C-EU0.7

(C-EU0.7) Which part of the electric utilities value chain does your organization operate in? Select all that apply.

Row 1

Electric utilities value chain
Electricity generation

Other divisions
Battery storage
Coal mining

C1. Governance

C1.1

(C1.1) Is there board-level oversight of climate-related issues within your organization/ ǯ

(C2.2) Describe your process(es) for identifying, assessing and responding d

Emerging regulation	Mandates on and regulation of existing products and services

Primary potential financial impact
Decreased asset value or asset useful life leading to write-offs, asset impairment or early retirement of existing assets

Climate risk type mapped to traditional financial services industry risk classification
<Not Applicable>

Company-specific description
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. In January 2021, President Biden issued written notification to the United Nations of the U.S.'s intention to rejoin the Paris Agreement, effective in February 2021. Although the Paris Agreement does not create any binding obligations for nations to limit their GHG emissions, it does include pledges to voluntarily limit or reduce future emissions, and various corporations, investors and U.S. states and local governments have previously pledged to further the goals of the Paris Agreement. Additionally, the Biden Administration has directed certain agencies to submit a plan to the National Climate Task Force to achieve a carbon-pollution-free electricity sector by 2035. 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.

Time horizon
Long-term

Likelihood
About as likely as not

Magnitude of impact
Medium

Are you able to provide a potential financial impact figure?
Yes, an estimated range

Potential financial impact figure (currency)
<Not Applicable>

Potential financial impact figure – minimum (currency)
0

Potential financial impact figure – maximum (currency)
1000000000

Explanation of financial impact 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 thermal assets.

Cost of response to risk
500000000

Description of response and explanation of cost calculation
Vistra management expects it will invest, on average, $500 million of equity per year on renewable generating assets (both solar and battery storage) and retail businesses as our portfolio continues to transition away from carbon-heavy generating resources. The amount of average capital invested could increase with supportive public policies and incentives to promote renewable development to achieve federal and/or state emission reduction targets. These growth investments will generate EBITDA that will, over time, replace EBITDA as our thermal resources retire or reduce their output.

Comment
Vistra is supportive of the Paris Agreement and has joined SBTi's Business Ambition for 1.5°C to align our emissions reduction targets with the Paris Agreement to keep warming to 1.5°C and reaching science-based net-zero emissions by 2050. Further, we are supportive of the U.S. setting an ambitious Nationally Determined Contribution (NDC) climate target of at least a 50% reduction by 2030 as compared to a 2005 baseline and setting a path to reach net-zero emissions by 2050. Vistra believes that with the appropriate and supportive public policy, net-zero carbon emissions is achievable.

Identifier
Risk 2

Where in the value chain does the risk driver occur?
Direct operations

Risk type & Primary climate-related risk driver

Reputation	Stigmatization of sector

Primary potential financial impact
Decreased access to capital

Climate risk type mapped to traditional financial services industry risk classification
<Not Applicable>

Company-specific description
There is attention and interest nationally and internationally on global climate change and how greenhouse gas (GHG) emissions, such as carbon dioxide (CO2), contribute to global climate change. The utility sector is the second highest contributor of GHG emissions, after the transportation industry. 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. Further, there has been growing attention from large investment firms and their investors in sustainable investing, the investment strategy that considers environmental, social, and [illegible]

<Not Applicable>

Company-specific description

Regulatory policy and legislation that is implemented at the national, regional, and state levels can directly impact Vistra's long-term strategy.

Medium-term

Likelihood
Likely

Magnitude of imp

Cost to re

returns of Vistra's existing and planned rene7 ǒ

C4.1a

(C4.1a) Provide details of your absolute emissions target(s) and progress made against those targets.

Target reference number
Abs 1

Year target was set
2020

Target coverage
Company-wide

Scope(s) (or Scope 3 category)
Scope 1+2 (location-based)

Base year
2010

Covered emissions in base year (metric tons CO2e)
172810588

Covered emissions in base year as % of total base year emissions in selected Scope(s) (or Scope 3 category)
100

Target year
2030

Targeted reduction from base year (%)
60

Covered emissions in target year (metric tons CO2e) [auto-calculated]
69124235.2

Covered emissions in reporting year (metric tons CO2e)
94623793

% of target achieved [auto-calculated]
75.4070259861624

Target status in reporting year
Underway

Is this a science-based target?
No, but we anticipate setting one in the next 2 years

Target ambition
<Not Applicable>

Please explain (including target coverage)
Vistra accelerated its GHG emissions reduction targets in 2020 and is now setting out to achieve a 60% reduction, previously 50%, in its Scope 1 and Scope 2 CO2 equivalent (CO2e) emissions by 2030 as compared to a 2010 baseline. Vistra has retired ~13,000 MW of coal and gas plants since 2010, contributing to a majority of the emissions reduction progress.

C4.2

(C4.2) Did you have any other climate-related targets that were active in the reporting year?
Net-zero target(s)

C4.2c

(C6.4a) Provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclos

Upstream transportation and distribution

Evaluation status

Franchises

Evaluation status
Not relevant, explanation provided

Metric tonnes CO2e
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
Vistra does not own franchises.

Investments

Evaluation status
Not relevant, explanation provided

Metric tonnes CO2e
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

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

Other (upstream)

Evaluation status
Not relevant, explanation provided

Metric tonnes CO2e
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

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

Other (downstream)

Evaluation status
Not relevant, explanation provided

Metric tonnes CO2e
<Not Applicable>

Emissions calculation methodology
<Not Applicable>

Percentage of emissions calculated using data obtained from suppliers or value chain partners
<Not Applicable>

Please explain
There are no other downstream emissions that are material to our overall emissions profile.

C6.7

(C6.7) Are carbon dioxide emissions from biogenic carbon relevant to your organization?
No

C6.10

Lignite

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

0

Net electricity generation (GWh)

0

Absolute scope 1 emissions (metric tons CO2e)

0

Hydropower

Nameplate capacity (MW)

0

Gross electricity generation (GWh)

C10.1a

(C10.1a) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.

Verification or assurance cycle in place
Annual process

Status in the current rep t lhn enl o l 'l Ď n

C11.1b

(C11.1b) Complete the following table for each of the emissions trading

(C11.3a) Provide details of how your org org

(C12.1a) Provide details of your climate-related supplier engagement strategy.

Type of engagement
Compliance & onboarding

Details of engagement
Code of conduct featuring climate change KPIs

% of suppliers by number
100

% total procurement spend (direct and indirect)
100

% of supplier-related Scope 3 emissions as reported in C6.5
0

Rationale for the coverage of your engagement
Vistra has a robust, centralized, strategic supply chain organization. We engage suppliers around the world to support our power generation business and our corporate shared services functions. In 2020, we spent ~$1.6 billion with ~7,000 suppliers. This includes everything from manufacturers of power generation equipment (such as solar panels, utility-grade batteries, generators, and turbines) to power plant maintenance providers and call center and sales personnel, in addition to other corporate products and services.

Impact of engagement, including measures of success
Our suppliers reflect our values and agree to our supplier code of conduct, found on our website, which was updated in 2020 to include a commitment to environmental stewardship and compliance. With every purchase order, all suppliers must review and agree to Vistra's Supplier Code of Conduct and the commitment to Vistra's core principles.

Comment

Type of engagement
Information collection (understanding supplier behavior)

Details of engagement
Collect climate change and carbon information at least annually from suppliers

% of suppliers by number
0.01

% total procurement spend (direct and indirect)
36

% of supplier-related Scope 3 emissions as reported in C6.5
0

Rationale for the coverage of your engagement
In 2020, Vistra's supply chain and sustainability teams partnered to begin the process of developing a formal Supply Chain Sustainability Initiative. The teams identified an inaugural class of participants, approximately top 1/3 spend of power pl l .

(C12.4) Have you published information about your organization’s response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s).

Publication
In voluntary sustainability report

Status
Complete

Attach the document
2020 VST Sustainability Report.pdf

Page/Section reference
All

Content elements
Governance
Strategy
Risks & opportunities
Emissions figures
Emission targets
Other metrics

Comment

Publication
Other, please specify (In voluntary report, incorporating the TCFD recommendations)

Status
Complete

Attach the document
2020 VST Climate Report.pdf

Page/Section reference
All pages

Content elements
Governance
Strategy
Risks & opportunities
Emissions figures
Emission targets

Comment

C15. Signoff

C-FI

(C-FI) Use this field to provide any additional information or context that you feel is relevant to your organization's response. Please note that this field is optional and is not scored.

C15.1

(C15.1) Provide details for the person that has signed off (approved) your CDP climate change response.

	Job title	Gyour mtext thaeld is as D®
