



**Code of Business Conduct
Array Technologies, Inc.**

Table of Contents

ARRAY'S CORE VALUES

INTRODUCTION TO OUR CODE

- What Array Expects from Each of Us
- Who Must Follow Our Code?
- Our Shared Obligations to the Code
- Additional Obligations for Managers and Supervisors
- Making the Right Decision
- Asking for Advice and Voicing Concerns
- Investigation Process
- Array Will Not Tolerate Retaliation

ONE ARRAY: HOW WE TREAT EACHOTHER

- Respecting Each Other and Promoting a Positive Workplace
- Workplace Safety
- Drug and Alcohol-Free Workplace
- Protecting Personal Data

ONE ARRAY: HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

- Avoiding Conflicts of Interest
- Financial Interests
- Outside Employment
- Improper Personal Benefits
- Corporate Opportunities
- Disclosure

SAFEGUARDING COMPANY PROPERTY AND INFORMATION

- Array's Physical Property
- Using Information Technology Resources
- Array's Confidential Information
- Insider Trading
- Array's Intellectual Property
- Respecting the Intellectual Property Rights of Others
- Statements to the Media
- Use of Social Media
- Use of Artificial Intelligence

ONE ARRAY: HOW WE TREAT OUR CUSTOMERS

- Providing Quality Products and Services
- No Bribery
- Gifts and Business Entertainment



ARRAY

- Interacting with Government Customers
- Anti-Money Laundering (AML)
- Compliance with International Competition Laws
- Seeking Business Openly and Honestly
- Following Accurate Billing Procedures
- Respecting Customer Property

ONE ARRAY: HOW WE TREAT OUR SUPPLIERS

- Seeking Long-Term Supplier Relationships
- Protecting Supplier Assets

ONE ARRAY: HOW WE TREAT OUR COMMUNITIES AND OUR WORLD

- Protecting the Environment
- Respecting Human Rights
- Making Political and Charitable Donations
- Complying with International Trade Controls

WAIVERS OF OUR CODE



ARRAY

ARRAY'S CORE VALUES

Our values represent what is important to us. They show how we should behave in order for Array to be successful. As we grow ever more global, they ensure our culture is consistent wherever we operate in the world.

- ▶ **Putting Passion into Action:** We are passionate about the planet and proud to devote our talents each day toward forwarding sustainable energy and curbing climate change.
- ▶ **Respecting What's Right:** We treat our partners, our people, and our planet with respect, and we act with integrity in all that we do.
- ▶ **Problem-Solving through Technology and Teamwork:** We apply the power of technology and teamwork to pioneer solutions and turn obstacles into opportunities.

We apply the six Array behaviors below to everything we do.

Growth and Customer Focus: Delivering world-class quality, value, and service every day to our customers and valuable stakeholders.

Getting Results: Acting with dependability and accountability by taking educated risks that drive breakthrough performance.

Leadership: Modeling passion, skill, courage, and respect to achieve and inspire greatness

Effective Communication: Meeting objectives by bringing order, clarity, precision, and active listening to all communications.

Teamwork and Diversity: Mobilizing diverse capabilities and perspectives to capture new ideas and opportunities.

Functional Excellence: Challenging ourselves and others to pursue continuous growth in our roles and understand our function's impact on financial performance.

INTRODUCTION TO OUR CODE

We created this Code of Business Conduct ("Code") to help our employees better understand our unwavering commitment to doing business the right way. Our Code describes the basic rules of conduct that we are expected to follow and the resources available to assist employees when they have questions or concerns about Array's business or business practices.

We expect our employees to familiarize themselves with our Code and use the Code as a resource any time they face an ethical dilemma or have questions or concerns about how Array is conducting business.



What Array Expects from Each of Us

Array's growth starts with each of us - we are key to our Company's character and central to its leadership and success.

We Expect all employees to act with integrity and to comply fully with our Code at all times. Acting with integrity is our competitive advantage, and we can all take pride in our unwavering commitment to accomplishing results the right way.

To ensure that all Array employees embody the high ethical standards of the company, we will conduct regular internal trainings. In addition to reinforcing best practices, these trainings will ensure that our Code remains at the forefront of all business decisions.

Who Must Follow Our Code?

Our Code applies to all employees, officers, and directors of Array Technologies, Inc. and its subsidiaries (collectively, "Array", the "Company", "we", or "us). Where appropriate, business partners working on our Company's behalf should also familiarize themselves with and follow our Code. If your job responsibilities require you to interact with representatives working on behalf of Array, be sure to notify them of their responsibility to act in accordance with this Code and provide them with a copy. Their behavior must be consistent with our Code, other Array policies and applicable laws and regulations.

Our Code reflects Array's ethical standards and should remain at the forefront of every business decision. To ensure that our Code is consistently incorporated throughout all of Array's business operations, the Audit Committee of the Board of Directors will conduct an audit of ethical standards at least once every three years.

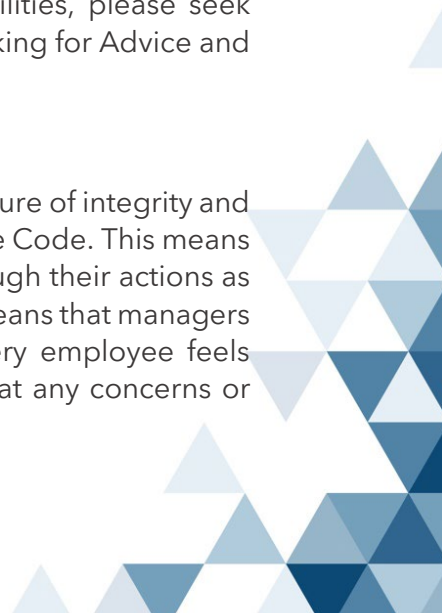
Our Shared Obligations to the Code

We all have a personal responsibility to know and follow the Code and other Company policies, procedures and guidelines that apply to our job responsibilities. You must pay close attention to developments in your area that might impact Array's compliance with laws, promptly raise any concerns about potential violations of law or Array policy, and fully and honestly cooperate in all Array investigations related to integrity concerns.

The Code is not all-inclusive. If you need help understanding our Code or a specific policy, procedure, or guideline, or how they apply to your scope of responsibilities, please seek guidance from Human Resources or any resource listed in the sections "Asking for Advice and Voicing Concerns."

Additional Obligations for Managers and Supervisors

Array managers and supervisors have a special responsibility to foster a culture of integrity and compliance through communicating the importance of compliance with the Code. This means that managers and supervisors should serve through their words and through their actions as role models for integrity and compliance in all of their interactions. It also means that managers and supervisors are responsible for creating an environment where every employee feels comfortable raising questions and concerns without fear of retaliation, that any concerns or



ARRAY

questions will be addressed and/or escalated in a professional and timely manner, and that we will not compromise our standards of integrity and compliance to obtain business results.

Managers and supervisors should also consider the character and behavior of colleagues whom they are considering for promotion. Promotions are a privilege only extended to those who exemplify our values and commitment to integrity in all that we do.

Laws and regulations are complex and subject to change, and often vary from country to country. Company policies may also be subject to change and may vary greatly depending on the country in which we are operating. For these reasons, you must take care to familiarize yourselves with the policies, procedures, and laws that apply to your particular job function(s) and the location(s) in which you operate.

Your business or region may have policies and practices that require more from you than required by this Code. The same may be true of local law. In all such instances, you must follow the stricter policy, practice, or law. If local law conflicts with our Code, comply with local law. If a local custom or practice conflicts with our Code, comply with our Code. If you have any doubts about the lawfulness or appropriateness of a proposed action, seek advice by following the steps set out in "Asking for Advice and Voicing Concerns."

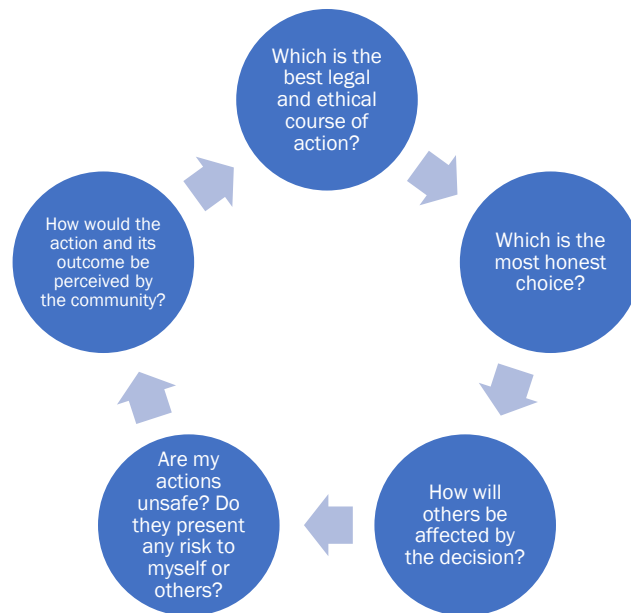
It is important to note that our employment rights are governed by the laws of the countries in which we do business, as well as the rules in place in the locations where we work. Our Code attempts to clarify Array's rights and expectations as an employer but does not create any contractual employment rights for employees.



Making the Right Decision

Sometimes the issues we face may not be black and white. We may encounter situations with conflicting priorities, such as choosing between a personal gain versus the right decision for the company.

Regardless of the situation, we must all use sound judgment when making a decision on behalf of the Company. Consider using this five-step process when facing a challenging decision:



Asking for Advice and Voicing Concerns

While working on behalf of Array, you may face difficult situations. Many times, your common sense, good judgment, our Code, and Company policies and procedures will be enough to guide you; however, there may be times in which you need additional help to make the right choice. In these cases, we have a number of resources available to assist you, including:

- your manager or supervisor;
- the Human Resources team;
- the Legal team; or
- TellArray.

TellArray is a 24-hour service, available 365 days per year. The service is provided by an independent third-party that accommodates all languages spoken in the places where Array

ARRAY

operates and allows employees to report misconduct using the options and instructions set forth below:

Via telephone at:

- for US callers: **833-332-7729**
- for international callers:
 - enter the appropriate access code¹ for the country you are calling from; then
 - when prompted, enter **800-603-2869**

Via email at: reports@lighthouse-service.com

Via the online portal at: www.intouchwebsite.com/TellArray, where employees can find additional information. Additionally, a link to the TellArray portal may be found on the Giganet.

If you become aware of a situation that may involve a violation of this Code, Company policy or any applicable law or regulation, it is your responsibility to report it through one of the channels mentioned above. Any violation of this Code will ultimately be reported to the Audit Committee of our Board of Directors.

Failure to comply with our Code, Company policy and applicable laws or regulations may lead to disciplinary action, up to and including reassignment, demotion, employment termination, as well as possible civil or criminal penalties.

Array will treat fairly and examine reports of misconduct and ethical concerns brought to its attention. We treat all reports confidentially to the extent possible, consistent with applicable law, Company policy and the Company's need to conduct a thorough investigation.

All reports will be investigated promptly and thoroughly, consistent with applicable law, and may be reported to the appropriate authorities. All directors, officers, and employees are expected to cooperate in any internal investigation of misconduct. Appropriate corrective or disciplinary action for Code violations will be taken whenever appropriate.

Investigation Process

- **Concern Documented:** Regardless of the way the concern is reported, it will be documented in our case management system. Each concern will be kept confidential to the extent possible.
- **Investigated by a Neutral Party:** Each case is investigated by an independent, neutral, and trained subject matter expert. Under no circumstances will an investigation be

¹ AT&T Direct Toll-Free Access Codes for the countries in which we operate are as follows: Australia (Optus), 1-800-551-155; Australia (Telstra), 1-800-881-011; Brazil, 0-800-890-0288; Brazil (TIM), 0-800-888-8288; Chile (Claro), 800-225-288; Chile (ENTEL), 800-360-312; Chile (ENTEL), 800-360-311; Chile (Telefonica), 800-800-288; Mexico, 001-800-462-4240; Mexico (New), 1-800-288-2872; Mexico (Por Cobrar – Spanish), 01-800-112-2020; Mexico (Spanish), 001-800-658-5454; Spain 900-99-0011; and United Kingdom, 0-800-89-0011.

ARRAY

conducted by, or under the supervision of, an individual accused of the activity under investigation, or who has had any involvement in the matter.

- **Investigation Completed:** Once the investigation is complete, the report is reviewed to ensure that all of the issues were thoroughly investigated.
- **Issues Addressed:** All substantiated concerns will be address through corrective action. Disciplinary action will be taken against an employee, if necessary, though in many instances improved procedures can sufficiently resolve a problem.
- **Case Closed:** The case is closed in the case management system, and a summary is communicated to the reporter, if appropriate. Details related to personnel actions are not shared in accordance with applicable employment laws.
- **Trending & Analysis of Similar Concerns:** Ethics activity is accumulated and evaluated on a regular basis to identify trends that need to be addressed. A summary report is provided to the Audit Committee of the Board of Directors.

Array Will Not Tolerate Retaliation

It is important that you feel comfortable raising your questions and concerns. Array will not tolerate any form of retaliation, whether direct or indirect, against you for making a good faith report of actual or potential misconduct. Making a report in “good faith” means your report is honest and sincere.

Our anonymous TellArray hotline and online portal is managed by a third-party and designed to allow employees to safely escalate questions or concerns with legal protection. The implementation of this formal system reinforces our no-retaliation policy. If you feel an act of retaliation has occurred, you should report your concerns via one of the methods outlined in “Asking for Advice and Voicing Concerns.”

ONE ARRAY: HOW WE TREAT EACH OTHER

Promoting a positive work environment based on mutual respect and a commitment to health and safety is the key to maintaining the best possible workforce and to providing growth opportunities for our stakeholders.

We recognize and reward our individual talents by providing compensation and competitive benefits. We also promote development through training that broadens work-related skills.

Respecting Each Other and Promoting a Positive Workplace

Array respects and values the diversity reflected in our various backgrounds, experiences, and ideas. Together, we provide an inclusive work environment that fosters respect for all of our coworkers, clients and business partners. As indicated in our Human Rights Policy, Array is committed to respecting and protecting human rights in the workplace and fully recognizes its responsibility to comply with all applicable laws regarding freedom of association. Our workplace is one that reflects the diversity of the communities in which we operate, and we are

ARRAY

committed to providing employees a workplace that is free from unlawful discrimination, harassment or other behavior that is not conducive to a productive work climate. Our commitment to diversity and the prohibition of discrimination and harassment applies to all phases of the employment relationship, including hiring, promotion, demotion, transfer, layoff or termination, compensation, use of facilities and selection for training or related programs. All employment decisions must be based solely on job qualifications and merit which include education, experience, skills, ability, performance, and growth values.

You may not refuse to work or cooperate with others because of characteristics covered by this policy such as an employee's race, religion, sex, age, or other characteristic protected by law (a "Protected Class").

We are committed to never making an unwelcome sexual advance to an employee or other person with whom you work. Such conduct, whether verbal, physical or visual is not allowed. Prohibited forms of harassment can range from sexually explicit verbal or unwelcome physical conduct to an offensive remark, joke, or gesture.

If you know or suspect that unlawful discrimination or harassment has occurred, you should report the situation immediately via one of the reporting channels described in "Asking for Advice and Voicing Concerns."

Retaliation of any kind against an employee making a good faith complaint of harassment will not be tolerated.

Workplace Safety

By integrating health, safety, and environmental considerations into all aspects of our business, we can protect our people and the environment, achieve sustainable growth, and accelerate productivity, and drive compliance with all applicable regulations. Our health, safety, and environment management systems reflect our values and help us meet our business objectives. If you believe that conditions are in any way unsafe, you should stop working immediately and report the issue to the health and safety team.

The health and safety of employees and others on Array property are of critical concern to Array intends to comply with all health and safety laws applicable to our business. To this end, we must rely upon employees to ensure that work areas are kept safe and free of hazardous conditions. Employees are required to be conscientious about workplace safety, including proper operating methods, and recognize dangerous conditions or hazards. Any unsafe conditions or potential hazards should be reported to management immediately, even if the problem appears to be corrected. Any suspicion of a danger present on Array's premises, or in a product, facility, piece of equipment, process, or business practice for which Array is responsible should be brought to the attention of management immediately.

Array may issue rules and guidelines governing workplace safety and health. Array may also issue rules and guidelines regarding the handling and disposal of hazardous substances and waste. All employees should familiarize themselves with these rules and guidelines, as strict compliance is expected.

ARRAY

We must make sure that our facilities are always secure. This means we allow only authorized individuals access our worksites. If you believe that someone is attempting to improperly access an Array facility, please contact your local EHS or Facility Manager.

Drug & Alcohol-Free Workplace

The Company is committed to maintaining a safe, healthy, and efficient working environment for all employees. Due to the environments in which employees work, as well as the machinery they are surrounded by and are expected to operate both safely and proficiently, being under the influence of any substance that could impair an employee's cognitive, or motor functions poses serious safety and health risks.

The Company prohibits the possession, use, and/or distribution of any unauthorized substance in the workplace, as well as reporting to work or working in any setting on the Company's behalf under the influence of or while impaired in any way by an unauthorized substance. For purposes of this policy, "unauthorized substances" include alcohol, as well as any drug that is unlawful to use or possess as a matter of applicable law, any prescription medication used other than as prescribed to the employee, and any substance, including any over-the-counter medication, that operates as an intoxicant or causes impairment. Please see the Company's complete Drug and Alcohol Policy, available on the Giganet, for more information.

Protecting Personal Data

At Array, we are committed to promoting a work environment and operating our businesses in a manner that fosters confidence and trust. To accomplish this goal, we must properly manage the personal data provided to us by our colleagues, customers, suppliers, and others. "Personal data" includes any information relating to an identified or identifiable natural person; an identifiable person is one who can be identified, directly or indirectly. Examples of personal data include name, physical address, email address, social security number, employee identification number, government identification number or any combination of information that might identify someone. We should only process (including collecting, accessing, using storing, disclosing, recording, organizing, adapting altering, or destroying; in each case, whether or not by automated means) personal data in accordance with applicable law, including all privacy laws relating to the processing, protection and disclosure of personal data. In addition, we should use the minimum amount of personal data needed to accomplish a task and maintain such personal data no longer than necessary for such task. We must not share this personal data with anyone, either inside or outside our Company, unless such sharing is in accordance with applicable law, including all privacy laws. Further, we must take steps to properly secure such data at all times using appropriate security measures.

Many countries have their own requirements governing the processing and other use of personal data, and Array must comply with those laws. For example, some countries limit the transfer of personal data to countries that have different rules governing personal data. Contact a member of Array Legal Department if you have questions in this area.

Company policies, practices and training programs are designed to assure that only authorized personnel access personal data. If you believe that personal data have been processed,



disclosed, or otherwise used inappropriately, you should contact Legal immediately. Failure to do so could subject our Company to fines and/or regulatory action.

ONE ARRAY: HOW WE ACT IN THE BEST INTEREST OF OUR COMPANY

We should conduct Array business free from outside influences or personal bias and make business decisions based on the best interests of Array.

Avoiding Conflicts of Interest

As part of our duty to uphold our Company's reputation, we must avoid improper conflicts of interest. A "conflict of interest" occurs when our personal interests interfere with, or appear to interfere with, our ability to perform our jobs without bias. We may not engage in any transaction, investment, or association in which a conflict of interest might arise. If you have a potential or actual conflict of interest, you must disclose it to your supervisor or Legal and seek prior authorization or approval from the Chief Legal Officer. Conflicts of interest are often easily avoided if disclosed in advance.

Examples of potential conflicts may include, but are not limited to:

Activities Requiring Disclosure	Description or Definition	Policy
Influencing decisions	Having a substantial investment in any supplier, customer or competitor where the Company employee has influence over contracts, processes, products, or makes supplier or Company business decisions with respect to that entity.	Related Party Transactions Policy
Hiring	Filling a position with an immediate family member or person with whom you have a close personal relationship.	Workplace Relationship Policy
Outside employment	Acting as an employee, officer, representative, agent, auditor or advisor of a supplier, customer, partner, subcontractor or competitor of our Company.	Related Party Transactions Policy
Boards and consulting arrangements	Acting as a member of a for-profit company board or having a consulting arrangement with a business or non-profit that requires pre-approval from Legal.	Related Party Transactions Policy
Gifts	Accepting gifts, entertainment, payment or services from parties conducting business with or seeking to do business with our Company if that gift or other thing of value is intended to influence materially your behavior.	Anti-Bribery and Anti-Corruption Policy

ARRAY

Trademarks	Using Company assets, including name, trademarks, trade names, facilities, or relationships for personal benefit or outside work.	
Relatives and close personal relationships	If you conduct Company business with a relative, someone you have a close personal relationship or with a business or government agency that you or a relative or someone you have a close personal relationship is associated with, this should be disclosed and may not be permitted.	Related Party Transactions Policy
Investments and ownership interests	Having an investment in an entity that does or seeks to do business with our Company or is a supplier or competitor or in property (i.e., real estate, patent rights or securities) that our Company is seeking to purchase.	Related Party Transactions Policy

Financial Interests

As Array employees, we should avoid doing business with any company in which we have a personal financial interest. There may be situations where our personal financial interest in a company with which Array does business is permissible; however, such situations should be reviewed by Legal to determine the best course of action.

In addition, you may not purchase or maintain a significant financial interest in a customer, competitor or business partner that does business with or potentially may do business with Array unless you receive approval from Legal. Always ensure you are impartial and able to make business decisions with Array's best interests in mind.

You have a duty to disclose if your personal or financial activities may interfere or have the potential of interfering with your allegiance toward the Company.

Outside Employment

From time to time, you may wish to engage in work outside our Company. In doing so, you must ensure that any employment does not create a conflict of interest. We must never use Array tangible and intangible property, including documents, systems, facilities, and intellectual property to conduct non-Array business.

Integrity in Action:

Q: Elle, a procurement specialist, has developed strong working relationships with several Array suppliers over the years. One of these suppliers asks Elle if she would be interested in doing some consulting work for their firm. Since she would only work for the supplier over the weekends, the outside employment wouldn't affect her ability to perform her job duties at Array. May she accept this offer

A: Even though Elle will only be working for this supplier when not performing work for Array, this outside employment may still be considered a conflict of interest. Elle

ARRAY

should consult her supervisor to confirm that this outside employment will not interfere with her job responsibilities. Elle's supervisor may consider consulting Legal or Human Resources for additional guidance and to confirm the extent of Array's business with the supplier. In addition, even if Elle decides to decline the suppliers offer of employment, she should report the employment offer to her supervisor.

Improper Personal Benefits

A conflict of interest may also arise when a director, officer, or employee, or a member of his or her immediate family, receives improper personal benefits because of his or her position at Array. Such benefits may include gifts or loans from an entity or person with whom our Company does business. We must avoid accepting any such improper benefit. This does not apply to personal banking or finance relationships with commercial banks with the same financial terms and conditions generally available to other customers.

In addition, a conflict of interest arises if an Array employee assists a competitor to Array's detriment. For example, providing confidential information to a spouse or partner who works for a competitor would constitute a conflict of interest and violate our Code.

Corporate Opportunities

In order to make objective business decisions on behalf of Array, we must never compete with our Company or use our position for personal gain. This means we may not take for ourselves any business or investment opportunities that we discover through our position at Array or through Company property or information. In addition, we must never help anyone else take such business or investment opportunities for personal gain. This includes our family members and friends.

Disclosure

The Company's periodic reports and other documents filed with the SEC, including all financial statements and other financial information, must comply with applicable federal securities laws and SEC rules. Each director, officer and employee who contributes in any way to the preparation or verification of the Company's financial statements and other financial information must ensure that the Company's books, records, and accounts are accurately maintained. Each director, officer, and employee must cooperate fully with the Company's accounting and internal audit departments, as well as the Company's independent public accountants and legal counsel.

Each director, officer and employee who is involved in the Company's disclosure process must:

- be familiar with and comply with the Company's disclosure controls and procedures and its internal control over financial reporting; and
- take all necessary steps to ensure that all filings with the SEC and all other public communications about the financial and business condition of the Company provide full, fair, accurate, timely and understandable disclosure.



SAFEGUARDING COMPANY PROPERTY AND INFORMATION

Array's Physical Property

Theft, damage, carelessness, and waste have a direct impact on our Company's success. We must therefore commit to protecting our Company's physical assets from theft, damage, loss, or misuse. This includes our facilities, vehicles, business equipment, merchandise, and supplies. If you suspect any form of fraud or theft, you should report it to your manager or supervisor immediately.

Authorized occasional personal use of certain Company equipment, such as telephones or internet, is sometimes appropriate. However, we must ensure our personal use is limited, does not interfere with our ability to do our work for Array and does not violate Company policy or law. Never use Array property for personal gain or for benefit of another person or organization. You must also return any Company property you possess at the end of your employment.

Using Information Technology Resources

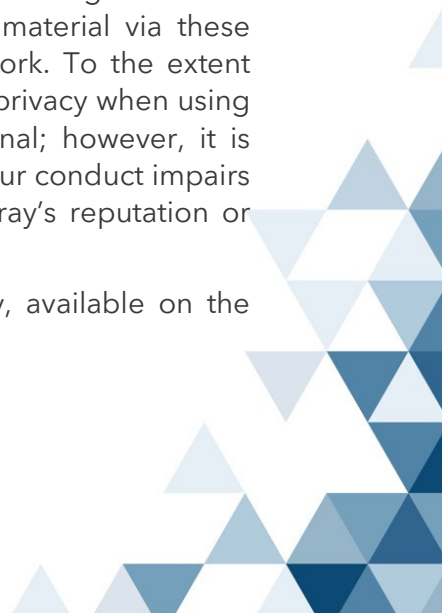
Array provides many of its employees with access to various computer, voice, and data communication equipment and systems, such as telephones, smart phones, mobile phones, computers, tablets, printers, fax machines, wireless data collection devices, copiers, servers, networks and all forms of Internet/Intranet access, and Company email. These systems are to be used for authorized Company business only, with limited exceptions for occasional personal use under certain conditions.

We have a duty to safeguard Company systems and the technologies provided to us at all times. This means we must each do our part to prevent damage, harm, loss, and unauthorized access to these resources. Be sure to follow all security measures and internal controls in place for the resources you use, and never share access rights, usernames, or passwords.

Remember that electronic messages (such as emails, instant messages, and text messages) are permanent records of your communications. These communications can be altered and forwarded without your permission. For this reason, take particular care when drafting any electronic messages on Company letterhead or when using Array resources.

Exercise good judgement and integrity when using these systems and technologies. Do not download or send inappropriate, sexually explicit, illegal, or offensive material via these resources. You may also not use these resources to conduct outside work. To the extent permitted by applicable local law, you should not have an expectation of privacy when using Company resources, as Array may monitor any usage, including personal; however, it is important to note that Array will not interfere in our personal lives unless our conduct impairs our work performance or adversely affects our work environment or Array's reputation or otherwise violates this Code or any Company policies.

Please see Array's Employee Handbook and Information Security Policy, available on the Giganet, for more information on acceptable use of Company Systems.



ARRAY

Array's Confidential Information

We are each entrusted with our Company's confidential information. We must protect this sensitive information at all times. This generally includes any nonpublic information that might be of use to our competitors or others, or which may be harmful to the Company if disclosed. Examples include business or marketing plans, customer, or supplier information, (including personal data) product design, manufacturing processes, existing and future merchandising information, and employee information (including personal data). Employees are expected to treat all knowledge and non-public information related to all aspects of Company's business as strictly confidential.

We must never allow others (whether coworkers or third parties) to access Array's confidential information, unless they have a legitimate business need to know, and even then, only subject to appropriate confidentiality protections, use restrictions and non-disclosure obligations and provided that the disclosure is done in accordance with applicable law, including all privacy laws relating to the protection and disclosure of personal data. If a third party seeks to compel you to disclose any of Array's confidential information or you have any doubts as to whether disclosure would be appropriate, please contact Legal for guidance. We must never use confidential information of the Company for personal gain or disclose it to others for their gain.

We must take care not to lose, misplace or leave confidential information (or technologies containing such information including computers, laptops, cell phones or tablets) unattended. Further, if we lose or misplace Array equipment or an item containing confidential Array information (for example an Array laptop, Blackberry, thumb drive, or the like), we should report the loss immediately to the Chief Information Officer or local IT Manager, as applicable.

In addition, we may not discuss confidential Array information in places where it might be overheard by those who do not have a need to know. This includes public spaces such as airport terminals, trains, and restaurants. It also includes open areas at Array, such as Company restrooms and break rooms.

We need to classify, label, store, and share all Array data, information, and documents and ensure that access to information and documents is granted only to individuals with a legitimate need. For more information on data classification, see our Data Classification Policy, available on the Giganet.

If an employee becomes aware of an unauthorized use of disclosure of confidential information, they must immediately notify their manager, Human Resources, or Legal.

Integrity in Action

Q: Lola often works through her lunch breaks, taking business calls at restaurants and in common areas in the building. Everyone around her seems engaged in their own conversations, so she assumes they aren't really paying attention to her. Can she discuss Array business this way?

A: It depends. Lola may take phone calls in public places, but she must exercise extreme caution when discussing Array business. Any confidential information

ARRAY

should not be discussed in public places, even if she believes that others are not listening to her conversations.

Integrity in Action

Q: Charlie carries his Array laptop on Company travel so he can use his free time on airplanes, trains, waiting areas and other public places to work on business-related documents. Is this a problem?

A: It may be. It is impossible to know who may be sitting or passing nearby in any public place. When laptops and similar devices are used in public places for Company business, you must ensure that your screen is protected from on lookers at all times. In addition, such devices should never be left unattended.

Insider Trading

Array's confidential information often constitutes material non-public information ("MNPI") for the purposes of complying with US securities laws. It is important that you never disclose or use for your personal benefit, any MNPI you know or possess. MNPI comes in various forms. Generally, it is information that a reasonable investor would consider important when making an investment decision, like buying or selling stock. Examples of MNPI could include, but are not limited to:

- the gain or loss of a significant customer contract;
- financial results and earnings forecasts;
- development of a significant new product or process;
- significant changes in earnings;
- significant pricing or demand changes; or
- merger, acquisition, or tender offer discussions.

Trading on MNPI is a violation of insider trading laws, which can subject the individuals involved to disciplinary action up to and including termination, as well as to potential civil and criminal penalties. It is also illegal to provide inside information to others (or "tip" them) in making their investment decisions. You should also be sure to know and follow specific laws, such as Regulation Fair Disclosure under the Securities and Exchange Act of 1934 ("Regulation FD"). This regulation makes it illegal for any of us to selectively disclose material, non-public information. To help you comply with these rules, our Company has established procedures for the release of MNPI, including the designation of Company spokespersons. These procedures ensure that information reaches the public in an appropriate way. You may not disclose MNPI to anyone outside our Company unless you are specifically authorized to do so under our guidelines for communication with the public and Array's Regulation FD Policy. This includes discussions concerning Array's business in all social media forums, as well as other verbal and non-verbal forms of communication.

ARRAY

Please see our [Insider Trading Policy](#) and our [Regulation FD Policy](#) available at www.arraytechinc.com/our-story/policies for more information.

Array's Intellectual Property

We work diligently to protect our Company's intellectual property. "Intellectual property" includes any of our Company's patents, trademarks, copyrights, or other intangible assets, such as ideas, know-how, inventions, processes, or designs created on Company time, at Company expense, using Company resources or within the scope of our job duties.

We will identify any new inventions we make and will direct them to Legal for patent, copyright, or trade secret protection. We only use or distribute Array's proprietary information or other intellectual property for the benefit of Array, and not for personal gain.

Remember to always consult with your manager or Legal if you have any questions or concerns regarding how to identify, handle, and protect Array's intellectual property. Any use of Array's trademarks must be cleared in advance by Legal.

Array aggressively protects its intellectual property and enforces its rights against others who take or use Array intellectual property without proper authorization. You should report any suspected misuse of our Company's intellectual property to Legal. Do not provide Array's proprietary or confidential information to a third party without the proper internal approval and the necessary confidentiality agreement with the third party. Please consult Legal if you have questions or need additional guidance.

After we leave employment with Array, we will not take, access, provide access to, or use any of Array's proprietary or confidential information or other intellectual property without authorization.

Respecting the Intellectual Property Rights of Others

We respect the valid intellectual property rights of others. This means we must never knowingly infringe on the copyrights, trademarks or patents of others or misappropriate their trade secrets. We may not, for example, use unlicensed software on Company computers, duplicate, publish or distribute other copyrighted materials or download songs, photographs, or videos, in each case, without consent from the rightful owner. Inappropriate use of others' intellectual property may expose Array and you to criminal and civil fines and penalties.

Do not bring, access, keep, share, or use third party's proprietary information or documentation, including proprietary information or documentation from a previous employer, without first consulting with and receiving prior approval from Legal.

Statements to the Media

Employees should not speak to the media on behalf of Array unless their role specifically requires them to do so, or if given specific permission by a member of the senior leadership team. All media inquiries should be directed to Marketing. If you have questions or need further guidance, please contact your supervisor or Marketing. For inquiries from investors, you should refer the request to Investor Relations.

ARRAY

Use of Social Media

Online networking sites (such as LinkedIn), social media sites (such as Facebook, Instagram, and TikTok), blogs, industry or professional websites, online discussion forums and Twitter (“Social Media Sites”) can serve a useful function. However, if improperly used, they can result in unintended relationships, the disclosure of sensitive information, defamation, and/or copyright infringement and other issues.

Employees should be careful that their postings do not provide or disclose proprietary, customer or vendor proprietary and/or confidential information. Nor should employees comment on competitors. In addition, employees should refrain from posting on behalf of the Company or commenting on any legal matter, and should exercise caution in expressing opinions on potentially controversial topics such as politics and religion that could be in any way attributed to the Company. Employees should be alert to potential defamation and copyright issues.

Under no circumstances may employees: (i) post confidential information, as defined above, of the Company or (ii) make comments or statements that attack or threaten another person, demean, disparage, or insult another person based on any Protected Class.

Any use of the Company’s network to post or comment on Social Media Sites should be limited to circumstances related to the Company business and necessary for the performance of an employee’s job. Employees must also refrain from offering or appearing to offer (i) Company products and services without permission, and (ii) unauthorized endorsement or appearance of endorsement by the Company of any commercial product or service not provided by the Company. Employees are expected to clarify that any information posted on social media websites reflect their own personal views and not the views of the Company. This includes posts on professional websites, such as LinkedIn, which may be misunderstood to reflect a Company position. If you have any question about the propriety of any posting, consult Legal.

Please see Array’s Employee Handbook and Information Security Policy, available on the Giganet, for more information on acceptable use of Social Media.

Use of Artificial Intelligence

When using AI tools, employees should not share or make any inquiries containing Array’s confidential information, trade secrets or intellectual property. A few examples would be:

- non-public financial information;
- pricing models and information;
- proprietary software code;
- certain engineering specifications and testing results; or
- sensitive HR information or personal identifiable information.

Employees should also avoid incorporating information or data generated by AI into key Array innovations and intellectual property.



ONE ARRAY: HOW WE TREAT OUR CUSTOMERS

Building mutually beneficial relationships with our customers is important to our success as a Company. Maintaining such relationships requires that we provide safe, quality products and uphold applicable law in all our interactions with both commercial and government customers.

Providing Quality Products and Services

We strive to provide products and services that meet or exceed our customers' requirements for quality, reliability, and value.

We are expected to comply with all quality control standards that govern job duties. This includes applicable laws and regulations, as well as Array's internal control procedures designed to promote the safe, quality manufacture of goods. We are also expected to follow all contract specifications at all times.

In addition to holding ourselves accountable for quality goods and services, we must also hold our suppliers and other business partners accountable to ensure the quality of the products and services they provide us.

No Bribery

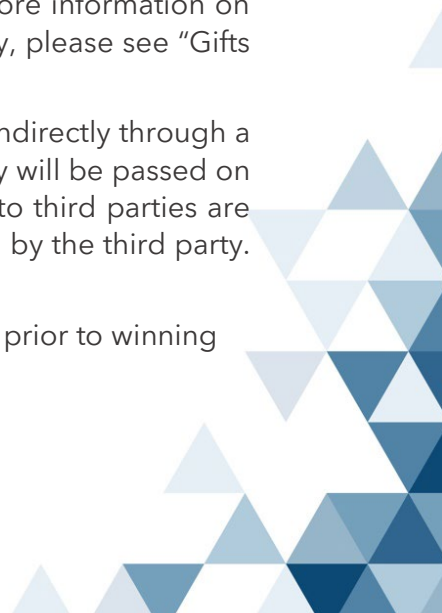
Array employees are forbidden from giving or receiving bribes or kickbacks. You may not make, offer, or facilitate a payment to anyone to gain or retain business or an improper business advantage (e.g., a license or tax rate lower than allowed by law). Nor may you accept any such payment yourself.

Array prohibits bribery to any party, but there are particular risks associated with government officials, including employees of state-owned companies, candidates for political office, or political party officials. If any government officials suggest or demand an improper payment for themselves, their relatives or some other third party, you should immediately notify Legal.

Prohibited bribes can take many forms and need not necessarily be a cash payment. A promise or employment for a relative, a charitable or political contribution, gifts, meals, or entertainment may all constitute bribes if they are made to improperly influence the recipient. Remember that providing gifts, entertainment, or anything else of value to government employees is highly regulated and often prohibited. Do not provide such gifts and entertainment unless you have received prior approval from Legal. For more information on giving or receiving gifts, entertainment, lodging, travel, or other hospitality, please see "Gifts and Business Entertainment."

Payments that are improper if made directly by an employee may not be indirectly through a third party. Even if you are not sure that a part of a payment to a third party will be passed on as a bribe, you cannot ignore signs of bribery by third parties. Payments to third parties are prohibited if you know, or have reason to believe, that a bribe will be paid by the third party. Warning signs of bribery or "red flags" include:

- a demand from a third party to receive its commission payment prior to winning a deal or contract;



ARRAY

- any suggestion to direct Array business through a specific representative or partner due a “special relationship”;
- any request to make a payment to a person who is not related to the transaction being discussed;
- a request that payments be made in a country other than where the Array business takes place; or
- commissions that seem too large in relation to the services provided.

For more information and examples, see our [Anti-Bribery and Anti-Corruption Policy](#). This policy is designed to ensure that Array’s high ethical standards are understood and consistently upheld by all members of the organization. Policy violations should be reported in a timely manner to the Chief Legal Officer you or via one of the methods outlined in “Asking for Advice and Voicing Concerns.”

Integrity in Action

Q: Laura and Ruth work together in Array’s buying group. Ruth overhears a phone conversation between Laura and potential supplier to Array. Over the course of the call, it becomes clear that Laura plans to award a large contract to this supplier, even though the supplier’s proposal does not offer Array the best overall value. It also becomes clear that she’s going to get a large sum of money in return. What should Ruth do?

A: Ruth should report what she heard to Legal immediately. It appears that Laura is accepting a kickback from this supplier, which is prohibited by Array policy, likely illegal and can have severe consequences for the individuals involved, the supplier, and Array.

Gifts and Business Entertainment

Developing strong working relationships with our customers, suppliers and other business partners is important to our growth. Business gifts and entertainment are sometimes used to strengthen these bonds; however, we must exercise particular caution when offering or accepting business courtesies. Exchanging gifts and entertainment can result in conflicts of interests. If not handled properly they may also lead to the appearance of improper payments, kickbacks, or corruption. You may not accept or provide any gift, favor or entertainment if it is made for an improper purpose, or if you know it would violate our policies, applicable law or the policies of the other party.

Integrity in Action

Q: John has received an invitation to a holiday party hosted by one of our suppliers. He works closely with this supplier and would love to attend, since this party is sure to include fine wine and gourmet dishes. May John accept the invitation?

ARRAY

A: John should consult with his supervisor or someone from Human Resources or Legal to determine whether it is appropriate to attend. Factors to consider include the cost of the meal, whether the supplier is actively bidding in the Array procurement decision-making process and whether there are other business-related reasons to go to the dinner.

Integrity in Action

Q: At an offsite meeting, a vendor who has been providing services to Array for several months invites Lucy to lunch. She accepts, allowing the vendor to pay for the meal. Are her actions acceptable?

A: Occasional and normal gifts are ordinarily acceptable, provided they don't raise questions about Lucy's objectivity. Customer entertainment and gifts should be discussed in advance with your supervisor. The supervisor should evaluate the business purpose for the meal, the setting and the cost of the meal, and the frequency of the vendor's invitations before deciding whether Lucy should attend.

Generally, we can offer or accept a gift, favor, or entertainment as long as it:

- does not make the recipient feel obligated or give the appearance of an obligation;
- does not exceed generally accepted local business practices;
- is of nominal value;
- cannot be construed as a bribe or payoff;
- does not violate applicable law, company policies or the policies of the recipient's company;
- is not solicited.

These rules do not apply to unsolicited promotional materials of a general advertising nature, such as imprinted pencils, memo pads and calendars, provided what is given does not create or appear to create any obligation for Array. Additionally, in keeping with national custom, ceremonial presentations may be permitted as long as what is accepted is not in violation of any law, cannot be viewed as a bribe and would not embarrass you or Array if disclosed.

Gifts should not be accepted from suppliers or potential suppliers (or other business partners) during or in connection with contract negotiations with the supplier. In addition, we should avoid soliciting gifts from suppliers to other business partners for Array functions or employee awards.

If you are unsure whether you should offer or accept a business gift or entertainment, you should seek guidance. Customer entertainment and gifts must be discussed in advance with your supervisor.

Specific laws often govern gifts offered or made to government officials, including employees of state-controlled companies. In certain instances, it may be illegal to offer or provide even a nominal gift or other benefit (e.g., a cup of coffee) to a government official. Whenever dealing

ARRAY

with government officials, make sure you know what rules are applicable before offering or providing any gift, meal, entertainment, travel, or other benefit to any official. When in doubt, discuss the matter in advance with Legal.

For more information and examples, see our [Anti-Bribery and Anti-Corruption Policy](#).

Interacting with Government Customers

In some instances, our work could involve contracts with government entities, including government-owned or -controlled companies. In these cases, we have a duty to know and follow applicable Company policies and the established laws, rules and regulations that govern our interactions with government customers. It is important to note that these rules may be stricter and more complex than those governing our dealings with private sector clients. Do not pursue government business without first contacting Legal.

We must always conduct ourselves with honesty and integrity when attempting to win government work. Of course, this means that Array can never offer or make a bribe to win a government contract, but you must also follow the following standards:

- Before submitting a proposal to a government, we should review the requirements with all applicable stakeholders and only accept those terms with which Array can comply.
- We may not take actions that would give Array an unfair competitive advantage, such as obtaining or using sensitive procurement information nor obtaining information about a competitor's proposal unless the government contracting officer has specifically and lawfully authorized its release.
- All representations we make, including pricing and bids, must be accurate and complete.
- All statements and records that we provide to government customers (including facility and quality reports and cost and pricing data) must be accurate.
- All work time must be recorded accurately. We should always identify and assign our time only to projects on which we work.
- All costs must be accurately charged.
- We must only use reputable consultants, sales agents, or other professional service independent contractors for legitimate legal purposes.
- We must follow all contract terms and may never use government property, equipment or supplies in a manner that is inconsistent with applicable law and the relevant contract.

We must also follow all applicable rules and regulations that govern how we engage current or former government employees in discussions about potential job opportunities at Array. We are each responsible for avoiding these types of conflicts of interest. Contacting or

ARRAY

engaging in employment-related discussions with current or former government employees is subject to special rules and procedures. These rules may also restrict the work that former government employees perform on our Company's behalf.

We are also expected to safeguard classified and other sensitive information we acquire in connection with work we do for our government clients. As required by the terms our government contracts other applicable regulations, we make this information available only to those who have a business need to know it and who have obtained the appropriate government clearance or other approvals. We must not share, distribute, or disclose classified or otherwise sensitive government information in a manner that would violate the terms of our government contracts.

Anti-Money Laundering ("AML")

Array is committed to complying with applicable anti-money laundering, corruption and terrorist financing laws and regulations. We conduct our business only with customers involved in legitimate business activities, with funds derived from legitimate sources. We adhere to risk-based "Know Your Customer" due diligence processes on perspective customers.

Employees must collect and understand documentation about prospective customers, agents, and business partners to ensure that they are involved in legitimate business activities and that their funds come from legitimate sources.

Employees must follow your business Know Your Customer procedures and rules on collecting and verifying information from our customers and related parties.

We must follow our business rules concerning acceptable forms of payment. Learn the types of payments that have become associated with money laundering (for example, payments on behalf of a customer from an unknown person).

Be alert for and escalate any signs of potential money laundering or other illegal activities.

Compliance with International Competition Laws

Fair competition creates a healthy marketplace. It ensures our clients the best and most innovative products and services at the lowest prices. In order for Array to compete lawfully and with integrity, we must comply with competition laws in place in the countries where we do business. If competition laws apply to your job function, you must know and follow them at all times.

Competition laws are often complex, and generally forbid discussing or agreeing on any topics with competitors that may restrain trade. Such topics include (but are not limited to) price fixing, bid rigging, or dividing or allocating markets, territories, or clients. You should not discuss any of these topics with a competitor, and if a competitor attempts to discuss any of these topics with you, you must register your objections and leave the meeting immediately. Then, you should report the incident to your local supervisor, who will work with you in consultation with our Legal Department. If you are attending a trade association meeting- or a social event, for example- exercise particular caution during discussions with competitors.

ARRAY

In addition, competition laws prohibit formal or informal agreements with suppliers, distributors, or clients that may restrict competition. Such agreements may include tying products, fixing resale prices or refusing to sell to particular clients or buy from particular suppliers.

You should not provide, receive or exchange any of the following types of information with a competitor or its representative, whether in person, electronically or at an industry meeting: current or future prices; pricing policies; bids; customers, suppliers, sales territories or product lines; terms or conditions of sale; production, sales capacity or volume; costs, profits or margins, market share; ancillary charges; credit terms; discounts; sales, marketing or development strategies of products or services and distribution methods. If you are meeting with a competitor or its representative, insist on a legitimate business purpose and an agenda for all meetings, and limit attendance to those employees that are necessary to meet the business purpose.

Through our work, we may obtain competitor information from our customers or other public sources. We must be particularly careful to handle this information in accordance with Company policy.

Please note that violating these laws may subject both the individuals involved and our Company to severe consequences.

If you have any additional questions, seek guidance from Legal.

Integrity in Action

Q: Juan has a good friend who works for an Array competitor. While at lunch one afternoon, his friend reveals her company's intent to raise prices on products in direct competition with his own. Juan says nothing in response to this but feels this information could be important for Array to use in making future business decisions. What should he do?

A: Juan should end the conversation immediately and provide a written summary of the incident to Legal. Engaging in discussions and acting on nonpublic information such as pricing could create the impression of an illegal collaboration between Array and a competitor, which could have serious consequences for both companies and the individuals involved.

Seeking Business Openly and Honestly

Our actions in the marketplace define who we are as a Company. By competing on the quality of our good and services, we uphold Array's reputation. We will never seek to limit the competitive opportunities of our rivals in deceitful or fraudulent ways.

In addition, we should never take advantage of anyone through unfair dealing practices. This means that we must be careful not to misrepresent the quality, features or availability of our products and services. In addition, we do not disparage or make untrue statements about our competitors' products or services. We seek to win business based on the quality of our products and our people, not through any improper means.

ARRAY

Integrity in Action

Q: Leah learns of a potential problem discovered during routine production line testing. The extent to which problem could affect product safety is unknown at this time, and Leah isn't sure what to do. Should Leah speak up about this, even if she doesn't know all the details?

A: Yes. Producing and selling potentially unsafe products could result in customer and employee injury. Leah should report the problem immediately, even if she isn't sure how production will be affected. Leah should make her supervisor aware of the issue as soon as possible. If Leah believes her concerns are not being adequately considered, she should contact Legal or escalate her concerns through Tell Array help line or any of the other channels identified in the "Asking for Advice and Voicing Concerns".

Integrity in Action

Q: Jack works closely with third-party distributors who resell Array products. A company interested in distributing Array products approaches Jack and offers to pay for his daughter's private school tuition in exchange for exclusive right to resell Array products in a specific sales region. What should Jack do?

A: Jack should end the discussion immediately and report the matter to Legal. Array will not tolerate the solicitation or receipt of improper kickbacks in exchange for awarding contracts.

Integrity in Action

Q: Kayla is concerned that Array will likely lose a big contract if she doesn't pay a local official a bribe. What should Kayla do?

A: Kayla should not pay a bribe or take any actions that could give the appearance that Array will condone the payment of bribes to win a contract. No contract is worth violating applicable law or our standards of business integrity. Kayla should immediately report the issue to Legal.

Following Accurate Billing Procedures

Our reputation in the marketplace is a critical company asset. For that reason, we reflect accurately on all invoices to customers the sale price or cost of goods or services sold and other terms of sale. We each have a responsibility to maintain accurate and complete records in order to allow Array to uphold this commitment. Never falsify any record - including timecards,

ARRAY

expense reports, sales numbers, test or quality records, or any other kind of record created during the course of your work for the Company—or make misleading or artificial entries on Array books or records.

Respecting Customer Property

At times, our customers may share their confidential information with us so that we may provide them products and services. It is our responsibility to use, store and carefully safeguard any such information in a manner that complies with all applicable laws and any contractual restrictions and obligations we have agreed to with our clients.

We each must take the necessary steps to secure this information and ensure it is used only for approved business purposes. We will not discuss or disclose client information outside of Array without proper authorization to do so.

ONE ARRAY: HOW WE TREAT OUR SUPPLIERS

Array's suppliers are our partners in our ongoing drive for customer satisfaction. The high caliber of materials, goods, and services they provide is linked directly to the quality, reliability, value and prompt delivery of Array products to customers.

Seeking Long-Term Supplier Relationships

Together, we strive to build long-term relationships with our suppliers. We use only legitimate, business-related criteria when choosing suppliers. We will enter into representation or supplier agreements only with companies believed to have demonstrated a record of and commitment to integrity. In addition, we never take unfair advantage of our suppliers through abuse of confidential information, misrepresentation of material facts, or any other unfair dealing practice.

We allow suppliers to compete fairly on the quality of their products and services. We will not be influenced by gifts or favors of any kind from our suppliers or potential suppliers. An occasional meal or entertainment in the normal course of business relations may be permissible, as long as:

- The representative of the supplier is in attendance
- Such hospitality is not excessive or unusual in nature
- The hospitality complies with applicable laws and is not otherwise prohibited by this Code

In addition, hospitality should be reciprocated, when practical.

For more information, see "Gifts and Business Entertainment" and "Interacting with Government Customers."

Protecting Supplier Assets

We treat supplier confidential information with the same care as we treat Array confidential information. We will not reproduce software provided to us by a supplier, nor will we



incorporate it in our own internally developed software unless we are expressly permitted to do so by license. We

ONE ARRAY: HOW WE TREAT OUR COMMUNITIES AND OUR WORLD

In order to grow as a Company, we must work to have a positive impact on the communities that sustain us. We must work to respect and protect not only the communities where we live and work, but also our planet and its inhabitants.

Protecting the Environment

We comply with all applicable environmental regulations as they relate to the Company's operations. We will dispose of any waste materials left over from the Company's operations in a legal manner. Any harmful situation that occurs in a Company facility must be immediately communicated to the appropriate manager.

As part of our commitment to the environment, we:

- minimize the environmental footprint of our operations through prevention of illness, injury, and pollution;
- actively promote and develop opportunities for expanding sustainable capacity by increasing fuel efficiency, improving security and safety, and reducing emissions of harmful pollutants;
- integrate our environmental goals into the design of our products, processes, and services, as well as of the lifecycle management of our products.
- apply a global standard to our management systems that provides protection of the environment during normal and emergency situations;
- abide by our own strict standards in cases where local laws are less stringent;
- seek to comply with all of our environmental and legal requirements everywhere we operate;
- promote accountability with our senior leadership and individual employees are accountable for their role in meeting our commitments.

If you have a concern about the environmental impact of our operations or decision-making, please contact your supervisor or Human Resources.

Respecting Human Rights

Our Code, along with other Array policies, establishes practices and standards that address a broad range of human rights and workplace issues. As indicated in our Human Rights Policy, Array respects and values diversity reflected in our various backgrounds, experiences, and ideas. Together, we provide each other an inclusive work environment that fosters respect for all of our coworkers and business partners. Refer to the section titled "Respecting Each Other and Promoting a Positive Workplace" for more information.



ARRAY

Our Company does not condone or employ child labor. In addition, we will never use forced, indentured or involuntary labor in any of our operations. As part of our commitment to our communities and our world, Array will not tolerate any instances of human trafficking or other forced labor.

Making Political and Charitable Contributions

Our Company understands the many ways in which the political process enriches our communities. Freedom of belief and conscience are fundamental rights, and we are free to communicate our opinions verbally, in writing or in graphical form without threat of censorship. However, when we participate in such activities, we should do so on our own time, at our own expense and ensure that our activities do not conflict with the Code.

We should not use Array property for personal political activities. In addition, we should never engage in any political activities on Array's behalf, unless authorized by the Company to do so. Never coerce a coworker, especially those with whom you have a reporting relationship, to support your particular causes.

As interested citizens, Array employees are free to make individual personal contributions to candidates of their choice.

Lobbying activities are highly regulated. Therefore, we may not make any contacts with government officials in an attempt to influence legislation, regulation, policy or other governmental actions on Array's behalf without authorization from Legal.

Array is committed to social responsibility in every step of the Company's activities. Oftentimes, our Company will support charitable activities in our local communities. Array may engage in such charitable activities, so long as both the charity and the activity have been approved by management and Legal.

You may not send emails in an attempt to raise money for an unapproved charity or any other fundraiser on Array's network. In addition, you may not use Array assets, including Company time, for personal charitable or political pursuits.

Complying with Internal Trade Controls

Array is committed to compliance with all applicable trade laws. This includes import and export control laws, as well as regulations in the countries where we do business.

Export control laws govern exports, reexports, and the transfer of goods, services, and technology to another country. Note that export controls govern many types of exchanges of information across national borders, including email transmissions and web access to different servers that could contain export controlled technical data to non-U.S.-persons within the United States. Import laws and regulations govern the importation of goods. Such laws ensure only admissible goods enter into the importing country, and that the correct amount of duties and taxes are paid on those goods. Array must maintain, among other things, accurate information on the commodity/nomenclature, commercial value, and country of origin of all imported goods.

ARRAY

As Array continues to expand globally, those of us who deal with the importation of goods and export- controlled items, technology and services have an obligation to understand and comply with applicable regulations. This includes import and export laws, technology control plans, the conditions and provisions of export license authorizations that may apply to their business or facility.

We may also be subject to U.S. anti-boycott rules, which may—as a matter of public policy—affect the way we may conduct our business. Specifically, a “boycott” occurs when one person or group refuses to do business with other people or groups. The prohibited acts may be found in contracts, invoices, or other documentation.

WAIVERS OF OUR CODE

In extremely limited circumstances, Array may find it appropriate to waive a provision of our Code. Approval of any action not compliant with this Code must be sought in advance and may be granted if approved by both the Chief Executive Officer and the Chief Legal Officer of Array. All waivers for member of the Board or for executive officers of Array require the approval of the Board and will be promptly disclosed when required by SEC or NASDAQ rules. When a waiver is granted, the Board shall ensure that appropriate controls are in place to protect the Company.