



CONFLICT MINERALS POLICY

ABOUT FLEX

Flex is a leading sketch-to-scale™ solutions company that designs and builds intelligent products for a connected world. With more than 200,000 professionals across 30 countries and a promise to help make the world Live smarter™, the company provides innovative design, engineering, manufacturing, real-time supply chain insight and logistics services to companies of all sizes in various industries and end-markets. For more information, visit www.flex.com or follow us on Twitter @flexintl.

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1.0 BACKGROUND/INTRODUCTION

- 1.1. The United Nations Group of Experts on the Democratic Republic of the Congo (DRC) found that the trade of certain minerals, Columbite-Tantalite (Coltan/Tantalum), Cassiterite (Tin), Wolframite (Tungsten) and Gold, called Conflict Minerals (3TG), is helping to finance the civil conflict in the DRC characterized by extreme levels of violence, particularly sexual and gender-based violence.
- 1.2. In July 2010, US President Barack Obama signed the "Dodd-Frank Wall Street Reform and Consumer Protection Act" that includes section 1502(b) on Conflict Minerals.
- 1.3. US Securities and Exchange Commission (SEC) released final rules in August 2012 requiring all public companies to disclose and report annually to the Securities and Exchange Commission (SEC) if the minerals used in their products (3TG), originated from the DRC or adjoining countries.

2.0 PURPOSE

- 2.1. This document contains Flex's policy regarding Conflict Minerals in our supply chain. Flex supports the activity of the Responsible Minerals Initiative, and as a charter member, we make use of all tools and resources created by the organization to support our Conflict Minerals due diligence program.

3.0 SCOPE

- 3.1. This document defines Flex's due diligence requirement and expectation of our supply chain.

4.0 DEFINITIONS AND ACRONYMS

- 4.1. **Dodd-Frank Section 1502:** In 2012, the U.S Securities and Exchange Commission (SEC) adopted rules mandated by the conflict minerals disclosure provisions of the Dodd-Frank Wall Street Reform and Consumer Protection Act. These rules require publicly traded companies to report annually on the source and chain of custody of conflict minerals in products manufactured by the company.
- 4.2. **Responsible Minerals Assurance Process (RMAP):** The flagship program of the RMI, the Responsible Minerals Assurance Process (RMAP) uses an independent third-party audit of smelter/ refiner management systems and sourcing practices to validate conformance with RMAP protocols and current global standards. The audit employs a risk-based approach to validate smelters' company-level management processes for responsible mineral procurement. Companies can then use this information to inform their sourcing choices.
- 4.3. **OECD definition of Conflict- Affected and High-Risk Areas (CAHRAs):** Conflict-affected and high-risk areas are identified by the presence of armed conflict, widespread violence or other risks of harm to people. Armed conflict may take a variety of forms, such as a conflict of international or non-international character, which may involve two or more states, or may consist of wars of liberation, or insurgencies, civil wars, etc. High-risk areas may include areas of political instability or repression, institutional weakness, insecurity, collapse of civil infrastructure and widespread violence. Such areas are often characterized by widespread human rights abuses and violations of national or international law.



5.0 REFERENCES

5.1.

Document Title	Document Number	Document \ Hyperlink
Conflict Minerals Policy	CSE-CPL-1-003-00	Conflict Minerals Policy

6.0 POLICY STATEMENT

6.1. Responsible Sourcing Policy

As a member of the Responsible Minerals Initiative (RMI), Flex is committed to responsibly sourcing the raw materials used in the components and products we assemble. We will collaborate with the RMI, with our customers, suppliers and others to prioritize the mineral substances considered to have the most salient environmental and social impacts and will contribute to mitigating those impacts.

"Conflict Minerals" refers to minerals or other derivatives mined in the Democratic Republic of the Congo (DRC) and in the adjoining countries where revenues may be directly or indirectly financing armed groups engaged in civil war, resulting in serious social and environmental abuses. In July 2010, the United States passed the Dodd-Frank Wall Street Reform and Consumer Protection Act. Section 1502(b) of this law requires all US stock listed companies to disclose the usage of Conflict Minerals (Tin, Tantalum, Tungsten, and Gold . . . 3TG).

Flex fully supports this legislation and the RMI's position to assure that specified minerals are not being sourced from mines in the "Conflict Region", which are under the control of armed groups, to finance conflict in the region. Consistent with the 'OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (CAHRAs)', Flex has adopted the RMI Due Diligence reporting process and will require declarations from Flex suppliers, ensuring transparency in our supply chain.

- Flex expects our suppliers to source from socially responsible suppliers. This means we not only source from suppliers using sources from other regions but also source with suppliers who have confirmed non-conflict sources, even if those sources do come from the DRC or adjoining countries.
- Flex expects our suppliers to work toward sourcing only from Responsible Minerals Assurance Process (RMAP) conformant smelters and refiners.
- Suppliers are expected to have policies and procedures in place to ensure that products and parts supplied to Flex 'DRC Conflict-free'.
- Suppliers are expected to provide all necessary due diligence information to confirm that all 3TG supplied to Flex is DRC Conflict-free.
- Flex expects suppliers to pass this requirement on to their supply chain.
- Compliance to these requirements will be taken into consideration when selecting and retaining suppliers.

Flex is a member of the Responsible Minerals Initiative (RMI) and is committed to identifying, assessing and remediating human rights violations in its minerals supply chain. Flex will provide its customers and expects its sub-suppliers to provide due diligence confirming that various minerals (i.e. other than 3TG) identified as a source of concern by the RMI have been responsibly sourced. Flex encourages smelters in our supply chain to undergo a third-party risk assessment, such as the Responsible Minerals Assurance Process (RMAP) administered by the RMI. Flex is committed to transparency in the implementation of this process by making reports on our progress available to stakeholders.

For assistance with any questions or concerns, please contact the Conflict Minerals team: cminerals.support@flex.com

'DRC Conflict-free' means that a product does not contain conflict minerals necessary to the functionality or production of that product that directly or indirectly finance or benefit armed groups.