

## Summary

Flex is committed to maintaining and improving systems and processes to avoid complicity with human rights violations related to our own operations, our supply chain and our products. Flex acknowledges that slavery and

KXPdq WUD FNLQJ FDQ RFFXU LQ PDQ\ IRU ODERU FKLOG ODERU GRPHVWLF VHUYLW ZRUNSODFH DEXVH 7KHUHIRUH WKURXJKR ZH XVH WKH WHUPV eVODYHU\ DQG KXPdq HQFRSDVV WKHVH YDULRXV IRUPV RI FRH

As discussed in greater detail below, Flex takes certain steps throughout the year to ensure that slavery and

KXPdq WUD FNLQJ DUH QRW WDNLQJ SODFH FKDLQV RU RWKHU SDUW RI RXU EXVLQHVV has established an integrated approach to managing human rights across our business including evaluating WKH ULVNV UHODWHG WR VODYHU\ DQG KX

Our commitment to human rights is outlined in the Code

RI %XVLQHVV &RQGXFw DQG (WKLfV e)OH[ and the Company's [Human Rights Policy](#). (YHU\ HPSOR\HF R FHU DQG GLUHFWRU RI )OH[ PXVW NQRZ IRORZ WKH )OH[ &RGH RI &RQGXFw DV ZH DQG UHODWHG SROLFLHV UHIHUHQFHG LQ and rely on when we work with one another, interact with customers, address shareholders, collaborate with business partners, and contribute to our communities.

7KH )OH[ &RGH RI &RQGXFw GLFWDWHV

- We Treat Others with Respect and Comply ZLWK )DLU /DERU DQG (PSOR\PHQW 3
- We are open and honest with one another and treat each other with integrity and respect.
- We do not discriminate against anyone on the basis RI UDFH FRORU JHQGHU DJH QDWL or any other legally protected characteristic.
- We strive to maintain a workplace where individuals DUH LHH JURP DQG IRUPV RI KDUDVV
- We provide employees with, at a minimum, all OHJDOO\ UHTXLHG EHQZwV :H GR IRUFHG LQGHWXUHG RU ERQGHG O D PLQLXP DJH UHTXLUPHQW IRU HF :H UHFRJQL]H WKH ULJKWV RI RXU ZR DVVRFLDWH IUHHO\ DQG EHOLHYH W

## FLEX OVERVIEW

)OH[ LV WKH PDQXIDFWXULQJ SDUWQHUR FRRLFH WKDW KHOSV D diverse customer base design and build products that LPSURYH WKH ZRUOG 7KURXJK WKH FROOHFWLYH VWUHQJWK RI D JOREDO ZRUNIRUFH DFURVV FRXQWULHV DQG UHVSRYLEOH sustainable operations, Flex delivers technology LQQRYDWLRQ VXSSO\ FKDLQ DQG PDQXIDFWXULQJ VROXWLRQV to various industries and end markets. For more LQIRUPDWLRQ YLVLW YH[ FRP



communication and direct engagement between workers and management is the most

## 9HULŽFDWLRQ

- We do not allow retaliation against anyone who raises a concern about discrimination, harassment, or any labor and employment practice.
- We expect our business partners to also meet these same standards.

7KH )OH[ &RGH RI &RQGXFV LV DYDLODEOH and employee training sessions incorporate real FDVH VFHQDULRV (PSOR\HHV DUH HQFRXUDJHG WR raise questions and concerns and have multiple FKDQQHOV WR GR VR `DQRQ\PRXVO\ LI WKH through a hotline and as permitted by law.

7KH +XPDQ 5LJKWV 3ROLF\ LV H[SOLF\ 8QLWHG 1DWLRQV \*XLGLQJ 3ULQFLSOHV Rights, extends to Flex’s entire value chain and outlines D UHSRUWLQJ DQG HVPDODWLRQ SURFHVV IRU VVSHFWHG 7KHVH FRPPLWPHQWV DUH UHLQIRUFHG LQ WKH 8QLWHG 1DWLRQV \*OREDQ &RPSD VXSURUW UHVSHFW IRU LQWHUQDWLRQDO DV WKH HOLPLQDWLRQ RI DOO IRUPV RI FRHUFHG ODERU

DEH[LWV\HHV VWHSV WR YHULI\ HYDOXDWH RI VODYHU\ DQG KXPdq WUD FNLQJ LQ RXU 7KH ŽUVW VWHS LQ WKLV SURFHVV LV WR IRU RXU VXSSOLHU )RU H[DPSOH WKH VXSSOLHU FRQUDFWV DQG 32 WHUPV FRQ requiring the suppliers to comply with these codes.

\$GGLWLRQDOO\ ZH PRQLWRU FRPSOLDQFH \$VVHVVPHQW 4XHVWLRQQDLUHV FRPSOHWH 7KHVH H[SFWLDWLRQV DUH FRGLŽHG LQ WKH

Conduct. Central to this commitment are the principles RI\UHQ\ &KRVHQ (PSOR\PHQW ZKLFK DUH )OH[ &RGH RI &RQGXFV DQG WKH 5%\$ &R ZKLFK VWDWHV e)RUFHG ERQGHG LQFOX or indentured labor, involuntary prison labor, slavery or WUD FNLQJ RI SHUVRQV VKDOO QRW EH XV

WR WKH 5%\$ &R WKH RI &RQGXFV DQG KDV D 8QLWHG 1DWLRQV &RQDQGV WR DQG GUHV D QXPEHU UHODWHG LVVXHV LQFOXGLQJ WUD FNHG D

D UHSRUWLQJ DQG HVPDODWLRQ SURFHVV IRU VVSHFWHG 7KHVH FRPPLWPHQWV DUH UHLQIRUFHG LQ WKH 8QLWHG 1DWLRQV \*OREDQ &RPSD VXSURUW UHVSHFW IRU LQWHUQDWLRQDO DV WKH HOLPLQDWLRQ RI DOO IRUPV RI FRHUFHG ODERU

,Q DGGLWLRQ WR WKHVH SROLFLHV )OH[ WKH 5HVSQRVLEOH %XVLQHVV \$OOLDQFH 5%\$ IRUPHUO\ NQRZQ DV WKH (OHFWURQLF ,QGXVWU\ &LWL]HQV We have a commitment to improve our programs and LPSOHPHQW WKH 5%\$ &RGH RI &RQGXFV LQFOXGLQJ WKH VXSSO\ FKDLQ 7KH 5%\$ FRQWLQV VSHFLŽF UHTXLUHPHQWV FRYH WUD FNLQJ WKDW DUH LQFRUSRUDWHG DV VHOI DVVHVVPHQW TXHVWLRQQDLUHV SURWRFROV )OH[ LV D IRXQGLQJ PHPEHU WKLV LQGXVWU\ RUJDQL]DWLRQV H•RUWV /DERU ,QLWLDWLYH DQG WKH 5HVSQRVLEOH DUH ZRUNLQJ ZLWK RWKHU PHPEHUV RI WKH

### Supplier Audits

PHPEHU RI WKH 5HVSQRVLEOH %XVLQHVV \$OOLDQFH 5%\$ IRUPHUO\ NQRZQ DV WKH (OHFWURQLF ,QGXVWU\ &LWL]HQV UHVSQRVHV DV ZHOO DV RWKHU IDFWRUV VXSURUW IRU VVSHFWHG FRQWLQV VSHFLŽF UHTXLUHPHQWV FRYH WUD FNLQJ WKDW DUH LQFRUSRUDWHG DV VHOI DVVHVVPHQW TXHVWLRQQDLUHV SURWRFROV )OH[ LV D IRXQGLQJ PHPEHU WKLV LQGXVWU\ RUJDQL]DWLRQV H•RUWV /DERU ,QLWLDWLYH DQG WKH 5HVSQRVLEOH DUH ZRUNLQJ ZLWK RWKHU PHPEHUV RI WKH

chain, customers, suppliers and competitors to better XQGHUVWDQG WKH IXOO H[WHQW RI WKLV FRPEDW WKH RFFXUUHQFH RI WUD FNHG \$GGLWLRQDOO\ )OH[ LV DQ DFWLYH PHPEHU %XVLQHVV ,QLWLDWLYH RQ +XPDQ 5LJKW organization is to advance human rights in a business FRQWH[W WKURXJK FURVV LQGXVWU\ SHU DQG FDSDFLW\ EXLOGLQJ DQG LQIRUPLQJ :H KDYH LQYHVWHG VLJQLŽFDQW WLPH FRUOHFWLYH industry wide improvements. Flex continues to XQGHUWDNH H•RUWV DPHG DW HQVXULQJ WUD FNLQJ RU VODYHU\ RI DQ\ NLQG LQ R

responsibility topics, including Slavery and Human WUD FNLQJ 5%\$ SHUFRQY\ VXFK 66\$YU\ DQG DXPDQ 7UD FNLQJ LQ \$VLD ZLWK 5%\$ 3ERXJK FRYLGHUV VHFUXLW\ canteen services in the region. We are working with those are exploring alternative providers where appropriate.

are immediately required to present mediation plans that are closely monitored. Failure to complete those plans

FRUOHFWLYH industry wide improvements. Flex continues to XQGHUWDNH H•RUWV DPHG DW HQVXULQJ WUD FNLQJ RU VODYHU\ RI DQ\ NLQG LQ R

are immediately required to present mediation plans that are closely monitored. Failure to complete those plans



analysis, correction and preventive action as well as  
DVVLJQPHQW RI DFWLRQ RZQHUV DQG WLP  
Flex monitors, reviews and reports on compliance with  
these requirements using a Corrective Action tracker to  
initiate the request, track response times, and report on  
UHVSQRVH VWDWXV DQG RXWVWDQGLQJ V

## & H U W L Ž F D W L R Q

Flex suppliers must comply with Flex supplier contracts  
and purchase order terms. Flex standard supplier  
contract terms require suppliers to comply with all  
applicable laws in the country or countries in which  
WKH\ GR EXVLQHVV DQG WKH 5%\$ &RGH R

## Internal Accountability

7KURXJK )OH[cV &RGH RI &RQGXFV WKH GLUHFWRU LV VHV  
E\ RXU &(2 WKDW ZH GR QRW FRQGRQH FKLOG IRUFHG  
indentured or bonded labor. Our [Human Rights](#)  
[Policy](#) also makes those same standards clear.

)OH[ 3OHGJH WKH PDQDJHPHQW V\ VWHP IRU RXU &RUSRUDWH  
6RFLDO DQG (QYLURQPHQWDO 5HVSQRVLELOLW\ &6(5 SURJUDP  
HVWDEOLVKHV SROLFLHV SURFHGXUHV DQG SURFHVVHV IRU  
PDQDJLQJ FRPSOLDQFH WR DOO &6(5 WRSLFV LQFOXGLQJ  
)RUFHG /DERU DQG +XPDQ 7UD FNLQJ ERWK DW RXU  
internal operations as well as in the Supply Chain.

Flex also has an Audit Committee that is chartered by the  
%RDUG RI 'LUHFWRUV WR RYHUVHH WKH FRPSOLDQFH SURJUDP  
7KH &KLHI (WKLHV &RPSOLDQFH 2 FHU e&(&2f UHSRUWV  
TXDUWHUO\ WR WKH \$XGLW &RPLWWHH RQ WKH VWDWXV RI WKH  
FRPSOLDQFH SURJUDP 7KH &(&2 DOVR UHSRUWV TXDUWHUO\ WR  
WKH ([HFXWLYH 6SRQVRUV D JURXS RI )OH[ H[HFXWLYHV ZKR  
SURYLGH IHGDFN DQG VXSSRUW RQ WKH VFRSH DQG FRQWHQW  
RI WKH FRPSOLDQFH IXQFWLRQ DQG HQVXUH LPSOHPHQWDWLRQ  
, Q DGGLWLRQ WKH &RPSOLDQFH 3URJUDP LV VXSSRUWHG E\  
PHPEHUV RI WKH &RPSOLDQFH &RXQFLO D FURVV IXQFWLRQDO  
WHDP RI VXEMHFW PDWWHU H[SHUWV LQ WKH YDULRXV FRPSOLDQFH  
DUHDV 7KH &RPSOLDQFH &RXQFLO KHOSV GULYH )OH[cV FXOWXUH RI

compliance in our Company across the globe. The Council  
PHQVLRU WRU RIRW & H W L R Q (WKLHV &RPSOLDQFH  
&RPSOLDQFH \$WWRUQH\ &RPSOLDQFH 'LUHFWRUV  
Compliance Team, and other relevant stakeholders  
IURP WKH EXVLQHVV VHJPHQWV DQG IXQFWLRQDO  
the company. The Council meets regularly to share  
EHVW SUDFWLFHV OHDUQ IURP LQWHUQDO  
highlight key policy, legal, and regulatory changes, and  
WR VKDUH NH\ DFFRPSOLVKPHQWV DQG IXQFWLRQDO

## TRAINING

Flex provides mandatory training to all Flex  
HPSOR\HHV RQ RXU &RGH RI &RQGXFV  
&RQGXFV ZLWK RY  
contracted legal and  
DQG +XPDQ 7UD FNLQJ (YHU\ HPSOR\HH  
DQG GLUHFWRU RI )OH[ PXVW NQRZ XC  
IROORZ WKH )OH[ &RGH RI &RQGXFV D  
SURFHGXUHV DQG UHODWHG SROLFLHV

6LJQH E\

