

**SUPPLIER CODE OF CONDUCT
ARRAY TECHNOLOGIES, INC.**

Array Technologies, Inc. (together with all of its operating companies and subsidiaries, “Array” or the “Company”) 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. Array expects its suppliers to commit to respecting human rights as set out in the United Nations Universal Declaration of Human Rights and the International Labor Organization (ILO) Declaration of Fundamental Principles and Rights at Work and adheres to the principles set out in the United Nations Guiding Principles on Business and Human Rights.
- **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 Foreign Corrupt Practices Act (FCPA) of the United States, the UK Bribery Act of 2010, the Brazilian Anticorruption Law No. 12,846/2013, the applicable provisions of the Spanish Criminal Code, the applicable Mexican¹ and Chilean² legislation in the area of corruption, and any other applicable anti-corruption laws and related regulations. Under no circumstance should any gift or entertainment be offered, given, or provided to any Array employee or contractor, or any

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.

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 Organisation for Economic Co-operation and Development (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict Affected and High-Risk Areas, that are designed to accomplish this goal.
- **Environment:** Array is committed to evaluate and improve the environmental performance of our operations and to promote greater environmental responsibilities. We expect all our suppliers to support our commitments in this area. Array expects all suppliers to follow our environmental requirements and work in accordance with an environmental management system. Suppliers are expected to evaluate environmental performances of their activities ensure efficient use of water and energy, and work to reduce hazardous waste and emissions.
- **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 Supplier 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 Supplier Code of Conduct is effectively implemented. Responsibility for the application of this Supplier Code of Conduct rests with all Array employees, contractors, suppliers and other vendors engaged in activities with Array. This Supplier 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 Supplier Code of Conduct will be posted on Array's website at www.arraytechinc.com/policies/.

COMPLIANCE

Our suppliers must comply with this Supplier Code of Conduct, in addition to all applicable laws, regulatory requirements, and Array's contractual requirements and policies. We expect our suppliers to commit to continuous improvement in all areas covered in this Supplier Code of Conduct. When screening for new suppliers, Array will use acknowledgement and acceptance of this Supplier Code of Conduct as a requirement.

As part of their compliance with this Supplier Code of Conduct, we also expect our suppliers to maintain appropriate records and to make these records available upon request. And we reserve the right to monitor and audit our suppliers' compliance activities and performance. If suppliers are not meeting our expectations, we will work together with the supplier to agree on a corrective action plan. If a supplier violates the Supplier Code of Conduct, or the supplier fails to correct non-compliance within a reasonable timeframe, we will consider suspending or terminating the business relationship.

SUPPLIER'S CERTIFICATION OF COMPLIANCE

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

Title: Supplier Code of Conduct	Document Number:
Approved: December 13, 2022	Supersedes: Human Rights Policy Statement and Supplier Code of Conduct, adopted December 1, 2021.
Expires: When replaced	Approved By: Board of Directors