

**VISTRA CORP.**  
**HUMAN RIGHTS**

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**I. SCOPE**

The Human Rights Policy (this “Policy”) applies to employees of Vistra Corp. and its subsidiaries (collectively

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.

**v. 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.

**vi. 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.

**IV. EMPLOYEE GUIDANCE AND REPORTING**

Vistra encourages open and honest communication among employees. Any employee who has a question

## **VII. GOVERNANCE \ IMPLEMENTATION**

The Company's Executive Vice President and Chief Administrative Officer has primary responsibility over this Policy, in coordination with the Company's Management Committee. 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.

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 a good faith report. 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 January 8, 2024.