

VISTRA



PURPOSE

This Policy documents Vistra's philosophy regarding the importance of promoting diversity, equity, and inclusion in the workplace, as well as the Company's commitment to integrity, compliance, and respect.

This Policy operates in coordination with Vistra's Employment Policy, which contains additional information regarding diversity, equity, and inclusion.

GOVERNANCE \ IMPLEMENTATION

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