

STATEMENT

Forced Labor and Human Trafficking Statement

For the fiscal year 2025



Flex's purpose is to make great products for our customers that create value and improve people's lives. Sustainability is at the core of our purpose, which in turn guides our actions.

We are committed to robust corporate governance practices and recognize its importance to earning and retaining the trust of our stakeholders. Flex senior leaders and Board of Directors continually review processes and implement procedures designed to maintain strong governance and operational standards.

Throughout our global operations, we strive to drive an accountable, ethical approach to doing business with suppliers and customers alike, minimize our environmental footprint, and help our employees to prosper and contribute to the communities where we operate. For more than 20 years, sustainability has been integrated into the fabric of our company, a key area of differentiation for Flex.

We look forward to deepening our engagement with Flex stakeholders, including employees, partners and customers, to help accelerate a more sustainable future.

A handwritten signature in black ink, appearing to read 'Revathi Advaiti'.

Revathi Advaiti
Chief Executive Officer, Flex

INTRODUCTION

The California Transparency in Supply Chains Act, the United Kingdom Modern Slavery Act 2015, and the Australia Modern Slavery Act 2018 require certain businesses to provide disclosures concerning their efforts, if any, to address forced labor and human trafficking within their supply chains. The disclosures are intended to provide consumers the ability to make better and more informed choices about the products and services they buy. Flex is aware of the implications of these and other relevant regulations and this Statement provides an overview of the efforts taken by the company to prevent forced labor or human trafficking in our business, including within our supply chain.

This disclosure covers Flex's fiscal year ended March 31, 2025.

OUR CODE OF CONDUCT AND RELATED POLICIES

Flex is committed to maintaining and improving systems and processes to avoid human rights violations in our operations, supply chain, and products. Flex acknowledges that forced labor and human trafficking can be connected to different practices such as slavery, bonded labor, retention of identity documents, withholding of wages, deception, and false promises. Therefore, throughout this disclosure, we use the terms "forced labor and human trafficking" to encompass these various practices. As discussed in greater detail below, Flex takes certain steps throughout the year to ensure that forced labor and human trafficking are not taking place in our operations, supply chains or other parts of our business. To this end, Flex has established an integrated approach to managing human rights across our business including evaluating the risks related to forced labor and human trafficking.

Our commitment to human rights is outlined in our [Code of Business Conduct and Ethics](#) and our [Human Rights Policy](#). Every employee, officer, and director of Flex must know, understand, and follow the Flex Code of Business Conduct and Ethics as well as the procedures and related policies referenced in it. This is what we expect and rely on when we work with one another, interact with customers and suppliers, address shareholders, collaborate with business partners, and contribute to our communities. Additionally, it is critical that Flex's suppliers, as well as their employees, agents, and subcontractors, understand and adhere to Flex's [Supplier Code of Conduct](#), so that these standards are upheld throughout our supply chain.

Flex's Human Rights Policy is explicitly aligned with the United Nations Guiding Principles on Business and Human Rights, extends to our entire value chain and outlines a reporting and escalation process for suspected issues. Our commitments are reinforced by our participation in the United Nations Global Compact whose principles support respect for international human rights as well as the elimination of all forms of coerced labor. In addition to these policies, Flex is an active member of the Responsible Business Alliance ("RBA"), the world's largest industry coalition dedicated to responsible business conduct in global supply chains.

As a founding member of the RBA, we have a commitment to continuously improving our programs and ensuring the implementation of the RBA Code of Conduct across our business including the supply chain. The RBA Code of Conduct contains specific requirements covering forced labor and human trafficking that are incorporated into Flex's tools, such as Self-Assessment Questionnaires and audit protocols. Through RBA's efforts, including the Responsible Labor Initiative ("RLI") and the Responsible Minerals Initiative ("RMI"), we are working with other members of the electronics supply chain, customers, suppliers, and competitors to better understand the full extent of trafficked and forced labor and to effectively combat its occurrence.

Additionally, Flex is an active member of the Global Business Initiative on Human Rights. The mission of this organization is to advance human rights in a business context through cross-industry peer learning, outreach and capacity building, and informing policy. We have invested significant time and resources in collaborating with others to address system-level industry-wide improvements.

Flex continues to undertake efforts aimed at identifying and addressing forced labor and human trafficking in our supply chain.

Our policies and governance framework covers:

- Child labor avoidance
- Forced labor avoidance
- Freedom of association & collective bargaining
- Worker-Management communication
- Non-discrimination
- Humane treatment
- Working time
- Disciplinary practices
- Compensation
- Occupational health and safety
- Environment
- Responsible Minerals
- Ethics
- Grievance mechanisms
- No retaliation
- Continuous improvement

For more information, please visit [our policies](#) web site.

STRUCTURE

Flex is the advanced, end-to-end manufacturing partner of choice that helps a diverse customer base design, build, deliver and manage innovative 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 diverse industries and end markets.

To ensure our continued leadership, and to do right by our stakeholders, we have set ambitious goals and commitments to run a responsible, sustainable business. Our history is built on the process of creating. It's the foundation of who we are – our global scale and regional connections, our advanced manufacturing technology, and our talented, dedicated teams make what we do possible.

Our vision is to be the most trusted global technology, supply chain, and manufacturing solutions partner to improve the world. Our full suite of specialized capabilities includes design and engineering, supply chain, manufacturing, post-production and post-sale services, and proprietary products. Flex partners with customers across a diverse set of industries including data center, communications, enterprise, consumer, automotive, healthcare, industrial, and power.

For more information about Flex visit: flex.com

RISK ASSESSMENT

We have invested significant time and resources in collaborating with others to address system-level industry-wide improvement by participating and holding memberships in different human rights and social compliance organizations, such as Global Business Initiative on Human Rights (GBI), the RLI, the RBA, the RMI, and GRI Community Membership. Flex continues to undertake efforts aimed at identifying and addressing forced labor and human trafficking in our supply chain.

To evaluate our risk related to forced labor and human trafficking, we look first at the sectorial and regional risks posed by our direct and indirect workforce.

From a sectoral perspective, we evaluate the types of activities performed by our direct and indirect workforce. Based on the United Nations' International Standard for Industrial Classification of All Economic Activities¹, most of the Flex workforce will fall in the Manufacturing sector, considered medium risk, as 18.7% of the cases of forced labor are found in this sector (per the International Labour Organization's Global estimates of modern slavery: Forced labor and forced marriage of 2022)².

Flex operates in 30+ countries and our workforce is based in three regions: Americas, Asia and EMEA. Considering the level of vulnerability to modern slavery from the Global Slavery Index 2023³, an investigation prepared by Walk Free, an international human rights group focused on the eradication of modern slavery, these regions may be considered medium and low risk. In response to modern slavery crises, countries have been implementing measures and creating resilient systems to withstand external shocks. All countries where Flex operates have responded to this situation, with 75% of them being recognized for their respective government's response falling within the top two out of the seven categories. Additionally, we continuously assess adherence to our policies and industry standards within our supply chain and our own factories.

The sectoral and regional risk evaluations described above are provided by third parties, but we also perform an internal risk analysis. We use a simple, but very effective and widely used methodology known as "simplified or direct risk assessment"^{4, 5}. This method combines the probability event occurrence with the potential damage reach, and establishes four levels of risk: serious, relevant, considerable and marginal. Considering that, within our operations and preferred suppliers, we have not identified any cases of modern slavery, forced labor, or human trafficking in the last five years, the probability variable is very low. However, we remain vigilant, as any occurrence in our supply chain could have serious implications for our reputation and, therefore, we have determined our risk to be considerable.

¹ United Nations Statistics Division (2008). [International Standard Industrial Classification of All Economic Activities \(ISIC\), Rev.4](#). United Nations.

² International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage](#), Geneva, 2022 ISBN: 978-92-2-037483-2 (web PDF).

³ Walk Free 2023, [The Global Slavery Index 2023](#), Minderoo Foundation.

⁴ Paul R. Garvey, Zachary F. Lansdowne, [Risk Matrix: An Approach for Identifying, Assessing, and Ranking Program Risks](#), Air Force Journal of Logistics, Vol. 22, No. 1, pp. 48–60. Harvard Business School Publishing.

⁵ Susan L. Murray, Katie Grantham, Siddharth B. Damle (2011), [Development of a Generic Risk Matrix to Manage Project Risks](#), Journal of Industrial and Systems Engineering, Vol. 5, No. 1, pp. 35-51.

The following table is a summary of what is described above:

	Sectorial risk	Regional risk	Simplified risk
Americas	Medium	Medium	Considerable
Asia	Medium	Medium	Considerable
EMEA	Medium	Low	Considerable

VERIFICATION, DUE DILIGENCE AND RISK MANAGEMENT

In addition to the foregoing described risk assessment, Flex takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chains. The first step in this process is to set clear expectations for our suppliers. For example, our standard supplier contract and our Standard Terms and Conditions of Purchase contain language requiring suppliers to comply with the RBA Code of Conduct and Flex's Supplier Code of Conduct.

We screen new suppliers at the time of onboarding to assess risks related to modern slavery, forced labor, and human trafficking.

Additionally, we assess and monitor compliance through Supplier Self-Assessment Questionnaires (SAQ) based on RBA requirements that are completed by our suppliers. Flex uses the Supplier SAQ responses and other factors to assess risk within the supply base. Based on this risk evaluation, internal Flex auditors, if needed, will perform audits covering sustainability elements, including forced labor and human trafficking. Specifically, as part of focused efforts to combat forced labor and human trafficking, we also from time to time perform audits of labor providers, security guards, cleaning, and canteen services. We will work with those firms to improve their labor practices where necessary.

During 2023, Flex conducted 223 audits, including initial and follow-up audits, focused on suppliers located in high-risk regions. Suppliers who present some risk of forced labor or underage labor are immediately required to present remediation plans, which are closely monitored. Failure to complete those plans and eliminate the risk may result in termination of the relationship. If deficiencies are found during an audit, Flex formally requests the supplier to develop and submit a Corrective Action Plan (CAP). It is expected that suppliers correct and improve their areas of deficiency within 90 days of the audit. The CAP should outline how the supplier will resolve the issue(s) following an 8D problem-solving methodology, addressing containment, root-cause analysis, correction, and preventive action as well as assignment of action owners and timeline for completion.

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 response status and outstanding supplier deficiencies. Audits for the supply chain are typically conducted by internal auditors, however third-party audits may be conducted at the request of the customer.

Many Flex manufacturing plants regularly host on-site compliance audits conducted by independent third parties, in accordance with RBA's Validated Assessment Program (VAP). The VAP is the leading standard for on-site compliance verification, and we proudly continue to add sites to the RBA Factory of Choice level, where VAP scores are above 180.

Either in the supply chain or Flex manufacturing plants, the audits are announced.

COMPLIANCE WITH LAWS AND REGULATIONS

Flex follows all applicable laws and regulations related to the use of forced labor and we hold

our business partners to these same standards. This is accomplished through our standard supplier contract language, which commits our suppliers to provide products and services free from forced labor. We require our suppliers to confirm this as part of our supplier qualification process, and we survey our critical suppliers periodically for forced labor issues. If we identify risk of forced labor in one of our supply chains, we can and do audit the supplier to mitigate that risk. In addition, Flex conducts quarterly supplier trainings to communicate key requirements that our suppliers must follow, such as the RBA Code of Conduct which prohibits the use of forced labor and the avoidance of inputs that may trigger import restrictions in the United States. We regularly communicate that Flex expects its suppliers to cascade such requirements with their own supply chains as well.

Flex has taken the following actions as part of its compliance efforts:

- Publication of the Flex Forced Labor and Human Trafficking Statement on our website approved by our Board of Directors.
- Supplier training reinforcement on Flex's policies which address forced labor and human trafficking.
- Furnishing Flex's Supplier Code of Conduct to our suppliers to reinforce our expectations on human rights, including the avoidance of forced labor and human trafficking.
- Reviews of supplier contracts, purchase orders and terms and conditions to include provisions on human rights and forced labor.
- Regular screening of suppliers through our Supplier Self-Assessment Questionnaire based on RBA guidelines.
- Establishment of a working group on forced labor with company subject matter experts and members of senior management.
- Regular review of the Uyghur Forced Labor Prevention Act entity list, including updates to such list, and corresponding updates to our restricted supplier list, as appropriate, to avoid business engagement with restricted entities.
- Active participation in different forums where human rights and forced labor issues are discussed.
- Regular review of media and regulatory developments in this area.
- Making available resources to report human rights issues. For example, Flex's third-party Ethics Hotline and reporting website are available internally and for our supply chain.

INTERNAL ACCOUNTABILITY

Through Flex's Code of Business Conduct and Ethics, the direction is set forth by our CEO that we do not condone child, forced, indentured, or bonded labor. Our [Human Rights Policy](#) also makes those same standards clear.

Flex's Sustainability Program Office coordinates across different areas of the company to establish policies, procedures, and processes for managing compliance with sustainability topics, including forced labor and human trafficking, both in our internal operations as well as in our supply chain.

Flex also has an Audit Committee that is chartered by the Board of Directors to oversee our compliance program. Our Chief Ethics & Compliance Officer ("CECO") reports quarterly to the Audit Committee on our compliance program. The CECO also reports periodically to the Executive Leadership Team, who provide feedback and support on the scope and content of our compliance program. In addition, our compliance program is supported by members of the Compliance Council, a cross-functional team of subject matter experts in various compliance areas. The Compliance Council helps drive Flex's culture of compliance in our company across the globe. The Compliance

Council consists of the CECO, regional compliance attorneys, compliance directors, our corporate compliance team, and other relevant stakeholders from the business units and functional areas within the company. The Council meets regularly to share best practices, learn from internal and outside speakers, highlight key policy, legal, and regulatory changes, and share key accomplishments and future goals.

Flex’s formal efforts to eliminate forced labor and human trafficking within its supply chain have been in effect for a number of years. Flex continues to analyze and improve its program and policy aimed to ensure that any perpetrators are identified promptly and prevent Flex’s involvement in carrying a significant risk of forced labor and human trafficking, so that appropriate action may be taken.

Flex also publishes additional information regarding our operations and supply chain in our annual Corporate Sustainability Report. Consult the latest sustainability report on our website at [Reports and Disclosure](#).

TRAINING

Flex provides mandatory training to all Flex employees on our Code of Business Conduct and Ethics, which contains content regarding forced labor and human trafficking. Every employee, officer, and director of Flex must know, understand, and follow the Flex Code of Business Conduct and Ethics as well as the procedures and related policies referenced in it.

PERFORMANCE INDICATORS AND EFFECTIVENESS OF THE ACTIONS

We measure our performance to ensure that slavery and human trafficking are not taking place against established key performance indicators (KPIs). These are reported annually in our sustainability report and include the following:

KPI	Performance	Flex 2024 Sustainability Report page
Commit to certifying all manufacturing sites with ‘RBA factory of choice’ by 2025	34% of our manufacturing sites were ‘RBA factory of choice’ certified, as of 2023	37
Flex Code of Business Conduct and Ethics online training completion	99% of our employees completed the training	88
Supplier audits on social and environmental criteria	During 2023, we conducted 178 initial audits (including 8 remote and 170 onsite) and 45 follow-up audits focused on suppliers located in high-risk regions	58
Percentage of new global suppliers screened using human rights, labor practices, and impact on society criteria	100% of our new global suppliers were screened during 2023	88

Our latest and historical sustainability reports can be publicly accessed in the [Reports and Disclosures section of our website](#)

In accordance with the UK Modern Slavery Act 2015 and the Australia Modern Slavery Act 2018, this 2025 Statement on efforts to combat forced labor and human trafficking in our business and supply chain was approved on May 15, 2025 by the Flex Board of Directors and has been signed by our CEO.

Signed by:

A handwritten signature in black ink, appearing to read 'Revathi Advaiti', followed by a period.

Revathi Advaiti, CEO

This statement applies to Flex Ltd. and its subsidiaries, including the following Flex affiliates that must report for the purposes of the United Kingdom's Modern Slavery Act: Flextronics UK Limited and Flextronics Global Services (Manchester) Limited.

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.

For more information, visit flex.com.

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