

**EXPORT CONTROL AND SANCTIONS COMPLIANCE POLICY STATEMENT****ARRAY TECHNOLOGIES, INC.****STATEMENT OF POLICY**

It is the policy of Array Technologies, Inc. and all of its operating companies and subsidiaries (together, the “Company”) to comply with applicable laws and regulations restricting the international transfer, export, re-export, sale, or disposal of any products, software, technology, or services. It is also the policy of the Company to comply with applicable laws and regulations that restrict the Company and its employees from doing business with sanctioned and embargoed countries, companies, and individuals. The Company’s Export Control and Sanctions Compliance Program (the “Compliance Program”) has been codified to ensure compliance with U.S. export control and sanctions laws and regulations, as well as applicable export control and sanction laws and regulations of other countries or jurisdictions in which the Company conducts business, including within the European Union, the United Kingdom, Australia, South Africa, Mexico, Chile and Brazil.

**DEFINITION OF EXPORT**

An export is the actual shipment or transfer of products, software, technology, or services from one country to another country. If the products, software, technology, or services are subsequently shipped or transferred from the foreign country to a second foreign country, this transfer is considered a re-export. The release of technology or software to non-U.S. nationals in the United States or abroad may also result in an export.

**THE EXPORT CONTROL AND SANCTIONS COMPLIANCE PROGRAM**

The Company’s Compliance Program is specifically designed to implement the requirements of applicable export control and sanctions laws. The persons responsible for administering the Compliance Program will be provided the necessary support to maintain compliance with changing export control and sanctions laws. It is the responsibility of these persons to establish, maintain, and update the Compliance Program. Any questions regarding the Compliance Program should be directed to the Company’s General Counsel.

**COMPLIANCE**

The Company will neither make any exports nor engage in any transactions that violate applicable export control or sanctions laws or the policies mandated under the Company’s Compliance Program.

**ACCOUNTABILITY**

Compliance with applicable export control and sanctions laws is not solely the responsibility of the persons administering the Compliance Program. Compliance is the responsibility of all employees involved, directly or indirectly, in international business activities.

## **REPORTING**

Notification of potential violations of applicable export control or sanctions laws or suspected non-compliance with the Compliance Program should be made promptly to the appropriate General Counsel for investigation.

## **EFFECT OF PROGRAM ON OTHER GOVERNMENT REQUIREMENTS.**

The Compliance Program does not affect or alter the requirements instituted by other U.S. government agencies. The Company will continue to comply with those requirements. Where any conflict may arise between compliance with the Compliance Program and other U.S. government requirements, that conflict will be resolved by the General Counsel

## **PENALTIES**

International operations are an important area of business for the Company, and a violation of any export control or sanctions law may jeopardize the Company's ability to ship items internationally. Furthermore, violations may subject the Company to significant fines and penalties. Employees violating the policies set forth in the Compliance Program or applicable export control and sanctions laws will be subject to discipline, up to and including termination of employment.

## **FURTHER INFORMATION**

Any questions concerning this policy should be directed to the General Counsel.



