

VISTRA CORP.
HUMAN RIGHTS

I. SCOPE

The Human Rights Policy (this "Policy") applies to employees of Vistra Corp. and its subsidiaries (collectively "Vistra" or the "Company"). Moreover, while this Policy is specifically written for employees, the Company expects contractors, consultants, and others who may be temporarily assigned to perform work or services for the Company to follow this Policy in connection with their work for the Company. This Policy also specifically extends to all individuals within our value chain, such as suppliers and other business partners.

II. PURPOSE

This Policy documents Vistra's human rights practices, reflects the Company's commitment to its core principles of integrity, compliance, and respect, and is part of the Company's sustainability strategy. The Company further communicates its commitment to human rights in the Vistra Code of Conduct.

III. POLICY STATEMENT

It is Vistra's policy to respect and promote fundamental human rights in all aspects of its business. Vistra is committed to respecting all internationally recognized human rights as embodied in the International Bill of Human Rights and the International Labor Organization's Declaration on Fundamental Principles and Rights at Work.

Vistra exercises appropriate due diligence to identify and mitigate human rights risks to people in its business and value chain. The Company is committed to fair and equitable remediation efforts if adverse human rights impacts result from or are caused by its business activities.

IV. SAFE AND HEALTHY WORKPLACES

As a fundamental part of Vistra's culture and operations, the Company is dedicated to providing an environment where the health and safety of employees, customers, visitors, and business partners is of paramount priority. The Company's safety rules and work practices have been developed to comply with the law and protect the safety and health of employees and the public. The Company does not tolerate any conduct that jeopardizes the safety of the workplace, other employees, or the public.

V. WORKPLACE SECURITY

Vistra is firmly committed to providing workplaces that are free from acts or threats of violence. In fulfillment of that commitment, Vistra has a Workplace Conduct Policy that establishes expectations for employee and business partner conduct and provides available reporting channels. The Policy also communicates the Company's commitment to promptly addressing conduct, both on- and off-duty, that has the potential to jeopardize the safety of the workplace. The Company does not tolerate and flatly prohibits any conduct that creates an intimidating or threatening work environment.

VI. CHILD LABOR, FORCED LABOR AND HUMAN TRAFFICKING

Vistra prohibits the hiring of individuals under 18 years of age and prohibits the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

VII. FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Vistra respects its employees’ rights to join, form, or not form a labor union without any fear of punishment or intimidation. The Company is committed to establishing and maintaining constructive dialogues with the labor unions that represent its employees and bargains with such labor representatives in good faith.

VIII. WORK HOURS, WAGES AND BENEFITS

Vistra complies with all applicable wage, hour, overtime, and benefits laws. The Company has a market-based, pay-for-performance compensation philosophy that competitively compensates employees relative to peers. Where employees are collectively represented, those employees’ hours of work, wages, and benefits are provided according to the terms of the applicable collective bargaining agreement.

IX. COMMUNITY IMPACT

The Company is committed to having a positive impact on the communities where it operates. Vistra engages with local communities on matters that are important to them, such as land and water issues. Vistra also engages and has formed long-term relationships with civil leaders and stakeholders on issues related to the Company’s business operations. In addition, the Company partners with nonprofit organizations and local, community-based organizations to support programs designed to improve some of the circumstances that contribute to adverse human rights impacts. Through its influence and business relationships with community leaders, Vistra seeks to promote the opportunity for all people in the communities it serves to exercise and enjoy their fundamental human rights.

X. EMPLOYEE GUIDANCE AND REPORTING

Vistra encourages open and honest communication among employees. Any employee who has a question about this Policy or believes a violation of this Policy may have occurred can raise his or her question or concern by contacting the Company’s Compliance Helpline at 800.453.0801 or www.vistraenergy.ethicspoint. The Helpline is staffed by an independent third party, and concerns may be raised anonymously. The employee may also contact management, the human resource team, the legal department, or any of the compliance professionals identified in the Company’s Code of Conduct. The Company trains employees on the topics covered in this Policy as part of its annual Code of Conduct training, which all employees are required to complete.

The Company will not take or tolerate any retaliatory action against an individual for making a good faith report, even if that person turns out to be mistaken. The Company will investigate and address any concerns raised and will take appropriate corrective action in response to any violation.

XI. PUBLIC REPORTING

Respect for human rights is an important part of Vistra’s sustainability strategy. Vistra reports to the public on its human rights commitments and efforts as part of its annual sustainability report.

XII. GOVERNANCE \ IMPLEMENTATION

This Policy is overseen by the Company’s Executive Vice President and Chief Administrative Officer, in coordination with the Chief Executive Officer and the rest of the Company’s Management Committee.

The Company reserves the right to modify this Policy at any time, for any reason, and without prior notice.

Reviewed June 2, 2020