

CORPORATE POLICY AND PROCEDURE



Policy Number:
600.02

Date:
April 7, 2025

Revision Number:
5

Section:
Policies and Procedures

Subject:
Supplier Code of Conduct

Written by:
Jenny Holsman Tetreault

Approved by:
Deane Ilukowicz
Steve Fishbach

Title:
Vice President and Associate General
Counsel

Title:
Chief People Officer
General Counsel

Table of Contents

Section 1: Introduction	Error! Bookmark not defined.
Section 2: Expectations	Error! Bookmark not defined.
Section 3: Business Ethics	3-5
Section 4: Respect for Human Rights.....	5-6
Section 5: Environmental, Health and Safety Practices.....	6-8
Section 6: Violations of this Code.....	8
Section 7: General Disclaimer	8

TPI Composites Holdings, LLC

Supplier Code of Conduct

1. Introduction

TPI Composites Holdings, LLC 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 Code are based on TPI’s core values and other internationally recognized standards. 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.

2. 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 shall have their own internal Code of Ethics and Business 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 conducting work for TPI.
- 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.

3. Business Ethics

a. Maintain Accurate Records

Suppliers are expected to create and maintain accurate records and may not alter any records to conceal or misrepresent applicable business information. 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 from TPI strictly for business purposes. Suppliers shall also 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 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 comply with the TPI Supplier Quality Requirements.

e. Improper Payments & Anti-Bribery

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. Conflicts of Interest

Suppliers and their representatives shall conduct business with integrity and avoid situations where personal interests conflict, or appear to conflict, with professional responsibilities. A conflict of interest arises when an individual is confronted with choosing between the obligations of their function and their own private interests. Suppliers shall have policies and controls in place to identify and prevent conflicts of interest.

g. Anti-Corruption & FCPA Compliance

Suppliers shall comply with all applicable anti-corruption laws, including the U.S. Foreign Corrupt Practices Act (FCPA) and local anti-corruption regulations. Suppliers shall not directly or indirectly offer, promise, or give anything of value to government officials, political parties, or business partners to influence or secure an improper advantage. Suppliers shall establish and maintain robust internal controls to detect, prevent, and address bribery and corruption risks.

h. 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 groups in conflict affected or high risk areas. 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.

i. Responsible Sourcing and Supply Chain Transparency

Suppliers are required to provide TPI with transparency regarding the origin of materials, goods, and services provided. Suppliers should maintain a clear, traceable path for their supply chains to ensure ethical practices throughout the sourcing process, including full disclosure of any third-party entities involved in the production and delivery of goods or services.

Supplier shall make reasonable efforts to obtain relevant third party certifications for responsible sourcing practices (e.g., ISO 14001 for environmental management, ISO 45001 for occupational health and safety). Upon request, Supplier shall provide TPI with the certification verification.

j. 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.

k. Antitrust and Anti-Competitive Conduct

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

l. Whistleblower Protection

Suppliers shall ensure that their employees are aware of and have access to effective channels for reporting unethical behavior or legal violations, including concerns related to fraud, safety, and human rights abuses. These channels must allow for anonymous reporting, and retaliation against employees who report in good faith is strictly prohibited.

4. Respect for Human Rights

a. Working Conditions: Suppliers shall:

- 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.
- v. Pay legally-mandated wages and benefits, comply with the law regarding wage deductions, and will not deduct from wages as a disciplinary measure.

b. Forced Labor and Child Labor: Suppliers shall:

- 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.
- iv. Not employ workers under the legal age in accordance with local laws or in accordance with the regulation of the International Labor Organization.
- c. Modern Slavery and Human Trafficking:** Suppliers shall:
 - i. Comply with all applicable laws and regulations regarding modern slavery and human trafficking. This includes taking appropriate steps to eliminate slavery and human trafficking from their supply chains and ensuring that their labor practices do not exploit individuals in any form.
- d. Health and Safety in the Workplace:** Suppliers shall:
 - 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.
- e. Non-Discrimination:** Suppliers shall:
 - 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. Support inclusiveness, diversity, and equal opportunity in their workplaces.
 - iii. Ensure that their employees are able to perform their work in an environment free from physical, psychological and verbal harassment, or other abusive conduct.
- f. Drug-Free Workplace:** Supplier shall:
 - i. Maintain a workplace free from illegal drugs and prohibited substances per local and applicable laws.

5. Environmental, Health and Safety Practices

TPI is committed to ensuring the environmental, health and safety ("EHS") of its processes, facilities, surrounding communities, and supply chain partners. To accomplish this goal, Suppliers shall 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 shall inform TPI of materials within their manufacturing process that do not comply with EU REACH regulations or customer blacklists, as applicable.
- d.** Suppliers shall 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 shall 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, U.S. EPA TSCA, Mexico NOM-052). 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. Suppliers shall ensure that all employees involved in the handling, storage, or transportation of chemicals receive regular training on chemical safety, proper handling techniques, and emergency response procedures. Suppliers shall maintain detailed records of all chemicals and hazardous substances used in their operations, including the origin, composition, safety data, and regulatory compliance status. These records should be readily available for review upon request and must allow for traceability in the event of a recall or regulatory inquiry.
 - 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 shall 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. Climate Change and Carbon Footprint

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 shall adhere to all applicable laws, regulations and customer requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.
 - vii. Biodiversity and Deforestation

Suppliers are expected to minimize their impact on biodiversity and ecosystems by avoiding practices that lead to habitat destruction, species loss, or deforestation. Suppliers should adhere to environmental regulations and adopt sustainable sourcing practices, especially for materials linked to deforestation, such as timber and palm oil. Suppliers are encouraged to seek certifications like FSC or Rainforest Alliance and take steps to reduce operational impacts on local ecosystems, while also engaging in biodiversity conservation efforts.

viii. Waste Reduction Efforts

Suppliers are expected to minimize environmental impact through effective waste management practices, including waste reduction at the source, proper segregation, and compliant disposal of hazardous and non-hazardous waste. Suppliers should prioritize recycling, reuse, and sustainable packaging solutions while working towards zero waste to landfill initiatives. Suppliers shall comply with local and international regulations and report waste management practices transparently. Suppliers are encouraged to adopt environmentally responsible treatment methods and continually improve efforts to reduce waste generation and environmental harm.

6. 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 shall be treated as confidential to the extent permitted by law.

7. 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 shall first adhere to the applicable laws and regulations, then the contract terms, followed by this Code.