



TPI Composites, Inc.

Supplier Code of Conduct

I. Introduction

TPI Composites, Inc., and its divisions, subsidiaries, and/or affiliates (“TPI”), is committed to delivering innovative and sustainable solutions to decarbonize and electrify the world by expanding the adoption of renewable energy. We achieve this business objective by operating with the highest standards of ethics and business conduct that is based on Safety, Integrity, Operational Excellence, Commitment and Leadership. We are, in turn, committed to working with a supply chain that understands and agrees to meet the high standards we have set for our associates, customers, communities, and stakeholders.

Suppliers are a critical part of the extended TPI team and work with us every day to meet and exceed the needs of our customers. To ensure alignment to our business objectives and values, TPI requires compliance with the obligations outlined in this Supplier Code of Conduct (“Code”).

The requirements in this Supplier Code are based on TPI’s core values and other internationally recognized standards, including the UN Guiding Principles on Business and Human Rights, the UN Global Compact Principles, and the International Labour Organization (ILO) Declaration on Fundamental Rights and Principles at Work.

II. Expectations

This Code is not intended to be an exhaustive list of all ethical and business conduct requirements to be followed by Suppliers. At a minimum, TPI expects the following from its Suppliers:

- a. Suppliers are responsible for ensuring that its officers, employees, representatives, and business partners understand and comply with the expectations set forth in this Code.
- b. Suppliers will have their own internal code of ethics and conduct.
- c. Suppliers shall ensure that they have adequate resources and systems in place to meet all obligations and to conduct business in a transparent and ethical manner. Suppliers shall be accountable for both their actions and any subcontractors.
- d. Suppliers shall exert appropriate due diligence and monitoring to prevent and detect corruption in all business arrangements, including partnerships, joint ventures, and all third-party engagements.
- e. TPI reserves the right to verify compliance with the Code through internal or third-party assessments and to require implementation of corrective actions toward meeting the requirements of the Code.

III. Business Ethics

a. **Maintain Accurate Records**

Suppliers are expected to create and maintain accurate records and not alter any



record entry to conceal or misrepresent the underlying transaction represented by it. All records, regardless of format, made or received in furtherance of a business transaction must fully and accurately represent the transaction or event being documented. When a record is no longer needed to conduct current business, records should still be retained based on the applicable retention requirements.

b. **Confidentiality and Intellectual Property**

Supplier shall ensure that they only collect, disclose, and use information gained in the course of business strictly for business purposes. Supplier shall ensure that it has all necessary controls to manage information in a way that provides access only to those with a legitimate business need to know.

c. **Information Security/Cybersecurity**

Supplier is expected to maintain the appropriate systems to prevent IT related risks, failures, and major information security / cybersecurity incidents. This includes protection of information and information systems from access, use, disclosure, disruption, modification, or destruction. Supplier should also develop contingency plans, maintain incident response procedures, and provide frequent training to employees to prevent and respond to security breaches.

d. **Quality**

Supplier is expected to maintain adherence to the TPI Supplier Quality Statement in whole, including Quality Management Systems and use of APQP4Wind and/or AIAG APQP processes for material and process qualification.

e. **Improper Payments**

Supplier shall conduct all business in an honest and ethical manner without providing gifts and entertainment that would compromise the integrity of a business relationship. Suppliers may never give or offer anything of value to, or ask for anything of value from, a TPI associate, customer or a government employee or official (whether at the local, state, or federal level) that is illegal. Similarly, Suppliers may never ask for bribes or kickbacks from a TPI customer, agent, or Supplier.

f. **Conflict Minerals**

Supplier is expected to take steps to determine if their products contain conflict minerals (tin, tantalum, gold, and tungsten) and if so, implement a supply chain due diligence process to identify sources of these minerals and support efforts to eradicate the use of conflict minerals which directly or indirectly finance or benefit armed groups in the Democratic Republic of Congo or adjoining countries. In addition, Supplier agrees to comply with TPI's supplemental Conflict Minerals Policy, which mandates disclosure and compliance with information requests on the source and origin of conflict minerals when requested.

g. **International Supply**

Suppliers are expected to ensure that all business practices are in accordance with all applicable laws, directives and regulations governing the import and export of parts, components, technical data, economic sanctions and embargoes, and U.S. anti-boycott requirements. Suppliers are expected to notify TPI of any known or suspected violations.



IV. Respect Human Rights

- a. TPI Suppliers commit to both the requirements in TPI's Human Rights Policy and make additional commitments as outlined below. Specifically, Suppliers will:
 - i. Comply with all applicable laws, industry standards and relevant collective agreements on wages, working hours, breaks, public holidays, leave and compensation in case of overtime.
 - ii. Ensure that employees are provided with all employment documents in written form that is understandable in their native language.
 - iii. Not participate in or benefit from the use of forced or involuntary labor or human trafficking in any form.
 - iv. Ensure that all employees have freedom of movement and are free to terminate their employment contracts at any times in accordance with local laws.
 - v. Not employ workers under the legal age in accordance with local laws or in accordance with the regulation of the International Labor Organization.
 - vi. Negotiate fairly and in good faith with Labor Unions and collective bargaining efforts.
 - vii. Not interfere with the formation of unions.
- b. Health and Safety in the Workplace
 - i. Commit to uphold the highest standards of occupational health and safety standards.
 - ii. Provide mandatory training to all employees, and use hierarchy of hazard control including elimination, substitution, engineering controls, administrative controls, and personal protective equipment.
 - iii. If providing housing, ensure that such housing is safe and meets international health and safety standards.
- c. Non-Discrimination
 - i. TPI seeks to maintain a work environment that recognizes the dignity and worth of each individual and is free from harassment and discrimination based on any protected characteristic or protected activities. Supplier must prohibit discrimination based on protected characteristics, including race, color, sex, religion, pregnancy condition, national origin, age), sexual orientation, gender identity and/or expression, veteran's status, marital status, qualified disability, genetic information (which includes family medical history), or any other characteristic protected by law.
 - ii. Suppliers are expected to support diversity and equal opportunity in their workplaces.
- d. Harassment
 - i. We expect our Suppliers to ensure that their employees may perform their work in an environment free from physical, psychological and verbal harassment, or other abusive conduct.
- e. Drug-Free Workplace
 - i. We expect our Suppliers to maintain a workplace free from illegal



drugs and prohibited substances per local and applicable laws.

V. Environmental, Health and Safety Practices

TPI is committed to ensuring the environmental, health and safety (EHS) integrity of its processes, facilities, surrounding communities, and supply chain partners. To accomplish this goal Supplier will ensure compliance with TPI's Environmental, Health & Safety Policy ("EHS Policy"). TPI expects the following from its Suppliers:

- a. EHS must be included in the internal auditing for sub-Suppliers.
- b. Supplier shall identify and reduce the use of hazardous materials, chemicals, and substances.
- c. Supplier will inform of materials within their manufacturing process that do not comply with REACH regulations or customer blacklists, as applicable.
- d. Supplier will maintain policies and procedures in accordance with applicable EHS requirements and regulations. All applicable employees shall be aware of and trained in related policies and procedures.
- e. At a minimum, Supplier will act in accordance with the following:
 - i. **Hazardous substance management and restrictions**
Supplier shall comply with all applicable laws and regulations prohibiting or restricting the use or handling of specific substances (such as EU REACH). To ensure safe handling, movement, storage, recycling, reuse, and disposal, Supplier shall identify and manage substances that pose a hazard if released to the environment and comply with applicable labeling laws and regulations for recycling and disposal.
 - ii. **Wastewater and solid waste**
Supplier shall monitor, control, and treat wastewater and non-hazardous solid waste generated from operations before discharge as required by applicable laws and regulations.
 - iii. **Air Emissions Management**
Supplier shall characterize, monitor, control, and treat air emissions of volatile organic chemicals (VOC's), aerosols, corrosives, particulates, ozone-depleting chemicals, and combustion by-products generated from operations, as required by applicable laws and regulations, before discharge.
 - iv. **Environmental Permits and Reporting**
Supplier must obtain, maintain, and keep current all required environmental permits (e.g. discharge monitoring) and registrations and follow the operational and reporting requirements of such permits.
 - v. **Pollution Prevention and Reduction of Energy Consumption**
Supplier must endeavor to reduce or eliminate solid waste, wastewater, and air emissions, including energy-related indirect air emissions, by implementing appropriate conservation measures in their production, maintenance, and facilities processes, and by recycling, reusing, or substituting materials.



vi. **Product Content Restrictions:**

Supplier must adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.

VI. Violations of this Code

In the event of a violation of any of the above expectations, TPI may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, TPI may be required to report those violations to proper authorities. TPI reserves the right to terminate our relationship with any Supplier under the terms of the existing procurement/purchasing agreement.

Reporting Violations and Grievance Resolution Suppliers should report all suspected violations of this Code or other business grievances using the following methods/procedures:

a. By phone (which may be done anonymously):

United States:	Direct Dial: 1-844-857-5641
Mexico:	International Toll-Free Service (ITFS): 001-844-990-1311
Germany:	Step 1 - Direct Access: 0-800-225-5288 Step 2 - At the English prompt dial 844-857-5641
India:	Step 1 - Direct Access: 000-117 Step 2 - At the English prompt dial 844-857-5641
China:	Global Inbound Services (GIS): 4006500041
Turkey:	Step 1 - Direct Access: 0811-288-0001 Step 2 - At the English prompt dial 844-857-5641

b. In writing (which may be done anonymously), addressed to the Office of the General Counsel as follows:

TPI Composites, Inc.
8501 N. Scottsdale Road
Gainey Center II, Suite 100
Scottsdale, AZ 85253
Attn: Office of the General Counsel
Phone: (480) 305-8923
Fax: (480) 305-8315

c. Online at tpicomposites.ethicspoint.com (which may be done anonymously under "Anonymity")

d. Or via email to compliance@tpicomposites.com

VII. General Disclaimer

This Supplier Code is in no way intended to conflict with or modify the terms and conditions of any existing contract. In the event of a conflict, Suppliers must first adhere to the applicable laws and regulations, then the contract terms, followed by this Supplier Code.