undergoing third party desktop audits. 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

Vistra's supply chain sustainability policy is in place 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%

(5.11.6.5) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue required to comply with this environmental requirement

Select from:

☒ 100%

(5.11.6.6) % tier 1 suppliers with substantive environmental dependencies and/or impacts related to this environmental issue that are 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

Vistra's supply chain sustainability policy is in place 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:

- ☒ Other, please specify :Increased transparency concerning sustainability related impacts in our supply chain.

(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

(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
- ☒ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges

(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%

(5.11.7.7) % tier 1 suppliers with substantive impacts and/or dependencies related to this environmental issue 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 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.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Customers

(5.11.9.2) Type and details of engagement

Education/Information sharing

- ☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services
- ☒ Share information about your products and relevant certification schemes
- ☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

- ☒ Align your organization's goals to support customers' targets and ambitions

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 51-75%

(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 serves nearly 5 million residential and business customers in 16 states and the District of Columbia. The integrated nature of our business is a core competitive advantage, providing stable financial earnings and confidence to partner with our customers through long-term agreements. Our diverse generation fleet allows us to deliver reliable power across competitive markets from nearly every type of generation source including natural gas, coal, nuclear, and solar. The variety of our generation sources enables Vistra Retail to play a pivotal role in clean energy, supporting customers interested in our comprehensive suite of products and services. This includes 100% wind and solar options enabled by renewable energy certificates (RECs) and emission-free energy certificates (EFECs) from our nuclear generation fleet. Vistra strongly supports the energy attribute certificate (EAC) market and the decarbonization value these market-based tools can provide to customers. The growth in the electrification of the economy is a stimulus for creating unique solutions that fit our customers' evolving electricity needs. We strive to provide customers with choice, convenience, and control over how they use electricity for both our commercial and residential markets.

(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.

Climate change

(5.11.9.1) Type of stakeholder

Select from:

☒ Other value chain stakeholder, please specify :Peers, trade organizations, and local communities

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☒ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 51-75%

(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 seeks engagement with peers and professional networks through industry groups, trade associations, and sustainability-focused organizations to share insights on best practices, industry trends, and emerging issues. Example memberships include EPSA, EPRI, NEI, Alliance for Competitive Power, Powering Texans, Business Roundtable, Climate Leadership Council, Disability:IN, Business for Social Responsibility, REAL, and INPO. Vistra believes maintaining this industry engagement is fundamental to understanding the positions and expertise of peers and stakeholders while sharing its views and knowledge of its products and industry. Vistra's community affairs team also engages local stakeholders around generation facilities through direct outreach, community meetings, ongoing dialogue, project updates, presentations at county commissioner and school board meetings, community town halls, and tours for STEM-focused education groups, industry partners, and civic organizations.

(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:

☒ Other value chain stakeholder, please specify :Peers, trade organizations, and local communities

(5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

Innovation and collaboration

☒ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.3) % of stakeholder type engaged

Select from:

☒ 51-75%

(5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

Vistra seeks engagement with peers and professional networks through industry groups, trade associations, and sustainability-focused organizations to share insights on best practices, industry trends, and emerging issues. Example memberships include EPSA, EPRI, NEI, Alliance for Competitive Power, Powering Texans, Business Roundtable, Climate Leadership Council, Disability:IN, Business for Social Responsibility, REAL, and INPO. Vistra believes maintaining this industry engagement is fundamental to understanding the positions and expertise of peers and stakeholders while sharing its views and knowledge of its products and industry. Vistra's community affairs team also engages local stakeholders around generation facilities through direct outreach, community meetings, ongoing dialogue, project updates, presentations at county commissioner and school board meetings, community town halls, and tours for STEM-focused education groups, industry partners, and civic organizations.

(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 2025 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

Asset acquisition from Lotus Infrastructure Partners

(7.1.1.3) Details of structural change(s), including completion dates

In October 2025, Vistra completed the acquisition of seven modern natural gas generation facilities totaling approximately 2,600 MW of capacity from Lotus Infrastructure Partners. The transaction closing follows receipt of all required regulatory approvals. With this acquisition, Vistra geographically expands its diverse generation portfolio, adding highly efficient assets across key competitive markets, including PJM, New England, New York, and California. These modern facilities strengthen Vistra's ability to deliver reliable, affordable, and flexible power to customers as the company continues to support the nation's energy future.

[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 ☒ 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

(7.1.3.4) 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 2025 acquisition on our baseline calculations and determined that the impact did not meet our significance threshold.

(7.1.3.5) 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 2025.

[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 excluded from your disclosure of climate-related data?

Select from:

☒ Yes

(7.4.1) Provide details of the sources of Scope 1, Scope 2, or Scope 3 emissions which are not included in your disclosure.

Row 1

(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 relevant but not yet calculated

(7.4.1.8) Estimated percentage of total Scope 1+2 emissions this excluded source represents

0.1

(7.4.1.10) Explain why this source is excluded

Fugitive emissions are estimated to be a de minimis total in comparison to the stationary combustion sources that make up Vistra's overall Scope 1 emissions profile. This is estimated to be less than 1% of combined Scope 1 and Scope 2. However, Vistra is currently working on calculation and disclosure methodologies to enable inclusion of fugitive emissions in future years.

(7.4.1.11) Explain how you estimated the percentage of emissions this excluded source represents

Relevant reporting thresholds per the U.S. EPA.

Row 2

(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

0.1

(7.4.1.10) Explain why this source is excluded

Emissions from mobile equipment are estimated to be less than 1% of combined Scope 1 and Scope 2.

(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.

[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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

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

(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)

92602549

(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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

Past year 1

(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)

86194601

(7.6.2) End date

12/31/2024

(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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

Past year 2

(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. Concerning acquisitions, the company's policy is to report Scope 1 and Scope 2 emissions data from a facility in the year in which the facility is acquired, unless the data is not readily available as date of reporting. Vistra has established a recalculation policy to update base year calculations when cumulative changes to methodology would result in changes exceeding a 5% threshold. As of the date of this report, no such cumulative changes have occurred.

[Fixed row]

(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?

Reporting year

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

237522

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

183382

(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 1

(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)

214558

(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)

165268

(7.7.3) End date

12/31/2024

(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)

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.

[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) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Scope 3 category 1 emissions from purchased goods and services are not considered material to our overall emissions profile. However, Vistra is evaluating methodology development to calculate and report on purchased goods and services emissions in the future.

Capital goods

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) Please explain

Scope 3 category 2 emissions from capital goods are not considered material to our overall emissions profile. However, Vistra is evaluating methodology development to calculate and report on capital goods emissions in the future.

Fuel-and-energy-related activities (not included in Scope 1 or 2)

(7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

20966608

(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

(7.8.6) Please explain

Scope 3 Category 3, FERA, includes emissions from fuels (coal, natural gas, etc.) that are used to power our generation assets. Calculation represents emissions not already included in Scope 1 and Scope 2. Activity data for the reporting year is obtained from internal teams.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) 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)

102388

(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

(7.8.6) Please explain

Scope 3 Category 4, waste generated in operations, reflects emissions from materials sent to landfill and recycled. Waste generation metrics are obtained from internal 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)

944

(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

(7.8.6) Please explain

Scope 3 Category 6, business travel, represents the emissions associated with air travel completed by employees and booked through Vistra's corporate travel agency. Vistra receives the log of booked travel and distance from its third-party vendor, and emissions are 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)

33049

(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

(7.8.6) Please explain

Scope 3 Category 7, employee commuting, represents emissions due to employee commuting to and from work. Vistra calculates the estimated distance traveled by employees between their mailing address and work location, as registered in our human capital management software. 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, calculated

(7.8.2) Emissions in reporting year (metric tons CO2e)

706

(7.8.3) Emissions calculation methodology

Select all that apply

☒ Average data method

(7.8.6) Please explain

Scope 3 Category 8, upstream leased assets, represents emissions from operation of our leased facilities. Vistra obtains invoice data covering electricity use at these leased facilities (which include leases for space at existing facilities for emergency coordination purposes and leased warehousing space), and then uses EPA eGrid factors to calculate emission output. In cases where activity cannot be found, Vistra uses the CBECS methodology to estimate energy consumption for relevant facilities.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) 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)

1490249

(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

(7.8.6) Please explain

Scope 3 Category 11, use of sold products, 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Emissions estimated to be insignificant

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

Vistra does not own any franchises.

Investments

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Emissions covered under scope 1 or 2

(7.8.6) Please explain

As a power generator, Vistra does not have material emissions in this category.

Other (upstream)

(7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

(7.8.5) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) 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) Reason for this category not being relevant

Select from:

☒ Not applicable to our organization's activities

(7.8.6) Please explain

There are no other downstream emissions that are material to our overall emissions profile.

[Fixed row]

(7.8.1) Disclose or restate your Scope 3 emissions data for previous years.

Past year 1

(7.8.1.1) End date

12/31/2024

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

18740422

(7.8.1.6) Scope 3: Waste generated in operations (metric tons CO2e)

86253

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

951

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

31688

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1866457

(7.8.1.19) Comment

Scope 3 Category 3 increase is attributed to greater data availability and improved methodology. Addition of Scope 3 Category 5 was enabled in part due to third party software calculation.

Past year 2

(7.8.1.1) End date

12/31/2023

(7.8.1.4) Scope 3: Fuel and energy-related activities (not included in Scopes 1 or 2) (metric tons CO2e)

14475

(7.8.1.7) Scope 3: Business travel (metric tons CO2e)

800

(7.8.1.8) Scope 3: Employee commuting (metric tons CO2e)

43743

(7.8.1.12) Scope 3: Use of sold products (metric tons CO2e)

1854571

[Fixed row]

(7.9) Indicate the verification/assurance status that applies to your reported emissions.

	Verification/assurance status
Scope 1	Select from: ☒ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	Select from: ☒ Third-party verification or assurance process in place
Scope 3	Select from: ☒ 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 2025.pdf

(7.9.1.5) Page/section reference

Page 4 of Vistra's GHG Review Report state Scope 1 emissions attestation standards. Statement of GHG Emissions for the Year Ended December 31, 2025.
<https://vistracorp.com/documents/sustainability/reporting-year/2025/Vistra%20GHG%20Review%20Report%202025%20With%20Opinion.pdf>

(7.9.1.6) Relevant standard

Select all that apply

☒ Attestation standards established by AICPA (AT105)

(7.9.1.7) Proportion of reported emissions verified (%)

100

[Add row]

(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 2025.pdf

(7.9.2.6) Page/ section reference

Page 4 of Vistra's GHG Review Report state Scope 2 emissions attestation standards. Statement of GHG Emissions for the Year Ended December 31, 2025.
<https://vistracorp.com/documents/sustainability/reporting-year/2025/Vistra%20GHG%20Review%20Report%202025%20With%20Opinion.pdf>

(7.9.2.7) Relevant standard

Select all that apply

☒ 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

Vistra GHG Review Report 2025.pdf

(7.9.2.6) Page/ section reference

Page 4 of Vistra's GHG Review Report state Scope 2 emissions attestation standards. Statement of GHG Emissions for the Year Ended December 31, 2025.
<https://vistracorp.com/documents/sustainability/reporting-year/2025/Vistra%20GHG%20Review%20Report%202025%20With%20Opinion.pdf>

(7.9.2.7) Relevant standard

Select all that apply

☒ 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:

☒ Increased

(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.

Acquisitions

(7.10.1.1) Change in emissions (metric tons CO2e)

4555370

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

5.27

(7.10.1.4) Please explain calculation

In 2025, Vistra completed the acquisition of seven modern natural gas generation facilities totaling approximately 2,600 MW of capacity from Lotus Infrastructure Partners. These highly efficient units reflect a 5.27% YoY increase in Scope 1 + Scope 2 emissions, however Vistra's overall Scope 1 intensity (mt CO2e / generated MWh) remained stable thanks in part to these highly efficient assets. In calculating the emissions value (percentage) value, the CDP provided formula of ((Change in Scope 1 + 2 emissions attributed to the reason described in column 1) / (Previous year Scope 1+2 emissions)) × 100 is used. Change in Scope 1 + 2 emissions attributed to acquisition = 4,555,371 (t) CO2e Previous Year Scope 1 + 2 emissions = 86,409,158. Scope 2 Location-Based is incorporated into the above totals.

Change in output

(7.10.1.1) Change in emissions (metric tons CO2e)

1875542

(7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

(7.10.1.3) Emissions value (percentage)

2.17

(7.10.1.4) Please explain calculation

In calculating the emissions value (percentage) value, the CDP provided formula of ((Change in Scope 1 + 2 emissions attributed to the reason described in column 1) / (Previous year Scope 1+2 emissions)) × 100 is used. Change in Scope 1 + 2 emissions attributed to increased output = 1,875,543 (t) CO2e Previous Year Scope 1 + 2 emissions = 86,409,158. 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) Does your organization have significant land sector activities in its operations or value chain?

(7.12.1) Agriculture, forestry or other land sector activities

Select from:

☒ No, explanation provided

(7.12.3) Specify the reason for no significant activities

Select from:

☒ Relevant activities identified but evaluated to be below the significance threshold

(7.12.4) Significance threshold

As a integrated power provider, Vistra has does not have significant operations in land use activities related to agriculture or forestry compared to other industries. Vistra's land use activities are primarily focused on land use reclamation for former mine locations as well as responsible lignite mining. These activities are not material relative to our total emissions inventory.

[Fixed row]

(7.13) Does your organization choose to account for and report technological CO2 removals or captured CO2 with geologic storage, or have you done so in previous years?

	Technological CO2 removals or captured CO2 with geologic storage in the reporting year	Technological CO2 removals or captured CO2 with geologic storage were accounted for and reported in previous years
	Select from: ☒ Not evaluated	Select from: ☒ No

[Fixed row]

(7.15) Does your organization break down its Scope 1 and/or Scope 2 emissions by greenhouse gas type?

(7.15.1) Emissions breakdown by greenhouse gas type

Select from:

☒ Yes, both Scope 1 and Scope 2 emissions

[Fixed row]

(7.15.1) Break down your total gross global Scope 1 and Scope 2 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 selected gas)

92235103

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

92235103

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

236204

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO₂e)

236204

(7.15.1.7) Scope 2 market-based emissions (metric tons of CO₂e)

183382

(7.15.1.8) 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 selected gas)

5678

(7.15.1.3) Scope 1 emissions (metric tons of CO₂e)

158980

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

563

(7.15.1.7) Scope 2 market-based emissions (metric tons of CO2e)

0

(7.15.1.8) 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 selected gas)**

787

(7.15.1.3) Scope 1 emissions (metric tons of CO2e)

208466

(7.15.1.4) Scope 2 location-based emissions (metric tons of selected gas)

3

(7.15.1.5) Scope 2 location-based emissions (metric tons of CO2e)

(7.15.1.7) Scope 2 market-based emissions (metric tons of CO₂e)

0

(7.15.1.8) 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 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 (Electric utilities)

(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

92235103

(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

5678

(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)

92602549

(7.15.3.5) Comment

The 'Total gross Scope 1 emissions' calculation includes 787 (t) / 208,466 (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	92602549

[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>48063704</i>
Row 2	<i>Texas</i>	<i>43727131</i>
Row 3	<i>West</i>	<i>811713</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
Energy utility & power generators	92602549	<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)

92602549

(7.22.2) Scope 2, location-based emissions (metric tons CO2e)

237522

(7.22.3) Scope 2, market-based emissions (metric tons CO2e)

183382

(7.22.4) Please explain

All emissions are in our consolidated accounting group. This aligns with our financial reporting strategy in annual regulatory filings.
[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

(7.26) Allocate your emissions to your customers listed below according to the goods or services you have sold them in this reporting period.

	Requesting member
Row 1	Select from: ☒ NRG Energy Inc

[Add row]

(7.27) What are the challenges in allocating emissions to different customers, and what would help you to overcome these challenges?

Row 1

(7.27.1) Allocation challenges

Select from:
☒ Customer base is too large and diverse to accurately track emissions to the customer level

(7.27.2) Please explain what would help you overcome these challenges

Vistra has millions of customers. Scope 2 GHG accounting is sufficient through other sources to resolve the vast majority of our customer needs.
[Add row]

(7.28) Do you plan to develop your capabilities to allocate emissions to your customers in the future?

	Do you plan to develop your capabilities to allocate emissions to your customers in the future?
	Select from: ☒ No

[Fixed row]

(7.29) What percentage of your total operational spend in the reporting year was on energy?

Select from:
☒ More than 55% but less than or equal to 60%

(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)	Select from: ☒ Yes
Consumption of purchased or acquired electricity	Select from: ☒ Yes
Consumption of purchased or acquired heat	Select from: ☒ No
Consumption of purchased or acquired steam	Select from: ☒ No
Consumption of purchased or acquired cooling	Select from: ☒ No
Generation of electricity, heat, steam, or cooling	Select from: ☒ 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

429088004

(7.30.1.5) Total (renewable + non-renewable) MWh

429088004.00

Consumption of purchased or acquired electricity

(7.30.1.2) MWh from renewable sources

184319

(7.30.1.3) MWh from non-renewable sources

390551

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

574870.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

0.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

184319

(7.30.1.3) MWh from non-renewable sources

429478555

(7.30.1.4) MWh from non-renewable zero or near-zero emission sources

0

(7.30.1.5) Total (renewable + non-renewable) MWh

429662874.00

[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: ☒ Yes
Consumption of fuel for the generation of heat	Select from: ☒ No

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of steam	Select from: ☒ No
Consumption of fuel for the generation of cooling	Select from: ☒ No
Consumption of fuel for co-generation or tri-generation	Select from: ☒ 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) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Vista Corp does not consume sustainable biomass fuel.

Other biomass

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Vistra Corp does not consume other biomass fuel.

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

0

(7.30.7.2) MWh fuel consumed for self-generation of electricity

0

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Vistra Corp does not consume forms of "other renewable fuels".

Coal

(7.30.7.1) Total fuel MWh consumed by the organization

165760157

(7.30.7.2) MWh fuel consumed for self-generation of electricity

165760157

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Coal is used for generation of electricity at a portion of Vistra generation assets.

Oil

(7.30.7.1) Total fuel MWh consumed by the organization

1344350

(7.30.7.2) MWh fuel consumed for self-generation of electricity

1344350

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Includes distillate fuel oil (DFO), which is used to power a small number of generation assets.

Gas

(7.30.7.1) Total fuel MWh consumed by the organization

261973496

(7.30.7.2) MWh fuel consumed for self-generation of electricity

261973496

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Includes a proforma view (January-October 2025) of fuel used at acquired Lotus natural gas assets.

Other non-renewable fuels (e.g. non-renewable hydrogen)

(7.30.7.1) Total fuel MWh consumed by the organization

10001

(7.30.7.2) MWh fuel consumed for self-generation of electricity

10001

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

Includes Jet-A fuel, which is used in one generation facility in the Vistra fleet.

Total fuel

(7.30.7.1) Total fuel MWh consumed by the organization

429088004

(7.30.7.2) MWh fuel consumed for self-generation of electricity

429088004

(7.30.7.3) MWh fuel consumed for self-generation of heat

0

(7.30.7.7) Comment

*Total consumed fuel across the Vistra fleet. All fuel is used for self-generation of electricity at Vistra generation assets.
[Fixed row]*

(7.30.14) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.

United States of America

(7.30.14.1) Consumption of purchased electricity (MWh)

574870

(7.30.14.2) Consumption of self-generated electricity (MWh)

0

(7.30.14.4) Consumption of purchased heat, steam, and cooling (MWh)

0

(7.30.14.5) Consumption of self-generated heat, steam, and cooling (MWh)

0

(7.30.14.6) Total electricity/heat/steam/cooling energy consumption (MWh)

574870.00

[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)

92840071

(7.45.3) Metric denominator

Select from:

☒ unit total revenue

(7.45.4) Metric denominator: Unit total

17738000000

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

4

(7.45.7) Direction of change

Select from:

☒ Increased

(7.45.8) Reasons for change

Select all that apply

☒ Acquisitions

☒ Change in output

☒ Change in revenue

(7.45.9) Please explain

Vistra revenue from 2024 to 2025 increased by 3%, while our gross scope 1 and scope 2 (Location Based) increased 7% year over year. In October of 2025, Vistra completed the acquisition of seven efficient, modern natural gas generation facilities, totaling approximately 2,600 MW of capacity, from Lotus Infrastructure Partners. Vistra included a full year of GHG impact for the acquired lotus impacts reflected in in the numerator. Accounting revenues only reflect a partial year contribution for the Lotus assets from Oct to Dec 2025.

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)

92840071

(7.45.3) Metric denominator

Select from:

☒ megawatt hour generated (MWh)

(7.45.4) Metric denominator: Unit total

217231083

(7.45.5) Scope 2 figure used

Select from:

☒ Location-based

(7.45.6) % change from previous year

0

(7.45.7) Direction of change

Select from:

☒ No change

(7.45.8) Reasons for change

Select all that apply

☒ Acquisitions

☒ Change in output

(7.45.9) Please explain

From 2024 to 2025, Vistra's gross scope 1 and scope 2 (Location Based) and overall generated MWh increased 7% year over year. This allowed for a stable generation intensity year-over-year while growing our overall fleet capacity by ~7% as well. In October of 2025, Vistra completed the acquisition of seven efficient, modern natural gas generation facilities, totaling approximately 2,600 MW of capacity, from Lotus Infrastructure Partners. Vistra included a full year of GHG impact for the acquired Lotus impacts reflected in in the numerator. Generation volumes reflect a full year proforma view including contribution for the Lotus assets from Oct to Dec 2025 as well as generation volume from Jan to Sep 2025.
[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)

6253130

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

930.66

Coal - Brown

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

36511465

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

1029.68

Oil

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

2397

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

799.00

Gas

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

49835557

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

409.28

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

Total

(7.46.1) Absolute scope 1 emissions (metric tons CO2e)

92602549

(7.46.2) Emissions intensity based on gross or net electricity generation

Select from:

☒ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

426.29

[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 Water Intensity (ML withdrawn / MWh generated)

(7.52.2) Metric value

0.06

(7.52.3) Metric numerator

Water Withdrawn (Megaliters): 12,714,284

(7.52.4) Metric denominator (intensity metric only)

Generated MWh: 217,231,083

(7.52.7) Please explain

Vistra's year-over-year intensity metric of megaltiers withdrawn water per generated MWh remained stable, even though individual water withdrawal and generation MWh intensity metrics increased. This can be attributed to Vistra's completed 2025 acquisition of highly efficient natural gas power plants from Lotus infrastructure partners, as well as Vistra's tenured history of efficient water use in our power plant operations - particularly in water stressed areas.

[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)

92602549

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

237522

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

(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**

77.13

(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 CO₂e 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 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 where favorable financial and market returns can be realized. 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. Our targets are ambitious and there are numerous factors outside our control that could affect our ability to achieve them as we prioritize reliability and affordability, balanced with sustainability. These factors include the potential for significant customer load growth, cost fluctuations for new generation resources, changing state and federal policies, and the impact of value-accretive mergers and

acquisitions. These factors, along with others, will impact the trajectory of emissions reductions over time. We will continue to evaluate our targets to ensure they appropriately reflect market conditions.

(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)

92602549

(7.53.1.58) Scope 2 emissions in reporting year covered by target (metric tons CO2e)

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

92840071.000

(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**

37.89

(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 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 where favorable financial and market returns can be realized. 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. Our targets are ambitious and there are numerous factors outside our control that could affect our ability to achieve them as we prioritize reliability and affordability, balanced with sustainability. These factors include the potential for significant customer load growth, cost fluctuations for new generation resources, changing state and federal policies, and the impact of value-accretive mergers and acquisitions. These factors, along with others, will impact the trajectory of emissions reductions over time. We will continue to evaluate our targets to ensure they appropriately reflect market conditions.

(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 (%)

(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)

92602549

(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)

15180.38

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

15180.380

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

92617729.380

(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

37.95

(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 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 where favorable financial and market returns can be realized. 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. Our targets are ambitious and there are numerous factors outside our control that could affect our ability to achieve them as we prioritize reliability and affordability, balanced with sustainability. These factors include the potential for significant customer load growth, cost fluctuations for new generation resources, changing state and federal policies, and the impact of value-accretive mergers and acquisitions. These factors, along with others, will impact the trajectory of emissions reductions over time. We will continue to evaluate our targets to ensure they appropriately reflect market conditions.

(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)

1490249

(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

1490249.000

(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

1490249.000

(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

132.39

(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

Reduction in the number of natural gas customers.

[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

(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. 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 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 where favorable financial and market returns can be realized. 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. Our targets are ambitious and there are numerous factors outside our control that could affect our ability to achieve them as we prioritize

reliability and affordability, balanced with sustainability. These factors include the potential for significant customer load growth, cost fluctuations for new generation resources, changing state and federal policies, and the impact of value-accretive mergers and acquisitions. These factors, along with others, will impact the trajectory of emissions reductions over time. We will continue to evaluate our targets to ensure they appropriately reflect market conditions.

[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.

	Emissions reduction initiatives that were active within the reporting year
	Select from: ☒ Yes

[Fixed row]

(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
To be implemented	1	16000000
Implementation commenced	1	1800000
Implemented	2	385129

[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)

330989

(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 2025, Vistra completed construction on the 200 MW Oak Hill solar project, located atop the site of the retired and reclaimed Oak Hill lignite mine. Per EPA Avert Tool, estimated annual CO2 emissions savings are 330,989 metric tons.

Row 2

(7.55.2.1) Initiative category & Initiative type

Other

☒ Other, please specify :EAC for Scope 2 Use

(7.55.2.2) Estimated annual CO₂e savings (metric tonnes CO₂e)

54140

(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 175,000 Energy Attribute Certificates (RECs and EFECs) were retired and incorporated into Vistra's Scope 2 market based calculation for 2025. Vistra is focused on the responsible and efficient use of electricity in our own operations. We report on our energy usage per GHG protocol. Our Scope 2 emissions are calculated from both a market and location-based approach and represent purchased electricity across our generation assets and office locations. 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 2025.

[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.

Row 3

(7.55.3.1) Method

Select from:

☒ Internal finance mechanisms

(7.55.3.2) Comment

Vistra works with customers to help enable offtake agreements for our zero-carbon assets both new development and uprates at existing assets on projects that help drive a favorable rate of return.

[Add row]

(7.58) Describe your organization's efforts to reduce methane emissions from your activities.

Methane emissions from direct generation activities account for less than 1% of our overall fleet Scope 1 emissions. In that 1%, primary sources for methane emissions will be from our coal and natural gas fired assets. Vistra has announced the retirements of several coal generation assets, as well as the coal to gas conversion plans additional plans in ERCOT and PJM. The majority of our power plants do utilize natural gas fuel which, will be a necessary fuel to support grid reliability, customer affordability, and the overall energy transition. Vistra personnel on-site at our natural gas plants in partnership with third party providers monitor pipelines carrying natural gas on-site for any presence of leaks or other anomalies that would need to be addressed. 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.

(7.73) Are you providing product level data for your organization's goods or services?

Select from:

☒ No, I am not providing data

(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)

Other

☒ 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

Row 2

(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:

☒ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☒ Large-scale light-water nuclear reactor

(7.74.1.4) Description of product(s) or service(s)

Vistra is an integrated retail electricity and power generation company 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. Vistra is one of the largest competitive power generators in the United States as measured by MWh of generation capacity. We own and operate six nuclear generation units at four different facilities (Comanche Peak, Beaver Valley, Perry, and Davis-Besse), and in 2025 our Nuclear assets account for 6,448 MW of capacity, amounting to 15% of our generation fleet.

(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

Row 3

(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:

☒ The EU Taxonomy for environmentally sustainable economic activities

(7.74.1.3) Type of product(s) or service(s)

Power

☒ Solar PV

(7.74.1.4) Description of product(s) or service(s)

Vistra is an integrated retail electricity and power generation company 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. Vistra is one of the largest competitive power generators in the United States as measured by MWh of generation capacity. We own and operate multiple solar PV facilities, and in 2025 our renewable (solar + battery) assets accounted for 1,274 (3%) of generation MW across our fleet.

(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:

☒ Water used for internal WASH services

(9.1.1.4) Primary reason why data is not collected and/or reported

Select from:

☒ Judged to be unimportant or not relevant

(9.1.1.7) Country/area and river basin of exclusion

United States of America

☒ Trinity River (Texas)

(9.1.1.8) Estimated volume of water the exclusion represents (megaliters)

102

(9.1.1.9) Estimated % of total water

0.1

(9.1.1.10) Please explain

Vistra office buildings are significantly less than 1% of our total annual water consumption. 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:

☒ At least once a month

(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:

☒ At least once a month

(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:

☒ At least once a month

(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:

☒ At least once a month

(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:

☒ At least once a month

(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

(9.2.4) Please explain

This is not currently 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:

- ☒ At least once a month

(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:

- ☒ At least once a month

(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:

☒ At least once a month

(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:

☒ At least once a month

(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:

☒ At least once a month

(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, 97.7% 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)

12714284

(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:

☒ Increase/decrease in business activity

(9.2.2.6) Please explain

Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity and as a function of impact from merger and acquisition activity during the reporting year. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Higher volumes in 2025 are largely driven by acquisition of seven natural gas plants from Lotus Infrastructure Partners as well as higher generation volumes as a result of increased power demand across our generation fleet.

Total discharges

(9.2.2.1) Volume (megaliters)

12417163

(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:

☒ Increase/decrease in business activity

(9.2.2.6) Please explain

Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity and as a function of impact from merger and acquisition activity during the reporting year. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Higher volumes in 2025 are largely driven by acquisition of seven natural gas plants from Lotus Infrastructure Partners as well as higher generation volumes as a result of increased power demand across our generation fleet.

Total consumption

(9.2.2.1) Volume (megaliters)

297269

(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:

☒ Increase/decrease in business activity

(9.2.2.6) Please explain

Water withdrawal, consumption, and discharge levels vary in response to generation facility demand and general business activity and as a function of impact from merger and acquisition activity during the reporting year. Across our fleet, Vistra practices good water stewardship and efficiencies through site-specific water management plans. Higher volumes in 2025 are largely driven by acquisition of seven natural gas plants from Lotus Infrastructure Partners as well as higher generation volumes as a result of increased power demand across our generation fleet.

[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)

1232760

(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:

☒ Mergers and acquisitions

(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

9.70

(9.2.4.8) Identification tool

Identification tool used

☒ WRI Aqueduct

(9.2.4.9) Please explain

Year-over-year increase in water withdrawal from water stressed areas is primarily attributed to the 2025 acquisition of natural gas power generation assets from Lotus Infrastructure Partners, as one of those acquired assets is located in a water-stressed region. 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 "arid", "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 • Annual corporate climate impact assessments • Annual 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)

12306420

(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 by 3% in 2025 in comparison to 2024. Several factors can account for this slight increase, including: 1) The completed 2025 acquisition of natural gas generation assets from Lotus Infrastructure partners, as a few of these assets source water withdrawals from surface water, accounting for 2% of the YoY increase. 2) General expected variety in water withdrawal rates due to increased generation output to meet consumer power demand. 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)

260191

(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 ~27% in 2025 in comparison to 2024. This decrease can be attributed to lower generation activity and output from out assets that withdraw seawater. 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)

2606

(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 ~15% in 2025 in comparison to 2024. 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 does not withdraw water from non-renewable groundwater sources.

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)

(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 third party water withdrawals increased by 35% in 2025 in comparison to 2024. Several factors can account for this increase, including: 1) The completed 2025 acquisition of natural gas generation assets from Lotus Infrastructure partners, as a few of these assets source water withdrawals from third-party sources, accounting for ~6% of the YoY increase. 2) General expected variety in water withdrawal rates due to increased generation output to meet consumer power demand. 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)**

12068375

(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:

☒ Increase/decrease in business activity

(9.2.8.5) Please explain

Vistra freshwater discharges increased by 3% in 2025 compare to 2024. Water discharge 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)

260119

(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 27% in 2025 in comparison to 2024. This decrease can be attributed to lower generation activity and output from out assets that withdraw seawater. Water withdrawal 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)

88669

(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 third-party water discharges increased 45% from 2024 to 2025. Several factors can account for this increase, including: 1) The completed 2025 acquisition of natural gas generation assets from Lotus Infrastructure partners, as a few of these assets discharge water to third-party sources. 2) General expected variety in water withdrawal rates due to increased generation output to meet consumer power demand. 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.

(9.2.10.2) Categories of substances included

Select all that apply

- ☒ Nitrates
- ☒ Phosphates
- ☒ 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 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 monitored for compliance against the United States National Pollutant Discharge Elimination System under the Clean Water Act via NPDES permits issued by state agencies. 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 substantive water-related dependencies, impacts, risks, and opportunities

(9.3.2) Total number of facilities identified

13

(9.3.3) % of facilities in direct operations that this represents

Select from:

☒ 1-25

(9.3.4) Please explain

In 2025, Vistra had 12 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 10% 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 substantive 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

(9.3.1.2) Facility name (optional)

Facilities located in the Gulf Coast Major River Basin

(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)

1255542

(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

1196313

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

291

(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

28939

(9.3.1.21) Total water discharges at this facility (megaliters)

1188794

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

1187909

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.26) Discharges to third party destinations

885

(9.3.1.27) Total water consumption at this facility (megaliters)

36749

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

The Gulf Coast Major River Basin supports 8 of our water-stressed generation assets, 7 gas assets and 1 coal asset. Generation output across these assets increased throughout 2025, accounting for increased water metrics.

Row 2

(9.3.1.1) Facility reference number

Select from:

☒ Facility 2

(9.3.1.2) Facility name (optional)

Facilities located in the Mississippi-Missouri Major River Basin.

(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: Mississippi-Missouri

(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)

6261

(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

6261

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.21) Total water discharges at this facility (megaliters)

1398

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ Higher

(9.3.1.23) Discharges to fresh surface water

(9.3.1.24) Discharges to brackish surface water/seawater

0

(9.3.1.26) Discharges to third party destinations

0

(9.3.1.27) Total water consumption at this facility (megaliters)

4863

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher**(9.3.1.29) Please explain**

The Mississippi-Missouri Major River Basin supports 1 of our gas fired assets in a water stressed location. Generation output increased throughout 2025, accounting for increased water metrics.

Row 3**(9.3.1.1) Facility reference number**

Select from:

☒ Facility 3**(9.3.1.2) Facility name (optional)**

Facilities located in the North Atlantic Coast Major River Basin.

(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)

935

(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

(9.3.1.17) 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

935

(9.3.1.21) Total water discharges at this facility (megaliters)

184

(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

0

(9.3.1.26) Discharges to third party destinations

184

(9.3.1.27) Total water consumption at this facility (megaliters)

771

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ Higher

(9.3.1.29) Please explain

The North Atlantic Major River Basin supports 2 of our gas fired assets in water stressed locations. One of our 2025 acquired natural gas assets from Lotus Infrastructure Partners is located in this river basin, accounting for the percent increase.

Row 4

(9.3.1.1) Facility reference number

Select from:

☒ Facility 4

(9.3.1.2) Facility name (optional)

Facilities located in the Rio Grande - Bravo Major River Basin

(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 :Maor Basin: Rio Grande - Bravo

(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

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.17) Withdrawals from groundwater - renewable

20

(9.3.1.20) Withdrawals from third party sources

0

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.24) Discharges to brackish surface water/seawater

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 Rio Grande - Bravo Major River Basin supports 1 of our gas fired assets in a water stressed location.

Row 5

(9.3.1.1) Facility reference number

Select from:

☒ Facility 5

(9.3.1.2) Facility name (optional)

Facilities located in the St Lawrence Major River Basin

(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

(9.3.1.9) 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)

1

(9.3.1.14) Comparison of total withdrawals with previous reporting year

Select from:

☒ About the same

(9.3.1.16) Withdrawals from brackish surface water/seawater

0

(9.3.1.19) Withdrawals from produced/entrained water

0

(9.3.1.20) Withdrawals from third party sources

1

(9.3.1.21) Total water discharges at this facility (megaliters)

0

(9.3.1.22) Comparison of total discharges with previous reporting year

Select from:

☒ About the same

(9.3.1.23) Discharges to fresh surface water

0

(9.3.1.27) Total water consumption at this facility (megaliters)

1

(9.3.1.28) Comparison of total consumption with previous reporting year

Select from:

☒ About the same

(9.3.1.29) Please explain

The St Lawrence Major River Basin supports 1 of our gas fired assets in a water stressed location.

[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 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 – 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 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 – quality by standard water quality parameters

(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 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)

17738000000

(9.5.2) Total water withdrawal efficiency

1395.12

(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 announced retirement of coal assets and 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)

1.37

(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) Five-year forecast

Select from:

☒ About the same

(9.7.1.6) Use of the metric within the organization

Select all that apply

☒ Inform strategies for managing and mitigating water stress

(9.7.1.7) Please explain

Vistra evaluates total water consumed and withdrawn for our water intensity metrics. In 2024, Vistra disclosed a total water consumption intensity of 1.30 m³/MWh. For 2025, the total water consumption intensity is 1.37 m³/MWh, resulting in a 5% increase year over year. Our team monitors water use across our fleet. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered to be water stressed. Our water related impacts are identified through a combination of approaches that also help inform opportunities for water management and efficiency improvements, including: • Enterprise-wide risk assessment • Site-specific environmental impact assessments • Annual corporate climate impact assessment • 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. Several strategies are employed to help reduce water consumption across the fleet, including construction of reservoirs to capture water where geographically and operationally appropriate, use of reclaimed or lower quality water in place of freshwater sources, and process improvements to increase generation asset performance with minimal increases to operational water demand.

Row 2

(9.7.1.1) Water intensity value (m3/denominator)

58.53

(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) Five-year forecast

Select from:

☒ About the same

(9.7.1.6) Use of the metric within the organization

Select all that apply

☒ Inform strategies for managing and mitigating water stress

(9.7.1.7) Please explain

Vistra evaluates total water consumed and withdrawn for our water intensity metrics. In 2024, Vistra disclosed a total water withdrawal intensity of 61.35 m3/MWh. For 2025, the total water consumption intensity is 58.53 m3/MWh, resulting in a 5% decrease year over year. Our team monitors water use across our fleet. Conservation is a focus at each of our generation facilities as we recognize the value of water resources, especially in areas considered to be water stressed. Our water related impacts are identified through a combination of approaches that also help inform opportunities for water management and efficiency improvements, including: •

Enterprise-wide risk assessment • Site-specific environmental impact assessments • Annual corporate climate impact assessment • 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. Several strategies are employed to help reduce water consumption across the fleet, including construction of reservoirs to capture water where geographically and operationally appropriate, use of reclaimed or lower quality water in place of freshwater sources, and process improvements to increase generation asset performance with minimal increases to operational water demand.
[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) Value chain stage where low water impact is assessed

Select all that apply

☒ Direct operations

(9.14.3) Indicator used to assess water impact

Water quantity

☒ Lower water withdrawal/consumption than conventional processes

(9.14.4) Have you used a certification standard to classify your products/services as low water impact?

Select from:

☒ No

(9.14.5) Definition used to classify low water impact

Evaluation of water withdrawn and volume of water reused or recycled

(9.14.7) 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) Indicate whether you have targets relating to water pollution, water withdrawals, WASH, or other water-related categories.

Water pollution

(9.15.1) Target set in this category

Select from:

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

(9.15.3) Primary reason for not setting a target in this category

Select from:

- ☒ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Vistra is committed to carefully managing water quality and consumption and conserve water resources, as well as continue to promote waste minimization and beneficial reuse. Water quality and pollution is managed through site level National Pollutant Discharge Elimination System (NPDES) requirements, and spills or permit exceedances are documented and reported as required.

Water withdrawals

(9.15.1) Target set in this category

Select from:

- ☒ No, and we do not plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

- ☒ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Vistra is committed to carefully managing water quality and consumption and conserve water resources, as well as continue to promote waste minimization and beneficial reuse. Vistra monitors water intensity trends, such as megaliters water withdrawn per generated MWh across our fleet. This metric has remained consistent year-over-year from 2024 to 2025 at 0.06 ML water withdrawn per generated MWh (as evidenced in our 2025 sustainability report).

Water, Sanitation, and Hygiene (WASH) services

(9.15.1) Target set in this category

Select from:

- ☒ No, and we do not plan to within the next two years

(9.15.3) Primary reason for not setting a target in this category

Select from:

☒ Not an immediate strategic priority

(9.15.4) Explain why you do not have a target set in this category

Vistra is committed to carefully managing water quality and consumption and conserve water resources, as well as continue to promote waste minimization and beneficial reuse. We are committed to ensuring appropriate provision of water, sanitation, and hygiene (WASH) services for employees, business partners, an visitors in our offices and operational locations, though no specific targets have been set in this category.

Other

(9.15.1) Target set in this category

Select from:

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

[Fixed row]

C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

- ☒ Land/water protection
- ☒ Land/water management
- ☒ Species management

[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: ☒ No

[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

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.

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 2025 Sustainability Report at 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 Senior Director of Sustainability Strategy, with additional review from relevant department leadership as required for high-quality disclosure.

[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 to facilitate collective action in priority basins.

Select from:

☒ No

