



Human Rights Policy

Section 1: Human Rights Policy

TPI Composites Holdings, LLC (“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 (“ILO”) 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. TPI’s approach is further informed by evolving mandatory human rights and environmental due diligence regimes, including the EU Corporate Sustainability Due Diligence Directive and laws in the jurisdictions where TPI operates and sells that prohibit the importation, sale, or placing on the market of goods made with forced labor..

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. Consistent with ILO Convention 190 on Violence and Harassment, TPI prohibits all forms of workplace violence and harassment,

including gender-based violence and harassment, and provides channels for associates to report such conduct without fear of retaliation.

- 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. Consistent with the Employer Pays Principle, no associate or worker in our supply chain shall be charged recruitment fees or related costs for obtaining employment, and any such fees identified will be remediated. TPI also prohibits the retention of associates' original identity documents, passports, or work permits by TPI or its suppliers as a condition of employment.
- e. **Supply Chain Traceability and Transparency.** TPI requires visibility into the origin of the materials and components in its supply chain. Suppliers must comply with all applicable laws prohibiting forced labor, including laws that prohibit the importation or sale of goods produced wholly or in part with forced labor, and must not use or source materials or products involving forced labor. Suppliers must maintain accurate, up to date supply chain mapping and traceability sufficient to identify the country and region of origin and relevant upstream suppliers of materials, components, and products supplied to TPI, including, where applicable, sources of raw materials and locations of production and processing. Supplier must retain supporting documentation for a period of not less than five (5) years and provide such information upon request to demonstrate compliance, cooperate with TPI's due diligence and verification activities, promptly disclose any actual or potential force labor risks, including any detention, exclusion, withhold release order, or similar governmental action or inquire relating to materials supplied to TPI, and communicate equivalent requirements to relevant upstream suppliers and subcontractors. Information requested under this Section must be provided within ten (10) business days, or within such shorter period as is reasonably required for TPI to respond to a detention, exclusion, or other inquiry by customer, border, or other governmental entity.
- f. **Responsible Minerals Sourcing.** TPI disapproves of human rights abuses associated with the extraction, processing, transport, or trade of minerals, including forced labor or child labor, 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 expects its suppliers to source tin, tantalum, tungsten, gold, and other minerals identified as higher risk responsibly, and to apply the supply chain traceability requirements in Section 2(e) to such minerals. TPI's due diligence aligns with the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. TPI supports its customers' responsible minerals programs by responding to reasonable due diligence inquiries using industry-standard reporting templates, and complies with any minerals disclosure requirements applicable to its operations.

- g. **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.
- h. **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.
- i. **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. TPI is committed to working toward the payment of a fair and living wage sufficient to meet associates' basic needs, consistent with the ILO's definition of a living wage, in addition to complying with all applicable minimum wage laws.
- j. **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 rights 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. The remaining two components — tracking the effectiveness of TPI's responses and communicating externally on how human rights impacts are addressed — are reflected in Section 2(k) (Remediation and Reporting) below. TPI's due diligence process is further informed by the OECD Due Diligence Guidance for Responsible Business

Conduct and by mandatory human rights and environmental due diligence laws applicable to TPI's operations and value chain.

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 industries, and input from relevant functions and external stakeholders:

- a. Treating workers with respect and dignity
- b. Promoting a safe and healthy work environment
- c. Providing a fair, inclusive, and non-discriminatory work environment
- d. Combating forced labor, human trafficking, and underage labor across our value chain
- e. Freedom of association and collective bargaining
- f. Respecting the land, cultural, and community rights of indigenous and local communities
- g. Responsible and ethical sourcing of raw materials, including conflict minerals

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

- k. **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. TPI strictly prohibits retaliation against any associate, supplier representative, or other stakeholder who, in good faith, raises a human rights concern or otherwise acts as a human rights defender. Grievance mechanisms under this Policy are intended to be legitimate, accessible, predictable, equitable, and transparent, consistent with the effectiveness criteria in Principle 31 of the UN Guiding Principles.
- l. **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 must 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.
- d. TPI reserves the right to assess supplier compliance with this Policy through self-assessments, audits, or other verification measures, and to work with suppliers on corrective action plans where gaps are identified.
- e. The Office of the General Counsel is responsible for developing the labor and human rights policy and escalates risks and violations to the Board of Directors.

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.