



## TPI Composites, Inc. Supplier Code of Conduct

### I. Introduction

TPI Composites, Inc. (TPI) is committed to accelerating global clean energy growth and supporting improved fuel economy and electrification in the transportation sector. In order to deliver exceptional value to our customer, we rely on the suppliers who provide the materials and services incorporated into our products. As part of this exceptional value offering, TPI expects its suppliers to operate with the utmost of integrity and meet the spirit and intent of all laws and regulations in the countries in which TPI and its suppliers operate.

### II. Operate with Integrity

Suppliers shall ensure that they have the adequate resources and systems in place to meet all obligations and to conduct business in a transparent and honest manner. Suppliers shall be accountable for the actions of itself and its subcontractors and fully committed to cooperating with corrective actions as needed.

- a. It is the expectation of TPI that 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.

### III. Maintain Accurate Records

Suppliers are expected to create and maintain accurate records and not alter any record entry to conceal or misrepresent the underlying transaction represented by it. 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.

### IV. Respect Human Rights

- a. TPI's Suppliers Commit to the following
  - 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. Not participate in or benefit from the use of forced or involuntary labor or human trafficking in any form.
  - iv. Ensure that all employees have freedom of movement and are free to terminate their employment contracts at any times in accordance with local laws.
  - v. Not employ workers under the legal age in accordance with local laws or in accordance with the regulation of the International Labor Organization.

- vi. Negotiate fairly and in good faith with Labor Unions and collective bargaining efforts.
- vii. Not interfere with the formation of unions.
- b. Health and Safety in the Workplace
  - i. Commit to uphold the highest standards of occupational health and safety standards in all production facilities.
  - ii. Provide mandatory training to all employees and access to appropriate personal protective equipment.
  - iii. If providing housing, ensure that such housing is safe and meets international health and safety standards.
- c. Non-Discrimination
  - i. TPI seeks to maintain a work environment that recognizes the dignity and worth of each individual and is free from harassment and discrimination based on any protected characteristic or protected activities. Supplier must prohibit discrimination based on protected characteristics, including race, color, sex, religion, pregnancy condition, national origin, age (40 and over), 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. Suppliers are expected to support diversity and equal opportunity in their workplaces.

## **V. Respect the Environment**

- a. TPI is committed to assuring the environmental, health and safety (EHS) integrity of its processes, facilities, surrounding communities, and supply chain partners. To accomplish this goal Supplier will ensure that throughout its supply chain, internal and external, EHS practices are used that maintain all legal and regulatory compliance, while protecting the wellbeing of the workforce and surrounding environment.
- b. TPI strives for continuous improvement of EHS across its supply base and takes EHS into consideration within business planning and supplier selection. Suppliers must provide systems and methods to improve EHS at all production locations and contracted third party locations. EHS must be included in the internal auditing for sub-suppliers.

## **VI. Respect Confidentiality and Intellectual Property**

Supplier shall ensure that it only collects, discloses and uses information gained in the course of business strictly for business purposes. Supplier shall 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.

## **VII. Quality**

Supplier is expected to have a management system that ensures adherence with all quality processes outlined by APQP or APQP4Wind, as applicable, and in the Supplier Quality Statement.

**VIII. Improper Payments**

Supplier 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 employee, 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 supplier.

**IX. Conflict Minerals**

Supplier is expected to comply with TPI's Conflict Minerals Policy whose requirements include its response to information requests on the source and origin of conflict minerals in the parts, components or materials provided to TPI.

**X. 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, and technical data. Suppliers are expected to notify TPI of any known or suspected violations.

**XI. Violations of this Code**

In the event of a violation of the any of the above expectations, TPI may pursue corrective action to remedy the situation. In the case of a violation of law or regulation, TPI may be required to report those violations to proper authorities. TPI reserves the right to terminate our relationship with any supplier under the terms of the existing procurement/purchasing agreement.

**XII. Reporting Violations**

Suppliers should report all suspected violations by email to [supplychainglobal@tpicomposites.com](mailto:supplychainglobal@tpicomposites.com)

**XIII. General Disclaimer**

This Supplier Code of Conduct 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 Supplier Code of Conduct.