

CORPORATE POLICY AND PROCEDURE



Policy Number: 400.04	Date: August 30, 2023	Revision Number: 1
Section: Legal & Compliance	Subject: Charitable Contributions, Community Donations & Sponsorship Policy	
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Section 1: Introduction

As a United States company conducting business around the world, TPI Composites, Inc., and its divisions, subsidiaries, and/or affiliates (“TPI”) strives to make a positive impact on the communities and countries where it does business. This commitment to global citizenship means enriching the communities of which we are a part of through community outreach, investing in economic development, educational opportunities, and environmental sustainability. Although such efforts are important, they also present bribery and corruption risk. To protect TPI and its associates, all Charitable Contributions, Community Donations, & Sponsorships, regardless of value, must pass through a due diligence and integrity screening process, and must be approved by the Office of the General Counsel.

Section 2: TPI Philosophy for Charitable Contributions, Community Donations & Sponsorships

TPI is recognized as a publicly-traded, multi-national corporation with a global workforce and multiple facilities worldwide. Through Charitable Contributions, Community Donations & Sponsorships, we reflect our corporate values and sustainability objectives within each country or geography in which TPI operates. We seek to align our charitable efforts as reflective of TPI’s core values, while also ensuring that TPI’s brand, image, assets, and commitments are safeguarded.

Section 3: Scope

This Charitable Contributions, Community Donations, & Sponsorships Policy (“Policy”) establishes TPI guidelines and applies to TPI’s directors, officers, associates, and representatives acting on behalf of TPI across the world.

The term "charitable contributions or community donations" as used within this Policy refers to both monetary contributions and product donations regardless of value given to a charitable foundation, academic institution, non-profit, local civic organization (e.g., fire and police departments), or community health organization (collectively referred to as “Charity”).

“Sponsorship” is about collaborating with external organizations to deliver mutual benefits through an exchange of funds, products, services, content, or other intellectual property. All sponsorships provided by TPI, its divisions, subsidiaries, and/or affiliates, must be compatible with our business activities and reflect our commitment to operating in an ethical manner.

Sponsorships may be in the form of a monetary contribution, an in-kind donation, or a combination of both. The following are examples of TPI sponsorship categories:

- Sponsorship involving the investment of funds, resources, and/or the use of TPI’s brand to sponsor or endorse events or activities led by external parties, including but not limited to, events, trade shows, public conferences, seminars, webinars, lecture series, industry awards programs, public awareness campaigns, and publications;
- Community awareness campaigns and local community outreach; and
- Sponsorships for local civic affiliations such as industry and business associations.

All charitable contributions, community donations & sponsorships are to be provided within a prescribed and well-controlled framework that mitigates bribery and corruption risk, is in strict

compliance with all laws, and also reflects TPI's core values, business, and social interests in the countries we operate.

This Policy does not apply to TPI's Community Support Program, which includes associate volunteer service in local communities. For any questions regarding volunteer events or hours, please contact your local HR Representative.

Section 4: Eligibility

A. Charitable Contributions, Community Donations & Sponsorship Request Process

All charitable contributions, community donations & sponsorships regardless of value, must be documented in writing, including the intended recipient, eligibility criteria, form of payment, description of products donated, and value. The following procedures must be completed **before** making any charitable contributions or community donations:

- (i) Appropriate due diligence must be conducted on the recipient organization and its ownership. The relevant Charity must, in fact, be a bona fide organization and not an entity controlled for the benefit of a foreign official.
- (ii) All donations and contributions must be pre-approved by the applicable Business Unit Senior Vice President or General Manager (referred to as the "first level of approval"). Email confirmation must be submitted to the Office of the General Counsel with the request at the link below.
- (iii) After receiving the first level of approval, the following information must be submitted through the *Charitable Contributions, Community Donations & Sponsorship Approval Request Form* on TPICConnect:
 - a. Detail describing the Charity
 - b. The amount of the proposed contribution and donation
 - c. The business reason for the charitable contribution, donation, or sponsorship request
 - d. The date of the event
 - e. Documentation confirming first level of approval
 - f. Any other supporting documentation for the request such as the Charity website or other information beneficial to help understand the nature of the request
- (iv) The Office of the General Counsel will review the request and may ask for additional information depending on the information provided.
- (v) Confirmation of approval must be received from the Office of the General Counsel prior to making the contribution, donation, or sponsorship with TPI funds.
- (vi) After the contribution is made, proper record-keeping is critical:
 - a. Monetary contributions must be invoiced to TPI to allow for accurate recording and record retention.

In-kind donations may include the donation of a product for use during a sponsored event, and/or sponsoring the meals at a local community or business event. In these instances, records and receipts **must** be retained to support the sponsorship and amount for appropriate recording.

B. Evaluation of Charitable Contributions, Community Donations & Sponsorship Requests

All charitable contributions, community donations & sponsorships will be considered and evaluated throughout the year and will be approved based upon eligibility criteria and available funding. **Requests must be received at a minimum of three to four weeks prior to event to allow for adequate vetting. If the request is for an annual event, continuation of the contribution, donation or sponsorship must be approved annually and renewal is not guaranteed.**

The Business Unit Senior Vice President or General Manager and the Office of the General Counsel will be responsible to approve all requests for charitable contributions, community donations and sponsorship requests based upon the eligibility criteria. All documentation must be retained for appropriate retention and recordkeeping and the following criteria must be met:

1. Ensure any sponsorship is in alignment with TPI's core values and ethical policies such as the FCPA Policy;
2. Any other promotional expenditure associated with the sponsorship activity must be reasonable and proportionate (examples of promotional items include t-shirts, calendars, pens and other similar items of modest value), and prior approval from Business Unit Leader and the Office of the General Counsel must be obtained;
3. Any use of the TPI brand or trademarks must be submitted for approval;
4. Sponsorships must not be made or offered in conjunction with, as part of, or in relation to any bid, tender, contract renewal, or prospective business relationship;
5. No associate in or relating to the course of his/her employment shall make any payment or other contribution to any political party, government official or candidate through TPI sponsorship activities; and,
6. All sponsorship activities, approvals are recorded and maintained for audit purposes.

All sponsorships will be evaluated based upon the criteria set forth above and are subject to TPI budgetary considerations. Further, and as outlined, all requests will be reviewed and approved by the Office of the General Counsel and are subject to additional scrutiny.

Section 5: No Foreign Political Contributions

No TPI funds, assets, services, or facilities shall be contributed to any candidate for political office in a foreign country, foreign political party, or foreign political action committee. TPI will not make charitable contributions or donations to foreign organizations whose primary purpose is to promote political views, influence legislation, or support candidates for public office. TPI will not contribute or provide donations to any organizations located in countries where a U.S. Trade Embargo is in place or if listed on TPI's Restricted Parties List maintained by the Office of the General Counsel. In addition, no charitable contribution or community donation will be made that could give the appearance of or be construed as:

1. Giving the appearance of a bribe, kick-back or facilitation payment;
2. Unduly influencing current or future TPI business transactions;
3. Securing an improper business advantage or induce anyone to act improperly;
4. Circumventing existing TPI policies;
5. Being inconsistent with applicable local laws including Anti-Bribery and Anti-Corruption Laws; and/or,
6. Creating a conflict of interest.

Section 6: Record Retention

All sponsorship requests, including approvals, must be retained to support the sponsorship and approval. Associates must retain these approvals and support documentation in accordance with TPI's Document Retention and Destruction Policy.

Section 7: Accounting Procedures

All charitable contributions, community donations or sponsorship requests must be pre-approved as described above to ensure proper vetting along with proper support and recording to the general ledger. It is TPI's policy to maintain accurate, detailed records that fairly reflect TPI's transactions, regardless of whether they are domestic or international. Therefore, TPI personnel shall not make any false or misleading entries in TPI's books and records for any reason and shall maintain a system of accounting controls sufficient to provide reasonable assurance that:

- (i) Transactions are executed in accordance with management's authorization; and
- (ii) Transactions are recorded as necessary to permit preparation of financial statements in conformity with generally accepted accounting principles (GAAP) or any other criteria applicable to such statements.

Section 8: Reporting of Suspected Policy Violation or Concern

If conduct is observed that may violate this Policy, please immediately contact the Office of the General Counsel at compliance@tpicomposites.com, use the Ethics Line at tpicomposites.ethicspoint.com, or use any of the toll-free phone numbers found on the TPI website. Suspected violations will be reviewed and investigated promptly. Any such reporting will be treated as confidential to the extent permitted by law.