



2025 SASB Index

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The mission of SASB, now a part of the International Financial Reporting Standards (IFRS) Foundation, is to develop sustainability metrics for public corporations to disclose material, decision-useful information to investors. NRG supports work that contributes directly to providing comparable and consistent data. The nature of our business directs us to consult the Electric Utilities & Power Generators SASB Standard as defined by the Sustainable Industry Classification System (SICS). Below is a table which contains relevant SASB disclosures against which we are able to report as a publicly traded company. Topics that are not applicable to NRG are denoted as such. Additional activity metrics that may assist in the accurate evaluation and comparability of disclosure may be found in NRG’s [2025 Form 10-K](#).

Code	Category	Unit of Measurement	Metric	2025 Response																					
Greenhouse Gas Emissions & Energy Resource Planning																									
IF-EU-110a.1	Quantitative	Million metric tons carbon dioxide equivalent (MMtCO ₂ e), Percentage (%)	(1) Gross global Scope 1 emissions, percentage covered under (2) emissions-limiting regulations and (3) emissions-reporting regulations	(1) 32,604 MMtCO ₂ e (2) 1.1% (3) 98.9%																					
IF-EU-110a.2	Quantitative	MMtCO ₂ e	Greenhouse gas (GHG) emissions associated with power deliveries	The calculation of this metric is under consideration and will not be disclosed this year.																					
IF-EU-110a.3	Discussion and Analysis	n/a	Discussion of long- and short-term strategy or plan to manage Scope 1 emissions, emissions reduction targets, and an analysis of performance against those targets	Our Scope 1 emissions include direct GHG emissions associated with fuel combustion in boilers, turbines, and engines used to produce electric power. When calculating our emissions, we do not include those associated with combustion of fossil fuels used for other activities or equipment, such as auxiliary boilers, starter engines, and company fleet vehicles, as they are not material sources of emissions for NRG. We also exclude emissions from fugitive sources such as hydrofluorocarbon (HFC) releases from use of refrigeration and/or air conditioning equipment, sulfur hexafluoride (SF ₆) from electrical equipment, and methane releases from natural gas transport. While our overall Scope 1 emissions will increase given recent acquisitions, we expect emissions intensity to decrease as natural gas begins to comprise a greater share of our portfolio compared to coal. While we are adjusting our short-term strategy, we remain committed to our long-term aspiration of achieving net-zero emissions by 2050. For more on our strategy to reduce our emissions, please see our 2025 Sustainability Report.																					
Air Quality																									
IF-EU-120a.1	Quantitative	Metric tons (t), Percentage (%)	Air emissions of the following pollutants: (1) nitrogen oxides [NO _x (excluding nitrous oxide N ₂ O)], (2) sulfur oxides (SO _x), (3) particulate matter (PM ₁₀), (4) lead (Pb), and (5) mercury (Hg); percentage of each in or near areas of dense population	<table><tr><th colspan="3">AIR QUALITY METRICS</th></tr><tr><th>Air emissions source</th><th>Air emissions (metric tons)</th><th>Percentage from production facilities within urbanized areas</th></tr><tr><td>NO_x</td><td>19,121</td><td>56%</td></tr><tr><td>SO_x</td><td>50,598</td><td>69%</td></tr><tr><td>PM₁₀</td><td>1,370</td><td>73%</td></tr><tr><td>Pb</td><td>.15</td><td>64%</td></tr><tr><td>Hg</td><td>.050</td><td>49%</td></tr></table>	AIR QUALITY METRICS			Air emissions source	Air emissions (metric tons)	Percentage from production facilities within urbanized areas	NO _x	19,121	56%	SO _x	50,598	69%	PM ₁₀	1,370	73%	Pb	.15	64%	Hg	.050	49%
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Water Management						
IF-EU-140a.1	Quantitative	Million cubic meters (m ₃), Percentage (%)	(1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress	TOTAL WATER WITHDRAWN		
				Water Source	Total (in millions of cubic meters)	Percent
				Freshwater	165	15%
				Non-Fresh Water	380	35%
				Ocean/Brackish Water	541	50%
				Total	1,086	100%
				Percentage of Each in Regions with High or Extremely High Baseline Water Stress		
				Baseline Water Stress High (40-80%) or Extremely High (>80%)	Percent of Total Water	Percent Non-Fresh
				Withdrawal from Areas with High/Extremely High Baseline Water Stress	0.01%	0%
				Consumption from Areas with High/ Extremely High Baseline Water Stress	0.06%	0%
				Type of Generating Facility in Baseline Water Stress Areas		
				Type of Generating Facility in Baseline Water Stress Areas	Number	
				Fossil Fuel (natural gas, coal, oil)	3	
				Renewable (solar and wind)	0	
				Nuclear	0	
Thermal (district heating and cooling)	0					
Total	3					
IF-EU-140a.2	Quantitative	Number	Number of incidents of non-compliance associated with water quality permits, standards, and regulations	NRG complies with water quality and discharge-related regulation at all facilities. Incidents affecting water quality or discharge compliance are tracked through enterprise-wide Environmental Key Performance Indicators (EKPIs), which are reported monthly to management and regularly to the Board. We refer to our formal Environmental Policy & Management framework if we must remediate water-related issues, including active groundwater monitoring and site closures, if needed. Also see the Environmental Compliance section of our 2025 Sustainability Report.		

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IF-EU-140a.3	Discussion and Analysis	n/a	Description of water management risks and discussion of strategies and practices to mitigate those risks	NRG’s definition of substantive risk from water is the possibility that an event will occur and significantly affect the achievement of NRG’s business goals. Risk identification and assessment process applies to both direct operations and supply chain. NRG uses measures, metrics, and indicators for water risk assessment leveraging management and professional judgment from the perspective of: Financial impact: including, corporate earnings, capital expenditure on technologies to reduce water consumption, and risk Environmental impact: including, availability, quality of river basis, and regulations that impact supply and/or management of water Plant operations: including, operation disruption due to shortage, increase in water costs, or supply chain risks We use the WRI Aqueduct tool annually to develop high-level views of basin-level risk that informs strategic decision-making and the setting of goals and targets. This tool is open source and provides ease of use. Because each generating facility is unique, the risk approach identifies and addresses risks related to water availability and quality, relevant regulatory, financial, operational, and environmental concerns, as well as stakeholder and supply chain impacts. Water risk is monitored by risk owners (individual plant operators) and reported to management upon material changes, with a threshold of 20% in water consumption and withdrawal levels. Plant Operations team members review modeling scenarios to identify if a water supply risk could impact projected generation levels at any point within a two-year timeframe. If so, risk mitigation efforts are identified and economically evaluated for implementation. Plant water usage is reviewed annually by the senior leaders of NRG’ s Operations, Engineering, and Commercial Operations teams. Risk response decisions are primarily made and executed by managing plant operations to maintain compliance with all relevant regulations. NRG also reports supply chain water risk annually through the CDP Questionnaire. For more information, see the Water Stewardship section of our 2025 Sustainability Report.
Coal Ash Management				
IF-EU-150a.1	Quantitative	Metric tons (t), Percentage (%)	(1) Amount of coal combustion products (CCPs) generated, (2) percentage recycled	(1) 871,013 (2) 56%
IF-EU-150a.3	Discussion and Analysis	n/a	Description of CCPs management policies and procedures for active and inactive operations	We continually research options for the beneficial reuse of coal combustion residuals (CCRs) from NRG operations. Examples include diverting CCRs for use in construction products, concrete, and cement. This practice helps reduce the need for mining virgin resources like native soil, gravel, and gypsum. In 2025, 56% of CCRs generated by NRG facilities were beneficially reused. The remainder was disposed of in accordance with applicable state and federal regulations.
Energy Affordability				
IF-EU-240a.1	Quantitative	Rate	Average retail electric rate for (1) residential, (2) commercial, and (3) industrial customers	This topic pertains to regulated electric utilities, and NRG is not a regulated utility. Therefore, this disclosure is not applicable to NRG.
IF-EU-240a.3	Quantitative	Number, Percentage (%)	(1) Number of residential customer electric disconnections for non-payment, (2) percentage reconnected within 30 days	This topic pertains to regulated electric utilities, and NRG is not a regulated utility. Therefore, this disclosure is not applicable to NRG.
IF-EU-240a.4	Discussion and Analysis	n/a	Discussion of impact of external factors on customer affordability of electricity, including the economic conditions of the service territory	This topic pertains to regulated electric utilities, and NRG is not a regulated utility. Therefore, this disclosure is not applicable to NRG.
Workforce Health & Safety				
IF-EU-320a.1	Quantitative	Rate	(1) Total recordable incident rate (TRIR), (2) fatality rate, and (3) near miss frequency rate (NMFR) for (a) direct employees and (b) contract employees	(1) 0.2 (2) 0 (3) 5.2

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End-Use Efficiency & Demand				
IF-EU-420a.2	Quantitative	Percentage (%) by megawatt hours (MWh)	Percentage of electric load served by smart grid technology	This topic pertains to regulated electric utilities, and NRG is not a regulated utility. Therefore, this disclosure is not applicable to NRG.
IF-EU-420a.3	Quantitative	Megawatt hours (MWh)	Customer electricity savings from efficiency measures, by market	This topic pertains to regulated electric utilities, and NRG is not a regulated utility. Therefore, this disclosure is not applicable to NRG.
Nuclear Safety & Emergency Management				
IF-EU-540a.1	Quantitative	Number	Total number of nuclear power units, broken down by results of most recent independent safety review	NRG does not provide electricity through nuclear sources. Therefore, this disclosure is not applicable to NRG
IF-EU-540a.2	Discussion and Analysis	n/a	Description of efforts to manage nuclear safety and emergency preparedness	NRG does not provide electricity through nuclear sources. Therefore, this disclosure is not applicable to NRG
Grid Resiliency				
IF-EU-550a.1	Quantitative	Number	Number of incidents of non-compliance with physical or cybersecurity standards or regulations	NRG does not have transmission and distribution operations. Therefore, this disclosure is not applicable to NRG.
IF-EU-550a.2	Quantitative	Minutes, Number	(1) Systems Average Interruption Duration Index (SAIDI), (2) System Average Interruption Frequency Index (SAIFI), and (3) Customer Average Interruption Duration Index (CAIDI), inclusive of major event days	NRG does not have transmission and distribution operations. Therefore, this disclosure is not applicable to NRG.
Activity Metrics				
IF-EU-000.B	Quantitative	Megawatt hours (MWh)	Total electricity delivered to: (1) residential, (2) commercial, (3) industrial, (4) all other retail customers, and (5) wholesale customers	2025 Form 10-K page 7
IF-EU-000.D	Quantitative	Megawatt hours (MWh), Percentage (%)	Total electricity generated, percentage by major energy source, percentage in regulated markets	2025 Form 10-K page 12 2025 Performance Data