Vistra Corp.

2024 CDP Corporate Questionnaire 2024

Word version

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C1. Introduction

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

(1.3.2) Organization type

Select from:

☑ Publicly traded organization

(1.3.3) Description of organization

Vistra (NYSE: VST) is a leading Fortune 500 integrated retail electricity and power generation company based in Irving, Texas, that provides essential power resources to customers, businesses, and communities from California to Maine. Vistra is the largest competitive power generator in the U.S., with a capacity of approximately 41,000 megawatts, or enough to power 20 million homes, operating in all of the major competitive wholesale markets in the country. Vistra is a leader in the energy transformation and expansion with an unyielding focus on reliability, affordability, and sustainability, powered by a diverse portfolio that includes natural gas, nuclear, coal, solar, and battery energy storage facilities. The company continues to grow its zero-carbon resources, operating the second-largest fleet of competitive nuclear power plants in the country, substantial battery energy storage capacity, and a growing number of solar facilities. Vistra is one of the largest competitive electricity providers in the country and takes an innovative, customer-centric approach to retail, offering solutions to meet customers' needs, including more than 50 renewable energy plans. Through its family of retail brands, Vistra serves approximately 5 million residential, commercial, and industrial retail customers. As a leader in the responsible transformation of the country's energy supply, Vistra has made significant progress towards its 2030 and 2050 targets. The company has committed to a 60% reduction of Scope 1 and 2 greenhouse gas emissions by 2030, as compared to our 2010 baseline, and net-zero carbon emissions by 2050, assuming necessary technological advancements and public policy incentives are achieved. Learn more about our environmental, social, and governance efforts and read the company's sustainability report at https://vistracorp.com/sustainability/. Vistra's hardworking team is committed to its purpose, "lighting up lives, powering a better way forward" and is guided by four core principles: we do business the right way, we work as a team, we compete to win, and we care about our stakeholders, including our customers, our communities where we work and live, our employees, and our investors.
[Fixed row]

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

(1.4.1) End date of reporting year

12/31/2023

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

Select from:

☑ Yes

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

Select from:

☑ Yes

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

Select from:

☑ 4 years

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

Select from:

☑ 4 years

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

Select from:

☑ 3 years

[Fixed row]

(1.5) Provide details on your reporting boundary.

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: ☑ Yes

[Fixed row]

(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?

ISIN code - bond

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

ISIN code - equity

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

CUSIP number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Ticker symbol

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ Yes

(1.6.2) Provide your unique identifier

VST

SEDOL code

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

LEI number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

D-U-N-S number

(1.6.1) Does your organization use this unique identifier?

Select from:

☑ No

Other unique identifier

(1.6.1) Does your organization use this unique identifier?

Select from:
☑ No
[Add row]

(1.8) Are you able to provide geolocation data for your facilities?

	Are you able to provide geolocation data for your facilities?	Comment
	Select from: ☑ No, not currently but we intend to provide it within the next two years	*Reviewing potential for disclosure in the future.*

[Fixed row]

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

Coal - Hard

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

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

8428

(1.16.1.4) Net electricity generation (GWh)

40740

(1.16.1.5) Comment

Total coal including Lignite. We do not disclose the types of coal power generation separately. Nameplate based on year end

Lignite

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

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

0

(1.16.1.3) Gross electricity generation (GWh)

0

(1.16.1.4) Net electricity generation (GWh)

0

Oil

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

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

203

(1.16.1.4) Net electricity generation (GWh)

11

(1.16.1.5) Comment

Nameplate based on year end

Gas

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

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

24313

(1.16.1.4) Net electricity generation (GWh)

107802

(1.16.1.5) Comment

Capacity and emissions are equity adjusted. Nameplate based on year end

Sustainable biomass

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

Select from:
☑ No

Other biomass

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

Select from:

☑ No

Waste (non-biomass)

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

Select from:

☑ No

Nuclear

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

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

2400

(1.16.1.4) Net electricity generation (GWh)

18893

(1.16.1.5) Comment

Nameplate based on year end. Does not include additional nuclear units acquired in March 2024.

Fossil-fuel plants fitted with carbon capture and storage

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

Select from:

☑ No

Geothermal

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

Select from:

☑ No

Hydropower

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

Select from:

☑ No

Wind

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

Select from:

☑ No

Solar

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

Select from:

☑ Yes

(1.16.1.2) Nameplate capacity (MW)

338

(1.16.1.4) Net electricity generation (GWh)

780

(1.16.1.5) Comment

Nameplate based on year end

Marine

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

Select from:
☑ No

Other renewable

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

Select from:
☑ Yes

(1.16.1.2) Nameplate capacity (MW)

1020

(1.16.1.5) Comment

Battery Nameplate based on year end

Other non-renewable

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

Select from:

☑ No

Total

(1.16.1.2) Nameplate capacity (MW)

36702

(1.16.1.4) Net electricity generation (GWh)

167958

(1.16.1.5) Comment

Nameplate based on year end
[Fixed row]

(1.24) Has your organization mapped its value chain?

(1.24.1) Value chain mapped

Select from:
☑ No, but we plan to do so within the next two years

(1.24.4) Highest supplier tier known but not mapped

Select from:
☑ Tier 1 suppliers

(1.24.8) Primary reason for not mapping your upstream value chain or any value chain stages

Select from:
☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(1.24.9) Explain why your organization has not mapped its upstream value chain or any value chain stages

Critical suppliers and supply chain are mapped, but not entire supply chain at this time.
[Fixed row]

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

	Plastics mapping	Primary reason for not mapping plastics in your value chain	Explain why your organization has not mapped plastics in your value chain
	Select from: ☑ No, and we do not plan to within the next two years	*Select from:* ☑ Not an immediate strategic priority	*Not a material source of impact for our company.*

[Fixed row]

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

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

Short-term

(2.1.1) From (years)

0

(2.1.3) To (years)

5

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

Correlates with Short-term timeframe for our climate report

Medium-term

(2.1.1) From (years)

5

(2.1.3) To (years)

10

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

Correlates with Medium-term timeframe for our climate report

Long-term

(2.1.1) From (years)

11

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

Select from:
☑ Yes

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

Correlates with Long-term timeframe for our climate report
[Fixed row]

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

	Process in place	Primary reason for not evaluating dependencies and/or impacts	Explain why you do not evaluate dependencies and/or impacts and describe any plans to do so in the future
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)	*N/A*

[Fixed row]

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

	Process in place	Risks and/or opportunities evaluated in this process
	Select from: ☑ Yes	*Select from:* ☑ Both risks and opportunities

[Fixed row]

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

Row 1

(2.2.2.1) Environmental issue

Select all that apply

☑ Climate change

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

Select all that apply

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

☑ Downstream value chain

(2.2.2.4) Coverage

Select from:

☑ Full

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

☑ Every two years

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Sub-national

(2.2.2.12) Tools and methods used

Enterprise Risk Management

☑ Enterprise Risk Management

Other

☑ Scenario analysis

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Heat waves

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Storm (including blizzards, dust, and sandstorms)

Chronic physical

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

☑ Changing temperature (air, freshwater, marine water)

☑ Heat stress

☑ Increased severity of extreme weather events

☑ Water stress

Policy

☑ Changes to national legislation

Market

☑ Changing customer behavior

Reputation

☑ Increased partner and stakeholder concern and partner and stakeholder negative feedback

Liability

☑ Non-compliance with regulations

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Investors

☑ Regulators

☑ Suppliers

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

Select from:

☑ Yes

(2.2.2.16) Further details of process

Vistra utilizes climate scenario planning as a tool to aid our strategy development process. We partnered with BSR, a global nonprofit that works with its network of over 300 member companies to build a just and sustainable world, to explore the strategic implications for Vistra under three climate scenarios through 2050. The scenario analysis process involved multiple steps. BSR and Vistra selected three climate scenarios, a 1.5C scenario, 2.0C scenario and greater than 2.0C scenario to provide the base narrative for our climate analysis. These climate scenarios provide the base narratives for Vistra's climate scenario analysis. BSR further extended each of the narratives by adding content about how a range of business-relevant topics might plausibly play out in each of these scenarios impacting Vistra. To identify climate-related risks and opportunities, interviews were conducted with more than 25 Vistra participants from seven diverse functional areas to analyze business impacts of the three scenarios and identify climate-related risks (both transition and physical) and opportunities for Vistra. A cross-functional workshop was conducted with internal Vistra stakeholders to validate the risk and opportunity assessment and identify ideas to enhance Vistra's resilience and refine its strategy around risks common across the three scenarios for all assets driving material impact to our business. A follow-up to the workshop was organized to identify the next steps on the most important issues to improve Vistra's strategic resilience. As a result of this effort, Vistra identified five strategic focus areas that may involve climate-related risks and opportunities across all scenarios: 1. Physical impacts to assets 2. Transition impacts on existing assets 3. Government regulation 4. Supply chain 5. Workforce and Reputation These scenario insights were reviewed by Vistra's management team and were used to inform Vistra's strategy and risk management processes. While there are a multitude of climate scenarios available, Vistra and BSR leveraged three climate scenarios developed by the Network for Greening the Financial System (NGFS): Net Zero 2050, Delayed Transition, and Current Policies. The impacts of these scenarios were grouped into three timeframes: Short Term (0-5 years), Medium Term (6-10 years) and Long Term (10 years). All these scenarios have a 2050 horizon year but are differentiated by various assumptions. Additional details for this effort are described in our biennial climate report.

Row 2

(2.2.2.1) Environmental issue

Select all that apply

☑ Water

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

Select all that apply

☑ Risks

☑ Opportunities

(2.2.2.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Upstream value chain

(2.2.2.4) Coverage

Select from:

☑ Partial

(2.2.2.7) Type of assessment

Select from:

☑ Qualitative only

(2.2.2.8) Frequency of assessment

Select from:

☑ Every three years or more

(2.2.2.9) Time horizons covered

Select all that apply

☑ Short-term

☑ Medium-term

☑ Long-term

(2.2.2.10) Integration of risk management process

Select from:

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

(2.2.2.11) Location-specificity used

Select all that apply

☑ Site-specific

(2.2.2.12) Tools and methods used

Commercially/publicly available tools

☑ WRI Aqueduct

Databases

☑ Regional government databases

Other

☑ Desk-based research

(2.2.2.13) Risk types and criteria considered

Acute physical

☑ Drought

☑ Flood (coastal, fluvial, pluvial, ground water)

☑ Heavy precipitation (rain, hail, snow/ice)

☑ Toxic spills

Chronic physical

☑ Water stress

☑ Declining water quality

☑ Precipitation or hydrological variability

☑ Water availability at a basin/catchment level

☑ Changing precipitation patterns and types (rain, hail, snow/ice)

☑ Increased levels of environmental pollutants in freshwater bodies

Policy

☑ Increased difficulty in obtaining water withdrawals permit

(2.2.2.14) Partners and stakeholders considered

Select all that apply

☑ Customers

☑ Employees

☑ Local communities

☑ Regulators

☑ Suppliers

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

Select from:

☑ Yes

(2.2.2.16) Further details of process

Vistra's environmental policy requires all business units to responsibly manage natural resources. We have numerous procedures and initiatives to manage operational risks associated with water resources.
[Add row]

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

	Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed	Primary reason for not assessing interconnections between environmental dependencies, impacts, risks and/or opportunities	Explain why you do not assess the interconnections between environmental dependencies, impacts, risks and/or opportunities
	Select from: ☑ No	*Select from:* ☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)	*N/A*

[Fixed row]

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

	Identification of priority locations	Primary reason for not identifying priority locations	Explain why you do not identify priority locations
	Select from: ☑ No, but we plan to within the next two years	*Select from:* ☑ Other, please specify :N/A	*N/A*

[Fixed row]

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

Risks

(2.4.1) Type of definition

Select all that apply

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Quantitative factors include our expected future EBITDA and free cash flow (FCF). Climate related-risks would impact both quantitative and qualitative factors.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Quantitative

(2.4.2) Indicator used to define substantive effect

Select from:

☑ EBITDA

(2.4.3) Change to indicator

Select from:

☑ % increase

(2.4.4) % change to indicator

Select from:

☑ 1-10

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Quantitative factors include our expected future EBITDA and free cash flow (FCF). Climate related risks would impact both quantitative and qualitative factors.

Risks

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Qualitative factors include corporate reputation, progress towards ESG goals, safety, and overall value to stakeholders. Climate-related risks would impact both quantitative and qualitative factors.

Opportunities

(2.4.1) Type of definition

Select all that apply

☑ Qualitative

(2.4.6) Metrics considered in definition

Select all that apply

☑ Frequency of effect occurring

☑ Time horizon over which the effect occurs

☑ Likelihood of effect occurring

(2.4.7) Application of definition

Vistra considers a substantive financial impact in terms of impact on our enterprise value. Enterprise value is impacted by quantitative and qualitative factors. Qualitative factors include corporate reputation, progress towards ESG goals, safety, and overall value to stakeholders. Climate related risks would impact both quantitative and qualitative factors.
[Add row]

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

	Identification and classification of potential water pollutants	How potential water pollutants are identified and classified
	Select from: ☑ Yes, we identify and classify our potential water pollutants	*As required by the NPDES permit, monthly samples are collected, analyzed, and reported to the applicable state permitting authority.*

[Fixed row]

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

Row 1

(2.5.1.1) Water pollutant category

Select from:

☑ Other physical pollutants

(2.5.1.2) Description of water pollutant and potential impacts

Water pollutants include organics, inorganics, and total suspended solids. Based on monthly sampling and analysis, additional treatment, including pH adjustment and chemical additives, is conducted. This ensures that the NPDES permit limits are met, before any discharge to Waters of the US.

(2.5.1.3) Value chain stage

Select all that apply

☑ Direct operations

(2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

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

(2.5.1.5) Please explain

N/A
[Add row]

C3. Disclosure of risks and opportunities

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

Climate change

(3.1.1) Environmental risks identified

Select from:

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

Water

(3.1.1) Environmental risks identified

Select from:

☑ Yes, only within our direct operations

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

Select from:

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

(3.1.3) Please explain

Upstream/Downstream evaluation of water environmental risks would require significant resources.

Plastics

(3.1.1) Environmental risks identified

Select from:
☑ No

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

Select from:
☑ Not an immediate strategic priority

(3.1.3) Please explain

Not material to the company relative to other priorities.
[Fixed row]

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

Climate change

(3.1.1.1) Risk identifier

Select from:
☑ Risk1

(3.1.1.3) Risk types and primary environmental risk driver

Policy
☑ Changes to regulation of existing products and services

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

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

(3.1.1.11) Primary financial effect of the risk

Select from:

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

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

Select all that apply

☑ Long-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

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

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

Select from:

☑ Yes

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

0

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

5000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1500000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

As of late 2023, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at 500M per year (based on recent historical run rate) over the foreseeable future, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Vistra has closed our acquisition of certain nuclear assets formerly owned and operated by Energy Harbor in Q1 of 2024 adding nearly 4,000MW of zero-carbon nuclear capacity and further reducing our risk.

Water

(3.1.1.26) Primary response to risk

Pricing and credits

☑ Other pricing or credit, please specify

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk2

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Other policy risk, please specify **:**Stigmatization of sector

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

GHG emissions from the combustion of fossil fuels, primarily from our coal/lignite-fueled generation plants, represent the substantial majority of Vistra's total GHG emissions. CO2, methane, and nitrous oxide are emitted in this combustion process, with CO2 representing the largest portion of these GHG emissions. Depending on individual stakeholders' level of acceptance of the utility/power generation sector and/or Vistra's own GHG emission levels and abatement strategy, our reputation could be harmed and thereby impair or limit our access to new capital or impair our ability to procure sufficient insurance coverage for our fossil assets. Further, Vistra's carbon abatement strategy depends on supportive policies and new technologies. If supportive policies are not implemented and/or the pace of innovation is too slow causing a hindrance to or the unsuccessful achievement of our long-term emission reduction goals and portfolio transformation, increased damage to our reputation could occur and in turn impact our access to capital and/or increase our cost of capital. Insufficient access to new capital or an inability to procure adequate insurance coverage for the fossil assets in our wholesale business, including as a result of sustainability positions taken by investors or insurance companies, may threaten the company's capacity to grow, execute its strategies, and generate future financial returns.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Decreased access to capital

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

Select all that apply

☑ Long-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

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

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

Select from:

☑ Yes

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

0

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

5000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1500000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

As of late 2023, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at 500M per year (based on recent historical run rate) over the next few years, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Vistra has closed our acquisition of certain nuclear assets formerly owned and operated by Energy Harbor in Q1 of 2024 adding nearly 4,000MW of zero-carbon nuclear capacity and further reducing our risk.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk3

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Other policy risk, please specify **:**Increased stakeholder concern or negative stakeholder feedback

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

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

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Other, please specify **:**Low valuation of the company, lower access to capital

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

Select all that apply

☑ Short-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ High

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

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

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

Select from:

☑ Yes

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

0

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

3000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1500000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

As of late 2023, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at 500M per year (based on recent historical run rate) over the next five years, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Vistra has publicly announced our acquisition of certain nuclear assets currently owned and operated by Energy Harbor which was completed in Q1 of 2024 adding nearly 4,000MW of zero-carbon nuclear capacity and further reducing our risk.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk4

(3.1.1.3) Risk types and primary environmental risk driver

Technology

☑ Transition to lower emissions technology and products

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

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

(3.1.1.11) Primary financial effect of the risk

Select from:

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

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

Select all that apply

☑ Long-term

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

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

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

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

Select from:

☑ Yes

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

0

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

1000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1500000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

As of late 2023, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at 500M per

year (based on recent historical run rate) over the next five years, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Vistra has closed our acquisition of certain nuclear assets formerly owned and operated by Energy Harbor in Q1 of 2024 adding nearly 4,000MW of zero-carbon nuclear capacity and further reducing our risk.

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk5

(3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☑ Other acute physical risk, please specify **:**Increase in extreme hot and cold temperatures

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

Vistra's generation facilities could be subject to extreme weather conditions, including natural disasters and sustained extreme cold or hot temperatures, which could stress our generation facilities and grid reliability, limit our ability to procure adequate fuel supply, or result in outages, damage, or destroy our assets and result in casualty losses that are not ultimately offset by insurance proceeds and could require increased capital expenditures or maintenance costs, including supply chain costs. Moreover, an extreme weather event could disrupt service to customers due to grid outages, downed wires and poles, or damage to other operating equipment, which could result in us foregoing sales of electricity and lost revenue. Extreme weather can also result in (i) unexpected increases in customer load, requiring our retail operation to procure power at wholesale prices above customer sales prices for electricity, (ii) the failure of equipment at our generation facilities,

(iii) a decrease in the availability of, or increases in the cost of, fuel sources, including natural gas, diesel and coal, or (iv) unpredictable curtailment of customer load by the applicable ISO/RTO to maintain grid reliability, resulting in the realization of lower wholesale prices or retail customer sales. Climate change may produce changes in weather or other environmental conditions, including temperature or precipitation levels, which may impact consumer demand for electricity.

(3.1.1.11) Primary financial effect of the risk

Select from:

☑ Increased direct costs

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

Select all that apply

☑ Short-term

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

Select from:

☑ About as likely as not

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

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

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

Select from:

☑ Yes

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

0

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

1000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

50000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

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

Climate change

(3.1.1.1) Risk identifier

Select from:

☑ Risk6

(3.1.1.3) Risk types and primary environmental risk driver

Policy

☑ Carbon pricing mechanisms

(3.1.1.4) Value chain stage where the risk occurs

Select from:

☑ Direct operations

(3.1.1.6) Country/area where the risk occurs

Select all that apply

☑ United States of America

(3.1.1.9) Organization-specific description of risk

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

(3.1.1.11) Primary financial effect of the risk

Select from:

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

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

Select all that apply

☑ Long-term

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

Select from:

☑ Unlikely

(3.1.1.14) Magnitude

Select from:

☑ Medium

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

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

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

Select from:

☑ Yes

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

0

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

1000000000

(3.1.1.25) Explanation of financial effect figure

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

(3.1.1.26) Primary response to risk

Infrastructure, technology and spending

☑ Increase environment-related capital expenditure

(3.1.1.27) Cost of response to risk

1500000000

(3.1.1.28) Explanation of cost calculation

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

(3.1.1.29) Description of response

As of late 2023, Vistra will continue our development and buildout on low-to no-carbon generation projects that can support appropriate returns over the next five years, as our generation portfolio continues to transition away from carbon-heavy generating resources. The amount of capital invested, approximated at 500M per year (based on recent historical run rate) over the next five years, could shift with evolving public policies and incentives to promote development to achieve federal and/or state emission reduction targets. These investments will generate EBITDA that will, over time, replace EBITDA from our fossil-fuel resources as they retire or reduce their output. Vistra has closed our acquisition of certain nuclear assets formerly owned and operated by Energy Harbor in Q1 of 2024 adding nearly 4,000MW of zero-carbon nuclear capacity and further reducing our risk.
[Add row]

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

Climate change

(3.1.2.1) Financial metric

Select from:

☑ Other, please specify :EBITDA

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

4000000000

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

Select from:

☑ 21-30%

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

4000000000

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

Select from:

☑ 21-30%

(3.1.2.7) Explanation of financial figures

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

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

	Water-related regulatory violations	Comment
	Select from: ☑ No	*Vistra was not subject to any water-related fines in 2023.*

[Fixed row]

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

California CaT - ETS

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

1

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

0

(3.5.2.3) Period start date

01/01/2023

(3.5.2.4) Period end date

12/31/2023

(3.5.2.5) Allowances allocated

10847000

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

2027074.58

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:
☑ Facilities we own and operate

(3.5.2.10) Comment

n/a

Massachusetts state ETS

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

0.3

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

0

(3.5.2.3) Period start date

01/01/2023

(3.5.2.4) Period end date

12/31/2023

(3.5.2.5) Allowances allocated

2820017

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

283431.9

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:
☑ Facilities we own and operate

(3.5.2.10) Comment

n/a

RGGI - ETS

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

10

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

0

(3.5.2.3) Period start date

01/01/2023

(3.5.2.4) Period end date

12/31/2023

(3.5.2.5) Allowances allocated

37846000

(3.5.2.6) Allowances purchased

0

(3.5.2.7) Verified Scope 1 emissions in metric tons CO2e

9061302.01

(3.5.2.8) Verified Scope 2 emissions in metric tons CO2e

0

(3.5.2.9) Details of ownership

Select from:
☑ Facilities we own and operate

(3.5.2.10) Comment

N/A
[Fixed row]

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

Climate change

(3.6.1) Environmental opportunities identified

Select from:

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

Water

(3.6.1) Environmental opportunities identified

Select from:

☑ No

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

Select from:

☑ Not an immediate strategic priority

[Fixed row]

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp1

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☑ Shift in consumer preferences

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Downstream value chain

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

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

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:
☑ Low

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

Favorable cash flow and EBITDA impact over the expected horizon.

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

Select from:
☑ Yes

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

0

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

30000000

(3.6.1.23) Explanation of financial effect figures

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

(3.6.1.24) Cost to realize opportunity

2000000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp2

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

☑ Use of low-carbon energy sources

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

Vistra knows how to manage the volatility and risk associated with renewables—and its retail operations serve nearly 4 million retail customers who are increasingly seeking to procure their electricity needs from renewable sources. As a result, Vistra can capture attractive stand-alone returns on these investments, with the opportunity to earn superior integrated returns through the retail value chain. Vistra is already a market leader in battery energy storage, operating one of the largest

battery systems of its kind in Moss Landing, California at 750 MW/3000 MWh. In addition, Vistra operates a 10 MW/42 MWh battery on the site of its 180 MW Upton 2 Solar Power Plant and a 260 MW/260 MWh energy storage facility co-located at its natural gas-fueled DeCordova Power Plant, both located in Texas. Over the next 10 years, Vistra intends to continue to seek out development projects and technologies related to renewables and energy storage. We have development opportunities at our current conventional generation sites, where we can utilize existing land and infrastructure to enable lower cost and faster development of new renewable generation assets. Vistra continues to evaluate and monitor new power facility technologies and we expect to balance investment in these new technologies with Vistra's commitment to providing safe, efficient, and low-cost power.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased production capacity

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

Select all that apply

☑ Medium-term

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

Select from:

☑ Very likely (90–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-low

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

Favorable cash flow and EBITDA impact over the expected horizon.

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

Select from:

☑ Yes

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

500000000

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

1000000000

(3.6.1.23) Explanation of financial effect figures

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

(3.6.1.24) Cost to realize opportunity

5000000000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp3

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

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

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

Under nearly all climate scenarios, demand for electricity is expected to increase between now and 2050 as growth from the electrification of the economy is projected to more than offset any energy efficiency improvements adopted. Vistra's integrated operations are well-positioned to serve this expected increase in electricity demand— both on the generation and retail sides of the equation. Vistra's existing highly efficient, flexible, and low-emitting natural gas fleet will be critical to meet this growing electricity demand, as it is a relatively low-emitting resource and is easily dispatchable to support the growing reliance on intermittent renewable resources. Vistra is also investing in incremental renewable generating assets and owns a highly efficient nuclear plant in Texas, both of which will be critical to the future electric supply. On the retail side, Vistra already serves nearly 4 million retail electricity customers with affordable, reliable power. Vistra is well-positioned to serve future increased demand for electricity. We expect we will be able to grow our retail customer base in the years to come, as Vistra's integrated operations provide a unique competitive advantage to offer the types of products and services customers require.

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

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

Select all that apply

☑ Long-term

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

Select from:
☑ Likely (66–100%)

(3.6.1.12) Magnitude

Select from:
☑ Medium

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

Favorable cash flow and EBITDA impact over the expected horizon.

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

Select from:
☑ Yes

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

0

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

350000000

(3.6.1.23) Explanation of financial effect figures

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

(3.6.1.24) Cost to realize opportunity

550000000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:

☑ Opp4

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

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

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

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

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Returns on investment in low-emission technology

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

Select all that apply

☑ Long-term

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

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium

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

Favorable cash flow and EBITDA impact over the expected horizon.

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

Select from:

☑ Yes

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

0

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

250000000

(3.6.1.23) Explanation of financial effect figures

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

(3.6.1.24) Cost to realize opportunity

500000000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

Climate change

(3.6.1.1) Opportunity identifier

Select from:
☑ Opp5

(3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

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

(3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☑ Direct operations

(3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☑ United States of America

(3.6.1.8) Organization specific description

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

(3.6.1.9) Primary financial effect of the opportunity

Select from:

☑ Increased revenues resulting from increased demand for products and services

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

Select all that apply

☑ Medium-term

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

Select from:

☑ More likely than not (50–100%)

(3.6.1.12) Magnitude

Select from:

☑ Medium-low

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

Favorable cash flow and EBITDA impact over the expected horizon.

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

Select from:

☑ Yes

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

0

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

100000000

(3.6.1.23) Explanation of financial effect figures

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

(3.6.1.24) Cost to realize opportunity

550000000

(3.6.1.25) Explanation of cost calculation

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

(3.6.1.26) Strategy to realize opportunity

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

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

Climate change

(3.6.2.1) Financial metric

Select from:
☑ Other, please specify **:**EBITDA

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

4000000000

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

Select from:
☑ 1-10%

(3.6.2.4) Explanation of financial figures

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

C4. Governance

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

(4.1.1) Board of directors or equivalent governing body

Select from:

☑ Yes

(4.1.2) Frequency with which the board or equivalent meets

Select from:

☑ Quarterly

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

Select all that apply

☑ Executive directors or equivalent

☑ Independent non-executive directors or equivalent

(4.1.4) Board diversity and inclusion policy

Select from:

☑ No

[Fixed row]

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

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

[Fixed row]

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

Climate change

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

Select all that apply

☑ Director on board

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

Select from:

☑ Yes

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

Select all that apply

☑ Board mandate

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

Select from:

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

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

Select all that apply

☑ Overseeing reporting, audit, and verification processes

☑ Approving corporate policies and/or commitments

☑ Overseeing the setting of corporate targets

☑ Monitoring progress towards corporate targets

(4.1.2.7) Please explain

The full Vistra Board of Directors oversees ESG with oversight of subject matter-specific components delegated to relevant Board Committees. We discuss sustainability-related topics with the Board each quarter and on a more frequent basis, as necessary. Each Board Member brings relevant experience navigating climate change and sustainability strategy and policy, human capital management, and DEI. Further, the full Board focuses extensively on our path to decarbonization and sustainability goals while taking an active role with management to review and oversee Vistra's long-term corporate strategy. 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, progress towards sustainability targets, and investments in low-to-no carbon resources. The Board leverages best corporate governance practices through the use of committees to provide a diversity of subject matter expertise. 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. The committee shall: 1. Review and discuss the Company's strategies, policies, and practices to assist the Company in addressing public sentiment and shaping policy to manage its sustainability efforts. 2. At least annually, review and discuss with management the Company's assessment of greenhouse gas-related risks, including transition, regulatory, reputational, and/or market risks related to climate change, and management's process for the identification, evaluation, and mitigation of transition risks related to climate change. 3. Oversee and monitor the Company's core vision and values and advise the Board and management on sustainability policies, including the Company's publicly stated targets and aspirational goals for company-wide reductions of greenhouse gas emissions from its power generation operations. 4. Provide oversight with respect to any sustainability reporting to the public or governmental agencies.

Water

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

Select all that apply

☑ Board-level committee

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

Select from:

☑ Yes

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

Select all that apply

☑ Board mandate

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

Select from:

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

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

Select all that apply

☑ Overseeing reporting, audit, and verification processes

☑ Approving corporate policies and/or commitments

☑ Monitoring compliance with corporate policies and/or commitments

(4.1.2.7) Please explain

Our Sustainability and Risk Committee has a broad mandate that encompasses environmental stewardship including water issues. They provide oversight to environmental policy in our environmental principles policy and our sustainability governance framework.
[Fixed row]

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

Climate change

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Yes

(4.2.2) Mechanisms to maintain an environmentally competent board

Select all that apply

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

(4.2.3) Environmental expertise of the board member

Experience

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

Water

(4.2.1) Board-level competency on this environmental issue

Select from:

☑ Not assessed

[Fixed row]

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

	Management-level responsibility for this environmental issue
Climate change	*Select from:*

	Management-level responsibility for this environmental issue
	☑ Yes
Water	*Select from:* ☑ Yes
Biodiversity	*Select from:* ☑ Yes

[Fixed row]

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

Climate change

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ Chief Executive Officer (CEO)

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Assessing future trends in environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

☑ Measuring progress towards environmental corporate targets

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

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

Other
☑ Providing employee incentives related to environmental performance

(4.3.1.4) Reporting line

Select from:
☑ Reports to the board directly

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

Select from:
☑ More frequently than quarterly

(4.3.1.6) Please explain

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

strategy, policy items, and operational updates. There are three standing committees that comprise the primary governance forums for day-to-day management of the company: Executive Committee, Commitments Committee, and Risk Management Committee.

Water

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☑ Assessing environmental dependencies, impacts, risks, and opportunities

☑ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☑ Managing engagement in landscapes and/or jurisdictions

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

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

Select from:

☑ More frequently than quarterly

(4.3.1.6) Please explain

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

Biodiversity

(4.3.1.1) Position of individual or committee with responsibility

Executive level

☑ General Counsel

(4.3.1.2) Environmental responsibilities of this position

Policies, commitments, and targets

☑ Monitoring compliance with corporate environmental policies and/or commitments

(4.3.1.4) Reporting line

Select from:

☑ Reports to the Chief Executive Officer (CEO)

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

Select from:

☑ Quarterly

(4.3.1.6) Please explain

N/A
[Add row]

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

Climate change

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

Select from:

☑ Yes

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

20

(4.5.3) Please explain

In 2023, Vistra continued to incorporate ESG metrics into our corporate scorecard to align both executive and 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% Scope 1 and 2 (location-based) reduction by 2030 compared to a 2010 baseline 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.

Water

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

Select from:

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

(4.5.3) Please explain

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

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

Climate change

(4.5.1.1) Position entitled to monetary incentive

Senior-mid management

☑ Other senior-mid manager, please specify **:**All Vistra employees

(4.5.1.2) Incentives

Select all that apply

☑ Bonus - % of salary

(4.5.1.3) Performance metrics

Targets

☑ Progress towards environmental targets

☑ Organization performance against an environmental sustainability index

(4.5.1.4) Incentive plan the incentives are linked to

Select from:

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

(4.5.1.5) Further details of incentives

In 2023, Vistra continued to incorporate ESG metrics into our corporate scorecard to align both executive and 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% Scope 1 and 2 (location-based) reduction by 2030 compared to a 2010 baseline 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.

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

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

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

	Does your organization have any environmental policies?
	Select from: ☑ Yes

[Fixed row]

(4.6.1) Provide details of your environmental policies.

Row 1

(4.6.1.1) Environmental issues covered

Select all that apply
☑ Climate change
☑ Water
☑ Biodiversity

(4.6.1.2) Level of coverage

Select from:

☑ Organization-wide

(4.6.1.3) Value chain stages covered

Select all that apply

☑ Direct operations

☑ Portfolio

(4.6.1.4) Explain the coverage

Vistra is committed to protecting and improving the environment by serving our customers and our communities through more efficient – and cleaner – applications of energy, including improving our operations and investing in low-to-no carbon or carbon-reducing technologies. We are also committed to improved environmental protection measures, building on our record of compliance with environmental laws and regulations. In addition, we will support and participate in environmentally sound solutions that also help reliably and affordably meet the growing demand for power.

(4.6.1.5) Environmental policy content

Environmental commitments

☑ Commitment to avoidance of negative impacts on threatened and protected species

☑ Commitment to comply with regulations and mandatory standards

Climate-specific commitments

☑ Commitment to net-zero emissions

Water-specific commitments

☑ Commitment to control/reduce/eliminate water pollution

☑ Commitment to water stewardship and/or collective action

Social commitments

☑ Commitment to respect internationally recognized human rights

Additional references/Descriptions

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

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

Select all that apply

☑ No, but we plan to align in the next two years

(4.6.1.7) Public availability

Select from:

☑ Publicly available

(4.6.1.8) Attach the policy

Environmental-Principles 1.pdf
[Add row]

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

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

Select from:

☑ Yes

(4.10.2) Collaborative framework or initiative

Select all that apply

☑ Climate Action 100+

☑ Science-Based Targets Initiative (SBTi)

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

☑ Transition Pathway Initiative

☑ Other, please specify

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

Participate, provide feedback or utilize framework.
[Fixed row]

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

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

Select all that apply

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

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

Select from:

☑ No, but we plan to have one in the next two years

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

Select from:

☑ Unknown

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

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

climate change are adopted and is committed to advocating for the country's transition to a lower carbon future in line with the Paris Agreement while providing affordable and reliable electricity.
[Fixed row]

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

Row 1

(4.11.2.1) Type of indirect engagement

Select from:
☑ Indirect engagement via a trade association

(4.11.2.4) Trade association

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

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

Select all that apply
☑ Climate change

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

Select from:
☑ Consistent

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

Select from:

☑ Yes, we publicly promoted their current position

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

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

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

Select from:

☑ Yes, we have evaluated, and it is aligned

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

Select all that apply

☑ Paris Agreement

[Add row]

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

Row 1

(4.12.1.1) Publication

Select from:

☑ In voluntary sustainability reports

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Value chain engagement

☑ Content of environmental policies

☑ Dependencies & Impacts

☑ Biodiversity indicators

☑ Public policy engagement

☑ Water accounting figures

☑ Water pollution indicators

(4.12.1.6) Page/section reference

All

(4.12.1.7) Attach the relevant publication

VST-sustainability-report-2023.pdf

(4.12.1.8) Comment

N/A

Row 2

(4.12.1.1) Publication

Select from:

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

(4.12.1.2) Standard or framework the report is in line with

Select all that apply

☑ TCFD

(4.12.1.3) Environmental issues covered in publication

Select all that apply

☑ Climate change

☑ Water

☑ Biodiversity

(4.12.1.4) Status of the publication

Select from:

☑ Complete

(4.12.1.5) Content elements

Select all that apply

☑ Strategy

☑ Governance

☑ Emission targets

☑ Emissions figures

☑ Risks & Opportunities

☑ Public policy engagement

☑ Content of environmental policies

(4.12.1.6) Page/section reference

All

(4.12.1.7) Attach the relevant publication

VST-Climate-Report-2023.pdf

(4.12.1.8) Comment

N/A
[Add row]

C5. Business strategy

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

Climate change

(5.1.1) Use of scenario analysis

Select from:
☑ Yes

(5.1.2) Frequency of analysis

Select from:
☑ Every two years

Water

(5.1.1) Use of scenario analysis

Select from:
☑ No, but we plan to within the next two years

(5.1.3) Primary reason why your organization has not used scenario analysis

Select from:
☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(5.1.4) Explain why your organization has not used scenario analysis

N/A
[Fixed row]

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

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 6.0

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Reputation

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 3.5ºC - 3.9ºC

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer sentiment

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Other regulators, legal and policy regimes driving forces, please specify **:**Regulatory volatility

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

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

(5.1.1.11) Rationale for choice of scenario

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

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Reputation

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.5°C or lower

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Stakeholder and customer demands

☑ Consumer sentiment

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Other regulators, legal and policy regimes driving forces, please specify **:**Regulatory volatility

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

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

(5.1.1.11) Rationale for choice of scenario

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

Climate change

(5.1.1.1) Scenario used

Physical climate scenarios

☑ RCP 2.6

(5.1.1.2) Scenario used SSPs used in conjunction with scenario

Select from:

☑ No SSP used

(5.1.1.3) Approach to scenario

Select from:

☑ Qualitative

(5.1.1.4) Scenario coverage

Select from:

☑ Organization-wide

(5.1.1.5) Risk types considered in scenario

Select all that apply

☑ Acute physical

☑ Chronic physical

☑ Policy

☑ Reputation

(5.1.1.6) Temperature alignment of scenario

Select from:

☑ 1.6°C - 1.9°C

(5.1.1.7) Reference year

2023

(5.1.1.8) Timeframes covered

Select all that apply

☑ 2025

☑ 2030

☑ 2040

☑ 2050

(5.1.1.9) Driving forces in scenario

Local ecosystem asset interactions, dependencies and impacts

☑ Changes to the state of nature

☑ Climate change (one of five drivers of nature change)

Finance and insurance

☑ Cost of capital

Regulators, legal and policy regimes

☑ Political impact of science (from galvanizing to paralyzing)

☑ Other regulators, legal and policy regimes driving forces, please specify **:**Regulatory volatility

Direct interaction with climate

☑ On asset values, on the corporate

(5.1.1.10) Assumptions, uncertainties and constraints in scenario

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

(5.1.1.11) Rationale for choice of scenario

Climate policies are delayed, which forces a very aggressive policy response starting in 2030.
[Add row]

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

Climate change

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

Select all that apply

☑ Risk and opportunities identification, assessment and management

☑ Strategy and financial planning
☑ Resilience of business model and strategy

(5.1.2.2) Coverage of analysis

Select from:
☑ Organization-wide

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

Details of the outcomes can be found in our 2023 Climate Report published on our website.
[Fixed row]

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

	Transition plan	Primary reason for not having a climate transition plan that aligns with a 1.5°C world	Explain why your organization does not have a climate transition plan that aligns with a 1.5°C world
	Select from: ☑ No, but we are developing a climate transition plan within the next two years	*Select from:* ☑ Other, please specify :Vistra has established near-term targets approved by SBTi aligned to a 1.5C pathway. We are reviewing additional potential disclosure for a climate transition plan.	*N/A*

[Fixed row]

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

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

Select from:
☑ Yes, both strategy and financial planning

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

Select all that apply

☑ Products and services

☑ Upstream/downstream value chain

☑ Investment in R&D

☑ Operations

[Fixed row]

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

Products and services

(5.3.1.1) Effect type

Select all that apply

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Through Vistra's multitude of retail brands and various marketing channels, we balance the needs and preferences of our customers through a vast portfolio of products and services, including green energy and conservation-focused products. As consumer preferences change to more climate-focused products, Vistra Retail's Marketing team creates new market-leading, innovative products. For its large business customers who have their own climate goals, Vistra's Business Markets team creates customized solutions that utilize wind PPAs, utility-scale solar generation, and other innovative structures for our business customer base.

Upstream/downstream value chain

(5.3.1.1) Effect type

Select all that apply

☑ Risks

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

Select all that apply

☑ Climate change

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

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

Investment in R&D

(5.3.1.1) Effect type

Select all that apply

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Vistra is not an R&D company, rather Vistra partners with key industry groups, investment firms, suppliers, academic institutions, and government organizations on innovative projects. Vistra has developed relationships with a number of organizations to which Vistra both provides our operational and market expertise and, in

return, gains access to valuable insight and collaboration regarding the development and deployment of energy technologies and innovations across the value chain. Vistra was an early adopter of battery energy storage, gaining industry-leading expertise in the development and commercialization of battery storage assets and is now a market leader in utility-scale battery development with the largest single battery storage system in the world located in Moss Landing California.

Operations

(5.3.1.1) Effect type

Select all that apply

☑ Opportunities

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

Select all that apply

☑ Climate change

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

Vistra understands the impact of our business on the environment and knows we have a social responsibility to combat climate change and reduce our carbon footprint, while still providing safe and reliable energy to our customers. Vistra follows all current environmental compliance and regulations when running its power plants. With long-term CO2e emission reduction targets of 60% by 2030 and net-zero carbon emissions by 2050, Vistra must make long-term operations decisions that meet or exceed these goals coupled with adjusting operations to meet any environmental laws and regulations imposed both regionally and nationally as well as meet the reliability needs of the electric grids where we operate. Changes in the asset life, or the operations of a power plant, can change due to the acceleration of renewables in the market it operates, new technologies, and changing regulations.
[Add row]

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

Row 1

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Revenues

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

☑ Water

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

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

Row 2

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Direct costs

☑ Indirect costs

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

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

Row 3

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Capital expenditures

☑ Capital allocation

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

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

Row 4

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Acquisitions and divestments

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

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

Row 5

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Access to capital

(5.3.2.2) Effect type

Select all that apply

☑ Opportunities

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

Select all that apply

☑ Climate change

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

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

Row 6

(5.3.2.1) Financial planning elements that have been affected

Select all that apply

☑ Assets

☑ Liabilities

(5.3.2.2) Effect type

Select all that apply

☑ Risks

☑ Opportunities

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

Select all that apply

☑ Climate change

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

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

[Add row]

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

	Identification of spending/revenue that is aligned with your organization's climate transition
	Select from: ☑ No, but we plan to in the next two years

[Fixed row]

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

(5.5.1) Investment in low-carbon R&D

Select from:

☑ Yes

(5.5.2) Comment

Vistra partners with Electric Power Research Institute (EPRI) on initiatives as well as leveraging our investments in funds focused on low-carbon products and efforts. [Fixed row]

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

Row 2

(5.5.7.1) Technology area

Select from:

☑ Other, please specify **:**Various low-carbon technologies

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Applied research and development

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

80

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

75

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

Vistra has made a 20 million commitment to invest in a fund managed by The Westly Group, a leading venture capital firm with an established track record of identifying and supporting emerging energy technologies. The Westly Group is focused on investing in early-stage companies that are developing new technologies and service offerings related to Smart Energy, Smart Mobility, Smart Buildings, and Industry 4.0. In addition to investing via the Westly Group, we can leverage our position as a leading competitive generator and retailer in the U.S. to partner directly with early-stage companies to pilot new technologies and help shape product roadmaps. Vistra has made a 10 million commitment to invest in a new fund managed by Energy Impact Partners, a venture capital firm that has been investing in climate tech, bringing together incumbents and innovators in a differentiated collaborative model to better screen and scale businesses for sustainable impact. Around a core of influential utilities, they have assembled a powerful ecosystem of more than 65 forward-looking corporations and industrials from key sectors such as the built environment, transportation, industry, and finance – seeking to decarbonize the global economy. Their dedicated research team provides them with insights and advice, they in turn share their learnings and help accelerate the growth of our investments. Vistra can leverage our position as a leading competitive generator and retailer in the U.S. to partner directly with early-stage companies to pilot new technologies and help shape product roadmaps.

Row 3

(5.5.7.1) Technology area

Select from:

☑ Solar energy generation

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Basic academic/theoretical research

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

9

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

5

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

Vistra has partnered with EPRI to fund base research around Solar Generation

Row 4

(5.5.7.1) Technology area

Select from:
☑ Carbon capture, utilization, and storage (CCUS)

(5.5.7.2) Stage of development in the reporting year

Select from:
☑ Basic academic/theoretical research

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

10

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

5

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

Vistra has partnered with EPRI and other companies to fund base research around Advanced Generation and Carbon Capture & Storage.

Row 5

(5.5.7.1) Technology area

Select from:

☑ Battery storage

(5.5.7.2) Stage of development in the reporting year

Select from:

☑ Basic academic/theoretical research

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

1

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

5

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

Vistra has partnered with EPRI to fund base research around Bulk Energy Storage Costs and Performance
[Add row]

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

Coal – hard

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The total CAPEX below is for nuclear and fossil-fuel maintenance spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation.

Lignite

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The total CAPEX below is for nuclear and fossil-fuel maintenance spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation.

Oil

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The total CAPEX below is for nuclear and fossil-fuel maintenance spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation.

Gas

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

730000000

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

45

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The CAPEX provided is the total nuclear and fossil-fuel maintenance spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation. Vistra has not provided details about CAPEX spending for the next 5 years.

Sustainable biomass

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own sustainable biomass-powered assets.

Other biomass

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own other biomass- powered assets.

Waste (non-biomass)

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own waste-powered assets.

Nuclear

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

206000000

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

13

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The CAPEX provided is the total nuclear fuel spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation. Vistra has not provided details about CAPEX spending for the next 5 years.

Geothermal

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own geothermal-powered assets.

Hydropower

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own hydro-powered assets.

Wind

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own wind generation assets

Solar

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

550000000

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

34

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The CAPEX provided is the total solar and battery spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation. Vistra has not provided details about CAPEX spending for the next 5 years.

Marine

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not own marine generation assets

Fossil-fuel plants fitted with CCS

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not have fossil-fueled with CCS generation assets

Other renewable (e.g. renewable hydrogen)

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

120000000

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

7

(5.7.5) Explain your CAPEX calculations, including any assumptions

Vistra does not publicly report CAPEX by specific fuel type. The CAPEX provided is the total solar and battery spend for the reporting year of 2023 as reported in Vistra's Q4 2023 Investor Presentation for existing assets

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

(5.7.5) Explain your CAPEX calculations, including any assumptions

N/A
[Fixed row]

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:
☑ Distributed generation

(5.7.1.2) Description of product/service

Vistra Retail offers a variety of renewable product offerings for its customers, including distributed generation. Vistra Retail can offer its residential customers the market's highest-efficiency rooftop solar panels and batteries. Vistra also offers a community solar product in Texas for our residential customers (TXU Solar Club.) For its large business customers, Vistra's Large Business Retail team provides solutions to meet customers' sustainability goals ranging from purchasing renewable energy credits to onsite renewable generation development to energy efficiency and advisory services.

(5.7.1.5) End year of CAPEX plan

2024
[Add row]

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

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: ☑ Yes	*Select all that apply* ☑ Carbon

[Fixed row]

(5.10.1) Provide details of your organization's internal price on carbon.

Row 1

(5.10.1.1) Type of pricing scheme

Select from:
☑ Shadow price

(5.10.1.2) Objectives for implementing internal price

Select all that apply

☑ Drive low-carbon investment
☑ Influence strategy and/or financial planning
☑ Stress test investments

(5.10.1.3) Factors considered when determining the price

Select all that apply
☑ Alignment with the price of a carbon tax
☑ Alignment with the price of allowances under an Emissions Trading Scheme
☑ Benchmarking against peers

(5.10.1.4) Calculation methodology and assumptions made in determining the price

n/a

(5.10.1.5) Scopes covered

Select all that apply
☑ Scope 1

(5.10.1.6) Pricing approach used – spatial variance

Select from:
☑ Uniform

(5.10.1.8) Pricing approach used – temporal variance

Select from:
☑ Static

(5.10.1.10) Minimum actual price used (currency per metric ton CO2e)

0

(5.10.1.11) Maximum actual price used (currency per metric ton CO2e)

16

(5.10.1.12) Business decision-making processes the internal price is applied to

Select all that apply

☑ Capital expenditure

☑ Product and R&D

☑ Risk management

☑ Opportunity management

(5.10.1.13) Internal price is mandatory within business decision-making processes

Select from:

☑ Yes, for some decision-making processes, please specify **:**

(5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☑ Yes

(5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

This carbon price, based off a 15/short ton RGGI price disclosed in our 10K converted to 16/metric ton. Our internal processes incentivize investments in low-carbon resources as those resources would be valued with a higher terminal multiple. Using a higher terminal multiple improves the valuation profile of renewable resources making them more attractive investment options as compared to investments in thermal resources.
[Add row]

(5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Customers	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change
Investors and shareholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water
Other value chain stakeholders	*Select from:* ☑ Yes	*Select all that apply* ☑ Climate change ☑ Water

[Fixed row]

(5.11.1) Does your organization assess and classify suppliers according to their dependencies and/or impacts on the environment?

	Assessment of supplier dependencies and/or impacts on the environment
Climate change	*Select from:* ☑ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

	Assessment of supplier dependencies and/or impacts on the environment
Water	*Select from:* ☑ No, we do not currently assess the dependencies and/or impacts of our suppliers, but we plan to do so within the next two years

[Fixed row]

(5.11.2) Does your organization prioritize which suppliers to engage with on environmental issues?

Climate change

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Material sourcing

☑ Procurement spend

☑ Regulatory compliance

☑ Vulnerability of suppliers

Water

(5.11.2.1) Supplier engagement prioritization on this environmental issue

Select from:

☑ Yes, we prioritize which suppliers to engage with on this environmental issue

(5.11.2.2) Criteria informing which suppliers are prioritized for engagement on this environmental issue

Select all that apply

☑ Material sourcing

☑ Procurement spend

☑ Regulatory compliance

☑ Vulnerability of suppliers

[Fixed row]

(5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

	Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process	Policy in place for addressing supplier non-compliance	Comment
Climate change	*Select from:* ☑ No, but we plan to introduce environmental requirements related to this environmental issue within the next two years	*Select from:* ☑ No, we do not have a policy in place for addressing non-compliance	*n/A*
Water	*Select from:* ☑ No, but we plan to introduce environmental requirements related to this environmental issue within the next two years	*Select from:* ☑ No, we do not have a policy in place for addressing non-compliance	*N/A*

[Fixed row]

(5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

Climate change

(5.11.7.2) Action driven by supplier engagement

Select from:

☑ Upstream value chain transparency and human rights

(5.11.7.3) Type and details of engagement

Capacity building

☑ Provide training, support and best practices on how to measure GHG emissions

☑ Provide training, support and best practices on how to set science-based targets

☑ Support suppliers to set their own environmental commitments across their operations

☑ Other capacity building activity, please specify :We have a growth and capacity building program for our diverse and small businesses to increase their business across Vistra as well as our Prime Suppliers, within our industry, and outside our industry to promote a sustainable and resilient chain.

Financial incentives

☑ Feature environmental performance in supplier awards scheme

Information collection

☑ Collect climate transition plan information at least annually from suppliers

☑ Collect environmental risk and opportunity information at least annually from suppliers

☑ Collect GHG emissions data at least annually from suppliers

☑ Collect targets information at least annually from suppliers

☑ Collect water quantity information at least annually from suppliers (e.g., withdrawal and discharge volumes)

Innovation and collaboration

☑ Encourage collaborative work in landscapes or jurisdictions

(5.11.7.4) Upstream value chain coverage

Select all that apply

☑ Tier 1 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☑ 76-99%

(5.11.7.6) % of tier 1 supplier-related scope 3 emissions covered by engagement

Select from:
☑ 1-25%

Water

(5.11.7.2) Action driven by supplier engagement

Select from:
☑ Waste and resource reduction and improved end-of-life management

(5.11.7.3) Type and details of engagement

Capacity building
☑ Provide training, support and best practices on how to mitigate environmental impact
☑ Provide training, support and best practices on how to set science-based targets
☑ Other capacity building activity, please specify **:**See above

Financial incentives
☑ Feature environmental performance in supplier awards scheme

Information collection
☑ Collect environmental risk and opportunity information at least annually from suppliers
☑ Collect targets information at least annually from suppliers

Innovation and collaboration
☑ Collaborate with suppliers on innovations to reduce environmental impacts in products and services
☑ Collaborate with suppliers on innovative business models and corporate renewable energy sourcing mechanisms
☑ Collaborate with suppliers to develop reuse infrastructure and reuse models
☑ Engage with suppliers to advocate for policy or regulatory change to address environmental challenges

☑ Invest jointly with suppliers in R&D of relevant low-carbon technologies

(5.11.7.4) Upstream value chain coverage

Select all that apply
☑ Tier 1 suppliers
☑ Tier 2 suppliers

(5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:
☑ 76-99%
[Add row]

(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.

Climate change

(5.11.9.1) Type of stakeholder

Select from:
☑ Other value chain stakeholder, please specify :Suppliers

(5.11.9.2) Type and details of engagement

Education/Information sharing
☑ Educate and work with stakeholders on understanding and measuring exposure to environmental risks
☑ Other education/information sharing, please specify :Regular Supplier Training on all aspects of ES&G

Innovation and collaboration
☑ Align your organization’s goals to support customers’ targets and ambitions
☑ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

☑ Engage with stakeholders to advocate for policy or regulatory change

(5.11.9.3) % of stakeholder type engaged

Select from:

☑ 76-99%

(5.11.9.4) % stakeholder-associated scope 3 emissions

Select from:

☑ 1-25%

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

We believe our suppliers should mirror Vistra Values in environmental, social and governance best practices. We work collaboratively with them and other power generators and retail electric suppliers to educate and support their journey to align with ours.

(5.11.9.6) Effect of engagement and measures of success

Number of suppliers participating in our annual assessment, quarterly calls and 1:1 trainings. Year over Year evaluation of Trends and Targets
[Add row]

C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used	Provide the rationale for the choice of consolidation approach
Climate change	*Select from:* ☑ Equity share	*GHG emissions are reported according to the equity share approach as defined by the GHG Protocol.*
Water	*Select from:* ☑ Operational control	*N/A*
Plastics	*Select from:* ☑ Operational control	*N/A*
Biodiversity	*Select from:* ☑ Operational control	*N/A*

[Fixed row]

C7. Environmental performance - Climate Change

(7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply ☑ No

[Fixed row]

(7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply ☑ No

[Fixed row]

(7.3) Describe your organization’s approach to reporting Scope 2 emissions.

	Scope 2, location-based	Scope 2, market-based	Comment
	Select from: ☑ We are reporting a Scope 2, location-based figure	*Select from:* ☑ We are reporting a Scope 2, market-based figure	*Vistra is reporting has started reporting Market-based emissions as of FY2023.*

[Fixed row]

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

Row 1

(7.4.1.1) Source of excluded emissions

Mobile emissions

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.10) Explain why this source is excluded

Emissions from mobile equipment are estimated to be 0.01% of total emissions.

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

This estimate is based on approximate amount of volume of fuel purchased to run mobile equipment.

Row 2

(7.4.1.1) Source of excluded emissions

Fugitive emissions

(7.4.1.2) Scope(s) or Scope 3 category(ies)

Select all that apply

☑ Scope 1

(7.4.1.3) Relevance of Scope 1 emissions from this source

Select from:

☑ Emissions are not relevant

(7.4.1.10) Explain why this source is excluded

Hydrofluorocarbons (HFCs), Perfluorocarbons (PFCs), Sulphur hexafluoride (SF 6), and nitrogen trifluoride (NF 3) emissions have been omitted from our reporting as they are not a material source of greenhouse gases for the business.

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

Relevant reporting thresholds per EPA
[Add row]

(7.5) Provide your base year and base year emissions.

Scope 1

(7.5.1) Base year end

12/31/2010

(7.5.2) Base year emissions (metric tons CO2e)

172810588.0

(7.5.3) Methodological details

The base year for Scope 1 GHG emissions is 2010, the year Vistra's last fossil-fueled asset was constructed and online. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. GHG emissions that pertain to the organizational and operational boundaries have been reported for the Company-owned buildings and power generation facilities, including facilities that are not required to report direct emissions under the US EPA's Mandatory Reporting Rule, and the Company's real estate financial leases located in the United States.

Scope 2 (location-based)

(7.5.1) Base year end

12/31/2018

(7.5.2) Base year emissions (metric tons CO2e)

248611.0

(7.5.3) Methodological details

The Scope 2 GHG emissions base year is 2018, the first year Vistra calculated Scope 2 GHG emissions. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. GHG emissions that pertain to the organizational and operational boundaries have been reported for the Company owned buildings and power generation facilities, including facilities that are not required to report direct emissions under the US EPA's Mandatory Reporting Rule, and the Company's real estate financial leases located in the United States. The Company's policy is to exclude Scope 2 GHG emissions from a facility in the year in which the facility is acquired.

Scope 2 (market-based)

(7.5.1) Base year end

12/31/2023

(7.5.2) Base year emissions (metric tons CO2e)

216477

(7.5.3) Methodological details

The Scope 2 market-based GHG emissions base year is 2023, the first year Vistra calculated Scope 2 market-based GHG emissions. Emissions are reported according to the equity share approach as defined by the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. GHG emissions that pertain to the organizational and operational boundaries have been reported for the Company owned buildings and power generation facilities, including facilities that are not required to report direct emissions under the US EPA's Mandatory Reporting Rule, and the Company's real estate financial leases located in the United States. The Company's policy is to exclude Scope 2 GHG emissions from a facility in the year in which the facility is acquired.

Scope 3 category 11: Use of sold products

(7.5.1) Base year end

12/31/2018

(7.5.2) Base year emissions (metric tons CO2e)

3356717.0

(7.5.3) Methodological details

[Fixed row]

(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?

	Gross global Scope 1 emissions (metric tons CO2e)	End date	Methodological details
Reporting year	*86326790*	*Date input [must be between [10/01/2015 - 10/01/2023]*	*GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol.*
Past year 1	*94785101*	*12/31/2022*	*GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol.*
Past year 2	*98749588*	*12/31/2021*	*GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol.*
Past year 3	*94290023*	*12/31/2020*	*GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol.*
Past year 4	*105523364*	*12/31/2019*	*GHG emissions have been reported according to the equity share approach as defined by the GHG Protocol.*

[Fixed row]

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

Reporting year

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

245785

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

216477

(7.7.4) Methodological details

Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by Vistra

Past year 1

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

220138

(7.7.3) End date

12/31/2022

(7.7.4) Methodological details

Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by Vistra

Past year 2

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

242970

(7.7.3) End date

12/31/2021

(7.7.4) Methodological details

Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by Vistra

Past year 3

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

333770

(7.7.3) End date

12/31/2020

(7.7.4) Methodological details

Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by Vistra

Past year 4

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

249068

(7.7.3) End date

12/31/2019

(7.7.4) Methodological details

Scope 2 GHG emissions include indirect GHG emissions from consumption of purchased electricity by Vistra
[Fixed row]

(7.8) Account for your organization’s gross global Scope 3 emissions, disclosing and explaining any exclusions.

Purchased goods and services

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from purchased goods and services are not considered material to our overall emissions profile.

Capital goods

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from purchased goods and services are not considered material to our overall emissions profile.

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

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

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

14475

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Average data method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

The amount of MWhs purchased for the reporting year is obtained from our Commercial Operations team who manages the purchase of power from other power suppliers.

Upstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from Upstream transportation and distribution are not considered material to our overall emissions profile.

Waste generated in operations

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from Waste generated in operations are not considered material to our overall emissions profile.

Business travel

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

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

800

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

This represents the emissions associated with air travel completed by employees and booked through Vistra's corporate travel agency. Vistra received the log of booked travel and distance from its third-party vendor.

Employee commuting

(7.8.1) Evaluation status

Select from:

☑ Not relevant, calculated

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

43743

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Distance-based method

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

Vistra calculated the estimated distance traveled by employees between their mailing address and work location, as registered in our human capital management software, for a sample size of employees that was then extrapolated to the total employee population.

Upstream leased assets

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from Upstream leased assets are not considered material to our overall emissions profile.

Downstream transportation and distribution

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from downstream transportation and distribution are not considered material to our overall emissions profile.

Processing of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from processing of sold products are not considered material to our overall emissions profile.

Use of sold products

(7.8.1) Evaluation status

Select from:

☑ Relevant, calculated

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

1854571

(7.8.3) Emissions calculation methodology

Select all that apply

☑ Methodology for direct use phase emissions, please specify **:**This represents the associated emissions from the sale of retail natural gas. The amount of MMBtu sold to our retail customers for the reporting year is obtained from our Accounting team.

(7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

0

(7.8.5) Please explain

This represents the associated emissions from the sale of retail natural gas. The amount of MMBtu sold to our retail customers for the reporting year is obtained from our accounting team.

End of life treatment of sold products

(7.8.1) Evaluation status

Select from:

☑ Not relevant, explanation provided

(7.8.5) Please explain

Vistra sells electricity and natural gas, neither of which require end-of-life treatment.

Downstream leased assets

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

As a power generator, Scope 1 emissions cover the vast majority of Vistra's total emissions. Scope 3 emissions from downstream leased assets are not considered material to our overall emissions profile.

Franchises

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Vistra does not own franchises.

Investments

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

Any investments Vistra makes would be included in its Scope 1 and Scope 2 emissions.

Other (upstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

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

Other (downstream)

(7.8.1) Evaluation status

Select from:
☑ Not relevant, explanation provided

(7.8.5) Please explain

There are no other downstream emissions that are material to our overall emissions profile.
[Fixed row]

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

Past year 1

(7.8.1.1) End date

12/31/2022

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

15585

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

622

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

18860

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

2361430

Past year 2

(7.8.1.1) End date

12/31/2021

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

12006

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

178

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

16429

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

1095

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

2386622

Past year 3

(7.8.1.1) End date

12/31/2020

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

440765

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

221

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

600

(7.8.1.9) Scope 3: Upstream leased assets (metric tons CO2e)

2193

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

2724789
[Fixed row]

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

	Verification/assurance status
Scope 1	*Select from:* ☑ Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	*Select from:* ☑ Third-party verification or assurance process in place
Scope 3	*Select from:* ☑ No third-party verification or assurance

[Fixed row]

(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Row 1

(7.9.1.1) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.1.2) Status in the current reporting year

Select from:
☑ Complete

(7.9.1.3) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.1.4) Attach the statement

FY 2023 Statement of GHG Emissions vFinal.pdf

(7.9.1.5) Page/section reference

1-5

(7.9.1.6) Relevant standard

Select from:
☑ Attestation standards established by AICPA (AT105)

(7.9.1.7) Proportion of reported emissions verified (%)

100
[Add row]

(7.9.2) Provide further details of the verification/assurance undertaken for your Scope 2 emissions and attach the relevant statements.

Row 1

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 location-based

(7.9.2.2) Verification or assurance cycle in place

Select from:
☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.2.5) Attach the statement

FY 2023 Statement of GHG Emissions vFinal.pdf

(7.9.2.6) Page/ section reference

1-5

(7.9.2.7) Relevant standard

Select from:
☑ Attestation standards established by AICPA (AT105)

(7.9.2.8) Proportion of reported emissions verified (%)

100

Row 2

(7.9.2.1) Scope 2 approach

Select from:
☑ Scope 2 market-based

(7.9.2.2) Verification or assurance cycle in place

Select from:

☑ Annual process

(7.9.2.3) Status in the current reporting year

Select from:
☑ Complete

(7.9.2.4) Type of verification or assurance

Select from:
☑ Limited assurance

(7.9.2.5) Attach the statement

FY 2023 Statement of GHG Emissions vFinal.pdf

(7.9.2.6) Page/ section reference

1-5

(7.9.2.7) Relevant standard

Select from:
☑ Attestation standards established by AICPA (AT105)

(7.9.2.8) Proportion of reported emissions verified (%)

100
[Add row]

(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.

Other emissions reduction activities

(7.10.1.1) Change in emissions (metric tons CO2e)

8432664

(7.10.1.2) Direction of change in emissions

Select from:
☑ Decreased

(7.10.1.3) Emissions value (percentage)

9

(7.10.1.4) Please explain calculation

Scope 1 GHG emissions include all relevant GHG emissions emitted directly from the Company's activities, which include fuel combustion in boilers, turbines, and engines used for the production of wholesale electric power. Lower overall generation volumes and lower mix of coal volumes reduced absolute emissions and emissions intensity relative to 2022.
[Fixed row]

(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).

Row 1

(7.15.1.1) Greenhouse gas

Select from:
☑ CO2

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

85952107

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Fourth Assessment Report (AR4 - 100 year)

Row 2

(7.15.1.1) Greenhouse gas

Select from:

☑ CH4

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

140916

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Fourth Assessment Report (AR4 - 100 year)

Row 3

(7.15.1.1) Greenhouse gas

Select from:

☑ N2O

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

233767

(7.15.1.3) GWP Reference

Select from:

☑ IPCC Fourth Assessment Report (AR4 - 100 year)
[Add row]

(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.

Combustion (Electric utilities)

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

85952107

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

5637

(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

86326790

(7.15.3.5) Comment

Total Scope 1 CO2e includes 784 metrics tons of Nitrous Oxide
[Fixed row]

(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.

	Scope 1 emissions (metric tons CO2e)
United States of America	*86326790*

[Fixed row]

(7.17.3) Break down your total gross global Scope 1 emissions by business activity.

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	*Combustion*	*86326790*

[Add row]

(7.19) Break down your organization’s total gross global Scope 1 emissions by sector production activity in metric tons CO2e.

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	*86326790*	*Related to generation of electricity*

[Fixed row]

(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.

Consolidated accounting group

(7.22.1) Scope 1 emissions (metric tons CO2e)

86326790

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

245785

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

216477

(7.22.4) Please explain

All emissions are in our consolidated accounting group.

All other entities

(7.22.1) Scope 1 emissions (metric tons CO2e)

0

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

0

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

0

(7.22.4) Please explain

none
[Fixed row]

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

Row 1

(7.27.1) Allocation challenges

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

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

Vistra has over 4 million customers
[Add row]

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

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

Select from:
☑ No

(7.28.3) Primary reason for no plans to develop your capabilities to allocate emissions to your customers

Select from:
☑ Lack of internal resources, capabilities, or expertise (e.g., due to organization size)

(7.28.4) Explain why you do not plan to develop capabilities to allocate emissions to your customers

Vistra customers can leverage multiple Scope 2 calculation tools based on the markets we operate
[Fixed row]

(7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	*Select from:* ☑ Yes
Consumption of purchased or acquired electricity	*Select from:* ☑ Yes
Consumption of purchased or acquired heat	*Select from:* ☑ No
Consumption of purchased or acquired steam	*Select from:* ☑ No
Consumption of purchased or acquired cooling	*Select from:* ☑ No
Generation of electricity, heat, steam, or cooling	*Select from:* ☑ Yes

[Fixed row]

(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.

Consumption of fuel (excluding feedstock)

(7.30.1.1) Heating value

Select from:

☑ HHV (higher heating value)

(7.30.1.2) MWh from renewable sources

0

(7.30.1.3) MWh from non-renewable sources

349299218

(7.30.1.4) Total (renewable and non-renewable) MWh

349299218

Consumption of purchased or acquired electricity

(7.30.1.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

133385

(7.30.1.3) MWh from non-renewable sources

457562

(7.30.1.4) Total (renewable and non-renewable) MWh

590946

Consumption of self-generated non-fuel renewable energy

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

0

(7.30.1.4) Total (renewable and non-renewable) MWh

0

Total energy consumption

(7.30.1.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.1.2) MWh from renewable sources

133385

(7.30.1.3) MWh from non-renewable sources

349756780

(7.30.1.4) Total (renewable and non-renewable) MWh

349890164
[Fixed row]

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	*Select from:* ☑ Yes
Consumption of fuel for the generation of heat	*Select from:* ☑ No
Consumption of fuel for the generation of steam	*Select from:* ☑ No
Consumption of fuel for the generation of cooling	*Select from:* ☑ No
Consumption of fuel for co-generation or tri-generation	*Select from:* ☑ No

[Fixed row]

(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.

Sustainable biomass

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

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

0

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

0

(7.30.7.8) Comment

N/A

Other biomass

(7.30.7.1) Heating value

Select from:
☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

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

0

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

0

(7.30.7.8) Comment

N/A

Other renewable fuels (e.g. renewable hydrogen)

(7.30.7.1) Heating value

Select from:

☑ Unable to confirm heating value

(7.30.7.2) Total fuel MWh consumed by the organization

0

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

0

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

0

(7.30.7.8) Comment

N/A

Coal

(7.30.7.1) Heating value

Select from:

☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

115091976

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

0

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

0

(7.30.7.8) Comment

N/A

Oil

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

845719

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

0

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

0

(7.30.7.8) Comment

N/A

Gas

(7.30.7.1) Heating value

Select from:

☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

233339903

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

0

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

0

(7.30.7.8) Comment

N/A

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

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

21620

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

0

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

0

(7.30.7.8) Comment

N/A

Total fuel

(7.30.7.1) Heating value

Select from:
☑ HHV

(7.30.7.2) Total fuel MWh consumed by the organization

349299218

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

0

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

0

(7.30.7.8) Comment

N/A
[Fixed row]

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

United States of America

(7.30.16.1) Consumption of purchased electricity (MWh)

590946

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

0

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

0

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

0

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

590946.00
[Fixed row]

(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.

Row 1

(7.45.1) Intensity figure

0.0059

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

86572575

(7.45.3) Metric denominator

Select from:
☑ unit total revenue

(7.45.4) Metric denominator: Unit total

14779000000

(7.45.5) Scope 2 figure used

Select from:
☑ Location-based

(7.45.6) % change from previous year

15

(7.45.7) Direction of change

Select from:
☑ Decreased

(7.45.8) Reasons for change

Select all that apply
☑ Other emissions reduction activities
☑ Change in output
☑ Change in revenue

(7.45.9) Please explain

Increase in revenue along with reduced overall emissions improved generation mix

Row 2

(7.45.1) Intensity figure

0.51

(7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

86572575

(7.45.3) Metric denominator

Select from:

☑ megawatt hour generated (MWh)

(7.45.4) Metric denominator: Unit total

167957718

(7.45.5) Scope 2 figure used

Select from:

☑ Location-based

(7.45.6) % change from previous year

7

(7.45.7) Direction of change

Select from:

☑ Decreased

(7.45.8) Reasons for change

Select all that apply

☑ Other emissions reduction activities

☑ Change in output

(7.45.9) Please explain

Reduced overall emissions from lower mix of higher carbon generation sources
[Add row]

(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.

Coal – hard

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

42611515

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

1045.94

Oil

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

5666

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

515.09

Gas

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

43709609

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

405.46

Nuclear

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

0

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Solar

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

0

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

0.00

Other renewable

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

0

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

Select from:
☑ Net

Total

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

86326790

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

Select from:
☑ Net

(7.46.4) Scope 1 emissions intensity (Net generation)

513.98
[Fixed row]

(7.52) Provide any additional climate-related metrics relevant to your business.

Row 1

(7.52.1) Description

Select from:
☑ Other, please specify **:**Water consumption usage at power plants. Measures water consumed over water withdrawn

(7.52.2) Metric value

0.02

(7.52.3) Metric numerator

198,755

(7.52.4) Metric denominator (intensity metric only)

11,919,714

(7.52.5) % change from previous year

14

(7.52.6) Direction of change

Select from:
☑ Increased

(7.52.7) Please explain

Percentage of water consumed vs water withdrawn slightly increased due to seasonal generation variance.
[Add row]

(7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

Row 1

(7.53.1.1) Target reference number

Select from:
☑ Abs 1

(7.53.1.5) Date target was set

10/10/2020

(7.53.1.6) Target coverage

Select from:
☑ Organization-wide

(7.53.1.7) Greenhouse gases covered by target

Select all that apply
☑ Carbon dioxide (CO2)
☑ Methane (CH4)
☑ Nitrous oxide (N2O)

(7.53.1.8) Scopes

Select all that apply
☑ Scope 1
☑ Scope 2

(7.53.1.9) Scope 2 accounting method

Select from:

☑ Location-based

(7.53.1.11) End date of base year

12/31/2010

(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

172810588

(7.53.1.13) Base year Scope 2 emissions covered by target (metric tons CO2e)

0

(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

0.000

(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

172810588.000

(7.53.1.33) Base year Scope 1 emissions covered by target as % of total base year emissions in Scope 1

100

(7.53.1.34) Base year Scope 2 emissions covered by target as % of total base year emissions in Scope 2

0

(7.53.1.53) Base year emissions covered by target in all selected Scopes as % of total base year emissions in all selected Scopes

100

(7.53.1.54) End date of target

12/31/2030

(7.53.1.55) Targeted reduction from base year (%)

60

(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)

69124235.200

(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

86326790

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

245785

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

86572575.000

(7.53.1.78) Land-related emissions covered by target

Select from:

☑ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

(7.53.1.79) % of target achieved relative to base year

83.17

(7.53.1.80) Target status in reporting year

Select from:

☑ Underway

(7.53.1.82) Explain target coverage and identify any exclusions

Vistra's emissions reduction target of 60% by 2030 includes Scope 2 GHG emissions, even though these emissions for the base year 2010 are not available. Vistra's Scope 2 GHG emissions are not a material driver of its overall emissions profile, consistently representing less than 0.5% of the total GHG emissions. As such, Vistra's Scope 2 GHG emissions represent an immaterial addition to the target base year's emissions.

(7.53.1.83) Target objective

60% reduction in Scope 1 and Scope 2 CO2e emissions by 2030, as compared to a 2010 baseline

(7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

There are various alternatives for achieving our reduction target, and we intend to keep these options open for now without committing to any single method, so that we can respond to technological, legal, and market changes over the target timeframe. Emission reductions may be achieved through the retirement of certain of our fossil-fueled assets, to the extent that regulators and policymakers allow those retirements, as well as simultaneous investment in renewable power generation and energy storage assets. Reductions may also be achieved by lowering generation volumes from higher emitting sources or otherwise adjusting fuel carbon intensity mix of our various generations assets to reduce scope 1 emissions. Carbon capture and sequestration (CCS) technologies and additional emission control investments are also being investigated to reduce emissions at fossil plants. Vistra is also exploring potential for reducing electricity usage to various sites through energy efficiency measures. We moved from 75% achievement of our target (end of FY2022) to 80% of our target (end of FY2023). Primary drivers of emissions improved generation mix for lower carbon intensity and lower overall volumes.

(7.53.1.85) Target derived using a sectoral decarbonization approach

Select from:

☑ No

[Add row]

(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☑ NZ1

(7.54.3.2) Date target was set

09/29/2020

(7.54.3.3) Target Coverage

Select from:

☑ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

☑ Not applicable

(7.54.3.5) End date of target for achieving net zero

12/31/2050

(7.54.3.6) Is this a science-based target?

Select from:

☑ No, but we anticipate setting one in the next two years

(7.54.3.8) Scopes

Select all that apply

☑ Scope 1

☑ Scope 2

(7.54.3.9) Greenhouse gases covered by target

Select all that apply

☑ Carbon dioxide (CO2)
☑ Methane (CH4)
☑ Nitrous oxide (N2O)

(7.54.3.10) Explain target coverage and identify any exclusions

Net-zero carbon emissions by 2050 (assuming necessary advancements in technology and supportive market constructs and public policy)

(7.54.3.11) Target objective

Vistra's emissions Net Zero target by 2050 includes Scope 1 and Scope 2

(7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:
☑ Unsure

(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:
☑ Yes, and we have already acted on this in the reporting year

(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

Select all that apply
☑ No, we do not plan to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation

(7.54.3.16) Describe the actions to mitigate emissions beyond your value chain

In 2023, Vistra successfully increased the number of suppliers reporting their ESG performance representing 54% of Vistra's spend. Vistra played a large role within the Sustainable Supply Chain Alliance (SSCA) to create and incorporate 25 ESG core questions along with additional questions based on the supplier's industry. The results of the annual assessment revealed that of reporting respondents: 48% report scope 1 47% report scope 2 34% report scope 3

(7.54.3.17) Target status in reporting year

Select from:
☑ Underway

(7.54.3.19) Process for reviewing target

Progress against this target is reviewed annually.
[Add row]

(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.

Select from:
☑ Yes

(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
To be implemented	*1*	*484737*
Implemented	*1*	*2794289*

[Fixed row]

(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.

Row 1

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☑ Other, please specify :Retirement of fossil fuel generating facility

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

2800000

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 1

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.7) Payback period

Select from:

☑ No payback

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

Retirement of Edwards power plant. Other planned initiatives for solar/battery development at the site in the future.

Row 2

(7.55.2.1) Initiative category & Initiative type

Low-carbon energy generation

☑ Other, please specify :Battery Energy Storage System)

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

119022

(7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☑ Scope 3: Other (upstream)

(7.55.2.4) Voluntary/Mandatory

Select from:

☑ Voluntary

(7.55.2.7) Payback period

Select from:

☑ 4-10 years

(7.55.2.8) Estimated lifetime of the initiative

Select from:

☑ Ongoing

(7.55.2.9) Comment

Moss Landing Phase III Battery Storage 300MW facility
[Add row]

(7.55.3) What methods do you use to drive investment in emissions reduction activities?

Row 1

(7.55.3.1) Method

Select from:

☑ Compliance with regulatory requirements/standards

(7.55.3.2) Comment

Vistra does business the right way and will maintain strict compliance with environmental laws and regulations. In some cases this means that Vistra must make capital expenditure decisions on the maintenance and upgrades at its existing power generation facilities. In addition, changes to, or development of, legislation that requires the use of clean renewable and alternate fuel sources or mandates the implementation of energy conservation programs that require the implementation of new technologies, could increase our capital expenditures.

Row 2

(7.55.3.1) Method

Select from:

☑ Internal price on carbon

(7.55.3.2) Comment

When Vistra evaluates power generation investments, the multiples applied by Vistra's team to value opportunities take into account carbon intensity and useful life. Lower emitting investments are prescribed higher multiples recognizing the higher value of low carbon investments.
[Add row]

(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.

Row 2

(7.74.1.1) Level of aggregation

Select from:

☑ Group of products or services

(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☑ Other, please specify **:**Internal methodology

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

Power

☑ Other, please specify **:**Green electricity plans, energy efficiency, and demand response products for retail electric customers

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

Vistra Retail currently offers dozens of electricity plans that incorporate renewable energy into the product offer. These products are offered to customers through Vistra's many retail brands leveraging various marketing channels across the U.S. These brands offer renewable energy, carbon offset, and energy management products that help consumers reduce their carbon footprint. These products include: Free Nights and Solar Days: With 100% wind power at night and 100% solar during the day, this plan helps customers stay cool and comfortable while easing strain on the electricity grid during peak usage. Customers are encouraged and incentivized to shift their usage to free hours every night. Vistra Retail offers the only plan of its kind in the country that allows customers to charge their EVs for free. Rooftop Solar: TXU Energy is a pioneer in bringing rooftop solar to ERCOT — as the first retail provider with a Net Metering plan (2009). We also offer rooftop solar systems and batteries to our customers through our partnership with Sunrun. Energy Management Tools: TXU Energy has been participating in Residential Demand Response for over a decade and was the first retailer to offer an internet-enabled smart thermostat in ERCOT. Our Connected Conservation program rewards customers for doing their part to reduce both their carbon footprint and strain on the grid by controlling and aggregating their smart thermostats.

(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☑ No

[Add row]

C9. Environmental performance - Water security

(9.1.1) Provide details on these exclusions.

Row 1

(9.1.1.1) Exclusion

Select from:
☑ Facilities

(9.1.1.2) Description of exclusion

Office buildings

(9.1.1.3) Reason for exclusion

Select from:
☑ Other, please specify **:**De minimis

(9.1.1.7) Percentage of water volume the exclusion represents

Select from:
☑ Less than 1%

(9.1.1.8) Please explain

Vistra office buildings are significantly less than 1% of our total annual water usage
[Add row]

(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?

Water withdrawals – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Calculated or metered

(9.2.4) Please explain

For water withdraw, pump flow rate multiplied by pump operating time. For water purchases from municipalities, water is metered.

Water withdrawals – volumes by source

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Calculated or metered

Water withdrawals quality

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Sampled and lab-analyzed

(9.2.4) Please explain

Periodic water withdraw characterization is conducted.

Water discharges – total volumes

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Measured at NPDES - permitted outfalls.

Water discharges – volumes by destination

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Measured at NPDES-permitted outfall.

Water discharges – volumes by treatment method

(9.2.1) % of sites/facilities/operations

Select from:
☑ Not monitored

Water discharge quality – by standard effluent parameters

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Sampled and lab-analyzed

(9.2.4) Please explain

As required by NPDES permit, water samples are collected, analyzed, and reported.

Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Sampled and lab-analyzed

Water discharge quality – temperature

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Continuously

(9.2.3) Method of measurement

Temperature measured at NPDES-permitted outfall.

Water consumption – total volume

(9.2.1) % of sites/facilities/operations

Select from:
☑ 100%

(9.2.2) Frequency of measurement

Select from:
☑ Monthly

(9.2.3) Method of measurement

Calculated

(9.2.4) Please explain

consumption withdraw-discharge
[Fixed row]

(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?

Total withdrawals

(9.2.2.1) Volume (megaliters/year)

11919714

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Unknown

(9.2.2.5) Primary reason for forecast

Select from:

☑ Unknown

(9.2.2.6) Please explain

Water withdrawals vary from year to year, due to changing plant operations and weather conditions.

Total discharges

(9.2.2.1) Volume (megaliters/year)

11721352

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Higher

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:

☑ Unknown

(9.2.2.5) Primary reason for forecast

Select from:

☑ Unknown

(9.2.2.6) Please explain

Discharges can vary from year to year, due to operational changes and weather conditions.

Total consumption

(9.2.2.1) Volume (megaliters/year)

198755

(9.2.2.2) Comparison with previous reporting year

Select from:

☑ Lower

(9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.2.4) Five-year forecast

Select from:
☑ Unknown

(9.2.2.5) Primary reason for forecast

Select from:
☑ Unknown

(9.2.2.6) Please explain

[Fixed row]

(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.

(9.2.4.1) Withdrawals are from areas with water stress

Select from:
☑ Yes

(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)

6956

(9.2.4.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.4.4) Primary reason for comparison with previous reporting year

Select from:

☑ Increase/decrease in business activity

(9.2.4.5) Five-year forecast

Select from:

☑ Unknown

(9.2.4.6) Primary reason for forecast

Select from:

☑ Unknown

(9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

0.06

(9.2.4.8) Identification tool

Select all that apply

☑ WRI Aqueduct

(9.2.4.9) Please explain

Withdrawals from areas of water stress can vary, from year to year, due to evolving business conditions and weather conditions
[Fixed row]

(9.2.7) Provide total water withdrawal data by source.

Fresh surface water, including rainwater, water from wetlands, rivers, and lakes

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

11421096

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

(9.2.7.5) Please explain

Water withdrawal from different sources will vary from year to year, due to changing business conditions and weather conditions.

Brackish surface water/Seawater

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

388724

(9.2.7.3) Comparison with previous reporting year

Select from:

☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

Groundwater – renewable

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

3181

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

Groundwater – non-renewable

(9.2.7.1) Relevance

Select from:
☑ Not relevant

Produced/Entrained water

(9.2.7.1) Relevance

Select from:
☑ Not relevant

Third party sources

(9.2.7.1) Relevance

Select from:
☑ Relevant

(9.2.7.2) Volume (megaliters/year)

106713

(9.2.7.3) Comparison with previous reporting year

Select from:
☑ About the same

(9.2.7.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity
[Fixed row]

(9.2.8) Provide total water discharge data by destination.

Fresh surface water

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

11270289

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

Brackish surface water/seawater

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

388584

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Higher

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity

Groundwater

(9.2.8.1) Relevance

Select from:
☑ Not relevant

Third-party destinations

(9.2.8.1) Relevance

Select from:
☑ Relevant

(9.2.8.2) Volume (megaliters/year)

62479

(9.2.8.3) Comparison with previous reporting year

Select from:
☑ Lower

(9.2.8.4) Primary reason for comparison with previous reporting year

Select from:
☑ Increase/decrease in business activity
[Fixed row]

(9.2.10) Provide details of your organization’s emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.

	Please explain
	N/A

[Fixed row]

(9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

	Identification of facilities in the value chain stage	Please explain
Direct operations	*Select from:* ☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years	*N/A*
Upstream value chain	*Select from:* ☑ No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years	*N/A*

[Fixed row]

(9.5) Provide a figure for your organization's total water withdrawal efficiency.

(9.5.1) Revenue (currency)

14779000000

(9.5.2) Total water withdrawal efficiency

1239.88

(9.5.3) Anticipated forward trend

We expect this trend shift in the future due to our recent acquisition of PJM nuclear assets. Direction of shift will depend on revenue trends and power costs.
[Fixed row]

(9.7.1) Provide the following intensity information associated with your electricity generation activities.

Row 1

(9.7.1.1) Water intensity value (m3/denominator)

1.18

(9.7.1.2) Numerator: water aspect

Select from:
☑ Total water consumption

(9.7.1.3) Denominator

Select from:
☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:
☑ Higher

(9.7.1.5) Please explain

Vistra Energy uses total water consumed divided by total electricity generated to compute water intensity. In 2023, Vistra's total water consumed intensity per unit of electricity generation was 1.18 m3/MWh. During 2022, Vistra's total water consumed intensity per unit of electricity generation was 1.00 m3/MWh. Therefore, our water intensity value is higher than the previous reporting year, representing a 16.5% increase.

Row 2

(9.7.1.1) Water intensity value (m3/denominator)

70.97

(9.7.1.2) Numerator: water aspect

Select from:

☑ Total water withdrawals

(9.7.1.3) Denominator

Select from:

☑ MWh

(9.7.1.4) Comparison with previous reporting year

Select from:

☑ Lower

(9.7.1.5) Please explain

Vistra Energy uses total water withdrawn divided by total electricity generated to compute water intensity. In 2023, Vistra's total water withdrawal intensity per unit of electricity generation was 70.97 m3/MWh. During 2022, Vistra's total water withdrawal intensity per unit of electricity generation was 78.79 m3/MWh. Therefore, our water intensity value is lower than the previous reporting year, representing a 10.4% decrease.
[Add row]

(9.12) Provide any available water intensity values for your organization's products or services.

	Comment
Row 1	*Not applicable for Vistra*

[Add row]

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances	Comment
	Select from: ☑ No	*No products produced that are hazardous*

[Fixed row]

(9.14) Do you classify any of your current products and/or services as low water impact?

	Products and/or services classified as low water impact	Primary reason for not classifying any of your current products and/or services as low water impact	Please explain
	Select from: ☑ No, and we do not plan to address this within the next two years	*Select from:* ☑ Judged to be unimportant, explanation provided	*Vistra's product and services are not differentiated based on our business model as an integrated power provider.*

[Fixed row]

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

	Target set in this category
Water withdrawals	*Select from:* ☑ Yes
Other	*Select from:* ☑ Yes

[Fixed row]

(9.15.2) Provide details of your water-related targets and the progress made.

Row 1

(9.15.2.1) Target reference number

Select from:
☑ Target 1

(9.15.2.2) Target coverage

Select from:
☑ Organization-wide (direct operations only)
[Add row]

(9.15.3) Why do you not have water-related target(s) and what are your plans to develop these in the future?

(9.15.3.1) Primary reason

Select from:

☑ Important but not an immediate business priority

(9.15.3.2) Please explain

No plans in future. Water withdraw amounts will vary from year to year, due to changing business decisions. It must be noted that the total water consumption is low, due to the fact that a significant amount of the withdrawn water is ultimately returned to the original source.
[Fixed row]

C11. Environmental performance - Biodiversity

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

	Actions taken in the reporting period to progress your biodiversity-related commitments
	Select from: ☑ No, we are not taking any actions to progress our biodiversity-related commitments

[Fixed row]

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	Select from: ☑ No, we do not use indicators, but plan to within the next two years

[Fixed row]

(11.4.1) Provide details of your organization's activities in the reporting year located in or near to areas important for biodiversity.

Row 1

(11.4.1.4) Country/area

Select from:

☑ United States of America

(11.4.1.9) Indicate whether any of your organization’s activities located in or near to the selected area could negatively affect biodiversity

Select from:

☑ Yes, and no mitigation measures have been implemented

[Add row]