

CORPORATE POLICY AND PROCEDURE



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Section 1: Human Rights Policy

TPI Composites, Inc. (“TPI”), and its divisions, subsidiaries, and/or affiliates (“TPI”) is committed to the highest business and ethics standards. As a result, TPI is committed to ensuring compliance with all applicable laws and regulations, and company policies, practices and procedures. 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.

To ensure alignment to our business objectives and values, TPI requires its associates, suppliers, and contractors to comply with the obligations outlined in this Human Rights Policy (“Policy”).

Section 2: Our Commitment

This Policy reflects TPI’s commitment to respecting the protection of internationally recognized human rights as outlined below:

- a. **Workplace Safety.** Safety is TPI’s most important Core value. We strive to provide for the wellbeing of our associates and have our associates return home at the end of their day in the same or better condition than when they first arrived. Our goal is to provide a safe workplace that complies with applicable environmental, health and safety (“EHS”) standards, laws and regulations. We deploy various EHS processes and operating methods and, as stated in our [EHS Policy](#), aim to continuously improve upon our EHS objectives.
- b. **Workplace Security.** TPI is committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats. Security safeguards for employees are provided as needed and will be maintained with respect for employee privacy and dignity. Private security forces working for TPI are also expected to comply with the terms of this Policy.
- c. **Free, Prior and Informed Consent (FPIC).** TPI respects the long-term formal and customary rights of indigenous and local communities in accordance with the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP). TPI will engage with local and international stakeholder communities to ensure FPIC processes are implemented.
- d. **Slavery, Forced Labor and Human Trafficking.** We prohibit the holding of any person in slavery or servitude, the use of all forms of forced, bonded or compulsory labour, and any participation in human trafficking. All employment with TPI is voluntary, and associates are free to terminate their employment at

any time. We prohibit the use of all forms of forced labor, including prison labor, indentured labor, bonded labor, military labor, modern forms of slavery, and any form of human trafficking.

- e. **Conflict Minerals.** TPI disapproves of human rights abuses associated with the extraction, processing transport, or trade of minerals and any direct or indirect support to non-state armed groups or security forces that illegally control or tax mine sites, transport routes, trade points, or any upstream actors in the supply chain. TPI adheres to its Conflict Minerals Policy and publishes legally required disclosures on conflict minerals.
- f. **Child Labor.** TPI is opposed to the use of child labor. TPI complies with all local laws on the minimum age of employment, as provided in the ILO Convention 138. We also prohibit the hiring of individuals that are under 18 years of age for positions in which hazardous work is required, as provided for in ILO Convention 182.
- g. **Freedom of Association and Collective Bargaining.** In accordance with ILO Convention No. 87 and 98, TPI respects our associates' right to associate or not associate with third-party organizations, join, form or not join a labor union, seek representation, bargain or not bargain collectively in accordance with local laws, without fear of reprisal, intimidation or harassment. Where associates are represented by a legally recognized union or works council, we are committed to establishing a constructive dialogue with their freely chosen representative.
- h. **Work, Hours, Wages, and Benefits.** TPI compensates associates competitively relative to the industry and local market conditions, and in accordance with terms of applicable collective bargaining agreements if applicable. We work to fully comply with wage, work hours, overtime, breaks, public holidays, and benefit laws.
- i. **Due Diligence.** TPI's approach to human rights due diligence is grounded in its values and serves as the foundation of its approach to human rights. TPI is committed to respecting human rights in its own operations and to holding its suppliers accountable for respecting the human rights of the people who make the products it sources. The U.N. Guiding Principles on Business and Human Rights recognize four essential components of an effective human right's due diligence program. TPI's due diligence program reflects these components: (1) it assesses actual and potential human rights impacts; and (2) integrates and acts upon the findings of its assessments.

TPI focuses its efforts on the following salient human rights issues based on our understanding of emerging issues, risks that are common in our sector, experience from other in industries, and input from relevant functions and external stakeholders:

- a. Treating workers with respect

- b. Promoting a safe and healthy work environment
- c. Providing a fair and inclusive work environment
- d. Combating forced and underage labor

Our salient human right areas of focus are continuously evolving and are part of our due-diligence commitment, with progress frequently monitored.

- j. **Remediation and Reporting.** In accordance with principles 29 and 31 of the UN Guiding Principles Reporting Framework, and TPI’s Ethics Line, internal and external stakeholders are encouraged to report concerns to the Company, including any human rights matters. TPI will take appropriate action to prevent, mitigate and, where appropriate, remediate human rights grievances that the Company caused or contributed to. TPI is also committed to working with our suppliers to mitigate or remedy adverse impacts that are directly linked to our operations, products, or services.
- k. **Diversity.** As a global business, TPI has an incredible opportunity to benefit from the diversity we have in our company. We maximize the positive impact that inclusion, equity, diversity, and a feeling of belonging can bring. We recognize that there is value in promoting different ways of thinking, celebrating unique perspectives, and ensuring that diverse points of view are listened to and respected. We want every one of our global associates to feel fairly treated and have equal opportunity to grow their careers at TPI. Our leaders are accountable for intentionally creating an environment where every associate is heard, included and valued, regardless of any likenesses or differences.

TPI’s Code of Business Conduct & Ethics (“Code of Conduct”) protects the rights of minority groups and women by strictly prohibiting discrimination or harassment of any kind on the basis of race, color, religion, veteran status, national origin, ancestry, pregnancy status, sex, gender identity or expression, age, marital status, mental or physical disability, medical condition, sexual orientation or any other characteristics protected by law. Our Code of Conduct also commits us to create a supportive work environment where each associate is expected to create a respectful workplace culture that is free of harassment, intimidation, bias and unlawful discrimination.

Section 3: Process for Implementation

- a. All TPI Suppliers are expected to follow the spirit and intent of this Policy.
- b. This Policy is aligned with the Company’s Code of Conduct.
- c. Training on this Policy will be provided internally and a copy of this Policy will be posted to the TPI website.

Section 4: Violations

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. Associates may also report violations to their supervisor or human resources. Suspected violations will be reviewed and investigated promptly. Any such reporting will be treated as confidential to the extent permitted by law.

Section 5: General Disclaimer

This Policy 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 Policy.