

# 2015 GRI Content Index

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## STRATEGY AND ANALYSIS

Indicator	Description	Response/Section Reference in Sustainability Report
G4-1	Statement from senior management	NRG 2015 Sustainability Report pg. 2
G4-2	Description of key impacts, risks, and opportunities.	NRG 2015 Sustainability Report, <a href="#">2015 NRG 10-k</a>

## ORGANIZATIONAL PROFILE

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-3	Name of the organization	NRG Energy, Inc.
G4-4	Primary brands, products, and services	<a href="http://www.nrg.com/">http://www.nrg.com/</a> <a href="#">2015 NRG 10-k</a> Item 1—Business
G4-5	Location of organization's headquarters	Princeton, New Jersey, United States
G4-6	Number and name of countries where the organization operates	United States, Australia, Turkey
G4-7	Nature of ownership and legal form	NRG Energy, Inc. is an investor-owned corporation trading on the New York Stock Exchange under the ticker NRG. NRG is also listed on the S&P 500.
G4-8	Nature of markets served (including geographic breakdown, sectors served, and types of beneficiaries)	<a href="#">2015 NRG 10-k</a> Item 1--Business
G4-9	Scale of the reporting organization (employees, operations, net sales, capitalization, quantity of products/services)	<a href="#">2015 NRG 10-k</a> Item 1--Business
G4-10	Total workforce by employment type, employment contract, and region, broken down by gender	NRG 2015 Sustainability Report pgs. 26, 31-33
G4-11	Percentage of employees covered by collective bargaining agreements	NRG 2015 Sustainability Report pg. 26

G4-12	Describe supply chain	NRG 2015 Sustainability Report pgs. 55-57
G4-13	Significant changes from previous report regarding size, structure, and ownership	<a href="#">2015 NRG 10-k</a> Item 1--Business
G4-14	Explanation of whether and how the precautionary approach or principle is addressed by the organization	Risks are assessed by NRG's Risk department and by department heads without specific reference to the precautionary principle. However, NRG has programs and policies in place to proactively assess climate change and other principle is addressed by the organization environmental sensitivities.
G4-15	External charters, principles, initiatives	<a href="#">2015 NRG 10-k</a> Item 1--Business
G4-16	Memberships in associations	Center for Climate & Energy Solutions Collectively Clinton Global Initiative Conservation International Corporate EcoForum Corporate Responsibility Association Electric Research Power Institute GreenBiz Executive Network Rocky Mountain Institute Business Renewables Council Sustainability Leadership Forum World Business Council for Sustainable Development

## IDENTIFIED ASPECTS AND BOUNDARIES

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-17	Entities included in financial statements, and specify which are included/excluded from this report.	NRG 2015 Sustainability Report pgs. 62-64
G4-18	Process for defining report content and aspect boundaries	NRG 2015 Sustainability Report pgs. 58-64
G4-19	List all the material Aspects identified in the process for defining report content.	NRG 2015 Sustainability Report pgs. 62-64
G4-20	Boundary of the report within the organization	NRG 2015 Sustainability Report pgs. 62-64
G4-21	Boundary of the report outside the organization	NRG 2015 Sustainability Report pgs. 62-64
G4-22	Explanation of the effect of any re-statements of information provided in earlier reports	NRG 2015 Sustainability Report pgs. 62-64
G4-23	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report	NRG 2015 Sustainability Report pgs. 62-64

## STAKEHOLDER ENGAGEMENT

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-24	List of stakeholder groups engaged by the organization	NRG 2015 Sustainability Report pg. 59
G4-25	Basis for identification and selection of stakeholders with whom to engage	NRG 2015 Sustainability Report pgs. 58-59, 62-64
G4-26	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	NRG 2015 Sustainability Report pgs. 58-59
G4-27	Key topics and concerns that have been raised through stakeholder engagement, and how the organization has responded to those key topics and concerns	NRG 2015 Sustainability Report pgs. 43-44, 51-54, 58-61 <a href="#">2015 NRG 10-k</a> Item 1A-Risks

## REPORT PROFILE

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-28	Reporting Period	Jan. 1, 2015, to Dec. 31, 2015
G4-29	Date of most recent previous report	June 2014
G4-30	Reporting Cycle	Annual
G4-31	Contact information	Sustainability@nrg.com
G4-32	"In accordance" option and location of the GRI content index	This report contains Standard Disclosures from the GRI Sustainability Reporting Guidelines. NRG is transitioning to the G4 Guidelines for reporting and has attempted to report "In accordance – Core," however, not all core indicators have been reported on for this reporting cycle. The GRI Index is posted under the Sustainability section on the NRG website.
G4-33	Assurance	NRG has chosen to voluntarily report on our corporate responsibility performance and has designed processes to collect and/or estimate, assess and report on this data. NRG management is responsible for the completeness, accuracy and validity of the information contained in this report. We've engaged a nationally recognized and registered public accounting firm to provide a limited assurance of our emissions inventory. Details of the statement of assurance can be on the NRG website.

## GOVERNANCE

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-34	Governance structure of the organization, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organizational oversight	<a href="#">Corporate Governance</a>
G4-35	Details on the process for delegating authority for economic, environmental and social topics from the highest governance body to senior executives and other employees.	<a href="#">Corporate Governance</a>
G4-36	Details on whether the organization has appointed an executive-level position or positions with responsibility for economic, environmental and social topics, and whether post holders report directly to the highest governance body.	<a href="#">Corporate Governance</a>
G4-38	Composition of the highest governance body and its committees	<a href="#">Corporate Governance</a> <a href="#">Board Composition</a>
G4-39	Details on whether the Chair of the highest governance body is also an executive officer (and, if so, his or her function within the organization's management and the reasons for this arrangement)	<a href="#">Corporate Governance</a> <a href="#">Board Composition</a>
G4-40	Nomination and selection processes for the highest governance body and its committees, and the criteria used for nominating and selecting highest governance body members	<a href="#">Governance &amp; Nominating Committee</a>
G4-41	Processes for the highest governance body to ensure conflicts of interest are avoided and managed	<a href="#">Governance &amp; Nominating Committee</a>
G4-42	Highest governance body's and senior executives' roles in the development, approval, and updating of the organization's purpose, value or mission statements, strategies, policies, and goals related to economic, environmental and social impacts.	NRG 2015 Sustainability Report pgs. 58-60

## ETHICS AND INTEGRITY

Indicator	Description	Response/ Section Reference in Sustainability Report
G4-56	Organization's values, principles, standards and norms of behavior such as codes of conduct and codes of ethics	NRG Energy <a href="#">Code of Conduct</a>
G4-57	Internal and external mechanisms for seeking advice on ethical and lawful behavior, and matters related to organizational integrity, such as helplines or advice lines.	NRG Energy <a href="#">Code of Conduct</a>
G4-58	Internal and external mechanisms for reporting concerns about unethical or unlawful behavior, and matters related to organizational integrity, such as escalation through line management, whistleblowing mechanisms or hotlines.	NRG Energy <a href="#">Code of Conduct</a>

## CATEGORY: ECONOMIC

DMA	NRG’s vision is to create a sustainable energy future by safely providing reliable, cleaner power that enhances people’s lives and delivers value to our stakeholders.	
ASPECT: ECONOMIC PERFORMANCE		
Indicator	Description	Response/ Section Reference in Sustainability Report
DMA		As a publicly held company, NRG has a responsibility to our shareholders to remain financially viable.
G4-EC1	Direct economic value generated and distributed	<a href="#">2015 NRG 10-k</a>
G4-EC2	Financial implications and other risks and opportunities for the organization’s activities due to climate change	<a href="#">2015 NRG 10-k</a> Item 1A-Risks
G4-EC3	Coverage of the organization’s defined benefit plan obligations	NRG believes this to be proprietary information and does not disclose at this time.
G4-EC4	Financial assistance received from government	<a href="#">2015 NRG 10-k</a>
G4-EC5	Ratios of standard entry level wage by gender compared to local minimum wage at significant locations of operation	NRG believes this to have confidentiality issues and does not report this information to GRI at this time.
G4-EC6	Proportion of senior management hired from the local community at significant locations of operation	NRG believes this to have confidentiality issues and does not report this information to GRI at this time.
G4-EC7	Development and impact of infrastructure investments and services supported	NRG 2015 Sustainability Report pgs. 33-42
G4-EC8	Significant indirect economic impacts, including the extent of impacts	<a href="#">2015 NRG 10-k</a> Section 2-Item 7



## CATEGORY: ENVIRONMENTAL

DMA	As one of the largest power producers in the United States NRG is subject to numerous environmental regulations as a result of our operations. NRG has always sought to comply with all environmental regulations and work with stakeholders across our value chain. Our focus areas in environmental include energy, biodiversity, water, emissions and effluents and waste. The VP of Environment oversees the management of NRG’s environmental programs with local responsibilities assigned to plant and facility personnel, while collaborating across the organization to ensure that environmental sustainability is embedded in our organization. NRG acknowledges our role to lead the path toward a sustainable energy future in 2014 NRG announced our long-term <a href="#">carbon reduction goals</a> . These goals have a baseline of 2014 and therefore will be tracked and reported annually going forward.	
ASPECT: ENERGY		
Indicator	Description	Response/ Section Reference in Sustainability Report
G4-DMA	Energy is a key issue to NRG because it is vital to run our operations.	
G4-EN3	Energy consumption within the organization	See NRG’s CDP Climate Change Survey response 2015
G4-EN4	Energy consumption outside of the organization	See NRG’s CDP Climate Change Survey response 2015
G4-EN5	Energy intensity	See NRG’s CDP Climate Change Survey response 2015
G4-EN6	Energy saved due to conservation and efficiency improvements	NRG 2015 Sustainability Report pgs. 49-50
G4-EN7	Reductions in energy requirements of products and services	NRG 2015 Sustainability Report pgs. 49-50

<b>ASPECT: WATER</b>		
<b>Indicator</b>	<b>Description</b>	<b>Response/Reference</b>
G4-DMA	Water is an essential resource in the generation of energy. The NRG Water initiative has a Program Manager that works with the Operations Steering Committee that is made up of the Senior Vice President of Engineering, Director of Engineering and three Plant Managers. The team helps to identify programs, implement processes, review data and provide progress updates on the water initiative. The plant manager for each location assigns a person responsible for tracking water use, water reduction projects and issues specific to their facility's location. Each NRG region has water subject matter experts that work with State and Local Governments, as well as other industrial water users to ensure that water concerns are understood and addressed.	

	<p>NRG uses GRI water accounting principles to account for water withdrawal, consumption and discharge. Additional tools used to evaluate water impacts are the World Business Council for Sustainable Development water tool, and CDP is used to identify water risks.</p> <p>Our efforts are also guided by specific legislation aimed at reducing water withdrawal, including:</p> <ul style="list-style-type: none"> <li>○ California Once Through Cooling Regulations</li> <li>○ EPA 316b, Once Through Cooling Regulations</li> <li>○ Coal Combustion By-products regulations</li> <li>○ Steam Effluent Guidelines regulation</li> </ul> <p>As part of the NRG Water Initiative, NRG Operations Sr. Vice President established a Water Policy in requiring each NRG generating facility to create a Water Management Plan and Drought Contingency Plan. Each facility manager is responsible for these plans and assigns a Water Champion for their facility.</p>	
G4-EN8	Total water withdrawal by source.	NRG 2015 Sustainability Report pgs.46-47
G4-EN9	Water sources significantly affected by withdrawal of water (additional)	NRG 2015 Sustainability Report pgs.46-47
G4-EN10	Percentage and total volume of water recycled and reused	NRG 2015 Sustainability Report pgs.46-47

ASPECT: BIODIVERSITY		
Indicator	Description	Response/ Section Reference in Sustainability Report
G4-DMA	<p>Biodiversity is material to NRG based on our 2013 materiality assessment. As a standard practice, NRG routinely gauges the importance of biodiversity through interactions with our peers in community meetings, environmental permit renewals, shareholder meetings and through our retail customers who buy our electricity. We offer our retail customers the ability to choose an electricity plan that meets their needs whether its lowest cost or renewables. The renewable option is barometer for customer awareness of biodiversity which helps us make informed decisions for future wholesale electricity production. NRG's Biodiversity program, implemented in 2011, includes a Biodiversity Policy Statement, Biodiversity Policy as a subset of our Environmental Policy and Procedures Manual and Biodiversity Plans for all generating sites. Biodiversity Plans are updated annually to incorporate changes and enhancements to site conditions.</p>	
G4-EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	NRG 2015 Sustainability Report pgs. 51-54
G4-EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	NRG 2015 Sustainability Report pgs. 51-54
G4-EN13	Habitats protected or restored	NRG 2015 Sustainability Report pgs. 51-54

G4-EN14	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk	NRG 2015 Sustainability Report pgs. 51-54
G4-EU13	Biodiversity of offset habitats compared to the biodiversity of the affected areas	NRG 2015 Sustainability Report pgs. 51-54

ASPECT: EMISSIONS		
G4-DMA	As one of the largest power producers in the United States NRG emits substantial carbon dioxide and other greenhouse gases as a result of our operations. NRG acknowledges our role to lead the path toward a sustainable energy future in 2014 NRG announced our long-term <a href="#">carbon reduction goals</a> . These goals have a baseline of 2014 and therefore will be tracked and reported annually going forward.	
Indicator	Description	Response/Reference
G4-EN15	Direct greenhouse gas (GHG) emissions (Scope 1)	NRG 2015 Sustainability Report pg. 45, 63
G4-EN16	Energy indirect greenhouse gas (GHG) emissions (Scope 2)	<ul style="list-style-type: none"> <li>a. Total Indirect Scope 2 Emissions - 237,007 metric tons of CO<sub>2</sub>e (Electricity use purchased from the grid and only includes the US)</li> <li>b. Base Year will be 2014 due to the various mergers and acquisitions that have occurred in the past 3 years (i.e. GenOn 2012, EME in 2014, etc.) and the company long range planning goals are based on reductions from 2014.</li> <li>c. Consolidation approach is by ownership percentage.</li> </ul>
G4-EN17	Other indirect greenhouse gas (GHG) emissions (Scope 3)	<ul style="list-style-type: none"> <li>a. Total Indirect Scope 3 Emissions – 17, 948 metric tons of CO<sub>2</sub>e. (Note that car rental emissions are carbon dioxide, CO<sub>2</sub> only)</li> <li>b. The primary activity is Business Travel (includes air, rental car and hotel night emissions).</li> <li>c. Base Year will be 2014 due to the various mergers and acquisitions that have occurred in the past 3 years (i.e. GenOn 2012, EME in 2014, etc.) and the company long range planning goals are based on reductions from 2014.</li> </ul>
G4-EN18	Greenhouse gas (GHG) emissions intensity	See NRG's CDP Climate Change Survey response 2015
G4-EN19	Reduction of greenhouse gas (GHG) emissions	See NRG's CDP Climate Change Survey response 2015
G4-EN20	Emissions of ozone-depleting substances (ODS)	NRG does not maintain this information centrally. Each individual facility complies with its record-keeping requirements regarding ozone-depleting substances.

G4-EN21	NOx, SOx, and other significant air emission	NRG 2015 Sustainability Report pgs. 45-46

ASPECT: EFFLUENTS AND WASTE		
G4-DMA	See 'Waste' section of 2015 Sustainability Report	
Indicator	Description	Response/ Section Reference in Sustainability Report
G4-EN22	Total water discharge by quality and destination	NRG 2015 Sustainability Report pgs. 46-47
G4-EN23	Total weight of waste by type and disposal method	NRG 2015 Sustainability Report pgs. 47-48
G4-EN24	Total number and volume of significant spills	NRG 2015 Sustainability Report pg. 44
G4-EN25	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally (additional)	NRG waste generation is primarily in the United States and is the report boundary for waste generation. Power generation does not generate large volumes of hazardous waste.
G4-EN26	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organization's discharges of water and runoff	NRG 2015 Sustainability Report pgs. 47,51-54
ASPECT: COMPLIANCE		
DMA	Compliance is a material issue to NRG as a result of our business sector and license to operate. The Chief Compliance Officer oversees all issues and the VP of Environmental is responsible for environmental compliance.	
G4-EN29	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	NRG 2015 Sustainability Report pgs. 43-44

## CATEGORY: SOCIAL

DMA	NRG considers social aspects of our sustainability strategy to be an integral part to our success as a responsible company. Our efforts span over a vast range of networks and organizations and help improve air, water and ecosystems, all while supporting each community and promoting the highest ethical business standards.	
SUB-CATEGORY: LABOR PRACTICES AND DECENT WORK		
ASPECT: EMPLOYMENT		
Indicator	Description	Response/ Section Reference in Sustainability Report
G4-DMA	NRG 2015 Sustainability Report pg. 26	
G4-LA1	Total number and rates of new employee hires and employee turnover	Not publicly disclosed in Sustainability Report
G4-LA2	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by significant locations of operation	Not publicly disclosed in Sustainability Report
G4-LA3	Return to work and retention rates after parental leave, by gender	Data not tracked at this time
ASPECT: OCCUPATIONAL HEALTH AND SAFETY		
G4-DMA	Safety is paramount— it is the first of our core values. At NRG our <a href="#">STRIVE</a> core values are the framework which drive our corporate strategy and decision making. Our goal is to attain a record of zero injuries in any given year and achieve top-decile performance for OSHA recordable injuries. We consistently update, implement and enforce robust preventive safety practices and programs to make sure our employees remain healthy and happy on the job. The VP of Safety & Training manages policies and procedures throughout the company.	

DMA	NRG considers social aspects of our sustainability strategy to be an integral part to our success as a responsible company. Our efforts span over a vast range of networks and organizations and help improve air, water and ecosystems, all while supporting each community and promoting the highest ethical business standards.	
G4-LA5	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs	NRG considers this information confidential and does not disclose to GRI at this time.
G4-LA6	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work related fatalities, by region and by gender	Not publicly disclosed in Sustainability Report
G4-LA7	Workers with high incidence or high risk of diseases related to their occupation	NRG does not track this data at this time.
G4-LA8	Health and safety topics covered in formal agreements with trade unions	NRG considers this information confidential and does not disclose to GRI at this time.

ASPECT: TRAINING AND EDUCATION		
G4-DMA	NRG 2015 Sustainability Report pgs. 26-30	
G4-LA9	Average hours of training per year per employee	10; The number excludes all training considered to be related to; safety, ethics or company policy. This training is designed to develop personnel skills, industry knowledge and basic personal improvement.
G4-LA10	Programs for skills management and lifelong learning	Employees
G4-LA11	Percentage of employees receiving regular performance reviews	100%; All full-time NRG employees have access to training and mentoring which include performance reviews with their manager.
ASPECT: DIVERSITY AND EQUAL OPPORTUNITY		
G4-DMA	NRG 2015 Sustainability Report pgs. 31-33	
G4-LA12	Details on breakdown of employees per employee category according to gender, age group, minority group membership, and other indicators of diversity	NRG 2015 Sustainability Report pgs. 31-33
ASPECT: SUPPLIER ASSESSMENT FOR LABOR PRACTICES		
G4-DMA	NRG 2015 Sustainability Report pgs. 55-57	
G4-LA14	Percentage of new suppliers that were screened using labor practices criteria	Supply Chain NRG 2015 Sustainability Report pgs. 55-57
G4-LA15	Significant actual and potential negative impacts for labor practices in the supply chain and actions taken	NRG 2015 Sustainability Report pgs. 55-57
G4-HR11	Significant actual and potential negative human rights impacts in the supply chain and actions taken	NRG 2015 Sustainability Report pgs. 55-57

## SUB-CATEGORY: SOCIETY

### ASPECT: LOCAL COMMUNITIES

G4-DMA	NRG 2015 Sustainability Report pgs. 44-40	
G4-SO1	Percentage of operations with implemented local community engagement, impact assessments, and development programs	100%

## GENERAL STANDARD DISCLOSURES FOR THE ELECTRIC UTILITY SECTOR

Indicator	Description	Response/ Section Reference in Sustainability Report
EU1	Installed capacity, broken down by primary energy source and by regulatory regime.	<a href="#">NRG Generation Overview</a> <a href="#">NRG Asset Map</a>
EU2	Net energy output broken down by primary energy source and by regulatory regime.	<a href="#">2015 NRG 10-k</a>
EU3	Number of residential, industrial, institutional and commercial customer accounts.	<a href="#">2015 NRG 10-k</a>
EU4	Length of above and underground transmission and distribution	Not applicable. NRG does not operate any transmission or distribution lines.
EU5	Allocation of CO2e emissions allowances or equivalent, broken down by carbon trading framework.	NRG is subject to the U.S. carbon trading programs the Regional Greenhouse Gas Initiative (RGGI) and California's AB32 program. NRG has plants located in five of the nine RGGI states as well as plants located in California that fall under the AB32 carbon program. Allowances or equivalents for these programs are purchased through auctions held by each program or by a third party, as they do not receive an allocation from the regulated program. NRG also owns a stake in Gladstone in Australia, but our partners are responsible for credits to comply with that program.
EU6	Management approach to ensure short and long-term electricity availability and reliability.	<a href="#">NRG 2015 Q4 Earnings</a> <a href="#">2015 NRG 10-k</a>
EU7	Demand-side management programs including residential, commercial, institutional and industrial programs.	Please refer to <a href="#">2015 NRG 10-k</a>

Indicator	Description	Response/ Section Reference in Sustainability Report
EU8	Research and development activity and expenditure aimed at providing reliable electricity and promoting sustainable development.	Please refer to <a href="#">2015 NRG 10-k</a>
EU9	Plant Decommissioning - Provisions for decommissioning of nuclear power sites	Please refer to <a href="#">2015 NRG 10-k</a>
EU10	Planned capacity against projected electricity demand over the long term, broken down by energy source and regulatory regime	NRG considers this information proprietary and does not disclose to GRI at this time.
EU11	Average generation efficiency of thermal plants by energy source and by regulatory regime	Please refer to <a href="#">2015 NRG 10-k</a>
EU12	Net energy output broken down by primary energy source and by regulatory regime.	N/A. NRG is an independent power producer.
EU19	Stakeholder participation in the decision making process related to energy planning and infrastructure	<a href="#">Investors</a>
EU21	Contingency planning measures, disaster/emergency management plan and training programs, and recovery/restoration plans.	NRG 2015 Sustainability Report pgs. 6-25 Please refer to <a href="#">2015 NRG 10-k</a>
EU28	Power outage frequency	Not applicable. NRG is not a utility.
EU29	Average power outage duration	Not applicable. NRG is not a utility.
EU30	Average plant availability factor by energy source and by regulatory regime	Please refer to <a href="#">2015 NRG 10-k</a>