

VISTRA CORP.
ENVIRONMENTAL PRINCIPLES

I. SCOPE

The Environmental Principles Policy (this “Policy”) applies to Vistra Corp. and all of its subsidiaries (collectively “Company” or “Vistra”). All employees acting on behalf of Vistra are expected to adhere to this Policy.

II. PURPOSE

This Policy communicates and illustrates our commitment to integrity and leadership, core principles of Vistra. This Policy also details the environmental principals Vistra is committed to following.

III. POLICY STATEMENT

Vistra is committed to protecting and improving the environment by serving our customers and communities through more efficient – and cleaner – applications of energy, including improving our operations and investing in new technologies. We are also committed to improved environmental protection measures, building on our strict 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.

IV. ENVIRONMENTAL PRINCIPLES

Vistra is committed to the following Environmental Principles:

- **Cleaner Air and Water and Less Waste**
We will strive for continuous improvement of the environment by operating more efficiently and exploring new solutions, even as we outperform current clean-air requirements through voluntary emissions reductions. We will continue to carefully manage water quality and consumption and conserve water resources, as well as continue to promote waste minimization and beneficial reuse. The Company will monitor and manage climate performance improvements in a centralized reporting system.
- **Energy Efficiency and Conservation**
Our goal is to encourage our customers to take advantage of all cost-effective opportunities to improve their energy efficiency. To that end, we will invest in initiatives that achieve long-lasting energy efficiency improvements across all our businesses. We will promote energy efficiency and conservation through new energy management tools and products for our customers, education and conservation programs designed to reduce overall energy use, and operational improvements at our facilities. The Company will lead by example promoting energy efficiency tips to its customers through various marketing initiatives and via customer touchpoints such as bill inserts or online account management portals. Inside the organization Vistra will promote energy efficient workspaces and offer employees environmentally-friendly programs such as desk side recycling and battery and electronic collection.
- **Development of New Technologies**
We will continue to invest in and support research efforts to develop new and emerging solutions, including, but not limited to, technologies for carbon-capture and storage, renewable energy, and end-use efficiency improvements to promote cleaner air, water and land.
- **Climate Change**
To address the growth of carbon dioxide emissions and their potential impact through climate change, we will continue to advocate for economically rational and market-based policies and solutions to address greenhouse gases. We will work within our industry and across other stakeholders to help develop policies that address the issue, balance the need for reliable and affordable power, and consider the impact on the domestic economy.

- **Renewable Energy**
We will continue to support policies that effectively use renewable resources to help meet growing energy needs and will seek to maintain a leadership position in the growth and development of renewable energy. Additionally, we will continue to pursue and invest in development opportunities for renewable energy resources including solar and wind, as well as battery energy storage facilities.
- **Resource Diversity**
We will serve as an environmental leader as we work to ensure the reliability and security of a diverse resource portfolio that includes energy efficiency, demand response, renewable energy, natural gas, coal and nuclear power, with the opportunities and challenges that each provides.
- **Compliance Excellence and Environmental Management**
We are committed to maintaining an excellent compliance record by meeting and surpassing all legal and regulatory requirements as we operate in an environmentally sensitive manner. Compliance is monitored by a corporate environmental services team organized by geographic region who oversees environmental compliance at each site. We maintain a task tracking system for all regulatory requirements and perform regular internal environmental audits to confirm compliance. All compliance actions, including audits, permits, incidents, will be recorded in the Company's central reporting system.
- **Minimization of Facility Impacts and Continuous Improvement**
We will continue to integrate environmental considerations into our business planning and decision making to reduce the environmental effects of our facility operations. Our objective is continuous improvement in implementation of effective technologies, improving the efficiency of our operations and promoting waste minimization and recycling.
- **Corporate Governance and Stakeholder Dialogue**
We are committed to furthering strong corporate governance standards, to include continuing to regularly monitor and report publicly on our environmental progress and accomplishments. In addition, Vistra and its businesses will seek to better understand the issues of concern to our key stakeholders, including customers, legislators, regulators and the communities we serve, through an open and candid dialogue with all audiences.

V. GOVERNANCE AND OVERSIGHT

The three standing management committees (Management Committee, Commitments Committee, and Risk Committee) provide daily governance over the Company's environmental principles. The Board of Directors, through the Vistra Sustainability and Risk Committee, oversees and monitors the Company's core vision and values and advises the Board and management on sustainability policies and reporting, including environmental principles.

VI. GOVERNANCE \ IMPLEMENTATION

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

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

Reviewed April 21, 2020