7.5,5.

Sustainability Report 2022



CORPORATE SUMMARY

STRATEGY AND INNOVATION

ESG STRATEGY STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH

COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES

APPENDIX

TABLE OF CONTENTS

Corporate Summary

- 3 Letter from President & CEO
- 4 Letter from Chief Strategy & Sustainability Officer
- About Vistra 5

Strategy and Innovation

- 6 Vistra's Strategy
- 7 Portfolio Transformation and Decarbonization
- Innovation in the Integrated Model 8

ESG Strategy and Governance

- Our Approach to ESG 12
- 13 ESG Pillars
- ESG Governance & Oversight 14
- 16 **Risk Management**
- 17 Committment to Transparency
- 18 Alignment with UN Sustainable Development Goals

Energy Stewardship and Emissions

- Environmental Compliance 20
- 21 Emissions
- 23 Generation
- 24 Water
- 25 Waste
- Biodiversity 26
- 27 **Energy Management**

DEI and Human Capital Management

- 29 Code of Conduct
- Governance of DEI 30
- 31 People

AND

- 34 Philanthropy
- 34 Procurement
- 35 Policy
- 36 Training & Development

Safety & Health

38 Culture of Wellbeing 39 Best Defense

Supporting Our Communities and Customers

- 44 Charitable Giving and Volunteering
- 45 Community Engagement

Responsible Business Practices

- 47 Supply Chain Program
- 50 Cybersecurity
- 51 Political Involvement

Appendix

- 53 SASB Table
- 56 GRI Index
- 62 Political Spending
- Trade Groups & Memberships 62



CORPORATE STRATEGY AND SUMMARY INNOVATION

D ESG STRATEGY AND GOVERNANCE

EGY ENERGY STEWARDSHIP CE AND EMISSIONS DEI AND SAFET HUMAN CAPITAL AND H MANAGEMENT

SAFETY COMM AND HEALTH AND

OMMUNITIES RESPONSIBLE ND CUSTOMERS BUSINESS PRACTICES APPENDIX

Letter From the President & CEO



For years, we have continued to see a rapid pace of change across our industry. But 2022 was uniquely defined by it. We saw continued demand for a cleaner, more electrified economy collide with geopolitical events, rising natural gas prices, supply chain disruption, persistent inflation,

the passage of the Inflation Reduction Act, and extreme weather events in both summer and winter. Through these challenges—and opportunities—Vistra stayed true to its strategic roadmap. We continue to deliver on the plans and promises that make our company a resilient enterprise that is focused on providing the reliable, affordable, and sustainable energy that customers are seeking.

I am proud to share that our Vistra team has made great strides in our efforts to simultaneously reduce emissions and grow our zero-carbon generation portfolio, Vistra Zero The company's overall CO_2e emissions dropped year-overyear in 2022, improving our trajectory to meet our goal of a 60% reduction in CO_2e by 2030 compared to our 2010 baseline. This was driven by the addition of more than 400 megawatts of solar and energy storage capacity brought online in Texas in 2022, along with the retirement of three coal facilities across Ohio and Illinois. We expect that factoring in these latest actions, we are tracking towards achieving 80% of our 2030 target by the end of 2023.

In addition, in 2023 we announced an agreement to acquire Energy Harbor and combine its nuclear and retail businesses with Vistra's nuclear and retail businesses and Vistra Zero renewables and storage projects under a new subsidiary called Vistra Vision. This transaction accelerates the growth of Vistra's zero-carbon operations, adding 4,000 MW of nuclear capacity and around 1 million retail customers. In total, Vistra Vision will be a large-scale 7,800 MW zero-carbon generation business with 5 million retail customers across the United States, and it will also have access to a growth pipeline of more than 3,500 MW of additional renewable and storage projects.

Vistra's continued success is powered by our people. As a leadership team, we understand that creating and maintaining an environment where people are respected, and differences are valued enhances our ability to recruit and retain top talent in the marketplace. Our employees are supported by top-notch training programs, leadership development, educational assistance, employee resource groups, and more. We are proud that our employees donate their time through volunteerism with hundreds of events and charitable efforts across the country in 2022. Notably, Vistra's annual United Way giving campaign raised \$1.8 million through employee donations and Vistra corporate matches, making it among the top five campaigns in the Dallas-Fort Worth area, which is even more impressive given that DFW is home to many Fortune 500 companies. In addition, the company is in the midst of a five-year commitment, made in 2020, to give \$10 million to organizations working to advance economic and educational opportunities for all members of our communities.

It's initiatives like these that stand as evidence that environmental, social, and governance efforts are priorities for Vistra — they are integral to our business strategy and ability to provide long-term value for all stakeholders.

While the pace at which our industry changes doesn't show signs of slowing down, we are focused on our strategy of responsibly transforming our generation fleet, creating value for customers and employees alike, and ensuring we have a resilient enterprise that creates value for years to come. Thank you for your interest in our company.

- Jim Burke, President & Chief Executive Officer

CORPORATE STRATEGY AND SUMMARY INNOVATION

D ESG STRATEGY AND GOVERNANCE

Y ENERGY STEWARDSHIP E AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Letter From the Chief Strategy & Sustainability Officer



In 2022, I became Vistra's chief strategy and sustainability officer, tasked with leading the company's strategic energy transition and sustainability efforts. As Jim mentioned, 2022 highlighted significant progress in our efforts to decarbonize our fleet in a responsible, thoughtful manner to ensure

we balance sustainability with the affordability and reliability our customers want and expect. We continue to make notable progress by continuing to lean into the priorities we laid out in the fall of 2020 to retire fossil assets while growing our zero-carbon generation portfolio.

In early 2022, Vistra announced an exciting 350 MW expansion of our Moss Landing Energy Storage Facility in California. Throughout the course of the year, we made tremendous progress, and the system will be operational by summer

2023. In Illinois, we are excited to continue our relationship with communities that have played a role in producing power for decades as we move forward with a first-in-thenation strategic energy transition of a coal fleet. With a focus on a just transition for these communities, Vistra is redeveloping several of its recently retired and to-be-retired coal plants into solar and/or energy storage facilities, resulting in the largest fleet of solar and storage facilities in Illinois.

As I look to Vistra's future, our commitment to a sustainable business that responsibly leads the way in the energy transition is only growing stronger. This includes our most recent announcement of growing our zero-carbon generation portfolio. In March 2023, we announced a planned acquisition of more than 4,000 MW of carbon-free nuclear generation capacity from Energy Harbor along with its retail business. This is an exciting opportunity that allows Vistra to grow its zero-carbon portfolio at scale and aligns with our focus on reliability during our nation's energy transition.

As we continue to bring projects to fruition, Vistra remains committed to consistent engagement with communities, elected officials (local, state, and federal), and regulators. Additionally, we continuously research, analyze, and, when appropriate, implement existing and new technologies that will help us improve our emissions profile.

In addition to the noteworthy CO_2 reductions Jim mentioned, we have made significant improvements in other emissions as well. We have been able to reduce nitrogen oxide (NO_x) and sulfur dioxide (SO₂) by more than 60% and 80% since 2010 respectively.

We are excited to be a part of the transition to a lower-carbon future while continuing to provide safe, reliable, and affordable power to our customers. We appreciate your engagement.

— Stacey Doré, Chief Strategy & Sustainability Officer, Executive Vice President of Public Affairs

CORPORATE STRATEGY AN INNOVATION

STRATEGY AND ESG S INNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

About Vistra

Vistra is a leader in the clean energy transition, with a strong zero-carbon generation portfolio and a deliberate and responsible strategy to decarbonize, all while delivering healthy returns and value for all stakeholders.

4 million

across the U.S.

20 states and the

District of Columbia

with operations

WE COMPETE

and decision-making

throughout the

organization.

TO WIN

customers

Our Purpose

Lighting up lives, powering a better way forward.

Vistra By the Numbers

37,000 megawatts of generation capacity

171,000,000

megawatt hours of generation

Core Principles

WE DO BUSINESS THE RIGHT WAY

Every decision we make and action we take will be evidence of the utmost integrity and compliance.

WE WORK AS A TEAM

8.000 megawatts of

zero-carbon generation

2050 net-zero carbon

targeted to be online

by end of 2023

emissions target

We are committedWe will create theto each other, inleading integratedeverything we doenergy company withand to the successan unmatched workof our company.ethic, an analysis-driven
and disciplined culture
with strong leadership

WE CARE ABOUT OUR KEY STAKEHOLDERS

Nearly 5.000

Fortune 500

employees

Company

We care about our employees, customers, and communities where we live and do business. We will maintain productive and respectful relationships with our elected officials, regulators and community leaders.

2022 SUSTAINABILITY HIGHLIGHTS



CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAF HUMAN CAPITAL AND MANAGEMENT

SAFETY AND HEALTH MMUNITIES RESPONSIBLE D CUSTOMERS BUSINESS PRACTICES APPENDIX

Vistra's Strategy

Vistra's integrated business model combines efficient, reliable, and ever-cleaner generation with a premier retail business. Through this powerful combination, we are taking a leading role in the responsible energy transition and expansion nationally.

Electricity is an essential resource—it's the lifeblood of our society. Its role in our everyday lives continues to grow as our economy electrifies everything from vehicles to home heating. As our country navigates the energy transition and associated increase in demand, we have an obligation to balance **affordability**, **reliability**, **and sustainability**. If we fail to achieve the proper balance of these factors, we risk adverse consequences. Vistra's strategy is to leverage innovation in both generation and retail for the benefit of our customers, our communities, and our shareholders. These efforts are symbiotic as the growing mix of carbon-free electricity we are generating is helping meet the growing demand of our customers. As one of the largest electricity generators in the U.S., Vistra has led the way in decarbonization efforts and is committed to sustainability, setting aggressive targets, and transitioning our fleet to low-to-no carbon resources, all while balancing our obligations to stakeholders and society.

While the way we generate electricity may be changing, our essential role in providing reliable and affordable electricity is not.



Together, our generation, commercial, and retail teams are powering a better way forward by balancing affordability, reliability, and sustainability.



0000

2030: 60% REDUCTION IN SCOPE 1 AND SCOPE 2 CO₂ EQUIVALENT EMISSIONS BY 2030, AS COMPARED TO A 2010 BASELINE



2050: NET-ZERO CARBON EMISSIONS BY 2050

CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAF HUMAN CAPITAL AND MANAGEMENT

SAFETY L AND HEALTH MMUNITIES RESPONSIBLE ID CUSTOMERS BUSINESS PRACTICES APPENDIX

Portfolio Transformation and Decarbonization

A primary element of Vistra's long-term business strategy is growth and transformation. We expect to responsibly transition our generation portfolio to low-to-no carbon generation sources through retirements of fossil-fueled assets and investments in renewables, battery energy storage, nuclear generation and carbon-reducing technologies. The company also expects to close on its transformative acquisition of Energy Harbor before the end of the year, which will grow the Vistra Zero portfolio with the addition of approximately 4,000 MW of carbon-free nuclear generation. In 2022, the company retired three coal sites, brought online two solar facilities and an energy storage facility, and announced

and began construction on the third phase of its Moss Landing Energy Storage Facility. These decarbonization efforts supporting America's energy

transformation are spearheaded by Vistra Zero.

Vistra Zero

Vistra Zero, our zero-carbon generation portfolio, continues to grow with the deployment of innovative technologies and solutions. As of last summer, Vistra has **3,400 MW of zero-carbon generation online** in Texas and California, including three projects completed in 2022:

- Brightside Solar Facility, 50 MW
- Emerald Grove Solar Facility, 108 MW
- DeCordova Energy Storage Facility (hybrid), 260 MW/260 MWh

Looking to 2023, the company expects to bring Phase III of the Moss Landing Energy Storage Facility online by summer, which will add another 350 MW to what is already the largest battery energy storage system in the world. This expansion will bring the site's total capacity to 750 MW/3,000 MWh. Additional solar and battery development is occurring in California, Illinois, and Texas. Vistra is also exploring emerging technologies and applications for the future.

Vistra is able to achieve these expansions with significant financial investment commitments. We continue to leverage the \$1 billion of 7% Green Perpetual Preferred Stock issued—the first U.S. corporation to issue green preferred stock—for the assets under development. As those funds are fully allocated, Vistra expects to primarily finance the remaining growth capital expenditures for these development projects primarily with non-recourse project or portfolio-level financing.

Our renewable and zero-carbon investments will not only assist in reducing our carbon footprint but will also create a more sustainable and resilient company.

Coal Retirements

In 2022, Vistra retired three coal plants totaling 2,887 MW. With these closures, Vistra has now decommissioned more than 15,000 MW of coal and gas plants since 2010, contributing to significant reduction of greenhouse gas (GHG) emissions since that time. Another five coal-fueled power plants across Illinois, Ohio, and Texas are set to retire no later than 2027, totaling another ~4,600 MW.

Just Transition & Site Redevelopment

While beneficial to our decarbonization transition, we know firsthand that power plant retirement decisions are never easy. Vistra strives to provide a just transition, working to minimize the social and economic impacts of closures. The company is leveraging innovation at many of these retired or to-be-retired sites by repurposing them



Vistra's 50-megawatt Brightside photovoltaic (PV) Solar Facility in Live Oak County, Texas, is a part of the company's growing portfolio of zero-carbon power generation assets, known as Vistra Zero.

into renewable and/or energy storage facilities. With interconnection infrastructure already available, these sites give the company a strategic advantage to quickly develop new zero-carbon facilities. More importantly, repurposing sites allows us to continue supporting the local plant communities and our employees in those areas. For example, Vistra is redeveloping and transforming its Illinois coal fleet. This first-in-the-nation transformation, supported by the Illinois Coal to Solar & Energy Storage Initiative, is taking retired or to-be-retired coal plant sites across central and southern Illinois and turning them into renewable energy centers. The initiative, which will bring online up to 300 MW of solar and up to 150 MW of battery energy storage, also includes diverse suppliers while continuing to support a muchneeded property tax base to local communities.

CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Reliability

While decarbonization is a key focus of our sustainability efforts, we are focused on a responsible transition that must balance reliability and affordability. As extreme weather events in February 2021, summer 2022, and December 2022 have demonstrated, there are periods when demand for electricity is extremely high and conditions are challenging. It is essential to have dispatchable generation assets to keep the grid functioning. While renewable and storage resources will continue to play an increasingly important role in our electric grid, the near-term horizon shows a continued need for reliable fossil fuel assets to provide power when we need it most. Because of this and Vistra's responsibility to provide reliable power, the company has not yet announced retirement dates for two coal plants, both located in Texas. Vistra will continue to evaluate these two assets based on economics, environmental impact. and reliability of the ERCOT grid, and is exploring potential decarbonization technologies for these plants.

Innovation in the Integrated Model

Innovation is fundamental to Vistra's success. Together, our generation, commercial, and retail teams are **powering a better way forward**. We operate in dynamic, evolving markets, so developing new approaches and investing in new technologies is critical to our ability to meet and exceed the needs of our customers. As the energy mix of the electric grids continues to change, it is important for our generation fleet and our commercial teams to adapt.

Vistra's support of innovation efforts across our **generation** fleet extends from the maintenance and optimization of our fleet to the build-out of new solar and energy storage facilities. We continue to review opportunities for investment in technologies such as carbon capture, long-duration storage, new nuclear, and hydrogen, all of which will be essential to ensuring a reliable, cost-effective power supply as the generation mix evolves. For our **retail** electricity customers, this transformation enables Vistra to provide solutions to their current needs and allows for potential new solutions in the future. Vistra Retail brands strive to be at the forefront of innovation with environmentally conscious and sustainably-focused products to reinforce our value proposition. This innovative spirit has positioned us to be leaders in the clean energy transition through the more than 50 green retail products and solutions we offer customers. Innovation drives us to design plans that meet different customer needs, increase brand consideration, and extend the customer life with the brand. To that end, Vistra's flagship retail brand, TXU Energy, has been first-to-market with more residential products and plans than all of its competitors combined.

Powering the Energy Transition for Customers

Vistra Retail, which serves nearly 4 million customers in 18 states and the District of Columbia, is the natural offtaker of the power produced by our generation fleet. This integrated nature of our business is a core competitive advantage that provides stable financial earnings. Our diverse generation fleet allows us to differentiate ourselves by providing a distinctive customer experience predicated on delivering reliable and innovative power products and solutions. This innovation gives our customers choice, convenience, and control over how they use electricity and related services.

Thus, our retail business can offer a comprehensive suite of green products and services, including 100% wind and solar options, as well as thermostats, dashboards, and other programs designed to encourage reduced consumption and increased energy efficiency. Vistra Retail plays a pivotal role in the clean energy transition. The growth of our zero-carbon generation portfolio, Vistra Zero, will provide the renewable and carbon-free electricity Vistra Retail needs to support the rise in renewable product offerings for end users. Further, the electrification of the economy will be the stimulus for creating unique solutions that fit our customers' evolving electricity needs.

We've invested nearly **\$24 million** in GreenBack rebates since 2011, an average of **\$2 million per year**.

Supported by GreenBack rebates, United Dairy Farmers replaced flourescent troffer and strip lighting with LED fixtures at more than 50 locations. The project decreased power needs for lighting by 75% and significantly reduces maintenance costs over time.



Vistra Retail Large Business Markets

Vistra Retail's Business Markets team is focused on bringing innovative products and services to large industrial and commercial customers. Our energy solutions address a wide range of sustainability needs—from programs that drive efficiency and cut costs to leadingedge tools that put usage data directly in customers' hands—our products are as diverse as the customers and industries we serve.

ENERGY EFFICIENCY SOLUTIONS

GreenBack Program

GreenBacks are rebate dollars that help business customers fund new energy efficiency projects or offset the cost of existing sustainability efforts. Projects like installing LED lights or electric vehicle charging stations, or HVAC equipment upgrades positively impact a customer's bottom line while benefiting the environment.

CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS APPENDIX

Energy Audits

For customers who are not sure where to begin or which efficiency project will have the greatest impact, we offer energy audits. We work with third party energy auditors to provide assessments for customers and create an action plan. Depending on the programs available where our business customers operate, these audits can be completed for reduced or even no cost.

• For example, the Ohio Department of Development will cover 75% of the audit for manufacturing companies. The remaining 25% is the customer's responsibility, but any GreenBack dollars the customer is eligible for can be used to defray the cost.

ENERGY MANAGEMENT SOLUTIONS

Energy Dashboard

We offer all large business and commercial customers access to our Energy Dashboard, an innovative digital platform to help customers track and identify trends in their energy usage and manage the associated costs. The Dashboard includes facility benchmarking, invoice management, weather normalization, and GHG and emissions reporting. Customers can also identify patterns in usage and compare facilities. The newly-launched broker view is specifically designed to provide a portfolio approach for brokers and consultants who have customers served by Vistra Retail brands.

Peak Notifications

Our Coincident Peak Notification program offers forecasts to help identify when these peak hours could occur. Customers can then use the notifications to reduce their load at critical times during peak summer months, which could result in lower electricity costs for the next 12 months.

Demand Response with GridBeyond

Vistra Retail partners with GridBeyond to deliver targeted and controlled load reduction using on-site control hard-

ware powered by artificial intelligence. The partnership incorporates any on-site industrial equipment or permitted generation assets to maximize demand and cost savings through optimized use of flexible loads. Customers set the criteria for when operations can be interrupted.



Vistra's innovative retail energy offerings yeild tangible savings via dashboard views for brokers, Al-powered business intelligence from GridBeyond, and Coincident Peak notifications.

CORPORATE SUMMARY STRATEGY AND ESG S

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

SUSTAINABILITY SOLUTIONS

For those customers with sustainability as a key focus, Vistra Retail offers renewable and emission-free supply options to help meet their company's goals.

We advise customers on solutions for their organization based on particular targets or claims, any requirements for specific standards or certifications, and available budget.

Our sustainable supply solutions range from renewable energy credits (RECs) from a Texas wind project to a sophisticated municipal aggregation supply agreement that incorporates output from a local utility-scale solar project.





POWERING SUSTAINABLE STEEL

Steel Dynamics Southwest (SDI) leverages innovation to power the largest steel mill in Texas. The company utilizes the TXU Energy Dashboard to monitor real-time market conditions and receive alerts when energy prices cross a pre-determined threshold. Reducing energy use during high-price periods increased SDI's cost savings and enhanced grid reliability across the Texas. TXU Energy, THG Energy, and AEP partnered to install usage equipment for SDI to access real-time energy use and costs for its manufacturing operation. Additionally, SDI chose to supply the mill with 100% zero-emission energy, sourced from Vistra's Comanche Peak Power Plant in Glen Rose, Texas. This allows SDI to claim zero Scope 2 emissions from electricity consumption in its sustainability reporting, which also helps SDI's customers reach their sustainability targets.

CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY AND GOVERNANCE ENERGY STEWARDSHIP AND EMISSIONS

DEI AND SAF HUMAN CAPITAL AND MANAGEMENT

SAFETY COMMU AND HEALTH AND CUS

COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Electrification

The transition to electric vehicles is underway. While passenger vehicles are dominating the sector, commercial fleets will not be far behind. Available federal and state government funding is a driving factor for companies to begin the transition now. Vistra Retail is ready to serve our customers through this process. From securing funding to selecting partners and installing equipment, we help customers create a plan and execute.

TXU Energy is partnering with electric vehicle supply equipment vendors to help our school district customers modernize their bus fleets with available grant funding from both federal and state agencies. The first round of applications for EPA's Clean School Bus Program resulted in our customers receiving awards for funding up to 25 buses and charging systems worth over \$9 million. We will continue to support Texas school districts in subsequent rounds of funding at both the state and federal levels.

Vistra Retail Residential Markets

Vistra is continuously innovating to make it easier for customers to use clean energy and make sustainable choices with our unique and compelling offers. Since 2010, Vistra's flagship retail



electricity brand, TXU Energy, has seen a 15x growth in residential customers going 100% renewable. In 2022, the carbon avoidance from TXU Energy customers' renewable energy use was equal to planting over 29.5 million trees.

FREE NIGHTS & 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.

GREEN-UP & PURE SOLAR:

• These plans allow customers to make any rate plan 100% green for a low price every month—providing fixed price certainty and transparency to customers who don't have to wonder how much they are paying to go green.

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.

• TXU Energy offers a wide range of net metering plans with customer growth of nearly 70% last year, resulting in a robust share of rooftop solar homes in ERCOT.

Energy Management Tools

TXU Energy has been participating in Residential Demand Response for over a decade and was the first retailer to offer an internetenabled 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.

Vistra Retail provides several tools that help customers consume less electricity—including energy insights in the MyEnergy Dashboard, custom budget alerts, and customized data on what appliances are using the most energy. We also provide eligible customers with free HVAC tuneups or include A/C maintenance bundled in select rate plans. In warmer markets, like ERCOT, a well-functioning A/C can consume up to 30% less electricity.



NEW IN 2022: DRIVING TO A CLEAN ENERGY FUTURE WITH FREE EV CHARGING

In keeping with our history of innovation with time-of-use products, we introduced another market first in 2022. TXU Energy Free EV Miles is our first "type of use" product that allows customers to charge their EVs for free. Free EV Miles pulls energy consumption data directly from the customer's electric vehicle, allowing us to itemize it separately from the household usage and deduct the charging load from their energy bill—as long as they charge during the off-peak hours. The plan is backed by 100% renewable energy.



STRATEGY AND INNOVATION SUMMARY

AND

ESG STRATEGY GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

RESPONSIBLE BUSINESS PRACTICES

APPENDIX

Our Approach To ESG

Stakeholder Engagement

Vistra considers all stakeholders in our decisions, processes, and activities. We believe regular, transparent communication with our stakeholders, from community leaders to customers and investors, is essential to our long-term success. We collect feedback on ESG interests and concerns from all stakeholders through various touch points and engagement throughout the year. We aim to provide a collaborative environment for meaningful discussions to occur, helping us inform our sustainability strategy. practices, and disclosures. Engagement opportunities vary by stake-holder as seen in the tables to the right.

When interacting with key stakeholders, we listen to feedback about how we can improve our business practices, inform our strategy, and ensure our sustainability strategy incorporates their concerns.

Community outreach efforts are held on a routine basis, oftentimes weekly, via in-person or virtual meetings to help inform and answer questions regarding Vistra's business, operational, and community activities.

In 2022, community outreach efforts included numerous in-person community meetings to share Vistra's plans to redevelop our legacy Illinois coal fleet to utilityscale renewable generation. Additionally, we hosted a community town hall regarding the proposed Morro Bay Energy Storage Facility; participated in the NRC's public meeting to discuss the NRC license renewal process

and environmental scoping for Comanche Peak Nuclear Power Plant; held community-wide open house ribbon cutting ceremonies for new renewable and energy storage projects; and hosted spring and fall companysponsored tree donations and planting events as part of our Trees for Growth initiative. We also provided power plant and renewable facility tours (typically held monthly) with various community organizations, civic groups, and universities or schools.

Further, Vistra seeks to enhance its ESG engagement through various peer networking groups, trade associations, and sustainability-focused organizations. These strategic partnerships provide opportunities to discuss and research insights on best practices, industry trends, advancements in climate change technologies and disclosures, and human capital management programs, among others.

Vistra Memberships

- Business Roundtable (BRT)
- World50
- Chief Executives for Corporate Purpose® (CECP)
- CEOAction for Diversity and Inclusion
- Disabilty:IN
- Business for Social Responsibility (BSR)
- Electric Power Supply Association (EPSA)
- Electric Power Research Institute (EPRI)
- Nuclear Energy Institute (NEI)

CUSTOMERS	
Creating custom solutions for customer needs	✓ Quarterly
Customer quality questionnaires	✓ Daily
Market research	✓ Quarterly
Social media	✓ Daily
Customer service rating	✓ Daily

INVESTORS	
Shareholder meetings	✓ Annually
Investor calls and conferences	✓ Regularly
Social media	✓ Daily

LOCAL, STATE AND FEDERAL GOVERNMENT		
City council meetings and town halls	✓ Regularly	
Meetings with state, local, and federal officials	✓ Regularly	
Community Awareness Meetings	✓ With New Projects	

EMPLOYEES	
Employee town halls	✓ Quarterly
Employee engagement surveys	✓ Annually
Training	✓ Yearly
Mentoring Opportunities	✓ Monthly
Feedback	✓ Continuously

SUPPLIERS	
Supplier requests for proposals	✓ Daily
Sustainability Supply Chain engagements	✓ Monthly
Sustainability scoring	✓ Annually

SUMMARY

STRATEGY AND INNOVATION

AND

ESG STRATEGY GOVERNANCE AND EMISSIONS

TOPICS

OLICII

DEI AND AND HEALTH HUMAN CAPITAL MANAGEMENT

APPENDIX

RESPONSIBLE

BUSINESS

PRACTICES

ESG Pillars

Vistra recognizes that creating a sustainable company requires a commitment to all facets of ESG stewardship, including: addressing climate change and being good stewards of environmental resources, supporting all company stakeholders, maintaining appropriate governance frameworks, and providing a long-term vision and sustainable strategy. We have identified five ESG pillars, aligned with stakeholder interest, to illustrate the foundation of our sustainability strategy and represent the key ESG focus areas for our business.

Compensation Alignment with ESG

In 2022, Vistra incorporated additional ESG metrics into our corporate scorecard to align employee compensation with the company's ESG and diversity, equity, and inclusion (DEI) goals. These metrics are weighted at 10% and include: GHG emissions reduction targets tracking to achieve a 60% reduction by 2030 and net-zero by 2050; GHG-related advocacy efforts and DEI initiatives, including the implementation of updated recruiting and hiring practices, DEI training and reporting enhancements, and supplier diversity expansion. In addition, there was a 10% weighting for new development and construction results to align with the company's strategic focus on growing our Vistra Zero portfolio.

In 2023, we are continuing this approach with 20% of Vistra's compensation scorecard driven by ESG-associated metrics.

Additionally, one of our five main corporate objectives is focused on advancing the company's sustainability efforts. There are 8 sub-objectives within this category, including progress toward decarbonization targets, DEI activities, and leadership training initiatives.



Vistra has committed to set near-term company-wide emission reductions in line with climate science with the Science Based Targets initiative. We have submitted our near-term targets to SBTi for assessment.





SUMMARY

STRATEGY AND INNOVATION AND

ESG STRATEGY GOVERNANCE AND EMISSIONS

SUSTAINABILITY

AND RISK COMMITTEE

Oversees corporate risk management,

including the management and

tracking of environmental risks and

opportunities, including climate

change, as well as external

sustainability reporting

DEI AND AND HEALTH HUMAN CAPITAL MANAGEMENT

RESPONSIBLE AND CUSTOMERS BUSINESS

APPENDIX

ESG Governance & Oversight

Board of Directors

The full Vistra board of directors oversees ESG with oversight of subject matter-specific components delegated to relevant board committees, as reflected in the diagram.

ESG-related topics are discussed at each guarterly board and committee meeting and on a more frequent basis as necessary. Each board member brings ESG experience, navigating climate change and sustainable strategy and policy, human capital management, and DEI experience (as detailed in our 2023 proxy statement). In addition, the full board has direct oversight responsibility of cybersecurity risk and Vistra's lobbying and political contributions. Further, the full board focuses extensively on our path to decarbonization, our longterm sustainability strategy, and takes an active role with management to review and oversee the development and execution of Vistra's long-term corporate strategy. In particular, given their significance and interconnectedness with capital deployment and business strategy, the board regularly reviews climate-related risks and opportunities, including the transformation of our generation portfolio and investments in zero-carbon resources.

Vistra's management team is led by a team of industry veterans with expertise across all areas of our generation and retail businesses. At a management level, the chief strategy and sustainability officer leads two committees, Sustainability Reporting and Sustainability Advocacy, to ensure the appropriate resources and stakeholders are implementing sustainability efforts.

BOARD OF DIRECTORS

NOMINATING AND **GOVERNANCE COMMITTEE** Oversees corporate governance framework

SOCIAL RESPONSIBILITY AND COMPENSATION COMMITTEE

Oversees Vistra's social responsibility initiatives, including talent management, compensation, diversity, equity and inclusion, and culture and community involvement

PRESIDENT AND CHIEF EXECUTIVE OFFICER

Responsible for all sustainability and ESG strategy including the setting and achievement of long-term emission reduction targets

CHIEF STRATEGY AND SUSTAINABILITY OFFICER AND EXECUTIVE VICE PRESIDENT OF PUBLIC AFFAIRS

Responsible for Vistra's corporate strategy, sustainability, regulatory and government affairs, communications, and community engagement



CORPORATE STRATE SUMMARY INNOV

STRATEGY AND ESC INNOVATION AND

ESG STRATEGY AND GOVERNANCE ENERGY STEWARDSHIP AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY COMMU AND HEALTH AND CU

COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Vistra Management

The board has delegated management of the company's day-to-day operations, including all ESG performance, to Vistra's executive officers. There are three standing committees that comprise the primary governance forums for day-to-day management of the company: Executive Committee, Commitments Committee, and Risk Management Committee.

	MEMBERS	MEETING OCCURANCE	FUNCTION
EXECUTIVE COMMITTEE	 CEO CEO's direct reports Leaders who represent key business areas and support functions 	Weekly	Provides the forum for discussion and decision-making related to general strategy and policy items, operational updates, information sharing, prioritization, and cross-business and cross-functional coordination
COMMITTEE	 Voting members: President and CEO (chair) CFO General Counsel and Chief Compliance Officer Chief Administrative Officer President of Wholesale Operations & Development President of Vistra Retail Chief Strategy and Sustainability Officer Standing Invitees: Other direct reports of CEO Other key functional and operational leaders 	Weekly	Provides operational oversight of Vistra's material committment activities, ensuring that an appropriate level of analysis, review, and approvals are performed prior to committing or deploying capital, approving transactions within transaction authority limits delegated by the Board
RISK MANAGEMENT COMMITTEE	 President and CEO CFO (chair) President of Wholesale Operations & Development Chief Risk Officer SVP of Commercial Operations General Counsel / Chief Compliance Officer President of Vistra Retail Chief Strategy & Sustainability Officer Controller Treasurer SVP of Planning VP of Wholesale Strategy 	Weekly	Provides risk management oversight, monitoring, control, and guidance for all risk management activities at Vistra, approving risk management activites within the limits delegated by the Board

STRATEGY AND SUMMARY INNOVATION

AND

ESG STRATEGY GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

AND CUSTOMERS BUSINESS

RESPONSIBLE APPENDIX

Risk Management

Vistra's chief risk officer oversees risk management efforts and regularly reports to the Sustainability & Risk Committee regarding enterprise risk management and assessment matters. The chief risk officer administers our risk management policy, which governs the Risk Management Committee. The risk management policy establishes guidelines necessary for the company to effectively manage the market, credit, operative, and regulatory risk of its commodities portfolios.

As part of this annual risk process, Vistra develops scenarios to evaluate their impact across multiple risk items. The focus of these scenarios are items of high potential impact but low likelihood of occurrence.

In addition to this comprehensive annual process, the risk universe and scenarios are reviewed on an interim basis to address both emerging risks and material changes that may occur, such as in-depth risk assessment and mitigation plans the company undertakes after extreme weather events or other extraordinary operational events.

Risks and opportunities that stem from climate change are managed through our established enterprise risk management framework. Vistra utilizes climate scenario analyses to help inform our climate-related risks and opportunities over various time horizons. In Q3 of 2022, Vistra engaged with a third party for a refreshed climate risk analysis. We intend to publish the high-level results of this analysis in 2023. Although the anticipated impacts of climate change

and related global mitigation efforts have the potential to present significant challenges to the energy sector across the world, we believe that there will be substantial opportunities for Vistra to play an increasingly important role in the energy transition and that we are well-positioned to capitalize on these prospects. Given our company's long history and deep knowledge of power markets, we feel we have the requisite capabilities to transform our company based on climate change and increasing mix of carbonfree assets, and our commitment to all stakeholders and diversity, equity, and inclusion.

PRACTICES

Annual Risk Process



STRATEGY AND SUMMARY INNOVATION

ESG STRATEGY AND

GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES

APPENDIX

Commitment to Transparency

Vistra has adopted globally accepted sustainability frameworks and standards to provide transparent ESG disclosures to all of our stakeholders. We report ESG disclosures through multiple resources, including this report. In our reporting, we commit to provide credible and relevant dis-closures to assess our progress on ESG goals and strategy.

This report highlights Vistra's sustainability progress in fiscal year 2022 (Jan. 1 – Dec. 31, 2022) and is presented on behalf of Vistra Corp. and its subsidiaries. We have prepared disclosures in accordance with the Sustainability Accounting Standards Board (SASB) industry standards for Electric Utilities and Power Generators. Vistra reported information cited in its GRI content index using guidance from the GRI Standards, Core Option 2016. We are exploring reporting alignment with the GRI Universal Standards 2021 for future disclosures.

We also incorporate many of the recommendations of Task Force on Climate-related Financial Disclosures (TCFD) into this annual sustainability report and plan to publish our second TCFD-guided Climate Report in Q3 of 2023. Further, we voluntarily disclose (since 2020) our environmental data through CDP's climate change questionnaire.

In addition, Vistra's independent accountants performed a review engagement (limited assurance) related to Scope 1 and Scope 2 GHG emissions presented in the company's Statement of Greenhouse Gas Emissions. The third-party review report can be found online [here]. For questions about any of the disclosures in this report or about any of Vistra's ESG-related activities, please email sustainability@ vistracorp.com.





As part of our committment to transparency in reporting, independent accountants performed a review engagement related to Vistra's Scope 1 and Scope 2 GHG emissions, presented in the company's Statement of Greenhouse Gas Emissions.

CORPORATE ST

STRATEGY AND ESG S INNOVATION AND

ESG STRATEGY AND GOVERNANCE ENERGY STEWARDSHIP AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Sustainable Development Goals

Launched in 2015, the 17 Sustainable Development Goals are a global set of goals, targets, and indicators developed by the United Nations to guide countries, communities, and organizations in their work to create a sustainable world by 2030. Vistra's business activities align with many of the SDGs, but our sustainability strategy predominately supports the four listed below:

SUSTAINABLE G ALS

SDG	GOAL	ALICNMENT
7 AFFORDABLE AND	Ensure access to affordable, reliable, sustainable, and modern energy	 8,000 MW of zero-carbon generation expected to be online or in development by late 2023 with a mix of nuclear, solar, and battery energy storage One of the largest wind purchasers in Texas Advocates for and supports competitive energy markets Renewable retail products and solutions offered in all retail electricity markets
8 DECENT WORK AND ECONOMIC GROWTH	Promote inclusive and sustainable economic growth, employment, and decent work for all	 Training and development programs at every level to help grow and develop employees Employee-initiated and led resource groups based on demographics, interests, and purpose Leading DEI efforts across the organization with requisite training underway
11 SUSTAINABLE CITIES	Make cities inclusive, safe, resilient, and sustainable	 Solar developer and provider of solar panels for residential customers Power plant optimization EV car charging stations Supports numerous city efficiency efforts Bill-payment assistance through Energy Aid programs Fossil-fueled plant closures with just transition and reinvestment across multiple states
	Sustainably manage forests, combat desertification, halt and reverse land degradation, halt biodiversity loss	 50+ years of land reclamation 300,000+ trees provided by Vistra Trees for Growth TXU Energy Urban Tree Farm and Education Center Luminant Environmental Research Program

CORPORATE STRATEGY AND SUMMARY INNOVATION

ND ESG STRATEGY N AND GOVERNANCE



DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Environmental Stewardship and Emissions

We are committed to being a good steward of the environment and minimizing the impact of our operations on the environment through our transition to low carbon and carbon-free power generation.



STRATEGY AND SUMMARY INNOVATION

ESG STRATEGY AND

ENERGY **STEWARDSHIP** GOVERNANCE AND EMISSIONS

DEI AND AND HEALTH HUMAN CAPITAL MANAGEMENT

RESPONSIBLE BUSINESS

APPENDIX



ENVIRONMENTAL STEWARDSHIP

Vistra is committed to responsible environmental practices that include an ambition for cleaner air, water, and land, waste reduction, and the conservation of natural resources. Vistra's commitment to improving the environment is described through nine Environmental Principles, which can be found on **our website**. Vistra employees conduct business and make decisions with these principles in mind.

Environmental Compliance

We do business the right way—we are committed to continuously improving environmental protection measures and building on our strict compliance with environmental laws and regulations. Vistra's corporate environmental team assists and guides compliance at each power plant. Roles and responsibilities are determined on a site-bysite basis, and all regulatory submittals and due dates are tracked in the company's work order system.

The corporate environmental team also performs internal audits at sites regularly and tracks open items to completion. Permit deviations, spills, or other environmental incidents are tracked in a central reporting system. The environmental team meets with senior management monthly to discuss compliance items, risks, and environmental planning. Any spills are documented in the company's central database and appropriate notifications are made depending on the quantity and material spilled. Importantly in 2022, Vistra plants did not experience any significant spills as defined by the GRI Effluent standard, and Vistra did not have any significant fines resulting from notices of violations (NOVs), which are preliminary allegations from the United States Environmental Protection Agency or a state environmental agency regarding potential non-compliance. Vistra's environmental, legal, and regulatory teams coordinate efforts to ensure that Vistra adheres to and responds to all federal and state environmental regulations.



Our stewardship begins with maintaining an excellent compliance record that meets or outperforms all applicable federal and state environmental laws and regulations.

CORPORATE STRATEGY AND SUMMARY INNOVATION

ATION ESG STRATEGY GOVERNANCE

EGY ENERGY STEWARDSHIP CE AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS APPENDIX

Emissions

Air emissions are a byproduct of our business operations electricity generation. Vistra tracks and reports its emissions not only for compliance with the EPA and state agencies but also to hold ourselves accountable to all stakeholders and the reduction targets we have committed to.

Recognizing the impact emissions have on the environment and climate change, Vistra set GHG emissions reduction targets:

- 60% reduction in Scope 1 and Scope 2 CO₂ equivalent (CO₂e) emissions by 2030, as compared to a 2010 baseline
- Net-zero carbon emissions by 2050

GHG emissions in 2022 fell nearly 4% from 2021, partly driven by coal plant retirements. With additional announced coal plant retirements that will occur by 2027 Vistra has a clear line of sight to achieving our 2030 emissions reduction goal. We continue to invest in innovation and operational improvements, as well as advocate for policy changes that will enable a responsible transition to a clean energy future. Assuming that the necessary technological advancements and public policy incentives are achieved, we believe we can reach our long-term target of net-zero carbon emissions by 2050.



Progress against our 60% reduction in scope 1 & 2 CO_2e emissions by 2030:

75% of goal achieved in 2022

Forecast **80%** of goal achieved by 2023, a reduction of nearly 90 million metric tonnes of CO₂e annually

GHG emissions in metric tonnes CO ₂ e	2018	2019	2020	2021	2022
Scope 1 ¹ emissions	118,650,466	105,523,364	94,290,023	98,749,588	94,785,101
Scope 2 ¹ , location-based emissions	248,611	249,068	333,770	242,970	220,138
Scope 3 ² emissions	-	-	2,724,789	2,386,622	2,361,430
Total GHG emissions	118,899,077	105,772,432	97,348,582	101,379,180	97,366,669
Total Generation (MWh)	166,988,411	186,428,605	172,243,738	174,040,471	171,433,319
Emissions Intensity (Scope 1 CO ₂ e/MWh)	0.71	0.57	0.55	0.57	0.55

1. Scope 1 and Scope 2 emissions have been reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Standard. Vistra's independent accountants performed a review engagement (limited assurance) related to Scope 1 and Scope 2 GHG emissions presented in the company's Statement of Greenhouse Gas Emissions.

2. Represents the associated emissions from the Use of Sold Products (retail natural gas), as categorized by the Greenhouse Gas Protocol Corporate Value Chain Standard, which is consistent with the target-setting criteria developed by the Science Based Targets initiative for electric utilities. The company is still undergoing an analysis of identifying and quantifying other categories of Scope 3 emissions.

STRATEGY AND SUMMARY INNOVATION

ESG STRATEGY AND GOVERNANCE

ENERGY STEWARDSHIP AND EMISSIONS

DEI AND AND HEALTH HUMAN CAPITAL MANAGEMENT

AND CUSTOMERS

RESPONSIBLE BUSINESS PRACTICES

APPENDIX



Carbon Dioxide (CO_2)







Vistra's tracked GHG emissions are comprised of three gases CO₂, nitrogen oxide (NO₂) and sulfur dioxide and (SO₂). The majority of our GHG emissions are CO₂, and we have made significant progress in reducing those emissions. However, we have also made significant reductions in our nitrogen oxide and sulfur dioxide emissions. Similar to CO₂, some of these reductions have been driven by fossil fuel plant retirements over the preceding years. However, Vistra has also taken steps to actively reduce nitrogen oxide and sulfur dioxide at our fossil fuel plants:

- Our Martin Lake facility reduced SO₂ mass emissions by 76% from 2010 through improvements to the SO₂ control system in combination with switching to a lower sulfur coal
- Our plants continue to implement and study efficiencies for NO_x control to optimize our NO_x reductions across the fleet

These efforts reinforce Vistra's commitment to improve the air quality for our stakeholders and communities as we provide reliable, dispatchable generation across our generation portfolio. We will continue to explore technologies, processes, and methods to improve our emissions profile in the years to come and expect further reductions as we continue to retire coal plants

SINCE 2010, VISTRA HAS ACHIEVED:

45% reduction in carbon dioxide

(CO₂) emissions

reduction

in nitrogen oxide (NO_v) emissions

81% reduction in sulfur dioxide (SO₂)emissions

Our near-term forecast for 2023 shows continued improvement for relevant emissions

CORPORATE STRA SUMMARY INNO

STRATEGY AND ESG STRATEGY INNOVATION AND GOVERNANCE

ENERGY STEWARDSHIP AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Generation

Vistra's generation fuel mix is continuing to rotate to low-tono carbon resources. This shift is in alignment with priorities we announced in 2020 to responsibly retire fossil assets while growing our zero carbon generation portfolio. We are constantly balancing our obligation to ensure affordability, reliability, and sustainability for all of our stakeholders. With the retirement of 2,900 MW of fossil fuel generation in 2022, we anticipate lowering our coal mix to less than 30%

of our total generation volume in 2023. This shift in fuel mix is improving our emissions profile while allowing for the potential growth of our solar capacity as we repurpose these sites. Vistra's solar generation output is continuing to grow year-over-year with our recent additions at Texas' Emerald Grove and Brightside solar facilities. As we look to the future, we anticipate we will be generating more than 1,000 GWh of solar annually.

2022 ZERO-CARBON GENERATION HIGHLIGHTS:



solar PV panels brought online



79,000 average residences Brightside and Emerald Grove can support



158 MW solar generation capacity brought online



260 MWh

battery energy storage capacity brought online



Vistra plans to continue to support electric grid transitions to lowto-zero-carbon through projects like our Emerald Grove facility.

Generation Volume

Primary Fuel	2020	2021	2022	2023 Target
Gas	55.9%	52.7%	55.1%	61.0%
Coal	32.5%	35.9%	32.9%	27.3%
Nuclear	11.3%	11.1%	11.5%	11.3%
Solar & Battery	0.3%	0.3%	0.5%	0.6%
Oil	<0.1%	<0.1%	<0.1%	<0.1%





STRATEGY AND

SUMMARY

AND ESG STRATEGY ON AND GOVERNANCE

Y ENERGY STEWARDSHIP AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX



Water

The use of water is imperative 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 resouces, especially in areas considered "high stress" or "extremely high stress." Water scarcity, along with additional environmental and climate-related risks, are incorporated into Vistra's corporate risk management process.

Across our fleet of power plants, Vistra practices good water stewardship and efficiencies through site-specific water management plans. 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, we built large reservoirs to capture water when it is plentiful, allowing it to be reused and recycled repeatedly. Vistra also finds ways to recycle water between systems to reduce usage and reclaim other types of wastewater, when feasible. In fact, Vistra power plants consume less than 2% of water withdrawn. Vistra will continue to focus on a target of 2% or less of water consumption in our plant operations.

Vistra has five efficient natural gas-fueled power plants in areas identified as "High" or "Extremely High" for water stress as defined by the GRI Standards. Each of these plants are 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. Each of these highly efficient natural gas plants utilizes low water demand and has its own site-specific conservation measures, including:

- Operating as a zero-discharge facility
- Using reclaimed water as its primary source
- Utilizing low-quality water with significant treatment to recycle extensively

Vistra is a critical player in helping manage national water resources and providing expertise on several official regional and statewide water planning, conservation, and flood planning groups or committees. Each year, we report our water use and conservation activities in responses to various states' Water Survey/Inventory Programs, and we carefully monitor the quality and impact of water returned to waterways.

SUMMARY

STRATEGY AND ESG STRATEGY INNOVATION AND

ENERGY STEWARDSHIP AND EMISSIONS GOVERNANCE

DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES

APPENDIX

Waste

Vistra works to minimize the amount of waste produced at each of our locations. This includes limiting the amount of inventory of ancillary chemicals at each location and ensuring that all product procured is utilized. Wastes such as metals, universal waste, e-waste, and used oils are recycled to the extent feasible at an average rate of 90%. All generated waste is appropriately collected, contained, and transferred to offsite facilities in accordance with all local and federal regulations.

Coal Ash Byproduct

Nearly 3 million tons of coal combustion byproducts are **beneficially** reused in products.

- Over **\$75 million in revenue** for Vistra
- Reduces carbon use—each ton of flv ash used in place of



% of Coal Ash

traditional cement, results in a reduction of about one ton of carbon dioxide.

• As required for compliance with the U.S. EPA standards, information on our coal combustion residual impoundments can be found on Luminant's website

Other Hazardous Waste

The amount of hazardous waste generated at our power plants is minimal and consists only of ancillary wastes generated from plant outages or cleaning activities.

- ✓ Management procedures are maintained at each facility
- ✓ Annual training is conducted
- ✓ Tracking of all hazardous waste in compliance with federal regulation
- ✓ Waste is properly captured, stored, and disposed of in approved landfills, recycled, or beneficially reused as appropriate

Radioactive Waste

Vistra manages low-level radioactive waste (LLRW) and spent nuclear fuel (SNF) safely, securely, and responsibly in accordance with all state and federal regulations.

Most radioactive waste generated by nuclear power plants is LLRW that is processed into a solid state before being placed in specially designed, robust containers for storage and disposal.

Radioactive material content waste, classified as Class B and C LLRW, accounts for ~10% of the average 9,000 cubic feet of waste generated at our facility. Since 2018, Comanche Peak Nuclear Power Plant has shipped its waste to a qualified LLRW disposal facility in Andrews, Texas.

SNF is stored on-site at all U.S. nuclear facilities, including Comanche Peak. We safely store SNF from our nuclear generating facility on-site in storage pools and dry cask long-term storage facilities. We have enough capacity to safely store our SNF through the extended life of our plant through decommissioning.

Recycling Program

17 TONS of waste recycled

Recycling is an easy sustainable practice that Vistra facilitates for its office



employees. Employees are provided with deskside recycling containers for comingled recyclables, including paper, plastic, glass, and aluminum.

In addition to recycling office waste, Vistra recycled more than 25,000 tons of waste at our generation sites, including nearly 100% of metal waste and nearly 94% of used oil.

RATE STRA

STRATEGY AND ESG STRATEGY INNOVATION AND GOVERNANCE

GY ENERGY STEWARDSHIP CE AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Biodiversity

Vistra is committed to minimizing collateral or transitory impacts of our operations as well as maintaining and enhancing the biodiversity on our land. Vistra seeks to ensure that our operations leave land as good or better than before our activities began. In Texas, Vistra works with external regulatory and academic partners such as the Railroad Commission of Texas, the Texas Commission on Environmental Quality, the U.S. Fish & Wildlife Service, and the Texas Parks and Wildlife Department to ensure proper assessment and mapping for biodiversity. This effort is aided significantly by research findings from graduate studies (both master's and Ph.D.) funded by Luminant's Environmental Research Program and led by an independent committee of leading scientists.

Environmental Impact Assessments

As part of developing our renewable and energy storage facilities, Vistra conducts environmental impact assessments (EIA), geotechnical studies, and/or habitat and species studies on a project-by-project basis as driven by regional needs and regulatory requirements. For example, projects in California will require a different EIA than those in Texas or New England. Some projects are built on existing brownfield sites, whereas others are built on greenfield sites, which can also influence the type of assessments and studies performed. Vistra strives to ensure all projects meet federal, state, and local permitting requirements.

LAND RECLAMATION BY THE NUMBERS:

✓ 86,000 ACRES of land reclaimed by Luminant for use as pastures, forests, wildlife

habitats, and water resources that are diverse, ecologically functional, and productive

✓ 7,000 ACRES of wetlands, ponds, and stream channels created and enhanced on

our restored lands, increasing water resources to benefit wildlife and livestock

- ✓ Over 43 MILLION trees planted since the late-1970s
- ✓ 45,000 ACRES of reclamation bond liability releases secured, demonstrating that

we have met or exceeded pre-mine standards

✓ 90+ AWARDS received for reclamation excellence







Awards

- ✓ Received the 2021 Excellence in Surface Coal Mining Reclamation Award from the Office of Surface Mining Reclamation & Enforcement, a bureau of the U.S. Department of the Interior, for work done to reclaim and restore previously mined land at Monticello-Winfield Mine.
- ✓ Named 2022 Texan by Nature 20 honoree, for the third consecutive year, for a demonstrative commitment to conservation and sustainability by Texan by Nature (TxN), a Texas-led conservation nonprofit founded by former First Lady Laura Bush.

CORPORATE STRATE SUMMARY INNOV

STRATEGY AND ESG STRATEGY INNOVATION AND GOVERNANCE



ENERGY STAP

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT

COMMUNITIES H AND CUSTOME RESPONSIBLE A BUSINESS PRACTICES

APPENDIX

Energy Management

Like the solutions we offer our customers, Vistra has implemented multiple sustainability and energy efficiency measures to manage its energy use, specifically electricity, at our home offices.

- ✓ Employed building automation systems to optimize start/stop times of HVAC equipment to reduce energy consumption while maintaining thermal comfort requirements
- ✓ Installed LED lights and occupancy sensors to shut off lighting and HVAC when areas of the building are unoccupied
- ✓ Procure 100% renewable energy through the purchase of renewable energy certificates (RECs) for our DFW-metroplex offices
- ✓ Use Green Seal certified cleaning products and procedures that are safer for employees and better for the environment

Additionally, in 2022, Vistra's Royal Lane offices :

- ✓ Added four new EV car chargers
- ✓ Configured interior office space so that workstations leverage natural light from nearby windows
- ✓ Installed four new chillers using R-514A, a non-ozone depleting, low global warming potential (GWP)
- ✓ BOMA 360 designation

Additionally, Vistra's Sierra HQ Office:

- ✓ LEED for commercial Interiors Silver
- ✓ ENERGY STAR Certified 11 consecutive years
- ✓ BOMA 360 designation

Vehicle Fleet

Within Vistra's fleet of vehicles, we look for opportunities to reduce our number of vehicles, transition to electrification, and manage fuel consumption. Electric vehicle charging stations are available for use at Vistra's headquarters and other locations for employees, contractors, and visitors.



Vistra's Royal Lane offices (top) and Sierra headquarters have both recieved the BOMA 360 designation, and are powered by 100% renewable energy through the purchase of renewable energy certificates (RECs).

CORPORATE STRATE SUMMARY INNOVA

STRATEGY AND ESG S INNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

DEI and Human Capital Management

We are one team, a group of talented, diverse, and dedicated employees. We maintain an equitable and inclusive workplace where differences are valued, and all are respected.



E STRATEGY AND INNOVATION

ATION AND ESG S

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL MANAGEMENT

TAL AND HEALTH

COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

DIVERSITY, EQUITY, AND INCLUSION AND HUMAN CAPITAL MANAGEMENT

Creating and maintaining an environment where differences are valued and respected enhances our ability to recruit and retain the best talent and provide a work environment that allows all employees to be their best. To ensure alignment of our values, Vistra maintains a code of ethics entitled "**Vistra Code of Conduct**" that applies to directors, officers, and employees.

SUMMARY

Code of Conduct

- ✓ Establishes the ethics and compliance standards for all employees across the company, including our board members
- ✓ Expectation that contractors, interns, and others temporarily assigned to perform work or services for Vistra follow the Code of Conduct

- ✓ Reviewed annually by the Audit Committee of the board of directors
- ✓ Covers issues including human rights, equal employment, and DEI
- ✓ Annual Code of Conduct training completed by employees and directors—100% completion rate in 2022
- ✓ Confidentiality and "no retaliation" provisions enforced
- ✓ The Compliance Helpline is available to anonymously submit ethical or compliance concerns
- ✓ Failure to follow the Code of Conduct can result in termination from Vistra

While many human rights issues are addressed in Vistra's Code of Conduct, Vistra also has a **standalone human rights policy**, which can be found on our website. This policy commits the company to respecting all internationally-recognized human rights as embodied in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Our Approach

PEOPLE ANALYTICS	OPEN FEEDBACK
 Utilizes a human capital management system to house employee, recruiting, and performance data Evaluates recruiting and hiring needs, skill gaps, forecast workforce attrition, performance of people managers, evaluate effectiveness of recruiting channels, and more Supports recruiting efforts to grow DEI in the workplace as well as identify and develop employees for new roles Manages future retirements and turnover in geographic regions Allows for increased transparency for external reporting 	 Promotes and accommodates an "open door" policy, as well as "skip-level" access to leadership Facilitates an open office environment, where employees may easily access leadership across the organization Hosts quarterly town halls to provide employees frequent and open communication, bringing the company together Promotes making Vistra a conducive environment for all employees

CORPORATE SUMMARY STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Governance of DEI

Recognizing the importance of creating a diverse, equitable, and inclusive culture, Vistra established oversight of DEI by the Social Responsibility and Compensation Committee of the board of directors with day-to-day management of programs performed by the Chief Diversity Officer. As DEI should be central to the company's culture, Vistra also maintains an employee-led DEI Advisory Council (DEIAC) to provide counsel to leadership and play an active role in the design and implementation of Vistra's DEI program.

The progress and results of our DEI program can be summarized in four focus categories as listed below and discussed in the following pages:

Employee Engagement

Understanding the impact of the Listening Sessions held in 2020, Vistra continues to provide opportunities for open dialogue, access to leadership, and employee involvement in change, through our employee-led Diversity, Equity, and Inclusion Advisory Council. The council meets with Executives on a regular schedule to communicate employee perspectives. Members also assist with initiatives including engagement action plans anddiversity training.





LIVESTREAM TOWN HALL	ENCOURAGING OPEN DIALOGUE AND SAFE SPACES	EMPLOYEE ENGAGEMENT SURVEYS
 These regularly-scheduled meetings allow employees to hear directly from our CEO and company leadership Employees can submit anonymous questions or topics for discussion 	 Vistra launched Culture Conversations, a continuation of our small group listening sessions. These important discussions ensure Vistra is cultivating a sense of belonging and that employee voices are heard and acknowledged. 	 Conducted employee engagement survey in 2022, with a 77% response rate Action plans developed at workgroup level and launched in 2023 Inclusion action plans being developed by DEIAC and performed in 2023 Survey results are reviewed with the Board of Directors

CORPORATE STRAT SUMMARY INNOV

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

People

Vistra recognizes the value of having a diverse and inclusive workforce. Diversity includes all the ways we differ, including age, gender, ethnicity, and physical appearance, as well as underlying differences such as thoughts, experiences, styles, religions, nationality, education, and numerous other traits. Vistra's diversity is evolving through the hiring, recruiting, and development initiatives we have created and implemented in the past two years.

Vistra continues to focus on increasing diversity at all levels across the enterprise. While skills-based hiring, diverse interview panels, and hiring manager training continue to yield positive outcomes, we are also incorporating technology to provide opportunities for greater exposure across the business.









Vistrability Employee Resource Group members volunteer with the Texas Ramp Project to build ramps for wheelchair users. Vistrability is increasing disability awareness at Vistra and growing our inclusive, accessible culture.

CORPORATE STF SUMMARY INN

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

APITAL AND HEALTH

COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Creating a Diverse Pipeline of Candidates through College Relationships and Intern Programs

Vistra understands the importance of creating a diverse pipeline of candidates. To ensure our interns were sourced from a diverse pool of large and small colleges and universities, first-generation and female-focused programs, and diverse degreed programs, Vistra's internship program was centralized within DEI, and a documented process was created. Management and student exposure contributed to a diverse pool of interns from more than a dozen universities.

Developing Inclusive Leaders

Vistra understands the important role leaders play in creating an inclusive culture. In 2022, our Board of Directors and personnel from VP level to managers attended diversity training provided by Basic Diversity. Internal training was developed to provide ongoing opportunities for leaders to develop their teams. Vistra also launched a new Learning Management system with diversity courses available ondemand to all employees.

Employee Resource Groups

Vistra's employee resource groups (ERGs) play an imperative role in building the culture, attracting diverse talent, and providing career development and networking opportunities. Each ERG has a purpose as unique and diverse as our employees. All ERGs are supported and sponsored by at least one executive leadership team member. Executive sponsors serve as advocates and advisors providing feedback and sharing ideas with group members. Vistra's ERGs contribute to the employee experience and operate true to our core values as one team.



13 EMPLOYEE RESOURCE GROUPS AT VISTRA:



CORPORATE STRA SUMMARY INNO

STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

PITAL SAFETY AND HEALTH COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Mentoring Program and ERG Leadership

Vistra offers a mentoring program open to all employees, at any stage in their career. The program supports and strengthens employees' leadership and professional skills, provides networking opportunities, cultivates and expands employees' professional learning circles, and serves as another path towards mutual understanding and appreciation of cultures and diverse communities.

ERG leaders develop leadership skills through management of ERG budgets and development of business plans and employee engagement strategies. In 2022, strategy sessions were held for officers and executive sponsors to elevate the ERG leader role as well as development of strategies to grow and increase ERG impact across the business.

Veteran and Military Support

The U.S. military employs a diverse, skilled workforce, and we consider veterans a tremendous asset to our team. Vistra has a legacy of hiring veterans and providing strategic support to our servicemen and women. In fact, there are nearly 400 veterans, guardsmen, and reservists in the Vistra family. We salute them for their service.

Vistra also began partnering with Skillbridge to provide internships to servicemen and women preparing to retire from military service and enter the workforce. These six-month internships are paid for by the Department of Defense and give service members an opportunity to begin thinking about their next chapter. From this partnership, Vistra has converted six interns to full-time employees thus far. We are also proud to partner with numerous

MENTORING BY THE NUMBERS

2 cohorts 12 month program **650** participants in 2022

4,800 hours of mentorship activities

veteran and military support organizations including Carry the Load, Fisher House Foundation, and the United Service Organization, among others.

Addressing the Needs of Our Diverse Workforce

Vistra continues to look for programs and services that address the needs of our workforce. Vistra partnered with disability support vendor Joshin to provide guidance for managers on support for employees with disabilities, as well as support for employees who identify as caregivers.

Additionally, Vistra's DEI team participated in a Second Chance Employment cohort and partnered with several organizations focused on removing employment barriers for people with criminal records.

Vistra employees are participating in the second cohorts of the McKinsey Black Leadership Academy, along with the McKinsey Hispanic/Latin and Asian Leadership Academies. These management accelerator programs help organizations improve their talent pipeline and equip minority leaders with the network, capabilities, mindsets, and behaviors to achieve their professional aspirations.

Vistra remains focused on strengthening relationships with community organizations and various nonprofits that reflect our employees. Vistra was proud to host the North Texas LGBTQ Chamber of Commerce Leadership Institute and also hosted the Disability Chamber of Commerce to provide insight on how members can increase business with corporations.



Vistra also incorporated ESG metrics into its company scorecard. These metrics include DEI components highlighting:

- Diversity Training
- Recruiting diverse candidates
- Reporting enhancements
- Supplier diversity expansion

CORPORATE STR SUMMARY INN

STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

APITAL AND HEALTH

COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Philanthropy

In 2022, we continued to act on our five-year, \$10 million commitment to social justice initiatives and further supported the advancement of diverse communities. Our monetary commitment is an extension of our existing efforts, which focus on national, state, and local organizations that support minority-owned small businesses, enhance economic development, and improve educational opportunities for students from diverse backgrounds. We strengthened support of minority-serving institutions by serving on employer advisory boards and supporting student programs through research projects and capstones.

Procurement

Vistra's supply chain diversity program seeks to reflect our evolving customer base and workforce compositions. Our efforts in this area are recognized year after year for the great work supporting small and diverse businesses. Recognitions in 2022 include:

- Selected as "Best Corporation for Veteran Business Enterprise" by National Veteran Owned Business Association (NaVOBA)
- Named as a Forefront 50 Top Corporation by the National Minority Development Council for leading the way to create greater economic access and equity
- Honored with the Top Corporation Award from the Women's Business Enterprise National Council (WBENC) for the utilization and development of women's business enterprises and inducted into the WBENC Hall of Fame

In addition to Vistra's financial support, our employee resource groups are actively involved in our communities. In 2022, members gave back through a number of projects including a partnership with the Special Olympics, building ramps for people who use wheelchairs, and a water drive and fundraiser for a predominantly Black neighborhood with no running water,



- Named a "Buy Those That Buy Us" Corporation by the Dallas Fort Worth Minority Supplier Development Council (DFWMSDC), recognizing best practices and real results from utilizing certified Minority Business Enterprises.
- Named to Women's Enterprise USA Magazine's Best of the Decade



CORPORATE STRAT SUMMARY INNOV

STRATEGY AND ESG S

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

Policy

Job Descriptions and Hiring Process

At Vistra, we foster a culture where all employees feel valued and are encouraged to explore and advance their careers while building new skills. Vistra has focused on lowering barriers to internal job mobility including requiring diverse interview panels, eliminating unnecessary credential requirements on job descriptions, and inclusion of diverse applicants in candidate pools. As a company fully committed to skills-based hiring, we adopted the program and all elements recommended by the Business Roundtable (BRT). Due to the success of our skills-based strategy, we are recognized as a leader in the initiative.

Flexible Work Environment

COVID-19 challenged Vistra to guickly adapt and provide a way for those who could work from home to do so productively. Our company and people were resilient through the pandemic and demonstrated an extraordinary ability to adapt to the new work environment. We took a safety-first approach to work locations: for some of our workforce, that meant managing the work-from-home environment, but for many of our workers, it was necessary to continue to report to their work location given the critical nature of our business operations. Vistra is proud of its safety record throughout the pandemic. Now that new cases, hospitalizations, and deaths have decreased substantially, we are opening our offices back up. Vistra believes personal interaction remains key to building relationships and performing at the highest level. We also believe this can be accomplished by offering flexibility in our work environment.. As we go forward, our work location philosophy will incorporate working with our team members to help them manage home and work, which we believe will lead to a highly committed and productive workforce.

Educational Assistance Program

Vistra has always encouraged employees to pursue continued learning through our educational assistance program. All employees who have completed a minimum of 90 days of active, continuous service and meet performance requirements are eligible to seek up to \$10,000 in educational assistance annually. In 2021, Vistra revised its program to pay employees upfront versus after completing their course, so employees will not pay out-of-pocket. In 2022, Vistra provided \$804,000 in educational reimbursement.

Employee Benefits

Vistra evaluates employee benefits annually, as maintaining an attractive total rewards program is important for recruiting and retaining talent. Full-time Vistra employees and part-time Vistra employees working a minimum of 20 hours per week are provided the opportunity to enroll in:

- ✓ Medical plans (including prescription drug, dental, and vision)
- ✓ Life insurance
- ✓ Accidental death & dismemberment
- ✓ Long-term disability coverage
- ✓ Short-term disability coverage*
- ✓ Employee assistance program
- ✓ Mental health wellness benefits
- ✓ 2 weeks parental leave (including non-birth, adoptive, or foster parents)
- ✓ 12 weeks maternity leave
- ✓ 401(k) plan with 6% match
- ✓ Incentives through equity and profit-sharing plans
- ✓ Tuition reimbursement
- ✓ Paid time off**

*For regular, full-time employees only. **Employees accrue PTO each calendar year based on their length of service at Vistra. Fertility benefits that do not require an infertility diagnosis were implemented to provide fertility treatment to all employees



SUMMARY

STRATEGY AND INNOVATION

AND

ESG STRATEGY GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL MANAGEMENT

AND HEALTH

RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES

APPENDIX

Training and Development

We believe employee development is critical to Vistra's current and future success. We have launched key programs to develop leaders at all levels of the organization.

Training and development programs include:

- Online learning courses
- Management system courses
- Webinars and presentations
- Self-paced development
- Employee-specific skill training

Performance Review Program

The goal of Vistra's performance management process is to guide the development of individuals and to continuously improve the results of the business. All full-time employees, other than those in a collective bargaining unit, receive a formal performance review. As part of the program, employees set objectives, have check-ins and ongoing dialogues with their manager, and receive a final year-end performance review.

Additionally, during the self-evaluation process, employees commit to following Vistra's core principles. Managers must also evaluate each employee's adherence to these core principles during the performance review.

As part of the performance review program, Vistra annually conducts a robust 9-box process. This process includes frontline managers, for a total of more than 800 employees. The inclusion of these managers allows a greater number of diverse employees to be assessed and visible to a broader group of leaders. The 9-box results are used to identify candidates across the company for open positions. Another key part of the 9-box process includes performing detailed succession plans which identify employees from across the organization who could develop into other roles within a five-year period. Subsequent development plans are created and play a critical role in developing a diverse pipeline of leaders.

MANAGER INCLUSIVITY TRAINING	VISTRA LEARNING COMMUNITY
Provides first-time managers with skills to lead organizations in situational leadership, business acumen, identification of communication styles, and inclusive communication practices and exposes them to best practices from across the company.	In 2022, we launched our Vistra Learning Community. This web-based platform offers a space for employees to connect, share insights, and learn new skills with access to 2,000 courses. We created seven learning communities strategically aligned with our corporate learning objectives: DEI, Communication, MS Office & Productivity Tools, Presentation & Facilitation Skills, Wellbeing, and Leadership Development. Since the launch, more than 1,500 employees have logged in to take a course.
CORPORATE STRA SUMMARY INNO

STRATEGY AND ESG S INNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH

COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Safety & Health

We put our best defenses forward and only accept the highest standards of safety when it comes to our most valuable resources at Vistra: our people, our customers, our business partners, and our communities.



CORPORATE STRAT SUMMARY INNO

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL S MANAGEMENT SAFETY AND HEALTH DMMUNITIES RESPONSIBLE ND CUSTOMERS BUSINESS PRACTICES APPENDIX



SAFETY & HEALTH

At Vistra, we believe a healthy workforce leads to greater well-being at work and home. Our healthcare plans are designed to reward employees for completing annual physicals and cancer screenings.

We offer fitness centers in multiple facilities, which include cardio equipment, free weights, and exercise mats.

Our employee-led wellness team engages our people to get active and supports causes that promote healthy living.

The company also supports registration costs for employees to participate in running events across the nation. Additionally, some employees participate in Dallas' annual Bike MS Ride to cure multiple sclerosis. Vistra also offers wellness programs specifically for fitness and weight management including:

BCBS Fitness Program: Employees can join a gym at a discounted rate through our healthcare provider, BlueCross BlueShield.

Wondr Health: Employees can sign up at no cost to join a digital health program designed to help people lose weight and improve their overall health. Wondr offers a skills-based solution that provides simple, sustainable, life-long results.



Since it was founded in 2003, the TXU Energy MS Bike Team has raised more than \$1 million to help the National MS Society research fund.

MYHEALTH CLINICS

Vistra offers onsite MyHealth Clinics at various locations for non-emergency medical needs. A dedicated primary care team operates each clinic and is always available. Employees can schedule appointments and receive preventative exams without leaving work, waiting at the doctor's office, or paying visit fees.

DOCTOR ON DEMAND

Doctor on Demand is a convenient resource to virtually connect to a medical care provider within minutes to receive treatment and any necessary prescriptions for many common non-emergency ailments.

EMPLOYEE ASSISTANCE PROGRAM

Vistra understands the importance of mental health and how it influences the way you think, feel, and behave. The company offers an employee assistance program through Magellan Health, which helps employees work through common mental health conditions and disorders.

AIRROSTI

Airrosti, a healthcare group specializing in non-surgical rapid recovery treatment, is available for all employees seeking relief from chronic back, neck, or other pains. Employees can sign up for complimentary assessments and remote recovery webinars focused on providing highly effective and personalized care in a virtual environment.

BEST DEFENSE: EVERYONE WINS. NO ONE GETS HURT.

CORPORATE STRA SUMMARY INNO

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL S MANAGEMENT SAFETY AND HEALTH COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Safety

Our people are our greatest resource, which is why safety—above all else—is our top priority. Vistra's goal is to provide each employee with essential training and resources to help ensure their safety and health while planning or conducting onsite activities. Promoting continuous learning throughout the fleet and removing latent organizational weaknesses are the cornerstone pieces of Vistra's safety philosophy. Also, reporting of all incidents, no matter how inconsequential, is critical for learning, and we ask that each individual report safety incidents and hazards to assist in proper identification and remediation. Additionally, we value the prevention of errors and are committed to reducing error-likely situations. All Vistra employees are covered by our safety program, and all personnel at Vistra locations are encouraged to be actively involved in the safety process. To facilitate a safetyfocused learning environment, our plants share their investigations and learnings of all safety events with all operations employees on weekly calls. The information is presented by front-line employees and supported by management. The lessons from each event are shared across the fleet to prevent similar incidents at other locations.

Safety Training

The goal of safety training is to enhance the employee's knowledge and skillset, hazard awareness, and to maintain

compliance with the applicable regulatory standards. We believe safety training is most effective when it is incorporated into standard operating procedures, workplace practices, and individual job performance requirements. We structure employee development and learning so our employees have the knowledge and skills needed to work safely, avoid creating hazards that could place themselves or others at risk, and ensure that each employee knows how to put up Best Defenses for job assignments. We strive to provide relevant, creative safety training content that contributes to the continuous improvement of the overall safety management system.



Vision:

Vistra's safety vision is simple, put forth our Best Defenses.

Mission:

We will always be focused on Best Defenses, continuous improvement, and limiting serious injuries.

Core Safety Principles:

- We place the safety of our people, communities, customers, business partners, and visitors first.
- We acknowledge human error is inevitable and will strive to incorporate Human Performance Improvement (HPI) principles and tools to establish Best Defenses so that we can fail safely.
- We believe in Best Defenses. If an incident occurs, we will fail safely. If it can't be done safely, we won't do it.
- Employee engagement is key to achieving accountability and ownership of our safety principles.



45,900

safety training courses completed in 2022

Safety leaders performed more than

52,000 proactive safety engagements across the fleet

SUMMARY

STRATEGY AND

EGY AND ESG S /ATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL S MANAGEMENT SAFETY AND HEALTH OMMUNITIES ND CUSTOMERS PRACTICES APPENDIX

Safety Statistics

Our focus on reducing the severity of injuries for both our employees and contractors has shown positive results. For the third year in a row, we operated without any serious injuries or fatalities to our Vistra employees and contractors working at our sites. In 2022, the



average reported total recordable incident rate (TRIR) of our employees was 0.85, down from 0.87 in 2021.

Safety of Our Contractors and Vendors

Vistra engages an independent third-party conformity assessment and certification vendor to manage adherence to our safety standards for all vendors and contractors working at our plants. In addition, we work closely with our suppliers and contractors to ensure our safety practices are upheld. More than 2,100 contractors are connected to us via our third-party system and meet our minimum safety requirements. Through this contractor selection process, we ensure the contractors on our sites score better than the industry average for overall safety programs and injury rates. In 2022, the average reported total recordable incident rate (TRIR) of our contractors was 1.25, reduced from 1.37 the prior year.

OSHA's Voluntary Protection Program

Fourteen plants in Vistra's generation fleet have earned the Voluntary Protection Program (VPP) Star designation by the Occupational Safety and Health Administration (OSHA) for superior demonstration of effective safety and health management systems and for maintaining injury and illness rates below the national averages for our industry. Two additional plants have submitted applications and are awaiting review by OSHA. VPP Star status is the highest designation of OSHA's Voluntary Protection Programs. The achievement is an honorable recognition for employers and workers who have implemented effective safety and health management systems and maintain injury and illness rates below national Bureau of Labor Statistics averages for their respective industries. These sites are self-sufficient in their ability to control workplace hazards and are reevaluated every three to five years. Additionally, 32 of our power plant and mine locations have adopted a proactive Behavior Based Safety approach, which focuses on identifying and providing feedback on at-risk behaviors observed. More than 38,000 peer-to-peer safety observations were performed in 2022.



VPP SITES

Casco Bay Power Plant Independence Power Plant Lamar Power Plant Ontelaunee Power Plant Hanging Rock Power Plant Hopewell Power Plant Bellingham Power Plant MassPower Power Plant Forney Power Plant Liberty Power Plant Washington Power Plant Kendall Power Plant Sayreville Power Plant Blackstone Power Plant

SAFETY MANAGEMENT SYSTEM (SMS) Based upon the basic concepts of the American National Standards Institute (ANSI) Z10 consensus standard, Vistra's SMS is a tool that is designed to help us put up our Best Defense and reduce the risk of occupational exposures, injuries, illnesses, property damage, and other incidents.

SUMMARY

STRATEGY AND INNOVATION

ESG STRATEGY GOVERNANCE AND EMISSIONS

AND

DEI AND HUMAN CAPITAL MANAGEMENT

SAFETY AND HEALTH

RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES

APPENDIX

Hazard Management

Vistra relies on the Center of Excellence (COE) groups, such as the Hazard Management COE, to provide standards to manage the hazards associated with our industry. The goal is to provide safe working environments and establish our Best Defense. The standards created by these COE groups will provide current and updated procedures, practices, and guidance documents. This will ensure all sites have the tools to stay in compliance with current regulations, share best practices, and have access to audit and review guidelines.

Vistra encourages all employees and contractors at our sites to "Stop When Unsure" and to not re-start jobs until they are sure safety defenses are in place. We encourage reporting and discussion at any time in the job process.

The Pre-Job Brief is one of the most effective HPI tools available for reducing significant injuries and fatalities. An effective Pre-Job Brief ensures workers and supervisors understand the scope of work to be performed so they can identify the hazards and related safety precautions associated with "this team on this task at this time." The purpose of the Post-Job Review is to identify potential safety improvements. Once the areas of improvement are identified, changes to task resources and procedures can be incorporated appropriately for future tasks.

Emergency Preparedness

By prioritizing emergency preparedness, Vistra demonstrates that we care about our employees, customers, and the communities where we live and do business. In fact, caring about our stakeholder is one of Vistra's guiding principles. Emergencies can strike at any time, and being prepared can make all the difference in minimizing the impact of such events. Whether it's a natural disaster, a medical emergency, or a human-made crisis, having a plan

in place can help people respond quickly and effectively, potentially saving lives and reducing damage.

Vistra provides a comprehensive and integrated emergency management system that coordinates on- and off-site resources to protect lives, property, and the environment through education, training, assessment, preparedness, response, and mitigation from all hazards that may impact

our company and community. To hone our emergency preparedness, we:

- 1. Identify the potential emergencies that may occur,
- 2. Create emergency action plans,
- 3. Clearly define and communicate expectations, roles, and responsibilities,
- 4. Identify the equipment, facilities, and personnel needed for response, and
- 5. Routinely conduct drills and exercises to stay ready.

This kind of proactive approach helps foster a culture of safety and preparedness, and ensures that everyone is better equipped to handle unexpected events.

Emergency Crisis Response Program and Plan

Vistra's emergency preparedness begins with its Emergency Crisis Management Program (the "Program") which provides an all-hazard, common structure and operational framework to govern and sustain Vistra's enterprise



crisis readiness and response capabilities. The Program is organized in a phased model (Prepare, Response, Recover), demonstrated above, and in conjunction with the Enterprise Crisis Response Plan (the "ECRP"). The ECRP identifies emergency operations plans for Vistra's generation fleet and retail providers while also addressing emergency communications, supplies, staffing, weather hazards, water shortages, pandemic preparedness, hurricane plans, cyber security, and physical security.

The scope of this Program includes all phases of the lifecycle. Vistra's prepared emergency processes and documented procedures and forms highlight the key components of the Prepare phase, or times of "business-as-usual". The second phase is the Response phase, which consists of the immediate investigation, containment, and response to the situation. The Recover phase is the final phase and includes the tactical, operational, and strategic activities to guide Vistra through the remediation of the crisis, posi-

CORPORATE SUMMARY

STRATEGY AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL S MANAGEMENT SAFETY AND HEALTH COMMUNITIES RESPONSIBLE AND CUSTOMERS BUSINESS PRACTICES APPENDIX

tioning the company to emerge stronger and return to a state of normal (though potentially transformed) business operations.

The Response and Recover phases are managed by utilizing the ECRP for overall crisis response guidance and utilizing Business Continuity Plans, Disaster Recovery Plans, and Emergency Response Plans for tactical and operational guidance. The ECRP assigns a cross-functional core leadership team of responders with authority to manage crisis or emergency-related responses effectively, efficiently, and consistently to mitigate impact to Vistra's people, operations, reputation, and strategy.

Identification and Communication of a Crisis

Vistra's Program and ECRP is activated upon a crisis. Vistra defines a "crisis" as any situation that has the potential to:

- Have a catastrophic impact on the life/safety of employees or customers;
- Have a significant enterprise-wide impact on the ability to deliver services;
- Have significant financial impact;
- Be harmful to the continuity of electric service;
- Cause strong, long-lasting reputational harm/damage; and/or
- Have a significant regulatory/legal impact that results in lawsuits and/or fines.

In the event of a crisis, it's crucial to communicate quickly and effectively with our employees, board of directors, and identified regulating bodies to ensure everyone is aware of the situation and can take appropriate action. The ECRP activation process clearly identifies how to notify employees of the event, including the type of emergency and any instructions they need to follow. The ECRP also includes contact information and reporting requirements for regulatory agencies depending on the nature of the crisis.

Emerging Stronger

Through its Program and ECRP, Vistra strives to emerge from any crisis stronger and more resilient than before. This includes continuous testing, reassessing, and improvement of the Program and ECRP through drills and readiness events which build the "muscle memory" required to navigate in the event of an actual crisis.



Vistra works to provide each employee with essential training and resources to help ensure their safety while planning or conducting onsite activities.

CORPORATE STRA SUMMARY INNO

STRATEGY AND

ESG STRATEGY AND GOVERNANCE ENERGY STEWARDSHIP AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Supporting Our Communities & Customers

We strive to be good corporate citizens and strengthen the communities where we do business, where we have customers, and where our employees call home.



STRATEGY AND SUMMARY

INNOVATION

AND

ESG STRATEGY GOVERNANCE AND EMISSIONS

DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

```
RESPONSIBLE
AND CUSTOMERS
               BUSINESS
               PRACTICES
```

APPENDIX



Charitable Giving and Volunteering

At Vistra, we do business the right way—and that means investing in the communities where our employees and customers live and work. In 2022, we reaffirmed this commitment by donating nearly \$2.3 million to nonprofit organizations that support critical community needs, programs that grow state and local economies, and programs and scholarships that build skills in science, technology, engineering, and math (STEM)

Additionally, Vistra proudly donated \$2 million in its third year of a five-year, \$10 million commitment to support organizations focused on social justice and equity across our key market areas.

We care about our customers, we understand that financial hardships can befall anyone. TXU Energy Aid uses donations from Vistra, our employees, and customers to

fund one of the most extensive utility and energy billpayent assistance programs in the nation. TXU Energy Aid has helped families in need keep their homes powered and safe for nearly 40 years. This program was expanded to Tri-Eagle and Ambit retail brands. Across all Energy Aid programs, we provided \$5.6 million in funds to 86 partner agencies, assisting more than 17,000 customers in 2022.

Beat the Heat

With summer heat impacting the health and well-being of the most vulnerable residents. Vistra and TXU Energy are committed to supporting our neighbors. The company's annual Beat the Heat program is a multi-week initiative. which includes partnering with nonprofit agencies to distribute A/C units and fans to families in need. Our 2022 Beat the Heat campaign was our largest giving effort vet—with over 5.500 fans and 450 A/C units distributed to more than 4 000 families





Every year, we come together to support our neighbors in need through our United Way and Energy Aid giving campaign. Employees and the company raised more than \$1.8 million in 2022 and over \$14 million in the last eight years.



Helping inspire a spirit of volunteerism, Energy in Action is a company-wide initiative to facilitate and encourage team members to give back to their communities. In 2022, over 350 Vistra employees contributed more than 700 hours to the communities we serve, completing 14 large-scale, highimpact events, which included new hybrid volunteer activities



TXU Energy Aid[™], one of the most extensive utility and energy bill-payment assistance programs in the nation, has helped families in need keep their homes powered and safe for 40 years. This program was expanded to Tri-Eagle and Ambit retail brands. Across all Energy Aid programs, we provided \$5.6 million in funds to ~86 partner agencies, assisting more than 17,000 customers in 2022.

AMBIT M

As a supporting partner of Feeding America®, the nation's largest organization dedicated to fighting domestic hunger through a network of food banks, Ambit Cares makes great strides to change the lives of those who face hunger. In 2022, Ambit Cares provided over \$200,000 in total contributions to support various Feeding America affiliates.

CORPORATE STR SUMMARY INN

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Local Community Engagement

Vistra and our subsidiaries have also engaged local communities as we address the potential impacts of our operations. Examples of these engagement efforts include:

INFORMATION

Vistra is committed to keeping local stakeholders informed on company initiatives and developments. This includes project updates for local chambers of commerce, presenting at meetings of county commissioners or school boards, organizing community town hall meetings, and hosting community ribbon cutting ceremonies to celebrate commercial operations.

FACILITY TOURS

Helping inspire the next generation of STEM leaders and innovators, the company is proud to host numerous school groups, industry partners, and civic organizations for tours of our power generation facilities and corporate offices.

EMERGENCY RESPONSE

Safety is our highest priority. We conduct emergency response team training at our generating sites and regularly engage with local fire, EMS, and law enforcement departments, familiarizing them with potential hazards they may encounter during an emergency response.

EMERGENCY PREVENTION

Emergency Action Plan (EAP) "tabletop" meetings are held for each of the dams near Vistra plants. These meetings are attended by multiple state and local agencies, including emergency officials, to inform and coordinate emergency prevention and action plans.

Environmental Community Initiatives and Engagement

VISTRA TREES FOR GROWTH Since 2002, Vistra has provided nearly 300,000 trees to communities to help generate environmental savings and health benefits for municipalities and residents valued at ~\$37 million annually during the life of the trees. Just a few of the Trees for Growth donations in 2022 were:

- 1,000 trees for Cincinnati parks through the Cincinnati Parks Foundation's 2022 ReLeaf program
- 250 trees through a partnership with Tree Pittsburgh and the City of Pittsburgh Forestry Division
- 20 trees for the Minooka School District and Bradley University in Illinois

TXU ENERGY URBAN TREE FARM AND EDUCATION CENTER

For nearly 20 years, TXU Energy has sponsored the TXU Energy Urban Tree Farm and Education Center, which assists Texas Trees Foundation in its mission to create healthy and sustainable communities. This project is one of Texas' largest-known urban tree farms and serves as a resource for urban forestry operations, volunteer recruitment, and carbon sink and urban heat island mitigation for North Dallas.



LUMINANT ENVIRONMENTAL RESEARCH PROGRAM

Luminant's Environmental Research Program, founded over 50 years ago, has provided graduate students with \$5 million in fellowship funding for the completion and publication of more than 110 independent post-graduate studies related to the company's environmental footprint. This research has provided significant economic and environmental benefits to Luminant and its customers, while furthering the advancement of research, scholarship, and student and faculty development. The independent steering committee that guides the research is now composed of leading scientists from The University of Texas (Bureau of Economic Geology), Texas A&M University, Stephen F. Austin State University, and The University of Texas at Arlington.



CORPORATE SUMMARY

STRATEGY AND AND

ESG STRATEGY STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAFETY AND HEALTH HUMAN CAPITAL MANAGEMENT

COMMUNITIES AND CUSTOMERS

RESPONSIBLE BUSINESS PRACTICES

APPENDIX

Responsible Business Practices

We conduct business the right way, with the utmost integrity, holding ourselves and our suppliers to high ethical standards and conducting all business in accordance with laws, regulations, and rules.



E STRATEGY AND INNOVATION

ATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT

members

respondents:

ENVIRONMENTAL

44% report scope 1

• 42% report scope 2

• 26% report scope 3

29% report water waste

• 33% report waste and recycled

ship and took a larger leadership role with

(SSCA, formally EUISSCA) comprised of 29

In 2022, Vistra successfully increased the

number of suppliers reporting their ESG

performance from 67 to 109, representing

48% of Vistra's spend. Vistra played a large

role within the SSCA to create and incor-

porate 25 ESG core questions along with

er's industry. The results of the annual

assessment revealed that of reporting

additional questions based on the suppli-

utility leaders and 75 prime supplier affiliate

the Sustainable Supply Chain Alliance

COMMUNITIES AND CUSTOME RESPONSIBLE BUSINESS PRACTICES APPENDIX

RESPONSIBLE BUSINESS PRACTICES

Supply Chain

Vistra has a robust, centralized, strategic supply chain organization with a global supply chain supporting electric power generation, retail electric sales, and corporate shared services.

SUMMARY

We ask that our suppliers reflect our values and agree to our Supplier Code of Conduct, **found on our website.** Every purchase order links to our Supplier Code of Conduct through its Terms & Conditions By acknowledging the purchase order, suppliers agree to abide by the code. This includes our commitment to responsible sourcing practices.

Commitment to Supply Chain Sustainability

In 2022, Vistra created a dedicated position and hired a 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 ESG 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

SUPPLY CHAIN BY THE NUMBERS

~\$1.81 BILLION spend

~**7,300** suppliers **14%** small and diverse suppliers

INCLUDES:

- Engineer, procure and construct companies
- Product manufacturers and service providers of power generation equipment, such as solar panels, utility-grade batteries, generators, and turbines
- Marketing and advertising companies
- ✓ Technology services providers

chain sustainability organizations, and suppliers. We also continued our member-

- 20% have publicly stated diverse spend target
- 29% have contracts that include clauses on environmental, labor, and human rights

GOVERNANCE

SOCIAL

- **35%** monitor supplier compliance with Supplier Code of Conduct
- 48% have contracts that include clauses on environmental, labor, and human rights requirements

Leading by example, Vistra held training sessions and quarterly calls to connect and engage with suppliers who have not implemented specific policies or sustainable performance objectives to promote best practices. Training and engagement covered areas including scope 1, scope 2, and scope 3 GHG emissions tracking and setting reduction goals, and implementing ESC-related policies and procedures.

Vistra will continue to expand and enhance sustainability within the supply chain. We believe partnering with our suppliers, internal and external stakeholders, and industry peers will empower us to positively impact the communities we serve and be better stewards of the environment.

Vistra Corp. 2022 Sustainability Report 47

SUMMARY

STRATEGY AND INNOVATION

ESG STRATEGY AND GOVERNANCE AND EMISSIONS

DEI AND AND HEALTH HUMAN CAPITAL MANAGEMENT

COMMUNITIES

RESPONSIBLE BUSINESS PRACTICES

APPENDIX

Responsible Sourcing

For Vistra's various renewable development projects, our procurement process considers sourcing of raw materials and arranges for end-of-life treatment including equipment replacement or recycling. For our energy storage projects, batteries are sourced from several manufacturers who can provide detailed sourcing and tracking methods of the ultimate product procured. For example, batteries procured from LG Chem or Samsung have complete traceability back to the mine in which the raw materials were produced, the batch mixing completed, who the operators were, and the ultimate production date including all testing and quality assurance reports. In addition, our battery procurement also contemplates and arranges for recycling and sets minimum standards for recyclability. Currently, over 95% of an energy storage battery can be recycled.

Solar panels have a similar procurement process. When Vistra issues a request for proposal and commits to a panel manufacturer, strict adherence to traceability is required and obtained from the manufacturer. Given that most components within a solar panel can be recycled, we are able to meet our objectives on responsible sourcing. Together with the traceability, recycling attributes, and long lifecycle of a solar panel, we ensure we are procuring products in an environmentally-responsible manner.

Supply Chain Risk Management

Risk assessment and management within Vistra's supply chain are performed independently by individual sourcing and category managers based on the supplier. In 2022, we continued to use a third party to evaluate our top 367 suppliers for adverse media impact and financial risk. Vistra has identified 62 critical tier one suppliers reflecting all categories under supply chain management: IT, shared services, and fossil, nuclear and renewables power generation. Vistra continues to evaluate suppliers based on our risk matrix, including the following attributes with multiple subcategories:

- 1. Technology
- 2. Sustainability Political Sensitivity
- 3. Continuity
- 4. Financial Stability
- 5. Industry Risk



During 2022, the world saw global uncertainty that Vistra had to maneuver to ensure our plants were able to perform to support our customers. The company's supply chain team collaborated with all aspects of the business and external stakeholders to battle against inflation, rising gas prices, and reduced supplies due to the Russia and Ukraine conflict. These supply chain issues caused delays in manufacturing and shipments that were overcome by strong relationships with our suppliers and dedication by the entire business.

CORPORATE STRA SUMMARY INNO

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS

DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOME RESPONSIBLE BUSINESS

PRACTICES

APPENDIX

Supply Chain Diversity

Supported through Vistra's overall commitment to diversity, equity, and inclusion, Vistra's supply chain diversity program seeks to reflect our customer base and workforce composition through a diverse supply chain. Endorsed and supported by the highest level of Vistra's executive team, this program supports the development and utilization of businesses owned by women, minorities, veterans, LGBTQ+, and disabled individuals, as well as small businesses. In addition, we recently added businesses owned by returning citizens (formerly incarcerated individuals) and foster care recipients.

Vistra's CEO serves as the chair of the Supply Chain Diversity Advisory Council, which is comprised of all his direct reports. The council meets annually to drive strategic direction and senior leadership engagement. Vistra's senior vice president of supply chain and his leadership team serve as the supply chain diversity working group, which meets monthly to evaluate performance and drive continuous improvement. At Vistra, we recognize that a successful, progressive, and innovative supply chain diversity program enhances the economic development of communities and strengthens Vistra's competitive advantage in the marketplace. These small and diverse suppliers and channel partners drive costs out of our business, bring innovation, and create market penetration. By growing and developing these small and diverse firms, we are investing in our own business success.

Vistra continued to be recognized by multiple national and local organizations for our supplier diversity efforts in 2022:

- Selected as **"Best Corporation for Veteran Business Enterprise"** by National Veteran Owned Business Association (NaVOBA)
- Named to Women's Enterprise USA
 Magazine's Best of the Decade
- Named as a Forefront 50 Top Corporation by the National Minority Development Council for leading the way to create greater economic access and equity
- Honored with the Top Corporation Award from the Women's Business Enterprise National Council (WBENC) for the utilization and development of women's business enterprises and inducted into the WBENC Hall of Fame
- Vistra was recognized by the Dallas Fort Worth Minority Supplier Development Council (DFWMSDC) as a "Buy Those That Buy Us" ™ Corporation, recognizing **best practices and real results** from utilizing certified Minority Business Enterprises
- Vistra received a perfect score on Disability: IN's Disability Equality Index and was recognized as one of the "Best Places to Work for Disability Inclusion."

NaV⊕**B**A

















SUMMARY

STRATEGY AND INNOVATION

AND

ESG STRATEGY STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND HUMAN CAPITAL AND HEALTH MANAGEMENT

AND CUSTOMERS

RESPONSIBLE BUSINESS PRACTICES

APPENDIX

Cybersecurity

In order to identify and mitigate Information Security risks, among other things, our Information Security program includes:

- · Regular enhancement of our security measures to protect our systems and data, including encryption, tokenization and authentication technologies to mitigate cybersecurity risk
- · Evolving monitoring capabilities to enhance early detection and rapid response to potential cyber threats. We leverage behavior-based monitoring for critical assets to ensure early detection.
- · Adaptation to changing risks with transition to remote or hybrid work environment through mitigation of remote network risk from our internal systems, assets, or data based on zero trust architecture methods
- A 24x7 Centralized Security Operations Center to ensure the consistent consumption and delivery of security services throughout the business with support for the effective detection of potential events and response processes, together with security operations training including logging, monitoring, and response technologies and procedures

BEST PRACTICES

Artificial intelligence leveraged to prevent business email compromise. Data classification and protections for sensitive critical data

Internal phishing campaign tests employees 24 times annually (twice a month)-above industry standards

- Application of knowledge gained through industry and government organizations, external partner cyber risk and maturity assessments to continuously improve our technology, processes and services to detect, mitigate, and protect our cyber and data assets
- Annual general and regulatory cybersecurity training, new hire training, and frequent employee phishing simulations
- · Defined response plans for each business area, leveraged through real world and/or test exercises several times a year
- Providing due diligence of key third-party vendors' information security programs and risk
- · Yearly assessment of cybersecurity maturity and defense capabilities through both internal audits and independent third-party engagements, including an annual maturity assessment against the National Institute of Technology Cybersecurity Framework

In early 2023, the Board of Directors engaged with a third-party advisor to provide cybersecurity oversight training and advisory services, and appointed a new director who brings extensive cybersecurity expertise to the board.

E-ISAC

Vistra's power plants participate in the Electricity Information Sharing Analysis Center (E-ISAC) secured portal, a hub for anonymously

sharing trends and bidirectional information among members, partners, E-ISAC analysts, and other power generators under NERC to collect data and

increase industry metrics. In collaboration with the Department of Energy, the Department of Homeland Security, and the Electricity Subsector Coordinating

Council, the E-ISAC serves as a trusted leader and security information resource within the electricity industry.

GOVERNANCE



CORPORATE S SUMMARY IN

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY ENERGY AND STEWARDSHIP GOVERNANCE AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS APPENDIX

Political Involvement

Advocacy

Vistra takes a leadership role in advocacy efforts, supporting public policies that advance the country's progress toward lowering GHG emissions.

As 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.



Additionally, Vistra shared its position and expertise on various carbon-pricing regimes and their impacts at the Federal Energy Regulatory Commission (FERC) in both PJM and ISO-NE electric markets and within

the Electric Power Supply Association.

Vistra also joins trade groups and participates in advocacy



 efforts that extend
 beyond Vistra's own utility sector. Vistra

joined the Zero Emissions Transportation Association (ZETA) as a founding member, advocating for policies that

will enable meeting a goal of 100% electric vehicle sales by 2030. As a member of this non-partisan group, Vistra is in the unique position to promote electrification of the transportation sector, support the buildout of infrastructure, collaborate on innovation, and promote competitive electric markets.



A three-year effort culminated in the 2021 passage of an omnibus energy package in Illinois that included our Coal to Solar & Energy Storage

Initiative. As enacted, the legislation supports Vistra's future construction and operation of up to 300 MW of utility-scale solar and up to 150 MW of battery energy storage facilities at retired or to-be-retired coal plant sites across central and southern Illinois.

The initiative will also include diverse suppliers while bringing a much-needed property tax base to local communities.

Lobbying and Contributions

As outlined in Vistra's Lobbying & Political Contributions Policy, <u>found here</u>, Vistra supports active corporate citizenship and takes an active voice on potential or proposed legislation and regulation while also participating in meetings, providing written letters, and interacting regularly with regulators and policymakers. Vistra also advocates for its business interests with state and federal government officials. Vistra's key business interests include:

RESPONSIBLE

BUSINESS PRACTICES

- · 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 including diversity and inclusion, social equity, and justice.

Vistra lobbies by advocating for legislation and regulations that will enhance value for our customers, communities, environment, employees, and shareholders. We recognize that public policy decisions can greatly impact our business and industry—now and in the future. Vistra reviews all lobbying efforts to ensure adherence to applicable laws and Vistra's core principles.

The appendix of this report includes Vistra's voluntary, annual report of its PACs' contributions, corporate contributions, and dues to trade organizations that are non-deductible under §162(e)(1)(B) of the Internal Revenue Code.

CONTENTS	CORPORATE SUMMARY	STRATEGY AND	AND		HUMAN CAPITAL		COMMUNITIES AND CUSTOMERS		APPENDIX
----------	----------------------	--------------	-----	--	---------------	--	------------------------------	--	----------

Appendix A

• SASB Table

Appendix B

• GRI Index

Appendix C

- Political Contributions
- Employee PACs
- Trade Groups and Memberships



2022 SASB STANDARDS TABLE

The Sustainability Accounting Standards Board (SASB) has developed industry-specific sustainability metrics for corporations to disclose material, decision-useful information to investors. Vistra's SASB disclosures for the Infrastructure Sector – Electric Utilities & Power Generators are outlined in the table below.

ТОРІС	SASB CODE	ACCOUNTING METRIC	2022 DISCLOSURE				
		(1) Gross global scope 1 emissions	94,785,101 metric tonnes of CO ₂ e Emissions are equity adjusted for partial ownership of certain power plants consistent with equity share m odologies as described in GHG Protocol: A Corporate Accounting and Reporting Standard, Revised Edition				
	IF-EU-110a.1	(2) Percentage covered under emissions-limiting regulations	11%				
		(3) Percentage covered under emissions-reporting regulations	99.6% All of Vistra's power plant facilities report under the EPA mandatory reporting program with the exception of four sites in 2022 whose emissions were insignificant.				
Greenhouse Gas Emissions and Energy Resource Planning	IF-EU-110a.3	Discussion of long-term and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Vistra's goal is to achieve a 60% reduction in CO ₂ e emissions by 2030, as compared to a 2010 baseline, and net-zero carbon emissions by 2050, assuming necessary advancements in technology and supportive market constructs and public policy. We expect progress towards these goals will include incremental fossil fuel asset retirements, continued investment in solar and battery energy storage, and the monitoring and potential deployment of new technologies. As of Dec. 31, 2022, Vistra reduced its CO ₂ e emissions by 45% compared to a 2010 baseline—achieving nearly 75% of Vistra's 2030 emissions reduction goal. Emissions decreased from 2021 due primarily to fossil fuel plant closures.				
		(1) Number of customers served in markets subject to renewable portfolio standards (RPS)	Vistra operates in retail electric markets that are competitive, allowing the customer to choose the retail electric provider and plan for their electricity needs. Vistra retail offers numerous renewable product offerin				
		(2) Percentage fulfillment of RPS target by market		e customer desires to purchase a renewable electricity plan. As of Dec. 31, 2022, of Vistra's -3.5 million omers, 100% of them are in states that have an RPS in place.			
			Pollutant	Emissions (metric tonnes)	% in or near areas of dense populations		
			NO _x	39,768	74%		
		Air emissions of the following pollutants: (1) NO _x (excluding N ₂ O), 2) SO _x , (3) particulate matter (PM _p), (4) lead (Pb), and (5) mercury (Hg); percentage of each in or near areas of dense population	SO _x	76,821	71%		
Air Quality	IF-EU-120a.1		PM ₁₀	6,333	54%		
			Pb	0.40	71%		
			Hg	0.37	54%		
			¹ Includes N ₂ O				

ТОРІС	SASB CODE	ACCOUNTING METRIC	2022 DISCLOSURE		
				2022 Total Water Withdrawn	
			Water Source	Total (MegaLiters)	
			Groundwater	7,525	
Water Management			Surface Water	13,029,494	
	IF-EU-140a.1	(1) Total water withdrawn, percentage in regions with High or Extremely High Baseline Water Stress	Sea Water	356,175	
			Third Party	113,971	
			Produced	0	
			Total	13,507,165	
			Vistra has five efficient na stress as defined by GRI	atural gas fueled power plants in areas identified as "High" or "Extremely High" water Standards.	
				2022 Total Water Consumed	
			Water Source	Total (MegaLiters)	
			Groundwater	5,534	
			Surface Water	139,283	
			Sea Water	191	
			Third Party	26,750	
			Produced	0	
			Total	171,758	
			Substantially all (99%) of our water withdrawn is not consumed, rather it is returned to its source or recycled. Vistra has five efficient natural gas fueled power plants in areas identified as "High" or "Extremely High" water stress as defined by GRI Standards. These five plants represent 4.0% of water consumed. See SASB disclosure IF-EU-140a.3 for further discussion.		
	IF-EU-140a.2	Number of incidents of non-compliance associated with water quantity and/ or quality permits, standards, and regulations	No material fines or violations in 2022.		
Water Management (continued)	t		electricity utilizes water i ment, pollution control er other uses. Therefore, wa those in high water stress management process, alo	sive, and shared resource that is essential to Vistra's power plant operations. Producing n several key functions such as producing steam, condensing steam, cooling equip- quipment and in some circumstances, boiler make-up, potable water, cleaning and ter conservation is a primary concern at each of our generating facilities, especially s areas. The risk and management of water is reviewed as part of Vistra's corporate risk ong with other environmental and climate-related risks. Further, water scracity from s part of Vistra's climate scenario analysis among various climate projections over the	
	IF-EU-140a.3	IF-EU-140a.3 Description of water management risks and discussion of strategies and practices to mitigate those risks	Though many of our power plants are geographically situated in an area of ample water supply, Vistra practice environmental stewardship and works to efficiently use water at all locations. Each facility manages its daily water withrdrawl, consumption, and discharge in accordance with local, state and federal permits and regulations that control water use and effluent quality. Where appropriate, we have built large reservoirs to capture water when it is plentiful, allowing it to be reused/recycled repeatedly. When feasible, we find ways to recycle water, to reuse water from one system to another system to reduce our use of freshwater, and to reclaim other types of wastewaters. In fact, Vistra power plants consume less than 2% of water withdrawn.		
			Stress" in Texas. They are to drought, and/or exper population growth in the have their own site-speci zero discharge facility, an	atural gas fueled power plants in areas identified as "High Stress" or "Extremely High located in regions of the state that are either typically arid, historically susceptible iencing higher electricity demands due to significant business development and state. Each of these highly efficient natural gas plants utilize low water demand and fic conservation measures: Two have extremely low water demand, one operates as a tother uses reclaimed water as its primary source, and the last one utilizes low quality atment, is able to recycle extensively, and then discharges to a facility that continues r.	

ТОРІС	SASB CODE	ACCOUNTING METRIC	2022 DISCLOSURE				
		Amount of coal combustion residuals (CCR) generated (metric tonnes)	4,163,808				
	IF-EU-150a.1	Percentage recycled (metric tonnes)	67.3%				
Coal Ash Management	IF-EU-150a.2	Total number of coal combustion residual (CCR) impoundments, broken down by hazard potential classification and structural integrity assessment	Vistra has a total of 30 impoundments classified as follows by hazard 14 Significant. Vistra complies with the US EPA Coal Combustion Resi publicly available on Luminant's website .				
		(1) Total recordable incident rate (TRIR)	0.85				
		(2) Fatality rate	0				
Workforce Health & Safety	IF-EU-320a.1	(3) Near miss rate	1.54				
				a to be an unplanned ever	nt that did not result	g by actual worked hours. Near Miss in any injury, illness or property dam- 2.	
			Reactor	Unit	A	ction Matrix Column	
	IF-EU-540a.1	Total number of nuclear power units, broken down by U.S. Nuclear Regulato-	Comanche	e Peak 1	l	Licensee Response	
		ry Commission (NRC) Action Matrix Column	Comanche	e Peak 2	l	Licensee Response	
Nuclear Safety & Emergency			This information is available on the NRC's website here.				
Management	IF-EU-540a.2	Description of efforts to manage nuclear safety and emergency preparedness	Safety is Vistra's top priority. As a commercial nuclear plant operator, we are licensed by the US NRC. V comply and follow NRC regulations and programs regarding nuclear operations including their safety of principles. Vistra's power plant, Comanche Peak, publishes its own emergency information website for public. In addition, oversight by the Nuclear Oversight Advisory Board (NOAB) ensures routine, periodic pendent oversight of nuclear plant performance, including safety metrics.			rations including their safety culture gency information website for the IOAB) ensures routine, periodic inde-	
		Number of residential customers served					
	IF-EU-000.A	Number of commercial customers served	Vistra serves 3,500,000 retail customers as of December 31, 2022.				
		Number of industrial customers served	-				
		Total electricity delivered to residential customers					
		Total electricity delivered to commercial customers	Vistra delivered 98,089 GWh of power to it is retail electric customers.				
	IF-EU-000.B	Total electricity delivered to industrial customers					
		Total electricity delivered to all other retail customers					
		Percentage of wholesale customers					
			2022 Total Electricity Generated				
Activity Metric			Fuel	MWh		% of Total	
			Gas	94,409,675	5	55%	
			Coal	56,435,900		33%	
	IF-EU-000.D	Total electricity generated, percentage of electricity generated by major energy source, percentage in regulated markets	Nuclear	19,687,742	2	11%	
			Solar & Battery	865,723	3	1%	
			Oil	34,278	8	0%	
			Total	171,433,31	9		
			0% of electricity is generate	ed in regulated markets.			
	IF-EU-000.E	Total wholesale electricity purchased	1,824 GWh with over 98% a	ttributed to renewable pu	irchases.		

VISTRA 2022 GRI CONTENT INDEX

Vistra has reported the information cited in this GRI content index for the period January 1, 2022 - December 31, 2022 using guidance from the GRI Standards, Core Option 2016. We are exploring reporting alignment with the GRI Universal Standards 2021 for future disclosures.

DISCLOSURE	DESCRIPTION	REFERNCE / SECTION	
102-1	Name of the organization	Vistra Corp.	
102-2	Activities, brands, products, and services	2022 Annual Report	
102-3	Location of headquarters	Irving, Texas, USA	
102-4	Location of operations	The company brings its products and services to market in 20 states and the District of Columbia, including six of the seven competitive markets in the U.S.	
102-5	Ownership and legal form	Vistra is an investor-owned corporation. Common shares trade on the New York Stock Exchange under the symbol "VST".	
102-6	Markets served	2022 Annual Report	
102-7	Scale of the organization	2022 Annual Report	
102-8	Information on employees and other workers	As of December 31, 2022, Vistra had approximately 4,910 employees. See Disclosure <u>405-1 - Diversity & Equal Opportunity</u>	
102-9	Supply chain	https://www.vistracorp.com/supply-chain/	
102-10	Significant changes to the organization and its supply chain	2022 Annual Report	
102-11	Precautionary Principle or approach	2022 Annual Report	
102-12	External initiatives	Referenced throughout our Sustainability Report	
102-13	Membership of associations	Sustainability Report: Stakeholder Engagement	
102-14	Statement from senior decision-maker	Sustainability Report: Letter from CEO	
102-16	Values, principles, standards, and norms of behavior	Sustainability Report: Core Principles Vistra's Code of Conduct	
102-18	Governance structure	Sustainability Report: <u>ESG Governance & Oversight</u> 2023 Proxy Statement	
102-40	List of stakeholder groups	Sustainability Report: Stakeholder Engagement	
102-41	Collective bargaining agreements	As of December 31, 2022, 26% of Vistra employees were under collective bargaining agreements.	
102-42	Identifying and selecting stakeholders	Sustainability Report: Stakeholder Engagement	
102-43	Approach to stakeholder engagement	Sustainability Report: Stakeholder Engagement	
102-44	Key topics and concerns raised	Sustainability Report: Stakeholder Engagement	
102-45	Entities included in the consolidated financial statements	2022 Annual Report	
102-46	Defining report content and topic Boundaries	Sustainability Report: Commitment to Transparency	
102-47	List of material topics	Economic Performance, Tax, Energy, Water and Effluents, Emissions, Waste, Environmental Compliance, Employment, Occupational Health and Safety, Training and Education, Diversi- ty and Equal Opportunity, and Public Policy.	
102-48	Restatements of information	No material restatements.	
102-49	Changes in reporting	No changes in reporting.	
102-50	Reporting period	January 1, 2021 to December 31, 2022	
102-51	Date of most recent previous report	May 2022	
102-52	Reporting cycle	Annual	

DISCLOSURE	DESCRIPTION	REFERNCE / SECTION
102-53	Contact point for questions regarding the report	Sustainability Report: Commitment to Transparency
102-54	Claims of reporting in accordance with the GRI Standards	Sustainability Report: Commitment to Transparency
102-55	GRI content index	Sustainability Report: CRI Index
102-56	External assurance	Deloitte & Touche LLP performed a review related to Scope 1 and Scope 2 GHG Emissions as presented within the Statement of GHG Emissions in accordance with the attestation standards established by the American Institute of Certified Public Accountants. The Statement of GHG Emissions and the Independent Accountants Review Report can be found on Vistra's Sustainability page.

GRI 201: ECONOMIC PERFORMANCE

103-1,2,3	Management Approach	2022 Annual Report
201-1	Direct economic value generated and distributed	2022 Annual Report
201-2	Financial implications and other risks and opportunities due to climate change	2022 Annual Report Sustainability Report: Vistra's Strategy, Risk Management

GRI 207: TAX

103-1,2,3	Management Approach	2022 Annual Report
207-1	Approach to Tax	Vistra operates in a complex environment, across many jurisdictions. Our businesses are subject to federal, state and local taxation regimes in the United States, and, on a smaller scale, internationally. Conducting our daily activities within the laws, regulations and rules is not an option we choose, but rather the way we do business that is ingrained in our culture. Our tax function is built in the bedrock of this principle, as we are committed to ensuring tax issues are handled with integrity and compliance in
207-2	Tax governance, control, and risk management	Is both the the serve. Wistra is committed to providing excellence in our operations, while maintaining an efficient cost structure. Tax can be a very large recurring expense to any business operation. Vistra's Tax department ensures Vistra operates with an efficient tax structure and regularly implements process and operating improvements to ensure our cost structure is optimized. Vistra Tax evaluates many opportunities to validly reduce its taxes, for example, by claiming available tax credits or eliminating entities in the structure that are no longer being used by the business operations, thereby reducing compliance costs. In evaluating these opportunities, however, Vistra Tax is anchored by our approach to taking highly certain tax positions. There are times when Vistra Tax records uncertain tax positions. These situations are largely limited to occasions where (i) Vistra acquires a business that has such positions recorded on their books, so they are inherited positions, or (ii) in rare circumstances, guidance from regulators is at odds with the laws issued by Congress. In all cases, where an uncertain tax position may exist, it is recorded and disclosed as required under the Internal Revenue Code and GAAP guidelines. We take a balanced approach towards audit of any of our tax positions. Our dealings with federal, state and local auditors, where applicable, are honest, pro- ductive and forthright, while also striving to achieve the full value of our enterprise for our investors. Similarly, we are very aware that the taxes we pay to do business in various jurisdictions has a direct impact on the communities we serve. To that end, at times, we may pay more than our fair share because it is the right thing to do in that particular commu- ity. Examples of this can be found in various property tax jurisdictions, where certain of our businesses have been discontinued. Many times, we work with the local jurisdictions to step-down the property tax ayements over time and provide other communities

DISCLOSURE	DESCRIPTION	REFERNCE / SECTION
GRI 302: ENER	GY	
103-1,2,3	Management Approach	Environmental Principles Policy
302-1	Energy consumption within the organization	388,514,771 MWh Vistra's total 2022 energy consumption represents the fuel and electricity consumed at its power plants and the electricity consumed at its corporate offices. All fuel was converted to MWh using the U.S. EIA conversion calculators.
302-3	Energy intensity	2.27 Calculated using the total energy consumption from disclosure 302-1 divided by the total MWh of electricity generated for 2022.
302-4	Reduction of energy consumption	Sustainability Report: Energy Management
GRI 303: WATE	R AND EFFLUENTS	
103-1,2,3	Management Approach	Sustainability Report: Water

103-1,2,3	Management Approach	Sustainability Report: Water			
303-1	Interactions with water as a shared resource	Sustainability Report: Water			
303-2	Management of water discharge-related impacts	Sustainability Report: Water			
		2022 Total Water Withdrawn			
		Water Source	Total (MegaLiters)		
		Groundwater	7,525		
		Surface Water	13,029,494		
303-3	Water withdrawal	Sea Water	356,175		
		Third Party	113,971		
		Produced	0		
		Total	13,507,165		
		stress as defined by GRI Standards. These five plants represent 0.05% of total water withdrawn. 2022 Total Water Discharge			
		Water Source	Total (MegaLiters)		
		Groundwater			
		Groundwater	1,991		
		Surface Water	1,991		
303-4	Water discharge		· · · · · · · · · · · · · · · · · · ·		
303-4	Water discharge	Surface Water	12,890,211		
303-4	Water discharge	Surface Water Sea Water	12,890,211 355,984		
303-4	Water discharge	Surface Water Sea Water Third Party	12,890,211 355,984 87,221		

DISCLOSURE	DESCRIPTION	REFERNCE / SECTION		
		2022 Total Water Consumed		
		Water Source	Total (MegaLiters)	
		Groundwater	5,534	
		Surface Water	139,283	
303-5	Water consumption	Sea Water	191	
		Third Party	26,750	
		Produced	0	
		Total	171,758	
		Vistra has five efficient natural gas fueled power plants in areas identified as "High" or "Extremely High" water stress as defined by GRI Standards. These five plants represent 4.0% of water consumed.		
GRI 306: EMISSIONS				
103-1,2,3	Management Approach	Sustainability Report: Emissions Environmental Principles Policy		
305-1	Direct (Scope 1) GHG emissions	Sustainability Report: Emissions		
305-2	Energy indirect (Scope 2) GHG emissions	Sustainability Report: Emissions		
305-3	Other indirect (Scope 3) GHG emissions	Sustainability Report: Emissions		

Sustainability Report: Emissions

Sustainability Report: Emissions
Sustainability Report: Emissions

2022 SASB Table

305-4

305-5

305-7

GHG emissions intensity

Reduction of GHG emissions

Nitrogen oxides (NO_{χ}), sulfur oxides (SO_{χ}), and other significant air emissions

ISCLOSURE	DESCRIPTION	REFERNCE / SECTION				
GRI 306: WASTE						
03-1,2,3	Management Approach	Environmental Principles Pol	icy			
06-1	Waste generation and significant waste-related impacts	Sustainability Report: Waste				
06-2	Management of significant waste-related impacts	Vistra's facilities minimize the amount of waste produced at each of our locations. This includes lin amount of inventory of ancillary chemicals at each location and ensuring that all product is used. V metals, universal waste and used oils are recycled to the extent feasible and average 99%. As note disclosure section, the company takes great efforts to sell our ash product into the market so it can ly reused in accordance with governing laws and regulations for products such as road bed materia shingles and other marketed products. All waste generated at each site is appropriately collected, transferred to offsite facilities in accordance with all local and federal regulations.				
06-3	Waste Generated		2022	Waste		
J0-3	Waste Generated	(metric tonnes)	Generated	Recycled	Disposed	
		Municipal Solid Waste	59,229	62	59,167	
06-4	Waste diverted from disposal	Non-Hazardous Waste	153,288	-	153,288	
		Hazardous Waste	173	0.2	172	
		Used Oil	1,051	992	59	
		Wood Waste	102	16	86	
	Waste directed to disposal	Metal Waste	21,912	21,903	10	
06-5		E-Waste	26	26	-	
		Universal Waste	1,373	1,370	3	
		Total	237,155	24,370	212,785	
GRI 307: ENVIRON	Management Approach	Sustainability Report: Environ Environmental Principles Pol				
07-1	Non-compliance with environmental laws and regulations	Sustainability Report: Environ				
GRI 401: EMPLOYM	/ENT	1				
03-1,2,3	Management Approach	Sustainability Report: Human	Capital Management - O	ur Approach		
01-1	New employee hires and employee turnover	Total Employees as of 12/31/22 4,910	Overa	II Turnover Rate	New Employees	
01-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Sustainability Report: Employee Benefits				

DISCLOSURE	DESCRIPTION	REFERNCE / SECTION
GRI 403: OCCU	IPATIONAL HEALTH AND SAFETY	
103-1,2,3	Management Approach	Sustainability Report: Safety
403-1	Occupational health and safety management system	Sustainability Report: Safety Management System
403-2	Hazard identification, risk assessment, and incident investigation	Sustainability Report: Hazard Management
403-4	Worker participation, consultation, and communication on occupational health and safety	Sustainability Report: Safety
403-5	Worker training on occupational health and safety	Sustainability Report: Safety Training
403-6	Promotion of worker health	Sustainability Report: Culture of Wellbeing
403-8	Workers covered by an occupational health and safety management system	All Vistra employees are covered by our safety program: Best Defense .
403-9	Work-related injuries	Sustainability Report: Safety Statistics
GRI 404: TRAIN	NING AND EDUCATION	
103-1,2,3	Management Approach	Sustainability Report: Training and Development
404-1	Average hours of training per year per employee	Sustainability Report: Training and Development
404-2	Programs for upgrading employee skills and transition assistance programs	Sustainability Report: Training and Development
404-3	Percentage of employees receiving regular performance and career development reviews	Sustainability Report: Performance Review Program
GRI 405: DIVER	RSITY AND EQUAL OPPORTUNITY	
103-1,2,3	Management Approach	Sustainability Report: Diversity, Equity, and Inclusion
405-1	Diversity of governance bodies and employees	EEO-1 Report
GRI 415: PUBLI	C POLICY	·
103-1,2,3	Management Approach	Lobbying and Political Contributions Policy
415-1	Political Contributions	Sustainability Report: Political Contribution Reports

CORPORATE ST SUMMARY IN

STRATEGY AND ESG SINNOVATION AND

ESG STRATEGY AND GOVERNANCE ENERGY STEWARDSHIP AND EMISSIONS DEI AND SAFETY HUMAN CAPITAL AND HEALTH MANAGEMENT COMMUNITIES AND CUSTOMERS PRACTICES APPENDIX

Appendix C

- 1. Political Contributions
- 2. Employee PACs
- 3. Trade Groups and Memberships

FORWARD-LOOKING STATEMENTS

CAUTIONARY NOTE REGARDING FORWARD-LOOKING STATEMENTS

The information presented herein includes forward-looking statements within the meaning of the Private Securities Litigation Reform Act of 1995. These forward-looking statements, which are based on current expectations, estimates and projections about the industry and markets in which Vistra Corp. ("Vistra") operates and beliefs of and assumptions made by Vistra's management. involve risks and uncertainties, which are difficult to predict and are not guarantees of future performance, that could significantly affect the financial results of Vistra, All statements, other than statements of historical facts, that are presented herein, or in response to questions or otherwise, that address activities, events or developments that may occur in the future, including such matters as activities related to our financial or operational projections, projected synergy, value lever and net debt targets, capital allocation, capital expenditures, liquidity, projected Adjusted EBITDA to free cash flow conversion rate, dividend policy, business and sustainability strategy, competitive strengths, goals, future acquisitions or dispositions, development or operation of power generation assets, market and industry developments and the growth of our businesses and operations (often, but not always, through the use of words or phrases, or the negative variations of those words or other comparable words of a future or forward-looking nature, including, but not limited to: "intends," "vill likely," "unlikely," "believe," "confident", "expect," "seek," "anticipate," "estimate," "continue," "will," "shall," "should," "could," "may," "might," "predict," "project," "forecast," "target," "potential," "goal," "objective," "guidance" and "outlook"), are forward-looking statements. Readers are cautioned not to place undue reliance on forward-looking statements. Although Vistra believes that in making any such forward-looking statement, Vistra's expectations are based on reasonable assumptions, any such forward-looking statement involves uncertainties and risks that could cause results to differ materially from those projected in or implied by any such forward-looking statement, including, but not limited to: (i) adverse changes in general economic or market conditions (including changes in interest rates) or changes in political conditions or federal or state laws and regulations; (ii) the ability of Vistra to execute upon its contemplated strategic, capital allocation, performance, and cost-saving initiatives, including the acquisition of Energy Harbor Corp., and to successfully integrate acquired businesses; (iii) actions by credit ratings agencies; (iv) the severity, magnitude and duration of extreme weather events, contingencies and uncertainties relating thereto, most of which are difficult to predict and many of which are beyond our control, and the resulting effects on our results of operations, financial condition and cash flows; and (v) those additional risks and factors discussed in reports filed with the Securities and Exchange Commission by Vistra from time to time, including the uncertainties and risks discussed in the sections entitled "Risk Factors" and "Forward-Looking Statements" in Vistra's annual report on Form 10-K for the year ended December 31, 2022 and any subsequently filed guarterly reports on Form 10-Q. Any forward-looking statement speaks only at the date on which it is made, and except as may be required by law, Vistra will not undertake any obligation to update any forward-looking statement to reflect events or circumstances after the date on which it is made or to reflect the occurrence of unanticipated events. New factors emerge from time to time, and it is not possible to predict all of them; nor can Vistra assess the impact of each such factor or the extent to which any factor, or combination of factors, may cause results to differ materially from those contained in any forward-looking statement.