

CORPORATE POLICY AND PROCEDURE

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Supplier Code of Conduct

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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 Code of Conduct (“Code”).

The requirements in this Code are based on TPI’s core values and other Internationally recognized standards, as established in the TPI respects internationally recognized human rights as established in the International Bill of Human Rights, the International Labor Organization’s Declaration on Fundamental Principles and Rights at Work (“Declaration”), the United Nations Global Compact, the United Nations Guiding Principles on Business and Human Rights, the OECD Guidelines for Multinational Enterprises, and the International Labour Organization’s Core Conventions.

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:

- 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.

II. 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**

Suppliers shall ensure that they only collect, disclose, and use information gained in the course of business strictly for business purposes. Suppliers 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**

Suppliers are 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. Suppliers should also develop contingency plans, maintain incident response procedures, and provide frequent training to employees to prevent and respond to security breaches.

d. **Quality**

Suppliers are 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**

Suppliers 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 other Suppliers.

f. **Conflict Minerals**

Suppliers are 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, Suppliers agree 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.

h. **Antitrust and Anti-Competitive Conduct**

Suppliers are strictly prohibited from entering into agreements that prevent, intend to prevent, restrict, or distort competition. All Suppliers must comply with applicable antitrust and anti-competition regulations.

III. **Respect for Human Rights**

Suppliers are expected to respect all internationally recognized human rights in their own operations, with their supply chain and business relationships as provided in the International Bill of Human Rights and the Declaration. TPI Suppliers commit to the requirements in TPI's [Human Rights Policy](#) and make additional commitments as outlined below.

a. **Working Conditions:** 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. Negotiate fairly and in good faith with Labor Unions and collective bargaining efforts.
- iv. Not interfere with the formation of unions. Pay legally-mandated wages and benefits, will comply with the law regarding wage deductions, and will not deduct from wages as a disciplinary measure.

b. **Forced Labor and Child Labor:** Suppliers will:

- i. Not use or permit forced or involuntary labor or human trafficking in any form.
- ii. Ensure that employees have freedom of movement.
- iii. Ensure that employees are free to terminate their employment contracts in accordance with local laws. Not employ workers under the legal age in accordance with local laws or in accordance with the regulation of the International Labor Organization.

c. **Health and Safety in the Workplace:** Suppliers will:

- 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.

- d. **Non-Discrimination:** Suppliers must:
 - i. 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. Must support diversity and equal opportunity in their workplaces.
- e. **Harassment:**
 - i. Suppliers will ensure that their employees may perform their work in an environment free from physical, psychological, and verbal harassment, or other abusive conduct.
- f. **Drug-Free Workplace:**
 - i. Suppliers will maintain a workplace free from illegal drugs and prohibited substances per local and applicable laws.

IV. 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 Suppliers 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. Suppliers shall identify and reduce the use of hazardous materials, chemicals, and substances.
- c. Suppliers will inform TPI of materials within their manufacturing process that do not comply with REACH regulations or customer blacklists, as applicable.
- d. Suppliers 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. Suppliers will seek to reduce their impact on the environment and utilize natural resources including energy, water, and raw materials in an efficient and economical way. As applicable, Suppliers will work to preserve natural ecosystems, promote biodiversity, and eliminate deforestation.
- f. At a minimum, Suppliers will act in accordance with the following:
 - i. **Hazardous Substance Management and Restrictions**
Suppliers 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, Suppliers 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**

Suppliers 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**

Suppliers 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**

Suppliers 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**

Suppliers must endeavor to reduce or eliminate solid waste, wastewater, and Greenhouse gas 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**

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

V. Violations of this Code

If Suppliers observe conduct that may violate this Policy, 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.

VI. General Disclaimer

This 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 Code.