

VISTRA CORP.
ENVIRONMENTAL PRINCIPLES

I. SCOPE

These Environmental Principles (the “Principles”) apply to Vistra Corp. and each of its subsidiaries (collectively the “Company” or “Vistra”). All employees, suppliers and other business partners, contractors, consultants, and others performing work on behalf of the Company are expected to support Vistra in adhering to these Principles.

II. PURPOSE

These Principles guide the management and business practices of Vistra relative to interactions with the environment. Further, they illustrate our commitment to our Core Principles, and are part of the Company’s sustainability strategy.

III. PRINCIPLES STATEMENT

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 help meet the growing demand for power both reliably and affordably.

IV. ENVIRONMENTAL PRINCIPLES

Vistra is committed to the following:

- **Cleaner Air, Water, and Land, and Less Waste**
We will strive for continuous improvement of the environment by operating more efficiently and exploring new power generation solutions. We commit to cleaner air and outperforming current clean-air requirements, through voluntary emissions reductions with the goal to achieve net-zero carbon emissions by 2050, assuming advancements in technology and supportive public policy. We will continue to carefully manage water quality and consumption and conserve water resources, as well as continue to promote waste minimization and beneficial reuse. The Company will seek to minimize the negative impacts of its operations on land and aim to restore and enhance habitats and biodiversity. Management of environmental performance and improvements will be monitored in a centralized reporting system.
- **Energy Efficiency and Conservation**
Our goal is to encourage our customers to take advantage of all cost-effective opportunities to improve their energy efficiency. To that end, we will invest in initiatives that achieve long-lasting energy efficiency improvements across all of our businesses. We will promote energy efficiency and conservation through new energy management tools and products for our customers, education and conservation programs designed to reduce overall energy use, and operational improvements at our facilities. The Company will lead by example, promoting energy efficiency tips to its customers through various marketing initiatives and via customer touchpoints such as bill inserts or online account management portals. Inside the organization, Vistra will promote energy efficient workspaces and offer employees environmentally-friendly programs such as desk side recycling and collection of batteries and electronics.
- **Development of Renewable Energy and New Technologies**
We will continue to support policies that effectively use renewable resources to help meet growing energy needs. Additionally, we will continue to pursue and invest in development opportunities for renewable energy resources including solar and wind, as well as investments in battery energy storage facilities to allow for continued renewable energy generation and storage of such intermittent generation to provide the dispatchable energy needed to promote the reliability of the grids we service. Further, we will invest

in and support research efforts to develop new and emerging solutions including, but not limited to, technologies for carbon-capture and storage, hydrogen-fueled resources, and end-use efficiency improvements to promote cleaner air, water, and land. Future growth capital will be allocated to renewable resources and research projects, which support the goals of the United Nations Framework Convention on Climate Change (UNFCCC) Paris Agreement.

- **Source Responsibly**

We will commit to procure materials for our current and future operations in a responsible manner through selection of suppliers with focus on minimizing the environmental impact on manufacturing, distribution, and decommissioning, and in compliance with applicable laws and regulations. In addition, Vistra will encourage positive environmental stewardship and climate risk management within its value chain.

- **Climate Change Advocacy**

To address greenhouse gas emissions and their potential impact through climate change, we will continue to advocate for economically rational and market-based policies and solutions to address greenhouse gases consistent with the goals of the UNFCCC Paris Agreement. We will work with our industry and its stakeholders to help develop policies that address the issue, balance the need for reliable and affordable power, and consider the impact on the domestic economy.

- **Resource Diversity**

We will serve as an environmental leader as we work to ensure the reliability and security of a diverse resource portfolio that includes energy efficiency, demand response, renewable energy, battery storage, natural gas, coal and nuclear power, with the opportunities and challenges that each provides.

- **Compliance Excellence and Environmental Management**

We are committed to maintaining an excellent compliance record by meeting all legal and regulatory requirements as we operate in an environmentally sensitive manner. Compliance is monitored by a corporate environmental services team organized by geographic region who oversees environmental compliance at each site. We maintain a task tracking system for all regulatory requirements and perform regular internal environmental audits to confirm compliance. All compliance actions, including audits, permits and incidents, will be recorded in the Company's central reporting system.

- **Minimization of Facility Impacts and Continuous Improvement**

We will continue to integrate environmental considerations, in our business planning and decision-making, to reduce the environmental impacts of our current and future facility operations. Our objective is continuous improvement in implementation of effective technologies, improving the efficiency of our operations and promoting waste minimization and recycling.

- **Corporate Governance and Stakeholder Dialogue**

We are committed to furthering strong corporate governance standards, including continuing to regularly monitor and report publicly on our environmental progress and accomplishments in the Company's annual sustainability report. The Company will seek to better understand the issues of concern to our key stakeholders, including employees, customers, suppliers, legislators, regulators and the communities we serve, through an open and candid dialogue with all audiences.

V. OVERSIGHT

The three standing management committees (Executive Committee, Commitments Committee, and Risk Committee) provide daily oversight of the Company's environmental principles. The Board of Directors, through the Vistra Sustainability and Risk Committee, oversees the Company's core vision and values as it pertains to the Company's approach to sustainability policies and reporting, including environmental principles.

VI. GOVERNANCE \ IMPLEMENTATION

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

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

Reviewed August 7, 2024.