

California Transparency in Supply Chains Act Disclosure

Array Digital Infrastructure, Inc., and its affiliated companies, (“Array”) makes this disclosure pursuant to the California Transparency in Supply Chains Act of 2010, a law which is designated to increase the amount of information manufacturers and retailers make public regarding their efforts to address the issue of slavery and human trafficking in their supply chains.

At Array, we are committed to conducting our business in a lawful and ethical manner, and we expect the same from our suppliers.

Array has taken the following steps to ensure our suppliers comply with applicable law:

Supplier Agreements. Array does not require its suppliers to certify that materials incorporated into their products comply with the slavery and human trafficking laws of the countries in which they are doing business. However, Array’s standard purchasing agreement requires suppliers to comply with all applicable laws, including laws that govern slavery, human trafficking and other exploitative labor practices.

Supply Chain Verification. Array does not engage in verification of product supply chains, either internally or by way of a third party to evaluate and address risks of slavery and human trafficking.

Audits. Array does not conduct, on an internal or independent, unannounced or announced basis, audits of its suppliers to evaluate compliance with company standards regarding slavery and human trafficking in company supply chains. However, many of those suppliers have their own codes of conduct and auditing programs and those companies share their own audit results with Array so that Array may verify that they operate their factories in accordance with all applicable laws.

Employee Training and Accountability. At this time, Array does not provide any employees with training on slavery and human trafficking. However, on an annual basis, each employee is required to review and acknowledge compliance with our Code of Conduct which identifies the principles under which Array conducts its business and dealings with employees and suppliers. Array maintains internal accountability standards and procedures for employees or contractors failing to meet company standards regarding slavery and trafficking, including: 1) Employees who interact with suppliers are expected to report any potentially unlawful or unethical conduct that comes to their attention, including the presence of slavery or human trafficking, in Array’s supply chain; and 2) Under Array’s Ethics Policy, any such report will be promptly and appropriately investigated.