

**HUMAN RIGHTS POLICY STATEMENT
AND
SUPPLIER CODE OF CONDUCT
ARRAY TECHNOLOGIES, INC.**

INTRODUCTION AND PURPOSE

Array Technologies, Inc. (together with all of its operating companies and subsidiaries, “Array” or the “Company”) must conduct its business in accordance with all applicable laws of the United States, Brazil, Spain, Mexico, Chile, Australia, South Africa and any other foreign governments, and in a manner that reflects the highest ethical standards. The purpose of this Human Rights Policy Statement and Supplier Code of Conduct (“Statement and Code of Conduct”) is to memorialize Array’s pledge to conduct its business with the highest ethical standards, foster a safe and healthy work environment, and demonstrate ethical behavior and respect for the human rights of our colleagues, individuals who are a part of our supply chain and throughout the communities in which we operate. This Statement and Code of Conduct also sets forth our Supplier Code of Conduct, as we expect that all our suppliers and contractors will embrace our pledge and seek to integrate it within each of their organizations.

APPLICABILITY

This Statement and Code of Conduct applies to all employees of Array and its subsidiaries, and those acting on Array’s behalf, including our suppliers and subcontractors.

OUR PLEDGE

Array is committed to respecting and protecting human rights in the workplace and promoting these values in our supply chain. This commitment includes respecting all individuals and encouraging our colleagues in their efforts to reach their full potential.

Specifically, Array recognizes its responsibilities with regard to:

- Protecting the health, safety and security of our employees, wherever we work and without regard to age, gender, gender identity, gender expression, religion or other characteristics.
- Complying with all applicable laws regarding slavery, human trafficking, child labor, freedom of speech, freedom of association and employee privacy, including the U.K. Anti-Slavery Act and the Brazilian legislations;
- Providing a workplace free from harassment or unlawful discrimination;
- Developing our employees’ potential, and affording them equal employment opportunity;

- Providing formal and informal training sessions, both in-person and through online courses, on our Code of Business Conduct, which includes the themes set forth in this Statement and Code of Conduct. The Company currently conducts in person training sessions regarding anti-corruption regulations, regularly holds leadership meetings to discuss the importance of guarding our Code of Business Conduct and deploys on-line courses to employees on topics such as workplace safety, harassment and other similar topics;
- Ensuring that our employees and property is secured and that we are taking the necessary actions to mitigate any potential risks relating thereto; and
- Selecting and working with suppliers and subcontractors to promote alignment with the principles reflected in our Code of Business Conduct.

SUPPLIER CODE OF CONDUCT

Array strives to achieve transparency with its vendors and is focused on critical issues in supply chain management, including ethical procurement and compliance with applicable laws. Array has a network of domestic and international suppliers supporting its global manufacturing footprint. These suppliers are economically diverse in terms of size. Array's supplier on-boarding process ensures that we are provided with the highest quality materials and level of customer service. We have implemented a risk-based approach in order to ensure compliance with Array's ethical standards. Such efforts ensure that Array's suppliers do not engage in unethical conduct.

In addition to maintaining the highest level of integrity and conducting their business in accordance with both the letter and spirit of the law, we expect the following of our vendors:

- ***Human Rights and Respect for People:*** Array expects suppliers to share our commitment to being attentive to the human rights of others. Suppliers should not engage in human trafficking or modern slavery, use child labor or otherwise use forced, prison or compulsory labor, or source materials that directly or indirectly finance or benefit armed groups. Furthermore, suppliers should not tolerate discrimination, harassment or retaliation, and should provide a safe, secure and healthy workspace.
- ***Gifts and Entertainment:*** Suppliers shall not engage in any form of bribery to secure or retain business and will act in accordance with all laws related to bribery and conflicts of interest, including the Brazilian Anti-Corruption Act, the Foreign Corrupt Practices Act of the United States,

the Brazilian Anti-Corruption Act, the Spanish Criminal Code, the applicable Mexican¹ and Chilean² legislation in the area of corruption and any other applicable anti-corruption laws. Under no circumstance should any gift or entertainment be offered, given, or provided to any Array employee or contractor, or any immediate family member of an Array employee or contractor, unless such gift or entertainment is not excessive in value and is consistent with customary business practices.

- **Conflict Minerals:** Suppliers shall take all measures necessary to comply with the supplier expectations set forth in Array’s Conflict Minerals Policy and Section 1502 of the Dodd-Frank Act, including the establishment of policies, due diligence frameworks, and management systems of their own, consistent with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, that are designed to accomplish this goal.
- **Transparency:** We expect the highest level of transparency from our vendors. Array may from time to time audit its suppliers or otherwise objectively verify that suppliers are in compliance with this Statement and Code of Conduct.

Array has set forth its commitment to integrity, ethical business practices and social responsibility in its Code of Business Conduct, which can be found on Array’s website.

APPLICATION

Array’s executive officers are accountable to the Board of Directors for ensuring that this Statement and Code of Conduct is effectively implemented. Responsibility for the application of this Statement and Code of Conduct rests with all Array employees, contractors, suppliers and other vendors engaged in activities with Array. This Statement and Code of Conduct will be submitted for review and approval by Array’s Board of Directors or a committee thereof on an annual basis. This Statement will be posted on Array’s investor relations website at ir.arraytechinc.com under the “Governance Highlights” Section of the “Corporate Governance” tab.

VENDOR’S CERTIFICATION OF COMPLIANCE

Array requires its new supplier, subcontractors, and employees to acknowledge this Human Rights Policy and Supplier Code of Conduct and their intention to comply with its requirements.

¹ Federal Criminal Code (“*Código Penal Federal*”), National Code of Criminal Procedures (“*Código Nacional de Procedimientos Penales*”), General Law of Administrative Responsibilities (“*Ley General de Responsabilidades Administrativas*”) and General Law of the National Anticorruption-System (“*Ley General del Sistema Nacional Anticorrupción*”).

² Law 20,939 (“*Ley 20.393*”), Law 19,913 (“*Ley 19.913*”) and the applicable provisions of the Chilean Criminal Code.