

HUMAN RIGHTS POLICY 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 and foreign governments, and in a manner that reflects the highest ethical standards. The purpose of this Human Rights Policy (this “Policy”) is to confirm Array’s commitment 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 employees, individuals who are a part of our supply chain, and throughout the communities in which we operate. We expect that all our suppliers and contractors will embrace our pledge and seek to integrate it within each of their organizations.

We strive to respect and promote human rights in accordance with the United Nations Guiding Principles on Business and Human Rights in our relationships with our employees, suppliers, subcontractors and any others acting on Array’s behalf. Our aim is to help increase the enjoyment of human rights within the communities in which we operate. This Policy is guided by international human rights principles encompassed by the United Nations Universal Declaration of Human Rights, including those contained within the International Bill of Rights and the International Labor Organization’s (ILO) 1998 Declaration on Fundamental Principles and Rights at Work. Array is a signatory to the United Nations Global Compact and follows the Organisation for Economic Co-operation and Development (OECD) Guidelines for Multinational Enterprises.

APPLICABILITY

This Policy 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;

- 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 Policy as well as annual training sessions regarding anti-corruption regulations, regular leadership meetings to discuss the importance of guarding our Code of Business Conduct and annual 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;
- selecting and working with suppliers and subcontractors to promote alignment with the principles reflected in our Code of Business Conduct;
- respecting our employees' right to join, form or not to join a labor union without fear of reprisal, intimidation or harassment;
- providing a safe and healthy workplace and comply with applicable safety and health laws and regulations;
- maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats;
- prohibiting the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery and any form of human trafficking;
- prohibiting the hiring of individuals that are under 18 years of age for positions in which hazardous work is require; and
- compensating employees competitively relative to the industry and local labor market, and in accordance with terms of applicable collective bargaining agreements.

DIVERSITY AND INCLUSION

Array upholds and supports the right to equal treatment without discrimination or harassment. We are committed to equal opportunity and are intolerant of discrimination and harassment. We work to maintain workplaces that are free from discrimination or harassment on the basis of any of the following, or a combination of the following, grounds:

- age;
- creed (includes religion);

- sex (including pregnancy and breastfeeding) *;
- gender Identity* and gender expression*;
- sexual orientation*;
- family status (such as a parent-child relationship);
- marital status (including the status of being married, single, widowed, divorced, separated, or living in a conjugal relationship outside of marriage, whether in a same sex or opposite sex relationship);
- disability (including mental, physical, developmental or learning disabilities);
- race;
- ancestry;
- place of origin;
- ethnic origin;
- citizenship;
- color;
- record of offences (criminal conviction for a provincial offence, or for an offence for which a pardon has been received) (applies to employment only);
- association or relationship with a person identified by one of the above grounds; and
- perception that one of the above grounds applies.

The basis for recruitment, hiring, placement, development, training, compensation and advancement at the Company is qualifications, performance, skills and experience. We do not tolerate disrespectful or inappropriate behavior, unfair treatment or retaliation of any kind. Harassment is not tolerated in the workplace and in any work-related circumstance outside the workplace.

* Note that harassment on these grounds have distinct requirements under OSHA.

| | |
|------------------------------------|--|
| Title: Human Rights Policy | 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 |