

CLAWBACK POLICY**ARRAY TECHNOLOGIES, INC.****PURPOSE**

This Clawback Policy (the “Policy”) applies in the event of (i) any fraud or intentional misconduct by one or more covered persons (as defined below) that results in the required restatement of any financial reporting required under the securities laws or other similar laws or regulations as applicable to Array Technologies, Inc., a Delaware corporation (the “Company”) or (ii) any payout of incentive compensation (as defined below) that was based on a miscalculation of performance results. Upon the occurrence of such an event, the Compensation Committee (the “Committee”) of the Board of Directors of the Company (the “Board”) shall review the circumstances that caused the event and shall take such action as it deems appropriate to prevent its recurrence, which may include requiring the reimbursement of certain compensation as provided in this Policy.

PERSONS SUBJECT TO THE POLICY

For the purposes of this Policy, (i) the term “performance-based compensation” means all bonuses and other incentive and equity compensation awarded to each of the Company’s covered persons, the amount, payment and/or vesting of which was calculated based wholly, or in part, on the application of objective financial performance criteria measured during any part of the period covered by the restatement and (ii) the term “covered person” shall refer to any person who receives performance-based compensation from the Company.

STATEMENT OF POLICY

If the Committee determines that the amount of any performance-based compensation actually paid or awarded to a covered person (the “Awarded Compensation”) would have been a lower amount had it been calculated based on such restated financial statement (the “Adjusted Compensation”), and that such covered person engaged in intentional or unlawful misconduct which materially contributed to the need for such restatement, then the Committee shall, except as provided below, seek to recover for the benefit of the Company the excess of the Awarded Compensation over the Adjusted Compensation (the “Excess Compensation”). The Committee may also seek to recover for the benefit of the Company, except as provided below, any Excess Compensation resulting from a miscalculation of the Awarded Compensation based on the Company’s performance results.

The Committee shall not seek recovery of Excess Compensation if the Committee determines that to do so would be (i) unreasonable or (ii) contrary to the interests of the Company. In making such determination, the Committee shall take into account such considerations as it deems appropriate including, but not limited to, (A) the likelihood of success to recover the claimed Excess Compensation under governing law versus the cost and effort involved, (B) the assertion of a claim may prejudice the interests of the Company, including in any related proceeding or

investigation, (C) the passage of time since the occurrence of the applicable fraud or unlawful conduct and (D) the existence of any pending legal proceeding relating to the applicable fraud or unlawful conduct.

Before the Committee determines to seek recovery pursuant to this Policy, it shall provide to the applicable covered person written notice and the opportunity to be heard, at a meeting of the Committee (which may be in-person or telephonic, as determined by the Committee).

If the Committee determines to seek a recovery pursuant to this Policy, it shall make a written demand for repayment from the applicable covered person and, if such covered person does not within a reasonable period tender repayment in response to such demand, and the Board determines that he or she is unlikely to do so, the Committee may seek a court order against the covered person for such repayment.

Any determination or other action by the Committee pursuant to this policy shall be made and taken by a vote of a majority of its members.

This Policy shall apply to any performance-based compensation paid to a covered person from and after the date such covered person first becomes subject to the terms hereof, and during the three-year period preceding the date on which the Company is required to prepare an accounting restatement.

ADVICE OF EXPERTS

In making any determination or in taking or not taking any action under this Policy, the Committee may obtain and may rely on the advice of experts, including employees of and professional advisors to the Company. Any action taken by, or inaction of, the Committee relating to or pursuant to this Policy shall be within the absolute discretion of the Committee. Such action or inaction of the Committee shall be conclusive and binding on the Company, on each affected covered person and on each other person directly or indirectly affected by such action.