

ENERGY VAULT HOLDINGS, INC. PROCUREMENT AND SUPPLY CHAIN ESG PRACTICES STATEMENT

Outreach and Screening

All potential suppliers and vendors are screened on the basis of their potential compliance with the Energy Vault Supplier, Subcontractor and Third-Party Intermediary Code of Conduct. The screening process includes review of the supplier questionnaire and/or publicly available information regarding the supplier's or vendor's environmental practices, governance structure and social accountability.

Contracting

The negotiation of supply agreements includes an emphasis on legal and policy compliance as outlined in the Energy Vault Supplier, Subcontractor and Third-Party Intermediary Code of Conduct. Supplier-specific negotiations also address country, sector and commodity-specific risks related to such compliance.

Relationship Management

Supplier performance will be evaluated through questionnaires and audits regarding compliance with the Energy Vault Supplier, Subcontractor and Third-Party Intermediary Code of Conduct, as well as iterative improvements in supply chain risk management.