



ENVIRONMENTAL POLICY

ARRAY TECHNOLOGIES, INC.

As a global provider of utility-scale solar tracker technology, Array Technologies, Inc. (together with its operating subsidiaries, "Array") will leverage our unique position as a global company to advance positive environmental change. We are committed to accelerating the adoption of cost-effective and sustainable energy. 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 officers, employees, agents, or contractors.

OVERSIGHT & COMPLIANCE

The Policy is overseen and administered by Array's ESG Executive Steering Committee (the "Committee"). Policy violations should be reported in a timely manner to Array's Chief Legal Officer or via the TellArray portal, which may be found on the Gigaset or www.intouchwebsite.com/TellArray

ENVIRONMENTAL COMMITMENT

Array Technologies, Inc. is committed to accelerating the adoption of cost-effective and sustainable energy. To advance our environmental strategy, we will:

- Comply with all relevant regulations and compliance obligations in the jurisdictions where we operate.
- Operate in ways that reduce natural resource use, enhance environmental outcomes and reduce the negative impacts on the environment.
- Implement an environmental management system to ensure that products, activities, and services with significant impacts on the environment are identified and managed responsibly.
- Conduct environmental audits to ensure our operations support our environmental strategy and help drive continuous improvements.
- Provide training and awareness programs internally to learn about the environmental management system.
- Track key environmental performance indicators and provide results to key stakeholders to demonstrate progress.

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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.

