

## **Conflict Minerals Policy**

TPI Composites, Inc.'s ("TPI" or "Company"), its divisions, subsidiaries, and/or affiliates, are committed to the Company's corporate values of *Safety*, *Operational Excellence*, *Commitment*, *Integrity* and *Leadership* are part of our culture. Accordingly, TPI is committed to responsible sourcing and operating a supply chain free of "conflict minerals", which include cassiterite, columbite-tantalite (colton), gold and wolframite and their derivatives, tin, tantalum, and tungsten (or any other mineral or its derivative designated by the Secretary of State) which are sourced from the Democratic Republic of the Congo ("DRC") or an adjoining country (together, the "Conflict Region") and whose extraction, processing, or trade are financing conflict in the Conflict Region.

TPI supports the goals established under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (the "Dodd-Frank Act") on conflict minerals and disapproves of any 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 works diligently to eliminate all conflict minerals in our products, while at the same time minimizing unintended consequences for legitimate miners and their dependents. TPI follows the Organization for Economic Co-operation and Development's ("OECD") guidelines to detect and eliminate sources of conflict minerals in our supply chain.

As part of its Conflict Minerals program, TPI works with an external provider to complete an annual assessment of its Suppliers to mitigate and remediate identified risks from minerals coming from Conflict Regions and high-risk areas. Additional information regarding TPI's diligence process can be found in its Conflict Mineral Report filed with the SEC annually.

In support of its Conflict Minerals program and this Conflict Minerals Policy ("Policy"), TPI:

- Will undertake reasonable country of origin inquiries and due diligence with relevant Suppliers in accordance with the OECD guidelines.
- Expects Suppliers cooperation in providing information to confirm our supply chain is free of conflict minerals or sourced responsibly in accordance with internationally recognized due diligence guidance.
- Expects Suppliers to source from the Conflict Free Smelters ("CFS") program.
- Will not knowingly purchase or use minerals whose extraction, processing or trade benefits armed conflict or human rights abuses.
- Will comply with the reporting obligations by publicly filing reports with the SEC.
- Reserves the right to take appropriate actions should a Supplier's efforts to comply with this policy be deficient.
- Will use reasonable efforts to work with Suppliers to enable conflict-free sourcing, as may be necessary.

TPI has a long-standing commitment to conducting business in compliance with applicable laws and regulations and in accordance with the highest ethical principles. We will continue to work with our Suppliers to ensure they conduct their business in line with TPI values.

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