



MODERN SLAVERY AND HUMAN TRAFFICKING STATEMENT

Vistra's Commitment

As a global organization, Vistra understands that we need to lead by example in the way we do business. We recognize 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 exploitation where an individual cannot refuse or leave service or work because of threats, violence, coercion, abuse of power or deception. 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.

About Vistra

Vistra is a leading provider of essential business services to support the global progress of companies and funds. Vistra operates throughout the Americas, Asia Pacific, Europe and the Middle East. The global Vistra network consists of separate legal entities that support service delivery. Vistra employs 9,000 people and uses contractors to deliver professional services to its clients and support its operations.

Our Policies on Modern 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 Modern Slavery Policy reflects our commitment to acting ethically and with integrity in all our business dealings and relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery and human trafficking is not taking place anywhere in our supply chains.

All Vistra people are prohibited from authorizing or knowingly facilitating modern slavery or human trafficking or engaging in any activity which may breach our Modern Slavery Policy.

The Vistra Board and our Senior Management is responsible for overseeing the implementation of our Modern Slavery Policy and our Executive Vice President, Regulatory is responsible for the preparation of this statement annually.

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 procure third-party suppliers for provision of information technology, office supplies, cleaning, maintenance and catering.

We have zero tolerance to modern slavery and human trafficking. We only seek to enter into business relationships with suppliers who have values and ethics which are similar to ours.

Our Actions to Prevent Slavery and Human Trafficking

Our Values and Culture

Our Code of Conduct and Business Ethics outlines the purpose and values which govern the Vistra way of working across our global business. The Code of Conduct and Business Ethics provides a framework for prudent decision making, in line with our values and behaviours and relevant legislative and regulatory requirements.

The Code of Conduct and Business Ethics acts as a guide for framing our policies and reflects best practice for governance and compliance. The Code of Conduct and Business Ethics provides clear parameters within which Vistra people are empowered, enabled, and expected to make decisions within the business.

Our Code of Conduct and Business Ethics provides the framework for how we act with honesty and integrity in relation to our:

- Business Dealings
- Vistra Group Activities
- Investors



- Colleagues
- Communities.

Identifying and Managing Risks

As part of managing the risks of modern slavery and human trafficking within our supply chain, we will conduct risk-based due diligence on our supplier's risks, communicate our zero tolerance of modern slavery and human trafficking and require our suppliers to enter into written contracts which contain modern slavery clauses.

While the risk of modern slavery is considered to be low based on our supply chain (e.g. information technology or office supplies), we also recognize that there is a risk of being directly linked to contributing to the facilitation of modern slavery or human trafficking in providing professional services to our client. We have incorporated modern slavery clauses into our client agreements and undertake risk-based screening of our clients for adverse news and enforcement activity.

We have suitable channels of communication by which any Vistra person can confidentially report an issue or suspicion of modern slavery without fear of retribution which are set out in our Speak Up Policy.

We conduct regular reviews to ensure we remain compliant with our policy and procedures.

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 Vistra people involved in procurement and/or with responsibility for our supply chain management. We also require all Vistra people to complete Global Business Ethics training.

Our Effectiveness In Combating Slavery And Human Trafficking

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

This statement was approved by Vistra Parent Limited on 10 December 2025.

