

**ENVIRONMENTAL POLICY
ARRAY TECHNOLOGIES, INC.**

As a global provider of utility-scale solar tracker technology, Array Technologies, Inc. (together with its operating subsidiaries, “Array”) is committed to accelerating the adoption of cost-effective and sustainable energy. We are also committed to leveraging our unique position as a global company to advance positive environmental change. Our Environmental Policy (this “Policy”) outlines our commitment to environmental management and operating in ways that reduce natural resource use, enhance environmental outcomes, and measure our performance over time. Our Policy is designed to advance our environmental strategy, which is detailed in our Environmental, Social and Governance (ESG) Report.

SCOPE

This Policy applies to all Array employees, including part time employees.

OVERSIGHT & COMPLIANCE

The Policy is overseen and administered by Array’s ESG Steering Committee (the “Committee”). Policy violations should be reported in a timely manner to Array’s Director of HSE, Christopher Faith at christopher.faith@arraytechinc.com or directly to a member of the Committee.

OPERATIONAL ENVIRONMENTAL MANAGEMENT & COMPLIANCE

Array will develop and implement an environmental management system to ensure that products, activities, and services with significant impacts on the environment are identified and managed responsibly. To advance our environmental strategy, we are committed to:

- Complying with all relevant environmental regulations and laws in the jurisdictions where we operate.
- Conducting internal and external environmental audits to ensure our operations are supporting our environmental strategy. These audits will also inform improvements to our internal best practices.
- Frequently sharing our environmental management practices with internal and external stakeholders. Internal stakeholders will participate in training and awareness programs to learn about the environmental management system. Environmental performance records and annual environmental reports will be shared with external stakeholders to demonstrate progress.
- Receiving ISO 14001 attestation to ensure that the operational environmental management system is compliant. The 14001 attestations will include the percentage of the suppliers’ operations that are covered by the ISO 14001 certification.

- Reducing the emissions intensity of Array’s business operations by measuring scope 1 & 2 carbon emissions as defined by the GHG Protocol Corporate Standard for Carbon Accounting and working to enhance our climate strategy over time.
- As a signatory of the UN Global Compact, we are committed to complying with all group requirements, including annual reporting.

WASTE MANAGEMENT & RECYCLING PROGRAMS

Array is committed to implementing strong waste management policies and recycling programs to reduce the negative impact of waste generation. We will:

- Implement internal policies and trainings focused on safely managing chemical waste and reducing hazardous and non-hazardous waste.
- Identify opportunities to reduce waste throughout our value chain, from reusing and recycling materials in production to working with suppliers on sustainable packaging alternatives.

NATURAL RESOURCE PROTECTION

To ensure that Array prioritizes environmental responsibility throughout its value chain, we have created specific programs and policies that are designed to help preserve our natural resources. Specifically, we will focus on water consumption and sourcing standards by:

- Developing and implementing a water recycling program.
- Creating annual reports that disclose information about the amount of water that is recycled, reused, and consumed.
- Developing high sourcing standards and purchasing environmentally responsible materials, such as green steel, to reduce production of materials with destructive supply chains.
- Monitoring the environmental impact of our sourcing standards and including metrics in annual reports.