

STATEMENT

# Forced Labor and Human Trafficking Statement

For the fiscal year 2026



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 the 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, reading "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 enable consumers to make better, 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 the company has made 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, 2026.

## Structure

Flex is the advanced, end-to-end manufacturing partner of choice, helping a diverse customer base design, build, deliver, and manage innovative products that improve the world. Through the collective strength of a global workforce spanning 30+ countries and responsible, sustainable operations, Flex delivers technology, 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, as well as 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](https://flex.com)

## Our code of conduct and related policies

Flex is committed to maintaining and enhancing systems and processes designed to identify, prevent and address human rights risks, including forced labor and human trafficking, 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. 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 aimed at identifying and addressing risks related to forced labor and human trafficking within our operations, supply chains, and other parts of our business. To this end, Flex has established an integrated approach to managing human rights across our business, including the evaluation of 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 is expected to be familiar with and adhere to the Flex Code of Business Conduct and Ethics, as well as the procedures and related policies referenced therein. 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, Flex expects its suppliers, as well as their employees, agents, and subcontractors, to understand and adhere to Flex's [standards](#), with the objective of promoting consistent standards throughout our supply chain.

Flex's Human Rights Policy is aligned with the United Nations Guiding Principles on Business and Human Rights. The policy outlines our commitment to promoting respect for international human rights and eliminating all forms of forced labor, as well as our reporting and escalation process for suspected issues. The standards defined in the policy are expected to be upheld and replicated throughout our entire value chain. These commitments are reinforced by our participation in the United Nations Global Compact, whose principles support respect for international human rights and the elimination of all forms of coerced labor.

In addition to these policies, Flex is a founding and active member of the Responsible Business Alliance ("RBA"), an industry coalition focused on promoting responsible business conduct in global supply chains. As part of this initiative, Flex seeks to strengthen its practices and enhance its programs to ensure consistent implementation of the RBA Code of Conduct across its operations and supply chain. These requirements 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 collaborate with other members of our supply chain, as well as with customers, suppliers, and industry participants to better understand risks related to forced labor and human trafficking and to support collective efforts to effectively combat its occurrence.

Additionally, Flex is an active member of the Global Business Initiative on Human Rights, a cross-industry organization focused on advancing human rights in a business context through peer learning, outreach and capacity building, and policy engagement. We invest time and resources in collaboration with other participants to support system-level industry-wide improvements related to human rights. Flex continues to undertake efforts aimed at identifying and addressing forced labor and human trafficking in its supply chain.

Our policies and governance framework cover:

- Child labor avoidance
- Forced labor avoidance
- Freedom of association & collective bargaining
- Worker-management communications
- 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](#) website.

## Risk assessment

We have invested significant time and resources in collaborating with others to drive system-level, industry-wide improvement by participating in and holding memberships in various industry and multi-stakeholder organizations focused on human rights and responsible business practices, such as the Global Business Initiative on Human Rights (GBI), the RLI, the RBA, the RMI, and the Global Reporting Initiative (GRI) Community Membership. Flex continues to undertake efforts to identify and address forced labor and human trafficking risks in its supply chain.

To evaluate risks related to forced labor and human trafficking, we assess sectoral and regional risks associated with our direct and indirect workforce.

From a sectoral perspective, this assessment considers the nature of activities performed across our workforce. Based on the United Nations' International Standard for Industrial Classification of All Economic Activities<sup>1</sup>, most of the Flex workforce falls within 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)<sup>2</sup>. Forced labor exploitation in manufacturing is typically associated with coercive practices<sup>3</sup> within the private economy. In light of these considerations, Flex undertakes due diligence efforts designed to identify and address sector-specific labor risks.

Flex operates in 30+ countries, and our workforce is based in three regions: the Americas, Asia, and EMEA. In assessing regional risk, we consider external benchmarks, including the Global Slavery Index 2023<sup>4</sup> published by Walk Free, an international human rights group focused on the eradication of modern slavery. Based on this analysis, the regions in which Flex operates are generally characterized as presenting medium to low vulnerability risk. In response to modern slavery risks, governments in many jurisdictions have implemented measures aimed at strengthening legal frameworks and resilience to external shocks. According to the Global Slavery Index, a majority of countries in which Flex operates have received relatively stronger ratings for government responses to modern slavery. These external indicators inform, but do not replace, our own risk assessment processes. In addition, we assess our adherence to our policies and applicable industry standards across our supply chain and factories.

The sectoral and regional risk evaluations described above are derived from third-party sources, but we also perform an internal risk analysis using a widely used methodology known as "simplified or direct risk assessment."<sup>5,6</sup> This method considers both the probability of an event occurring with the potential severity of its impact, resulting in four levels of risk:

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

<sup>2</sup> 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).

<sup>3</sup> International Labour Organization (ILO), Walk Free, and the International Organization for Migration (IOM), [Global Estimates of Modern Slavery: Forced Labour and Forced Marriage. Methodology](#), Geneva: International Labour Office, 2025. ISBN: 978-92-2-039863-0 (web PDF)

<sup>4</sup> Walk Free 2023, [The Global Slavery Index 2023](#), Minderoo Foundation.

<sup>5</sup> 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.

<sup>6</sup> 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.

serious, relevant, considerable, and marginal. Based on internal assessments, we have not identified any cases of modern slavery, forced labor, or human trafficking within our operations and preferred suppliers in the last five years, the probability variable is assessed as very low. Nevertheless, given the potential severity of harm and reputational impact associated with any such occurrence, Flex continues to treat these risks as requiring ongoing attention and diligence.

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

	Sectorial risk	Regional risk	Simplified risk assessment
<b>Americas</b>	Medium	Medium	Considerable
<b>Asia</b>	Medium	Medium	Considerable
<b>EMEA</b>	Medium	Low	Considerable

**Verification, due diligence, and risk management**

In addition to the risk assessment described above, Flex takes steps to verify, evaluate, and address risks of forced labor 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 a range of risks, including those related to modern slavery, forced labor, and human trafficking.

Additionally, we assess and monitor compliance through Supplier Self-Assessment Questionnaires (SAQs), which are based on RBA requirements and completed by suppliers. Flex uses the Supplier SAQ responses, together with other relevant factors, to assess risk within the supply base. Based on this risk evaluation, Flex may conduct audits, including audits performed by internal Flex auditors, covering sustainability-related elements such as forced labor and human trafficking. As part of focused efforts in this area, we also, from time to time, perform audits of certain service providers, including labor providers, security guards, cleaning, and canteen services. Where issues are identified, we engage with the relevant parties to support corrective actions and improvements to labor practices, as appropriate.

During 2024, Flex conducted 206 audits, including initial and follow-up audits, focused on suppliers located in high-risk regions. Suppliers who present potential risks related to forced labor or underage labor are immediately required to develop and present remediation plans, which are monitored as part of its follow-up processes. 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) using an 8D problem-solving methodology, addressing containment, root cause analysis, correction, and preventive action, as well as the assignment of action owners and a 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 of the supply chain are typically conducted by internal auditors, although third-party audits may also be conducted, including at the request of customers.

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 in Flex manufacturing plants, the audits are announced.

## Compliance with laws and regulations

Flex is committed to complying with all applicable laws and regulations relating to forced labor, and we hold our business partners to the same standards. This is accomplished through our standard supplier contract language, which requires 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 risks. If we identify the 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 these 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, which has been 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 addressing human rights and forced labor.
- Regular screening of suppliers through our Supplier Self-Assessment Questionnaire based on RBA guidelines.
- Establishment of a cross-functional working group on forced labor, including company subject matter experts and members of senior management.
- Regular review of the Uyghur Forced Labor Prevention Act entity list, including updates to the 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 concerns. For example, Flex's third-party Ethics Hotline and reporting website are available internally and for members of our supply chain.

## Internal accountability

Under Flex’s Code of Business Conduct and Ethics, our CEO has set forth 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 the company, including different functions, to support the development and implementation of policies, procedures, and processes related to managing compliance with sustainability topics such as forced labor and human trafficking in both our internal operations and our supply chain.

Flex also has an Audit Committee, 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 the Compliance Council, a cross-functional team of subject-matter experts across various compliance areas. The Compliance Council helps drive Flex’s culture of compliance across our company worldwide. The Compliance Council consists of the CECO, regional compliance attorneys, compliance directors, our corporate compliance team, and other relevant stakeholders from the company’s business units and functional areas. 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 address risks related to forced labor and human trafficking within its supply chain have been in effect for a number of years. Flex continues to evaluate and enhance its program and policies designed to identify and address potential risks of forced labor and human trafficking, with the objective of enabling timely and appropriate action where concerns are identified.

Flex also publishes additional information regarding our operations and supply chain in our annual 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 includes content addressing forced labor and human trafficking. Every employee, officer, and director of Flex is expected to be familiar with and adhere to the Flex Code of Business Conduct and Ethics and the procedures and related policies referenced therein.

## Performance indicators and the effectiveness of the actions

We measure our performance to ensure that slavery and human trafficking are not taking place.

Flex monitors aspects of its program related to forced labor and human trafficking against established key performance indicators (“KPIs”). These KPIs are intended to support the assessment of program implementation and due diligence activities and are reported annually in Flex’s Sustainability Report. The KPIs include the following:

KPI	Performance	Flex 2025 Sustainability Report page
Commit to certifying all manufacturing sites as the 'RBA factory of choice' by 2025	73% of our manufacturing sites were 'RBA factory of choice' certified, as of 2024	88
Flex Code of Business Conduct and Ethics online training completion	100% of our employees completed the training	53
Supplier audits on social and environmental criteria	During 2024, we conducted 135 initial audits (including 11 remote and 124 onsite) and 71 follow-up audits focused on suppliers located in high-risk regions	59
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 2024	50

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 2026 Statement on efforts to combat forced labor and human trafficking in our business and supply chain was approved on May 14, 2026 by the Flex Board of Directors and has been signed by our CEO.

Signed by:



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 leading brands design, build, and manage products that improve the world. With a global footprint spanning 30 countries, Flex delivers advanced manufacturing and supply chain solutions, innovative products and technology, and lifecycle services that support customers from concept to scale. In the AI era, Flex is helping customers accelerate data center deployment by solving power, heat, and scale challenges through cutting-edge power and cooling technology and scalable IT infrastructure solutions. For more information, visit [flex.com](https://flex.com).