

ENERGY VAULT HOLDINGS, INC.

RESPONSIBLE ARTIFICIAL INTELLIGENCE STATEMENT

Our Commitment

Energy Vault Holdings, Inc. recognizes the significant potential of artificial intelligence to accelerate innovation across our business, alongside the responsibility that comes with its use. This Statement describes the principles and governance that guide how Energy Vault and its employees use AI technologies and complements our published Cybersecurity Statement and Digital Security Program.

- **Governance and Oversight:** Energy Vault maintains an internal Artificial Intelligence Policy that governs the use of AI tools and systems across the company. The policy is reviewed at least annually, and on an ad hoc basis when AI platforms, regulations, or risks materially change. Oversight is coordinated by Energy Vault's Information Operations function, in coordination with Legal and executive leadership.
- **Data Privacy and Cybersecurity:** AI tools used at Energy Vault are subject to data classification and handling requirements designed to protect personal data and confidential company information. Only AI tools that have been reviewed and approved by Energy Vault may be used with company data, and higher-sensitivity data is restricted from external AI systems absent appropriate contractual data protection terms. These controls operate within Energy Vault's broader Digital Security Program (ISO 27001-aligned), described in our published Cybersecurity Statement.
- **Bias, Fairness, and Human Oversight:** Energy Vault works to identify and mitigate bias in the AI systems it uses, including through the use of diverse, representative data and periodic assessment of AI outputs for fairness. AI tools are treated as decision-support instruments, not decision-makers: human review is required before AI-generated content or output is used in any material business, financial, legal, compliance, or safety-related context.
- **Transparency and Accountability:** Energy Vault requires that AI-assisted work be clearly attributed and that the use of AI systems be documented in a way that is explainable to relevant stakeholders. Defined roles and responsibilities govern the oversight, approval, and management of AI tools and use cases across the organization, so that accountability for AI-influenced outcomes is always assignable to a person, not just a system.
- **Defined Boundaries for AI Use:** Energy Vault maintains defined boundaries on how AI tools may and may not be used. These include restrictions on inputting sensitive data into external AI systems, prohibitions on relying on AI as the sole basis for financial, legal, compliance, or safety-critical decisions, and prohibitions on using AI for any purpose that would violate Energy Vault's Code of Conduct. Consistent with the EU Artificial Intelligence Act, Energy Vault does not use or deploy AI systems that engage in manipulative or deceptive practices, exploitation of vulnerabilities, social scoring, or unauthorized biometric surveillance.
- **Training and Awareness:** Energy Vault provides training on the ethical and secure use of AI to all employees during onboarding. Additional training is pushed out as AI technology changes, and policy updates are communicated to employees annually.
- **Looking Ahead:** AI governance is an evolving discipline. Energy Vault continues to evaluate its AI governance program against emerging frameworks and standards, including the EU AI Act, the NIST AI Risk Management Framework, and ISO/IEC 42001, and will update this Statement and its underlying policies as its program matures.