



TPI Composites — UK Data Protection Complaints Procedure Policy

Section 1: Introduction

Since June 19, 2026, individuals in the United Kingdom have had a statutory right to submit a complaint directly to TPI Composites Holdings, LLC, and its divisions, subsidiaries, and affiliates (“TPI” or “Company”), about how it has handled their personal data, separate from their existing right to complain to the UK regulator (the Information Commissioner's Office, transitioning to the Information Commission). This is required by section 164A of the Data Protection Act 2018, as inserted by the Data (Use and Access) Act 2025 (“DUAA”). This Procedure sets out how TPI receives, acknowledges, investigates, and responds to those complaints, and is the internal process that Section 10.D of TPI's Privacy Policy and Annex D of TPI's Personnel Privacy Notice both refer to.

Scope: This Procedure applies to complaints from any individual located in the UK about TPI's handling of their personal data — including customers, Business Partner representatives, job applicants, and current or former employees (“UK Personnel”) — regardless of which TPI notice originally applied to them.

Section 2: What Counts as a Complaint

For purposes of this Procedure, a “complaint” is any communication from a UK individual expressing dissatisfaction with how TPI has collected, used, shared, retained, secured, or otherwise processed their personal data, or asserting that TPI has not properly handled a request they made under UK data protection law (for example, a request to access, correct, delete, or restrict their data). A general customer service complaint that does not concern the handling of personal data is not a complaint under this Procedure and should be routed through TPI's standard customer service or HR channels instead.

Section 3: How to Submit a Complaint

TPI provides the following accessible channels for UK individuals to submit a data protection complaint:

- **Online/email:** ukdpcomplaints@tpicomposites.com
- **Post:** TPI Composites Holdings, LLC, ATTN: Office of the General Counsel / Data Privacy Lead, 7500 N. Dobson Road, Suite 150, Scottsdale, AZ 85256, marked “UK Data Protection Complaint.”
- **For UK Personnel specifically:** hrprivacy@tpicomposites.com

Section 4: Our Process and Timelines

Step	Timeline	What Happens
Acknowledge	Within 30 days of receipt	TPI sends a written acknowledgment confirming receipt of the complaint and providing an estimated timeframe for a substantive response.
Investigate	Begins promptly after receipt; runs in parallel with/after acknowledgment	The complaint owner (see Section 4) makes appropriate inquiries into the subject matter of the complaint, which may include reviewing relevant systems, records, or personnel, and consulting the Office of the General Counsel or outside counsel as needed.
Keep informed	Throughout the investigation	If the investigation will take longer than 30 days from acknowledgment, TPI provides the complainant with an update on progress and a revised expected timeframe.
Respond	Without undue delay once the investigation concludes	TPI provides a substantive written response explaining the outcome of the investigation, any corrective action taken, and the complainant's right to escalate to the regulator described in Section 6.

Section 5: Roles and Responsibilities

Role	Responsibility
Complaint intake owner	The Office of the General Counsel monitors the channels in Section 2, logs each complaint within [1] business day of receipt, and assigns an investigator.
Investigator	The Office of the General Counsel will work in partnership with the HR and IT Departments to conduct the inquiry described in Section 3, documents findings, and drafts the substantive response for review.
Reviewing authority	The Office of the General Counsel will review and approve the acknowledgment and final response to the complainant.

Section 6: Recordkeeping

TPI maintains a log of all complaints received under this Procedure (Appendix D), including the date received, channel, a summary, the assigned owner, key dates (acknowledgment sent, updates provided, final response sent), and the outcome. This log is retained pursuant to TPI's Document Retention and Destruction Policy to allow TPI to demonstrate compliance with section 164A and to identify any patterns that may indicate a broader process or systems issue.

Section 7: The Complainant's Right to Escalate to the Regulator

Submitting a complaint to TPI under this Procedure does not affect, delay, or replace a UK individual's independent right to complain at any time to the UK's data protection regulator — the Information Commissioner's Office (ICO), which is transitioning to the Information Commission under the DUAA. TPI's acknowledgment and final response templates (Appendices B and C) both restate this right, including the regulator's current contact details, so complainants are not required to wait for TPI's internal process to conclude before contacting the regulator if they choose to.

Section 8: Confidentiality and Non-Retaliation

TPI will not retaliate against any individual — including current or former employees — for submitting a good-faith complaint under this Procedure. Complaint records are handled on a need-to-know basis by the roles identified in Section 4, consistent with TPI's data security obligations under its Privacy Policy and Personnel Privacy Notice.

Section 8: Review of This Procedure

TPI will review this Procedure at least annually, and promptly following any material change in UK data protection law (including further phases of the DUAA or related ICO/Information Commission guidance), to confirm the channels, timelines, and roles described above remain accurate and operational.

Appendix A — Complaint Intake Form (Optional)

A complainant is not required to use this form, but it can be offered or completed by TPI staff to make sure the information needed to investigate is captured consistently.

Date received	
Channel (email / post / other)	
Complainant name	
Complainant contact details	
Relationship to TPI (e.g., customer contact, Business Partner representative, employee, job applicant, other)	
Description of the complaint	
Personal data or processing activity involved	
Desired outcome, if stated	
Prior related request or complaint (if any)	
Received/logged by	