

VISTRA CORP.
LOBBYING & POLITICAL CONTRIBUTIONS

I. SCOPE

The Lobbying & Political Contributions Policy (this “Policy”) applies to Vistra Corp. and all of its subsidiaries (collectively “Company” or “Vistra”). All employees, contractors, interns, and third parties (“Personnel”) who may be assigned to perform related work or services for or on behalf of Vistra are expected to adhere to this Policy. This Policy does not apply to Personnel’s political participation or contributions made as private citizens (other than contributions made by certain management employees as provided under applicable laws). These personal political activities will not affect one’s compensation, job security, or opportunities for advancement.

- Food, transportation, or lodging for any public office, official, or candidate,
- Employee expenditures used for lobbying public officials; and
- Gifts given to any public office, official, or candidate.

If the SVP of Government Affairs determines an employee must register as a lobbyist, the employee must submit all lobbying- related expenditures through MyExpenses for reimbursement. Only expenses made in compliance with the ethics requirements of the jurisdiction and this Policy will be reimbursed. For avoidance of doubt, expenses made without prior approval from the SVP of Government Affairs will NOT be reimbursed. All expense records must be retained and recorded for any appropriate state or federal reports that the Governme5 (F)-.002 Tc 0.005 Tw8SVP of Gov51if GV (u)-.9 (N)2.6 (11o02 T 1.2 (o)6.d7 (s)5.3 e r)0.5 4e9 T

VI. CORPORATE GIVING

A. Corporate Political Contributions

Vistra values its right to participate in the political process outside of its PACs, both as a legislative advocate and as a participant in the electoral process. Such participation is guided by our responsibility to always conduct our activities with honesty and integrity and in accordance with the laws, regulations and rules that govern such activities. Similar to its PACs, any corporate political contribution is done so with the belief that the recipient will meet the

even if that person turns out to be mistaken.

IX. DEFINITIONS \ KEY TERMS