

Human rights policy

1.0 PURPOSE

- 1.1. At Flex we are committed to respecting the Human Rights of all of people throughout our operations and in our value chain. This Policy is based upon our intention to conduct business legally, ethically and with integrity at all times. This Policy is further supported by related Company policies and with due diligence and remedy procedures to ensure respect for human rights and to avoid complicity in violations. This Policy aligns to the UN Guiding Principles on Business and Human Rights and is inclusive of all rights outlined in the United Nations Universal Declaration of Human Rights to the extent those rights apply to business operations. This Policy also complies with U.K.'s Modern Slavery Act of 2015, California's Transparency in Supply Chains Act of 2010, and Federal Acquisition Regulation ("FAR") 52.222-50.

2.0 SCOPE

- 2.1. This Policy is applicable to Flex and each of our subsidiaries and affiliates, all employees on a worldwide basis and to our value chain (including suppliers and vendors).

3.0 DEFINITIONS AND ABBREVIATIONS

- 3.1. CoBCE - Flex Code of Business Conduct and Ethics
- 3.2. RBA - Responsible Business Alliance
- 3.3. Sustainability - Covers the different environmental, social and governance pillars of the company
- 3.4. VAP - Validated Assurance Process

4.0 POLICY STATEMENT

Flex Human Rights Policy

- i) **Freely Chosen Employment.** Ensure that employees work of their own free will and are free to leave the Company upon reasonable notice under the terms of their labor contract. There shall be no unreasonable restrictions on freedom of movement in the facility. All employment contracts are voluntary agreements. Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, forced labor or trafficking of persons shall not be used. Workers shall not be charged any fees for placement or recruitment. Migrant workers should have free and complete access to their own passports, identity documents and residency papers and enjoy freedom of movement.

- ii) **Child Labor and Young Workers.** Comply with all appropriate local and international regulations on the restriction on the employment of child labor and the protection of young workers. There shall be no employment of anyone under the age of 15 for any position or under the minimum age for employment in the country, whichever is greatest. Workers under the age of 18 should not perform hazardous work and should not work night shifts or overtime.
- iii) **Benefits and Wages.** Ensure that the compensation and benefits for employees comply or exceed all applicable wage laws of the country where employees are employed.
- iv) **Working Hours.** Comply with local working hours' requirements or the Responsible Business Alliance (RBA) guideline, whichever is lower. Overtime work is voluntary, and employees are compensated for overtime work in accordance with local laws.
- v) **Equal Opportunity and No Discrimination.** Ensure our hiring, compensation, training, promotion, termination and retirement policies and practices do not discriminate upon the basis of race, color, age, gender, sexual orientation, gender identity and expression, ethnicity or national origin, disability, pregnancy, religion, marital status, union membership or political affiliation.
- vi) **Housing.** Whenever workers are provided with housing, assure that all dormitories, hostels or other accommodations are comfortable, safe and hygienic.
- vii) **Humane Treatment.** There is to be no harsh or inhumane treatment, including any physical, sexual, psychological or verbal harassment or abuse against employees, suppliers or vendors.
- viii) **Freedom of Association.** In conformance with local law, we respect the right of all workers to form and join trade unions of their own choosing, to bargain collectively and to engage in peaceful assembly as well as respecting the choice of workers to refrain from such activities. Workers and their representatives shall be able to openly communicate and share ideas and concerns with management regarding working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.
- ix) **Health and Safety.** All operations shall provide a healthful and safe working place for all.
- x) **Human Trafficking.** Flex prohibits it's employees, suppliers, subcontractors, and agents from engaging in human trafficking and related activities.



Revathi Advaiti, CEO

5.0 U.S. GOVERNMENT'S ANTI TRAFFICKING POLICY

- 5.1. The United States Government has a zero-tolerance policy against trafficking in persons and Flex supports the government's position. The anti-human trafficking clause of the FAR applies to government contractors, contractor employees, subcontractors, subcontractor employees, and their agents, and prohibits:
- Engaging in severe forms of trafficking in persons during the performance of a government contract;
 - Procuring commercial sex acts during the performance of the contract;
 - Using forced labor in the performance of the contract;
 - Destroying, concealing, confiscating, or otherwise denying access by an employee to the employee's identity or immigration documents, such as passports or drivers' licenses, regardless of issuing authority;
 - Using misleading or fraudulent practices during the recruitment of employees or offering of employment, or using recruiters that do not comply with local labor laws of the country in which the recruiting takes place;
 - Charging employees recruitment fees;
 - Failing to provide return transportation or pay for the cost of return transportation upon the end of employment in certain situations for employees hired for the purpose of working on a government contract;
 - Providing or arranging housing that fails to meet the host country housing and safety standards; or
 - If required by law or contract, failing to provide an employment contract, recruitment agreement, or other required work document in writing in a language the employee understands (if the employee must relocate to perform the work, the work document must be provided at least five days before the employee relocates).

Similarly, this policy prohibits these actions and failures by Flex's employees, agents and subcontractors. Any violation of this policy will result in disciplinary action, up to and including termination.

6.0 RESPONSIBILITIES

- 6.1. It is the responsibility of Flex management to comply with this policy and to communicate the policy to our employees, suppliers and customers.
- 6.2. The Corporate Sustainability and HR Function will provide necessary training, guidance and monitoring to ensure this policy is implemented at all sites.
- 6.3. Implementation:
- 6.3.1. Operate with respect for the universal human rights identified in the UN Declaration on Human Rights and in accordance with UN Guiding Principles on Business and Human Rights.
 - 6.3.2. Not knowingly allow a business partner or customer to abuse human rights using Flex products or solutions.
 - 6.3.3. Regularly assess human rights impacts by business function, geography and product impacts through due diligence and through internal/external stakeholder engagement.

- 6.3.4. Provide access to grievance mechanisms, investigate allegations and escalate known cases of human rights abuse to senior leadership.
- 6.3.5. Integrate training and accountability for respecting human rights across its value chain.
- 6.3.6. Collaborate with other companies on common challenges and share best practices for operating with respect for human rights.
- 6.4. Reporting, Cooperation, and Escalation Processes
 - 6.4.6. Failure to comply with this Policy and relevant policies outlined below is a basis for disciplinary action that may include termination of employment and/or termination of contract or engagement, as appropriate. In some cases, a referral to legal authorities may also be appropriate. Flex employees are expected to report violations or suspected violations of this policy to their management, the Law Department or the Ethics and Compliance Department.
 - 6.4.7. When Flex is serving as a federal contractor, it will report credible information of human trafficking activities to the Contracting officer and the agency Inspector General.
 - 6.4.8. Flex's Ethics Point Hotline offers employees, business partners, suppliers and customers an avenue to report any suspected ethical concerns to our Ethics and Compliance Department. You can report information in multiple languages by either calling the Flex Ethics Hotline using a [local toll-free number](#) or by submitting a report on Ethics Hotline external website (www.flexethicshotline.com). The information you submit to Ethics Hotline will be confidentially and anonymously forwarded to management. The Company has a very clear policy of non-retaliation and protection for anyone reporting a violation using Ethics hotline.
 - 6.4.9. You may also report suspected human trafficking activities to the Global Human Trafficking Hotline by calling 1-844-888-FREE or by e-mail at help@befree.org
 - 6.4.10. As provided in FAR, Flex will provide timely and complete responses to Government auditors' and investigators' requests for documents, and will cooperate fully in providing reasonable access to Flex's facilities and staff to allow contracting agencies and other responsible Federal agencies to conduct audits and investigations of potential human trafficking violations.
 - 6.4.11. Flex will protect all employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited. Flex will not prevent or hinder the ability of these employees from cooperating fully with Government authorities.

7.0 TRAINING REQUIREMENTS

- 7.1. All sites are required to provide all employees with training and communication on this policy.
- 7.2. All sites are expected to communicate this policy to any relevant internal and/or external stakeholders, e.g. employees, agencies, brokers, contractors, customers, suppliers, etc.

8.0 ASSESSMENT OF CONFORMANCE METHOD

- 8.1. Compliance with this policy will be assessed by the HR Function through internal audits, the VAP and the RBA factory of choice.

9.0 DOCUMENT REVIEW AND APPROVAL REQUIREMENTS

- 9.1. This document will be maintained on DMS portal.
- 9.2. This document will be available for download from DMS Portal.
- 9.3. This policy will be revised by the Sustainability and HR owners when required.

10.0 APPENDIX A: RELEVANT POLICIES AND GUIDELINES

The following operational policies supplement our Human Rights Policy, thereby integrating accountability and ensuring management across our value chain:

Flex Umbrella Policies

- 10.1. Flex Code of Business Conduct and Ethics (CoBCE: describes recognizing and respecting people's rights and dignity as a core ethical value. In our daily operations, we follow this policy in dealing with employees, suppliers and others with whom we do business.)
- 10.2. Responsible Business Alliance (RBA) Code of Conduct.
- 10.3. EHS Policy which outlines our policy on operating facilities in an environmentally acceptable manner, on offering products and services that consider environmental and safety impacts, and on working with employees to maintain a healthy and safe workplace.

Flex (Reg. No. 199002645H) is the manufacturing partner of choice that helps a diverse customer base design and build products that improve the world. Through the collective strength of a global workforce across 30 countries and responsible, sustainable operations, Flex delivers technology innovation, supply chain, and manufacturing solutions to various industries and end markets.

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For more information, visit [flex.com](https://www.flex.com).

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The logo for Flex, consisting of the word "flex" in a lowercase, white, sans-serif font on a blue background.