ANTI-SLAVERY AND HUMAN TRAFFICKING STATEMENT

As a global organisation Vistra understands that we need to lead by example in the way we do business. We recognise that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We aim to act fairly, ethically and openly in everything we do and are committed to practices to combat slavery and human trafficking in our supply chains or in any part of our business.

Vistra has over 5,000 employees working across 46 jurisdictions throughout the Americas, Asia Pacific, Europe and the Middle East. More information about our business can be found on our Website .

OUR POLICIES ON SLAVERY AND HUMAN TRAFFICKING

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our business. Our Anti-Slavery Policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery and human trafficking is not taking place anywhere in our supply chains.

OUR SUPPLY CHAIN

In order to provide our services and expertise we procure a range of goods and services from third party suppliers who may, in turn, enter into sub-contracts with their suppliers. We may also, from time to time, outsource some of our back-office functions to suppliers.

We have zero tolerance to slavery and human trafficking. We expect all those in our supply chain to comply with our values and ethics. To this end we have the following measures in place:

- Our Code of Conduct and Business Ethics outlines the purpose and values which govern the Vistra way of working across our business units globally. It emphasises the need to respect and value those we work with and it requires colleagues to act fairly and ethically in all that they do.
- As part of our onboarding process, we complete a risk assessment of our suppliers to minimize the risk of modern slavery or human trafficking within our supply chain.
- We have an independent system in place to encourage the reporting of concerns and the protection of whistle blowers.
- Our Director of Compliance is responsible for overseeing the implementation of our Anti-Slavery Policy and the annual preparation of our slavery and human trafficking statement.

TRAINING

To ensure a high level of understanding of the risks of modern slavery and human trafficking in our supply chains and our business, we will provide training to our staff involved in procurement and/or with responsibility for our supply chain management.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

If we discover a violation of our Anti-Slavery Policy we will respond in a manner proportionate to the nature and extent of the violation.

This statement was approved by Vistra Group Holdings (BVI) III Limited on 14 December 2022 and is made pursuant to section 54(1) of the UK Modern Slavery Act 2015. It constitutes Vistra's Anti-Slavery and Human Trafficking Statement for the financial year commencing 2022 and ending 2023.

- End of Statement -

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