2019 – GRI Content Index

GRI Standards			
GRI 101: Foundation			
GRI 102: General Disclosures			
Disclosure	**Description**	**Reference/Section**	**Omission**
102-1	Name of the organization	2019 Annual Report/Form 10K	
102-2	Activities, brands, products, and services	2019 Annual Report/Form 10K	
102-3	Location of headquarters	Princeton, New Jersey, United States	
102-4	Location of operations	2019 Annual Report/Form 10K	
102-5	Ownership and legal form	2019 Annual Report/Form 10K	
102-6	Markets served	2019 Annual Report/Form 10K	
102-7	Scale of the organization	2019 Annual Report/Form 10K	
102-8	Information on employees and other workers	2019 Annual Report/Form 10K	
102-9	Supply chain	2019 Sustainability Report – Sustainable Suppliers	
102-10	Significant changes to the organization and its supply chain	2019 Annual Report/Form 10K	
102-11	Precautionary Principle or approach	2019 Annual Report/Form 10K	
102-12	External initiatives	2019 Annual Report/Form 10K	
102-13	Membership of associations	2019 Sustainability Report – Sustainable Business	
102-14	Statement from senior decision-maker	2019 Sustainability Report – CEO Letter	
102-15	Key impacts, risks, and opportunities	2019 Annual Report/Form 10K	
102-16	Values, principles, standards, and norms of behavior	NRG Energy Code of Conduct	
102-17	Mechanisms for advice and concerns about ethics	NRG Energy Code of Conduct	
102-18	Governance structure	Corporate Governance	
102-19	Delegating authority	Corporate Governance	
102-20	Executive-level responsibility for economic, environmental, and social topics	Corporate Governance	
102-21	Consulting stakeholders on economic, environmental, and social topics	2019 Sustainability Report – Sustainable Business	

GRI 102: General Disclosures (continued)

Disclosure	Description		Omission
102-22	Composition of the highest governance body and its committees	Board of Directors	
102-23	Chair of the highest governance body	Board of Directors	
102-24	Nominating and selecting the highest governance body	Governance and Nominating Committee	
102-25	Conflict of interest	Governance and Nominating Committee	
102-26	Role of highest governance body in setting purpose, values, and strategy	2020 Proxy Statement	
102-29	Identifying and managing economic, environmental, and social impacts	2019 Annual Report/Form 10K	
102-40	List of stakeholder groups	2019 Annual Report/Form 10K	
102-41	Collective bargaining agreements	2019 Annual Report/Form 10K	
102-42	Identifying and selecting stakeholders	2019 Sustainability Report – Reporting	
102-43	Approach to stakeholder engagement	2019 Sustainability Report – Sustainable Business	
102-44	Key topics and concerns raised	2019 Sustainability Report – Sustainable Business	
102-45	Entities included in the consolidated financial statements	2019 Annual Report/Form 10K	
102-46	Defining report content and topic boundaries	2019 Sustainability Report – Reporting	
102-47	List of material topics	2019 Sustainability Report – Reporting	
102-48	Restatements of information	2019 Sustainability Report – Reporting – Appendix, Safe Harbor	
102-49	Changes in reporting	2019 Sustainability Report – Reporting – Appendix, Our approach to sustainability reporting	
102-50	Reporting period	Jan. 1, 2019, to Dec. 31, 2019	
102-51	Date of most recent report	May, 2020	
102-52	Reporting cycle	Annual	
102-53	Contact point for questions regarding the report	Sustainability@nrg.com	
102-54	Claims of reporting in accordance with the GRI Standards	2019 Sustainability Report – Reporting – Appendix, Our approach to sustainability reporting	
102-55	GRI content index	GRI Content Index	
102-56	External assurance	2019 3rd Party Verification	

Key topics

GRI 201: Economic Performance

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Annual Report/Form 10K	
103-2	The management approach and its components	2019 Annual Report/Form 10K	
103-3	Evaluation of the management approach	2019 Annual Report/Form 10K	
201-1	Direct economic value generated and distributed	2019 Annual Report/Form 10K	
201-2	Financial implications and other risks and opportunities due to climate change	2019 Annual Report/Form 10K	
201-3	Defined benefit plan obligations and other retirement plans		NRG believes this to be proprietary information and does not disclose at this time.

GRI 204: Procurement Practices

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Suppliers	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Suppliers	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Suppliers	
204-1	Proportion of spending on local suppliers		We do not currently report on local spend

GRI 302: ENERGY

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Reporting	
103-2	The management approach and its components	2019 Sustainability Report – Reporting	
103-3	Evaluation of the management approach	2019 Sustainability Report – Reporting	
302-1	Energy consumption within the organization	NRG's CDP Climate Change Survey response 2019	
302-2	Energy consumption outside of the organization	NRG's CDP Climate Change Survey response 2019	

GRI 302: ENERGY (continued)

Disclosure	Description	Reference/Section	Omission
302-3	Energy intensity	NRG's CDP Climate Change Survey response 2019	
302-4	Reduction of energy consumption	NRG's CDP Climate Change Survey response 2019	
302-5	Reductions in energy requirements of products and services	NRG's CDP Climate Change Survey response 2019	

GRI 303: WATER AND EFFLUENTS

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Operations	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Operations	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Operations	
303-1	Total water withdrawal by source	2019 Sustainability Report – Sustainable Operations	
303-2	Water sources significantly affected by withdrawal of water (additional)	See NRG's CDP Water response 2019	
303-3	Percentage and total volume of water recycled and reused	See NRG's CDP Water response 2019	

GRI 305: EMISSIONS

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Operations	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Operations	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Operations	
305-1	Direct (Scope 1) GHG emissions	2019 3rd Party Verification	
305-2	Energy indirect (Scope 2) GHG emissions	2019 3rd Party Verification	
305-3	Other indirect (Scope 3) GHG emissions	2019 3rd Party Verification	
305-4	GHG emissions intensity	NRG's CDP Climate Change Survey response 2019	
305-5	Reduction of GHG emissions	2019 Sustainability Report – Sustainable Operations	

GRI 305: EMISSIONS (continued)

Disclosure	Description	Reference/Section	Omission
305-6	Emissions of ozone-depleting substances (ODS)	2019 Sustainability Report – Sustainable Operations	
305-7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	2019 Sustainability Report – Sustainable Operations	

GRI 306: EFFLUENTS AND WASTE

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Operations	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Operations	
103-3	Evaluation of the management approach	See NRG's 2018 CDP Water Response	
306-1	Total water discharge by quality and destination	See NRG's 2018 CDP Water Response	
306-2	Waste by type and disposal method	See NRG's 2018 CDP Water Response	
306-3	Significant spills	See NRG's 2018 CDP Water Response	
306-5	Water bodies affected by water discharges and/or runoff	See NRG's 2018 CDP Water Response	

GRI 307: ENVIRONMENTAL COMPLIANCE

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Operations	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Operations	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Operations	
307-1	Non-compliance with environmental laws and regulations	2019 Sustainability Report – Sustainable Operations	

GRI 308: SUPPLIER ENVIRONMENTAL ASSESSMENT

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Suppliers	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Suppliers	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Suppliers	
308-1	New suppliers that were screened using the environmental criteria	2019 Sustainability Report – Sustainable Suppliers	
308-2	Negative environmental impacts in the supply chain and actions taken	2019 Sustainability Report – Sustainable Suppliers	

GRI 403: OCCUPATIONAL HEALTH AND SAFETY

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report – Sustainable Operations	
103-2	The management approach and its components	2019 Sustainability Report – Sustainable Operations	
103-3	Evaluation of the management approach	2019 Sustainability Report – Sustainable Operations	
403-1	Workers represented in formal joint management–worker health and safety committees	2019 Sustainability Report – Sustainable Operations	
403-2	Type of injury and rates of injury, occupational diseases, lost days, and absenteeism, and total number of work-related fatalities	2019 Sustainability Report – Sustainable Operations	
403-5	Worker training on occupational health & safety	2019 Sustainability Report – Sustainable Operations	

GRI 405: DIVERSITY AND EQUAL OPPORTUNITY

Disclosure	Description	Reference/Section	Omission
103-1	Explanation of the material topic and its boundary	2019 Sustainability Report	
103-2	The management approach and its components	2019 Sustainability Report	
103-3	Evaluation of the management approach	2019 Sustainability Report	
405-1	Diversity of governance bodies and employees	2020 Proxy Statement & 2019 Sustainability Report	

GENERAL STANDARD DISCLOSURES FOR THE ELECTRIC UTILITY SECTOR

Disclosure	Description	Reference/Section
EU1	Installed capacity, broken down by primary energy source and by regulatory regime.	2019 Annual Report/Form 10K
EU2	Net energy output broken down by primary energy source and by regulatory regime.	2019 Annual Report/Form 10K
EU3	Number of residential, industrial, institutional and commercial customer accounts	2019 Annual Report/Form 10K
EU5	Allocation of CO2e emissions allowances or equivalent, broken down by carbon trading framework.	Not applicable. NRG does not operate any transmission or distribution lines.
EU6	Management approach to ensure short and long-term electricity availability and reliability.	2019 Annual Report/Form 10K
EU7	Demand-side management programs including residential, commercial, institutional and industrial programs.	2019 Annual Report/Form 10K
EU8	Research and development activity and expenditure aimed at providing reliable electricity and promoting sustainable development	2019 Annual Report/Form 10K
EU16	Policies and requirements regarding health and safety of employees and employees of contractors and subcontractors	NRG's CDP Climate Change Survey response 2019
EU18	Percentage of contractor and subcontractors' employees that have undergone relevant health and safety training	NRG's CDP Climate Change Survey response 2019
EU19	Stakeholder participation in the decision-making process related to energy planning and infrastructure	NRG's CDP Climate Change Survey response 2019
EU21	Contingency planning measures, disaster/emergency management plan and training programs, and recovery/restoration plans.	NRG's CDP Climate Change Survey response 2019