ENERGY VAULT HOLDINGS, INC.
QUALITY & ENVIRONMENTAL MANAGEMENT POLICY

INTRODUCTION

Energy Vault Holdings, Inc. (“Energy Vault”) is an integrated power infrastructure platform that builds, owns and operates flexible, reliable energy systems, supporting the clean energy transition through the development of advanced energy infrastructure solutions. The following policy outlines Energy Vault’s environmental management policies and programs across our global operations. Energy Vault is committed to environmental responsibility by minimizing our impact and contributing to a sustainably energized world where nature and humankind coexist in harmony. Implementation and guidance of this policy is the responsibility of the Sustainability Team, who reports on progress to the Executive Leadership team and ultimately the Board of Directors.

QUALITY & ENVIRONMENTAL MANAGEMENT

Energy Vault is committed to environmental sustainability as reflected in our core mission, our focus on sustainable business management practices, and our dedication to sustainable production design and supply chain management. Energy Vault is committed to operating assets responsibly while continuously improving our environmental performance and setting targets to minimize the environmental impact of our operations. Energy Vault’s Sustainability Team works to implement the specific initiatives outlined in this section on a day-to-day basis—further information on specific roles and responsibilities can be found in our 2025 Corporate Sustainability Report.
Energy Vault takes actions toward solidifying our Quality, Environmental, and Health & Safety Management Systems. Achieving and maintaining our ISO (International Organization for Standardization) certifications is proof of this effort.

- Energy Vault’s companywide quality management system is in in compliance with and certified under ISO 9001:2015 standards to consistently provide products and services that enhance customer satisfaction.
- As a sustainable energy solutions provider, we recognize the importance of achieving our mission in the most environmentally friendly manner possible. Energy Vault’s companywide environmental management system is in compliance with and certified under ISO 14001:2015.
- Energy Vault recognizes the safety and health of our employees, ensuring a safe working environment globally. The company complies and is certified under ISO 45001.
- Energy Vault has certification for an integrated management system under ISO 9001, ISO 14001, and ISO 45001—the certification covers Energy Vault’s main offices and global operations.
- Energy Vault products undergo a life cycle analysis (LCA) in line with the ISO 14040:2006 framework.
- Energy Vault understands that effective and efficient relationships with suppliers are critical to achieving corporate objectives.
- Energy Vault invests time and resources in continuously improving the quality management systems and environmental management systems that directly impact the quality of the products and services Energy Vault offers.

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Energy Vault is aware of the environment in which we operate and the challenges of the new millennium. Energy Vault strives for environmental protection through a series of commitments, principles, guidelines, and strategic goals.

- We commit to document Energy Vault's environmental impact on an annual basis through the publication of a Corporate Sustainability Report. The report is aimed at increasing internal and external stakeholders' awareness of Energy Vault's sustainability strategy and impacts across the environmental, social, and governance dimensions.
- We provide sustainability-focused education to our employees to ensure they understand Energy Vault's operational environmental impacts.
- We comply with all applicable environmental statutory and regulatory requirements.
- We will continue to work with appropriate governmental entities for the development of technically sound and financially responsible environmental laws and regulations.
- We will continually assess the impact of our facilities and products on the environment and on the communities in which we operate as we strive for continuous improvement.
- We conduct analysis of the economic, environmental, & strategic risks and opportunities of environmental management.
- We are committed to working with outside organizations on a continuous basis to update and implement this policy, specifically through our work with ISO, OSHA, ISI Envision, and consultants.
- We are committed to reducing waste and pollutants, conserving resources and recycling materials at every stage of the product life cycle.
- We work towards the greater efficiency in the rational use of natural resources, and the beneficial reuse of waste materials, such as coal combustion residues.
- We promote the reuse or recycling of waste materials within our production cycle and projects in order to create a circular economy.
- We promote the reduction of emissions into the atmosphere through the design of energy storage systems that support the energy transition where possible.

Energy Vault will identify a quality & environmental management representative at each office and project site in order to oversee the effective implementation of this policy.

Energy Vault's company-wide Environmental Management Policy covers Production Operations/Business Facilities, Products/Services, Distribution/Logistics, Management of Waste, Suppliers/Service Providers/Contractors, Other Key Business Partners, Mergers/M&A, and other upstream/downstream corporate interactions.

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ENERGY MANAGEMENT

Energy Vault is committed to the continuous improvement of energy management throughout the organization and to minimize greenhouse gas emissions arising from energy consumption. Energy Vault's Energy Management Policy is aimed at tracking and reducing our global energy footprint in alignment with our public and validated Science Based Targets Initiative near-term and net-zero target. With the release of this target, Energy Vault made a formal commitment to reduce scope 1 and scope 2 GHG emissions 63% by 2035 from a 2024 base year, and to measure and reduce scope 3 emissions. Energy Vault also commits to reach net-zero by 2045. As part of this, it commits to reduce Scope 1, 2 and 3 emissions 90% by 2045 from a 2024 base year. Energy Vault strives for responsible energy management throughout offices and across global operations.

- We commit to disclosing Energy Vault's global energy use in our annual Corporate Sustainability Report—both from renewable and non-renewable sources.
- We commit to quantifying and disclosing our energy reduction targets, specifically in line with validated near-term and net-zero SBTi targets.
- We audit our energy use on an annual basis to track energy use changes and identify areas for improvement—this allows us to evaluate the progress of energy reduction initiatives while our global footprint and company headcount continue to expand.
- We reduce our corporate energy use through facility upgrades and continue to invest in energy efficiency R&D.
- We commit to increase our use of clean or green energy through the purchase of Renewable Energy Certificates (RECs) and investigating on-site renewable energy generation.
- We promote energy use awareness inside our organization, providing resources and trainings to our employees to understand corporate energy consumption and energy efficiency initiatives.
- We strive to work in energy efficient facilities and limit our corporate reliance on fossil fuels.
- We commit to improving the energy efficiency of our products, working to deliver sustainable energy storage systems with high round trip efficiency (RTE).

Initiatives

- Retrofit of office spaces with energy efficient LED lighting.
- Installation of motion sensor lights at offices and R&D sites.
- Use of portable photovoltaic (solar) power systems on some construction sites.
- Use of ECO upgraded portable site buildings on some construction sites.
- 100% green electricity use for operations of Snyder R&D site.
- Innovation in energy reduction strategies for manufacturing, construction, and installation methods of B-Vault™ & G-Vault™.

Targets

- We target that new O&O projects will achieve a construction diesel usage reduction intensity (measured as gallons of diesel consumed per MWh of project size) of 10% by 2030 and 20% by 2035, against a 2025 baseline.
- We target a reduction in electricity consumption at our owned and operated facilities by 10% by 2030 and 20% by 2035, against a 2025 baseline.

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WASTE MANAGEMENT

Energy Vault is committed to ensuring all company generated waste is disposed of responsibly. Energy Vault is dedicated to promoting a circular economy through three main principles; elimination of waste and pollution, recirculation of materials in use-phase, and through supporting the regeneration of nature. Energy Vault, its partners, and its stakeholders are encouraged to follow the principles of circularity to eliminate waste by reusing, repairing, or recycling material in an effort to reduce the demand on natural resources. Energy Vault promotes environmental awareness to understand the impacts of waste, how to minimize waste generation, and how to recycle appropriately. Our waste strategies and impacts are made public on an annual basis through the publication of our Corporate Sustainability Report.

Energy Vault strives for responsible waste management throughout offices and across global operations.

- We strive to protect the environment surrounding company facilities from potential impacts from project- and operations-related waste management activities.
- We will identify local, or onsite personnel and/or a waste management company who is responsible for waste management.
- We conduct waste audits and assessments on an annual basis—publishing results in our Corporate Sustainability Report and identifying areas of significant waste generation and for improved waste management.
- We commit to diverting waste from landfills when feasible—this allows Energy Vault to minimize waste generation at source and facilitate reduction, reuse and recycling of waste.
- We commit to ensuring that hazardous waste (batteries, fuels, paints, etc) is disposed of according to local rules and handled by an authorized or licensed waste disposal entities. We will track hazardous waste to its destination to ensure end-of-life disposal procedures.
- We train the necessary employees on managing company waste at end-of-life, highlighting various recycling streams and site-separation to reduce waste generation across operation
- We innovate and research around waste management identifying opportunities to use waste material in the production of our energy storage systems.
- We commit to setting quantified time-bound targets for waste reduction and waste performance improvement.
- We commit to integrate programs at company facilities that directly divert waste from landfill
- We work with facilities that have appropriate licenses, permits and approvals to perform recycling, material reuse, and waste disposal.
- We commit to engaging with vendors and customers to understand and implement best waste management practices.

(Waste Management continued)

Initiatives

- Sorting buckets at construction sites and R&D facilities to promote recycling and reduce waste to landfill.
- Office locations equipped with recycling centers focused on three categories: compostables, recyclables, and general waste.
- On-site employees/contractor trainings for waste sorting and proper waste management/disposal/minimization.
- Current recycling of the following items: Paper products, Cardboard, Wood, Plastics, Metal, Glass, E-waste/Batteries, Coffee Pods, Furniture, Construction Waste (Concrete, Wood, Metal, etc.).
- Investment in B-Vault™ installation innovation, to improve site construction timeframes and minimize waste generation during construction.
- Improvement of G-Vault™ manufacturing and assembly to streamline processes, speed-up construction, and minimize waste generation. By leveraging advanced construction techniques such as pre-cast modules and trolley based installation alongside major system improvements, Energy Vault is accelerating gravity technology delivery timelines while reducing costs and minimizing waste.
- Identification and R&D of waste material for use in G-Vault™ mobile masses.

Targets

- We commit that new O&O projects will achieve a construction waste intensity reduction (measured as tons of waste generated per MWh of project size) of 10% by 2030 and 20% by 2035, against a 2025 baseline.
- We commit to diverting 30% of construction waste from landfill by 2030, increasing to 50% by 2035.

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WATER MANAGEMENT

Energy Vault is committed to ensuring the sustainable and responsible use of water throughout its operations. We commit to make efforts to reduce our water footprint, increase water efficiency of our systems, and reuse water after treatment when feasible. This policy specifically covers freshwater for daily office/R&D use and for construction/installation of Energy Vault's energy storage systems. Our goal is to communicate objectives and strategies for Energy Vault's commitment to understanding impacts of water scarcity, water risks, and responsible water use. Energy Vault is committed to implementing the following policies and programs as we strive to properly manage water as a critical resource to our business.

Energy Vault strives for responsible water management throughout offices and across global operations.

- We commit to publicly disclosing our global water use on an annual basis in our Corporate Sustainability Report. This disclosure allows Energy Vault to audit our water use annually, highlighting areas of significant consumption and helping direct our focus for water efficiency improvements.
- We commit to continually implementing water management measures within our office spaces and on our R&D sites, directly reducing water consumption and wastewater quality where possible.
- We train employees on our project sites, educating them on responsible water use and water discharge best practices.
- We commit to work with our vendors and customers on responsible water use. This collaboration can help us co-create solutions to reduce water footprint.
- We commit to set time-bound and site-specific water use targets and increase water efficiency.

Initiatives

- Installation of low flow kitchen and bathroom fixtures.
- R&D site water recycled on-site for irrigation.
- Rainwater collection and filtration for use as grey water in job site trailers and portable restrooms.
- Project site trainings to employees and contractors on best practices for water use and discharge.

Targets

- We commit to reducing absolute water consumption at our offices by 10% by 2030 and 20% by 2035, against a 2025 baseline.
- We commit that new O&O projects will achieve a construction water intensity — measured as gallons of water per MWh of installed capacity — at least 10% below the average intensity of our owned and operated project portfolio (2025 baseline cohort) by 2030, and at least 20% below by 2035.

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RAW MATERIAL MANAGEMENT

Energy Vault is committed to using raw materials in a sustainable manner, striving to ensure that our materials are sourced in a responsible way that respects human rights and minimizes negative environmental impacts. We acknowledge that the sourcing of raw materials for our energy storage systems can have impacts on local communities and ecosystems, and we've established this policy to inform our procurement practices and promote a sustainable supply chain. Energy Vault strives for responsible raw material management throughout offices and across global operations. Energy Vault is committed to implementing the following policies and programs as we strive to increase our sustainable raw material use.

- We commit to minimize the negative environmental impact of raw material sourcing, working with vetted and local suppliers where possible.
- In line with our Environmental Management Program, we are committed to increasing the use of recycled materials in the production of our energy storage systems, reducing the need for raw materials.
- We collaborate with stakeholders to innovate around raw material use and share best practices, participating in industry associations, with global institutions, and directly with our key suppliers.
- We encourage Life Cycle Assessments (LCAs) or Environmental Product Declarations (EPDs) from suppliers, with our goal of increasing the use of third-party verified raw materials.
- We commit to striving to avoiding raw materials from sites containing globally or nationally significant biodiversity.
- We commit to reporting on progress towards our raw material goals in our annual Corporate Sustainability Report.
- We've created sustainable material use goals, setting company targets for the share of sustainable raw materials and recycled raw materials that we use in the production of our energy storage systems. We are targeting 100% sustainable material inputs into our energy storage solutions that are renewable, recyclable, or reusable by 2040.

Initiatives

- Collaborative work with our procurement team, sharing resources and training on sustainable raw materials.
- Use of multiple LCA software to track raw materials through our upstream supply chain.