Equator Principles
Environmental and Social Impact Assessment

Vistra reviews its business activities, including development and construction of these projects, for climate risk as part of its enterprise risk management process. Vistra reports on the aggregate risks and opportunities in Task Force on Climate-Related Financial Disclosures climate report published on our website under Sustainability, https://vistracorp.com/sustainability/reporting/. In accordance with local, state, and federal permitting guidelines and regulations, Vistra has conducted various environmental and social studies to determine potential impacts of the project/these projects. These studies include, for example, an Environmental Site Assessment, Historic-Age Non-Archaeological Resource Reconnaissance Survey, Archaeological Survey, Hydrology Study, Wetland Delineation Study, Ecological Compliance Assessment, U.S. Fish and Wildlife IPaC Report, and Habitat Survey. These projects will be conducted in accordance with all applicable rules and requirements.

These projects include:

Baldwin

The Environmental Site Assessment revealed no recognized environmental conditions. The Historic-Age Non-Archaeological Resource Reconnaissance Survey determined there will be no adverse effects to Historic Places since one area identified in the archaeological survey will be avoided by project activities. The site was deemed suitable for planned development in the hydrology study, and any hydraulic concerns will be addressed by either avoiding areas of high flood depths or through detailed engineering design. The wetland delineation report received concurrence from the U.S. Army Corp of Engineers and identified areas where impacts could be minimized or avoided in the design of the project. The Ecological Compliance Assessment and IPaC report identified protected species that the company will avoid adversely impacting by following the recommendations of the Illinois Department of Natural Resources and U.S. Fish and Wildlife Service. The IPaC report identified no critical federally-listed habitats in this location. Lastly, a habitat survey identified the locations of trees that may be utilized by protected bat species in the project area and will be protected.

Coffeen

The Environmental Site Assessment revealed no recognized environmental conditions. The Historic-Age Non-Archaeological Resource Reconnaissance Survey determined there will be no adverse effects to Historic Places since one area identified in the archaeological survey will be avoided by project activities. The site was deemed suitable for planned development in the hydrology study, and any hydraulic concerns will be addressed by either avoiding areas of high flood depths or through detailed engineering design. The wetland delineation report received concurrence from the U.S. Army Corp of Engineers and identified areas where impacts could be minimized or avoided in the design of the project. The Ecological Compliance Assessment and IPaC report identified protected species that the company will avoid adversely impacting by following the recommendations of the Illinois Department of Natural Resources and U.S. Fish and Wildlife Service. The IPaC report identified no critical federally-listed habitats in this

location. Lastly, a habitat survey identified the locations of trees that may be utilized by protected bat species in the project area and will be protected.

Oak Hill/Dry Creek

The Environmental Site Assessment identified previously known conditions associated with the mine operations and maintenance facilities that do not have impacts on the project. The Cultural Resources Review determined there will be no adverse effects to cultural resources, with the one area identified being avoided by project activities. The site was deemed suitable for planned development in the hydrology study, and any hydraulic concerns will be addressed by either avoiding areas of high flood depths or through detailed engineering design. The wetland delineation report received concurrence from the U.S. Army Corp of Engineers and identified areas where impacts could be minimized or avoided in the design of the project. The IPaC report identified two ESA-protected bird species that are migratory through the region. The company will avoid adversely impacting protected species by following guidelines of the Texas Parks and Wildlife Department and the U.S. Fish and Wildlife Service recommendations. Lastly, a habit survey did not identify any critical habitat associated with protected species.

Pulaski

The Environmental Site Assessment identified previously known conditions outside of the project footprint that do not have impacts on the project. Based on the location and distance of the known conditions from the project property, the assessment concluded that they constitute minimal risk of liability to the construction, operation, and maintenance of the project property. The Cultural Resource Review determined there will be no adverse effects to cultural resources, since areas identified will be avoided by project activities. The site was deemed suitable for planned development in the hydrology study, and any hydraulic concerns will be addressed by either avoiding areas of high flood depths or through detailed engineering design. The wetland delineation report received concurrence from the U.S. Army Corp of Engineers and identified areas where impacts could be minimized or avoided in the design of the project. The Ecological Compliance Assessment and IPaC report identified protected lands and species that the company will avoid adversely impacting by following the recommendations of the Illinois Department of Natural Resources and U.S. Fish and Wildlife Service. The IPaC report identified no critical federally-listed habitats in this location. Lastly, habitat surveys identified locations of trees that may be utilized by protected bat species and bald eagles. All regulatory requirements from the Illinois Department of Natural Resources and U.S. Fish and Wildlife Service will be followed with respect to these species.