



## **CONFLICT MINERALS POLICY**

### **ARRAY TECHNOLOGIES, INC.**

#### **OVERVIEW**

Array Technologies, Inc. (together its subsidiaries, “Array” or the “Company”) is committed to maintaining the highest standard of ethical conduct and supports the goals and objectives of Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the “Dodd-Frank Act”) with respect to humanitarian and environmental abuses associated with the use of certain minerals that directly or indirectly finance or benefit armed groups in The Democratic Republic of the Congo (the “DRC”) or “adjoining countries,” as defined in the Dodd-Frank Act (the “Covered Countries” and each, a “Covered Country”). To that end and in connection with the enactment of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010 (the “Dodd-Frank Act”), Array is compelled to determine whether its products contain (i) columbite-tantalite, also known as coltan (the metal ore from which tantalum is extracted); cassiterite (the metal ore from which tin is extracted); gold; wolframite (the metal ore from which tungsten is extracted); or their derivatives; or (ii) any other mineral or its derivatives determined by the United States Secretary of State to be financing conflict in the DRC or a Covered Country (collectively, “Conflict Minerals”).

#### **SCOPE**

This Policy applies to all Array products and/or product families. Array requests that all its partners, subcontractors, and suppliers adopt and enforce this Policy as it pertains to review of Conflict Minerals products.

#### **POLICY**

Array is committed to avoiding the use of Conflict Minerals which directly or indirectly finance or benefit armed groups in the DRC or adjoining countries. Array is committed to complying with the reporting obligations required under Section 1502 of the Dodd-Frank Act, as well as the related rules and regulations issued by the U.S. Securities and Exchange Commission (the “SEC”), including the requirement that the Company conduct inquiries into the source of any Conflict Minerals included in its products.

Array has implemented a process to evaluate its products, survey its relevant suppliers and perform good faith, reasonable due diligence to determine the origin of Conflict Minerals that are contained in, or used in the production of, its products. Due to the complexity of Array’s supply chain, this undertaking is ongoing and will require a significant investment of time and resources. Array will work closely with its direct suppliers in carrying out these steps and fulfilling disclosure and reporting requirements. It is Array’s goal for all products, materials and components supplied to it to be free of Conflict Minerals or include only those Conflict Minerals that (i) originate outside of the Covered Countries, (ii) come from scrap or recycled sources or (iii) are supplied from smelters and refiners that have been validated by an independent private sector party to be conflict-free.



# ARRAY

In furtherance of these goals, Array expects each of its suppliers (and each of their “upstream” suppliers) to:

- familiarize itself with the SEC’s Conflict Minerals rules and this policy, implement policies and systems that are consistent with the rule and this policy and require their direct and indirect suppliers to do the same;
- implement procedures to trace Conflict Minerals at least to the smelter or refiner level (working with their direct and indirect suppliers as applicable) and provide Array with proper verification of the country of origin and source of the materials used in the products, materials or components supplied to Array;
- respond to Array’s survey requests and other in a timely manner and with full disclosure following the specific instructions provided;
- at Array’s request, provide Array with written certifications and other information concerning the origin of conflict minerals included in products, materials and components supplied to Array, and require their direct and indirect suppliers to do the same; and
- where reasonably possible, source Conflict Minerals from smelters and refiners validated as conflict free (see [www.conflictreesmelter.org](http://www.conflictreesmelter.org)) and require their direct and indirect suppliers to do the same.

## **COMPLIANCE TEAM**

A committee (the “Compliance Team”) consisting of a representative from the Company’s legal, engineering, and integrated supply chain departments shall be established and meet periodically. Each member of the Compliance Team shall be responsible for their respective department’s compliance with this Policy and requirements set forth in the Company’s Conflict Minerals Memorandum

## **COMPLIANCE WITH LAWS**

These policies and procedures are in compliance with applicable law, including compliance with the Securities and Exchange Commissions’ final rule implementing Section 1502 of the Dodd-Frank Act.

## **TRANSPARENCY AND REPORTING**

Array is committed to transparency in the implantation of this Policy and will make available reports on its progress to relevant stakeholders. Any inquiries or concerns regarding this Policy please contact the Chief Legal Officer.

