

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

This Code of Conduct for Suppliers, Subcontractors and Third-Party Intermediaries (this “Code of Conduct”) defines the basic requirements for suppliers, subcontractors and third-party intermediaries (collectively, “partners”) of Energy Vault Holdings, Inc., a Delaware corporation, and its affiliates (“Energy Vault”), concerning our partners’ responsibilities towards their communities, stakeholders and the environment. Energy Vault expects all partners to adhere to the guidelines included in this Supplier Code of Conduct and reserves the right to reasonably audit compliance or stop using a partner at any time if such Partner fails to comply with this Code of Conduct . Energy Vault reserves the right to change the requirements of this Code of Conduct at any time. In such event, Energy Vault expects our partners to accept, promptly comply and abide by such changes.

Energy Vault expects the following commitment from its suppliers, subcontractors and third-party intermediaries:

1.0 Commitment to Integrity and Fair Dealing

- 1.1 To support Energy Vault’s commitment to integrity and fair dealing, including a commitment to honesty and transparency in all business activities. This commitment includes the avoidance of any actions that create or appear to create a conflict of interest between personal interests and the interests of Energy Vault and our partners.
- 1.2 To work to establish and maintain a risk-based human rights and environmental due diligence process and criteria covering their own operations, subsidiaries, and business partners criteria for compliance. These criteria are listed in Appendix 1.

2.0 Legal compliance

- 2.1 To comply with the laws of all jurisdictions to which it is subject. In addition to applicable laws in their jurisdiction, All partners shall comply with the Foreign Corrupt Practices Act (FCPA), the United Kingdom Bribery Act of 2010 (UKBA) and the European Union Directive of Combating Corruption, and no partner shall tolerate any form of, and shall not engage directly or indirectly in any form of, corruption or bribery. No partner shall grant, offer or promise anything of value to a government official or to a counterparty in the public or private sector to secure any official action or obtain any improper advantage.

3.0 Fair competition, anti-trust laws and intellectual property rights

- 3.1 To act in accordance with national and international competition laws and not to participate in price fixing, market or customer allocation, market sharing or bid rigging with competitors.

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

3.2 To respect the intellectual property of others.

4.0 Respect for the basic human rights of employees

- 4.1 To uphold and respect fundamental human rights, including in accordance with recognized international standards, including the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labor Organization's (ILO's) Fundamental Conventions.
- 4.2 To promote equal opportunities for and treatment of their employees irrespective of skin color, race, nationality, national origin, social background, medical condition, genetic information, marital status, sexual orientation, political or religious conviction, sex, gender, age or status as a military veteran.
- 4.3 To respect the personal dignity, privacy and rights of each individual.
- 4.4 To prevent any form of abusive or illegal labor such as forced labor or human trafficking. All labor must be voluntary, and workers must be allowed freedom of movement. All forms of forced labor and human trafficking are prohibited, including but not limited to any form of prison, slave, bonded or forced indentured labor.
- 4.5 To refuse to tolerate any unacceptable treatment of employees, such as mental cruelty, physical or corporal discipline, sexual harassment or discrimination.
- 4.6 To prohibit behavior including gestures, language and physical contact, that is sexual, coercive, threatening, abusive or exploitative.
- 4.7 To provide fair remuneration and to guarantee the applicable national statutory minimum wage.
- 4.8 To comply with the maximum number of working hours and all overtime-pay requirements established by applicable laws.
- 4.9 To respect employees' right to freedom of association and collective bargaining, as far as legally possible.
- 4.10 To identify, assess, prevent, mitigate, and where necessary remediate actual and

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

potential adverse human rights impacts arising from their operations and supply chains, including impacts affecting workers, local communities, and other vulnerable groups.

- 4.11 To engage, where appropriate, with workers' representatives and impacted communities during the identification and mitigation of human rights and environmental risks.

5.0 Prohibition of child labor

- 5.1 To employ no workers under the age of 15 or, in those countries subject to developing exception of the ILO Convention 138, to employee no workers under the age of 14.

6.0 Health and safety of employees

- 6.1 To take responsibility for the health and safety of its employees.
- 6.2 To control hazards and take the reasonable precautionary measures against accidents and occupational diseases in accordance with applicable laws and good industry standards.
- 6.3 To provide reasonable training and ensure that employees are educated in health and safety issues applicable to their roles.
- 6.4 To use, when reasonable, an occupational health & safety management system.
- 6.5 To encourage, when reasonable, formal occupational health and safety management systems aligned with ISO 45001 or equivalent internationally recognized standards.

7.0 Sustainability & Environmental protection

- 7.1 To operate in a manner that reduces their environmental footprint, manages climate change-related risks, and ensures responsible management of natural resources. partners are encouraged to implement ISO 14001 management principles to monitor, manage, and report on their environment performance, including the implementation of energy efficiency and low-carbon solutions, water efficiency measures, waste management procedures, and sustainable procurement guidelines (including anti-deforestation measures and promotion of biodiversity and conservation).
- 7.2 To act in accordance with the applicable statutory and international standards

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

regarding environmental protection and pollution prevention.

- 7.3 To identify and track scope 1 & 2 emissions and encourage identification and tracking of scope 3 categories that have significant impacts on operations.
- 7.4 To encourage Life Cycle Analysis by ISO 14040 standards or obtain Environmental Product Declarations, as applicable or appropriate.
- 7.5 To take reasonable measures to prevent environmental degradation, biodiversity loss, deforestation, hazardous pollution, and adverse impacts on water and soil resources.

8.0 Supply Chain

- 8.1 To require suppliers to follow practices consistent with, and no less strict than, this Code of Conduct.
- 8.2 To comply with the principles of non-discrimination with regard to supplier selection and treatment.
- 8.3 To create and implement a sustainable supply chain policy for downstream suppliers and agree to share such policy with Energy Vault upon request.
- 8.4 To refrain from sourcing materials or services from any entity listed on the Specially Designated Nationals and Blocked Persons List maintained by the United States Treasury Office of Foreign Asset Controls (OFAC).
- 8.5 To apply appropriate due diligence measures to their own suppliers and business partners and maintain records demonstrating compliance with this Code of Conduct and related criteria in Appendix 1.

9.0 Responsible Mining

- 9.1 To participate in the Responsible Minerals Initiative and the Responsible Cobalt Initiative, and to make commercially reasonable efforts to encourage downstream suppliers to also participate in these initiatives.

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

- 9.2 To take reasonable efforts to avoid the use of conflict minerals and raw materials which directly or indirectly finance armed groups who violate human rights.

10.0 Supplier Auditing

- 10.1 To provide Energy Vault evidence of Code of Conduct compliance, including with respect to environmental, social and governance issues, when requested through requested partner surveys, on-site audits, regular business review collaborations, or other means of validation.
- 10.2 To monitor business changes and, where risks, concerns, or evidence of activity contrary to this Code of Conduct are identified, act promptly to remedy any such issues.
- 10.3 To implement, where non-compliance is identified, corrective action plans with defined responsibilities, timelines, and monitoring mechanisms.

11.0 Training

- 11.1 To provide and promote partner employee training with respect to compliance with applicable laws and this Code of Conduct.
- 11.2 To cooperate and participate in any Energy Vault-sponsored training with respect to compliance with this Code of Conduct.

12.0 Reporting

- 12.1 Any violations of this Code of Conduct can be reported by any stakeholder at: <https://irdirect.net/NRGV/whistleblower>. To the extent possible, Energy Vault will maintain the confidentiality of any individual who, in good faith, sought advice or reported violations of this Code of Conduct and will not tolerate any retaliation or retribution against such an individual.
- 12.2 To establish or participate in grievance and complaints mechanisms that are accessible, confidential, non-retaliatory, and available to workers, communities, and other affected stakeholders.

**ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS,
SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES**

- 12.3 To maintain appropriate records evidencing compliance with human rights and environmental obligations and shall provide relevant information to Energy Vault upon reasonable request.

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

Code of Conduct - Declaration of the Subcontractor, Supplier and Third-Party Intermediaries

We hereby declare the following:

1. We have received a copy of the Energy Vault Code of Conduct for Subcontractors, Suppliers and Third-Party Intermediaries (hereinafter "Code of Conduct"), updated as of September 2026, and commit to comply with its principles and requirements. These commitments are in addition to any other commitments set out in supply agreements or purchase orders we have with Energy Vault from time-to-time.
2. We will provide Energy Vault upon request - but not more than once a year - either, at our option (i) a written self-assessment in the form provided by Energy Vault or (ii) a written report approved by Energy Vault describing the actions taken or to be taken to assure our compliance with the Code of Conduct.
3. We confirm that we promote and implement the principles of the Energy Vault Code of Conduct with our suppliers and perform reasonable due diligence to ensure compliance with the principles of the Energy Vault Code of Conduct.
4. We agree that Energy Vault, Energy Vault's customers, or a third party appointed by Energy Vault and reasonably acceptable to us, shall be entitled (but not obliged) to conduct inspections at our premises in order to verify our compliance with the Code of Conduct. Such inspections may only be conducted upon prior written notice from Energy Vault, during regular business hours, in accordance with the applicable data protection law and shall neither unreasonably interfere with our business activities nor violate any of our confidentiality agreements with third parties. We further agree to reasonably cooperate in any inspections conducted and to bear our expenses in connection with such inspection; Energy Vault will bear its expenses. We agree to cause our suppliers to honor the foregoing access and inspection rights for Energy Vault and its customers.
5. In addition to any other rights and remedies Energy Vault may have, in the event of (i) our material or repeated failure to comply with the Code of Conduct or (ii) our denial of Energy Vault's or its customers' right of inspection as described above, Energy Vault may terminate any purchase agreement entered into and/or any purchase order without any liability whatsoever. For the avoidance of doubt, material failures always would include, but are not limited to, incidents of child labor, corruption or bribery, human trafficking or forced labor, or failure to comply with the Code of Conduct's environmental protection requirements.
6. We agree that this declaration is subject to the substantive law, legal proceedings and venue which is set out in the purchase agreement and/or purchase order concluded between Energy Vault and us. In the event no such agreement is yet established, this declaration is subject to the substantive law (without reference to any of its conflict of law rules) of the federal laws of the United States and the laws of the State of California, and disputes shall be brought exclusively in courts of competent jurisdiction located in Los Angeles County, California, United States.

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

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ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

The foregoing Energy Vault Supplier Code of Conduct is acknowledged and agreed by:

Place, date

Signature

Name, Function

Company Name / Seal

Separate signature page to:

Energy Vault Code of Conduct - Declaration of the Subcontractor, Supplier and Third-Party
Intermediaries

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

Appendix 1

The following topics are included in the annex for suppliers flagged as part of Energy Vault's value-chain due diligence assessment criteria:

1. Child Labour
 - a. Risk of child labour in operations or supply chain
 - b. Child labour incidents in the past 3 years and remediation actions
 - c. Preventive measures in high-risk regions
 - d. Supplier mechanisms to prohibit and monitor child labour
2. Forced Labour
 - a. Retention of workers' identity documents by company or recruiters
 - b. Workers' ability to terminate employment freely without penalty
 - c. Forced labour incidents in the past 3 years and remediation actions
 - d. Supplier mechanisms to prohibit and monitor forced labour
3. Occupational Health and Safety
 - a. Regular health and safety risk assessments
 - b. Tracking of LTIFR and fatalities
 - c. Preventive measures to reduce workplace risks
 - d. External OHS certification, such as ISO 45001
4. Freedom of Association and Collective Bargaining
 - a. Workers' right to form or join trade unions
5. Discrimination and Diversity
 - a. Policies addressing discrimination and harassment
 - b. Processes for reporting and resolving discrimination cases
 - c. Workforce diversity data collection and monitoring
6. Carbon and GHG Emissions
 - a. Scope 1 and Scope 2 GHG measurement, monitoring and reporting
 - b. Formal Scope 1 and Scope 2 GHG reduction targets
 - c. Scope 3 GHG measurement, monitoring and reporting
 - d. Formal Scope 3 GHG reduction targets
7. Anti-Corruption and Business Ethics
 - a. Anti-corruption and anti-bribery policy
 - b. Employee training on ethical business conduct
 - c. Confirmed corruption incidents in the past 3 years

ENERGY VAULT HOLDINGS, INC. CODE OF CONDUCT FOR SUPPLIERS, SUBCONTRACTORS, AND THIRD-PARTY INTERMEDIARIES

8. Environmental Pollution — Air, Water and Soil
 - a. Compliance with environmental permits and regulations
 - b. Monitoring and reporting of air emissions, water discharges and hazardous waste
 - c. Environmental incidents or fines in the past 3 years
 - d. Measures to prevent pollution
 - e. Use and handling of hazardous chemicals and related incidents
9. Governance of Supply Chain
 - a. Formal human rights and environmental due diligence policy, approved by senior management and reviewed regularly
 - b. Coverage of human rights standards, including ILO Conventions and UN Guiding Principles
 - c. Coverage of environmental impacts, including pollution, biodiversity loss, climate change and resource use