

Human Rights Policy

About Flex

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 diverse industries and end markets.

1.0 Purpose

- 1.1 At Flex, we are committed to respecting the Human Rights of all people throughout our operations and in our value chain. This Policy is based upon our intention to conduct business in a legal, ethical, and transparent manner with integrity at all times. This Policy is further supported by related Company policies, as well as due diligence and remedy procedures, to ensure respect for human rights and to avoid complicity in violations. This Policy aligns with the UN Guiding Principles on Business and Human Rights and encompasses 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 the 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.
- 1.2 Furthermore, as a member of the Responsible Business Alliance, Flex adheres to the RBA's Code of Conduct. This code establishes a comprehensive set of standards addressing social, environmental, and ethical issues within the supply chain.

2.0 Scope

- 2.1 This Policy applies to all those working for Flex, including its subsidiaries and affiliates, whether as employees, agency workers, officers, or board members.
- 2.2 Flex expects suppliers, vendors, and other members of our value chain to comply with the standards articulated in this Policy, as reflected in our Supplier Code of Conduct.

3.0 Definitions and acronyms

- 3.1 Employee – Refers to the person who has a labor relationship with Flex, governed by a direct or indirect employment contract and who is identified as a worker or as a professional employee.
- 3.2 FAR - Federal Acquisition Regulation.
- 3.3 Professional Employee – Refers to a person engaged in work that is predominantly intellectual and varied in character as opposed to more routine mental, manual, mechanical, or physical work; such work involves the consistent exercise of discretion and judgment in its performance and is of such a character that the output produced, or the result accomplished cannot be standardized in relation to a given period of time.
- 3.4 RBA - Responsible Business Alliance
- 3.5 Sustainability – Covers the different environmental, social, and governance pillars of the company.
- 3.6 VAP – Validated Assurance Process.
- 3.7 Worker - Direct or indirect worker dedicated to the core business of the company, which is subject to an hourly increase or decrease due to volume production, and /or is covered by local laws governing overtime.

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, as per the terms of their labor contract. There shall be no unreasonable restrictions on entering, exiting, and freedom of movement in the facility, which includes dormitories and living quarters. 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; this includes transporting, harboring, recruiting, transferring, or receiving persons by means of threat, force, coercion, abduction, or fraud for labor or services. To respect the right to be informed, during onboarding, an agreement will be provided in the worker’s native language or a language comprehensible to them, detailing the terms and conditions of employment, and it will be explained to them. Employment agreements and/or offer letters that detail terms and conditions of employment will be provided to workers before they accept the job and shall not be altered after the employee has accepted and before the employee commences the employment, especially for foreign migrant workers, unless the changes are required to comply with local laws that improve the employment terms. Workers shall not be charged any fees for placement or recruitment. If any recruitment fees have been charged, corrective actions will be taken. Migrant workers should have free and complete access to their own passports, identity documents, and residency papers, and enjoy freedom of movement. The only exception to this will be if they are required to hold certain documentation in order to comply with local laws.

- 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 greater. A mechanism will be applied to verify the age of workers. Workers under the age of 18 should not perform hazardous work and should not work night shifts or overtime. Student workers, interns, and apprentices are authorized as long as the learning programs comply with all applicable laws and regulations. All student workers shall receive appropriate support and training. If any situation contrary to those described in this paragraph arises and is identified, immediate assistance and remediation will be provided in accordance with local law and the internal site's policy where the incident occurred. In case an individual is identified as both a student and a young worker, the category of young worker prevails over the student category.
- iii) **Benefits and Wages.** Ensure that the compensation and benefits for all employees, including student workers, interns, and apprentices, comply with or exceed all applicable wage laws of the country where employees are employed. Employees shall be provided with a timely and understandable wage statement. This also applies to temporary, dispatch, and outsourced labor. Deductions and threats of deductions from wages as disciplinary measures are strictly prohibited.
- iv) **Working Hours.** Comply with local working hours' requirements or the RBA Code of Conduct guideline, whichever is more beneficial to our employees. Excessive working hours are strictly prohibited; employees are limited to working no more than 60 hours per week. The employment agreement will outline the regular workweek, rest days, and weekly working hours, including overtime, with the understanding that these may be subject to change in case of emergencies or unusual circumstances. Overtime work is voluntary, and workers are compensated for overtime work in accordance with local laws. Flex acknowledges that every individual has the right to rest. Employees are entitled to legally mandated rest breaks, days off, and public holidays, in accordance with the applicable laws and regulations of their respective country or region. In areas where this right is not recognized under the local law, Flex is committed to upholding and advocating for this right.
- 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. Guarantee that all employees, regardless of age, nationality, or any other personal characteristic, receive equal remuneration for work of equal value. Reasonable accommodation for religious practices and disabilities are provided through our facilities around the world. The use of medical tests that might result in discrimination, including pregnancy or virginity tests or any other physical test that could be used this way, is prohibited. Medical testing, including drug and alcohol testing, may be conducted only as allowed by law. In such cases, the results of these tests must be used solely for official purposes in accordance with the law, with full respect for individuals' rights to privacy and dignity.
- vi) **Housing.** Whenever workers are provided with housing, ensure that all dormitories, hostels, or other accommodations are comfortable, safe, and hygienic, providing the necessary facilities to ensure that living conditions meet basic human needs.

- vii) **Humane Treatment.** There is to be no harsh or inhumane treatment, including any physical, sexual, psychological, or verbal harassment, physical coercion, bullying, public shaming, abuse, or threats of any such treatment 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 healthy and safe working place for all. We continuously improve our health and safety performance.
- x) **Human Trafficking.** Flex prohibits its employees, suppliers, subcontractors, and agents from engaging in human trafficking and related activities.



Revathi Advaiti, CEO
Chief Executive Officer, Flex

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).

5.2 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 Implementation

6.1 Flex effectively implements this policy through a comprehensive, cross-functional approach. Our commitment is demonstrated through these actions and practices:

- 6.1.1 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.
- 6.1.2 Regularly assess human rights impacts by business function, geography, and product impacts through due diligence and through internal/external stakeholder engagement.
- 6.1.3 Provide access to grievance mechanisms, investigate allegations, and escalate known cases of human rights abuse to senior leadership.
- 6.1.4 Integrate training and accountability for respecting human rights across its value chain.
- 6.1.5 Collaborate with other companies on common challenges and share best practices for operating with respect for human rights.

7.0 Responsibilities

7.1 Flex Management

- Ensure the policy is communicated to our stakeholders, including but not limited to employees, suppliers, investors, and customers.
- Ensure the integration of human rights considerations into the company’s strategic goals and operations.
- Oversee and support human rights initiatives across the organization.
- Provide guidance and resources to develop and manage programs and policies that promote human rights within Flex.

7.2 Human Resources

- Design and deliver comprehensive, ongoing training programs for all employees, with a focus on human rights topics and the standards outlined in this policy.

- Maintain records of training completion and continuously monitor participation to strengthen accountability.
- Support during audits by ensuring follow-up actions related to human rights compliance are carried out within the scope of the Human Resources function, in alignment with the principles outlined in this policy.
- Monitor workplace practices to ensure compliance with human rights standards and this policy across all sites.
- Ensure all employees, including officers, have access to Human Rights Policy training.

7.3 Ethics & Compliance

- Establish accessible and effective channels for employees and stakeholders to report human rights violations.
- Clearly communicate grievance mechanisms and processes to all employees and stakeholders.
- Maintain comprehensive records of grievances and oversee the investigation process.

7.4 Global Sustainability

- Monitor compliance with this policy is ensured through adequate management systems, promoting continuous improvement.
- Update and align with applicable regulations and relevant industry standards
- Support Flex Management in developing and managing programs and policies aimed at promoting human rights within Flex with the support and collaboration of the Human Resources department.
- Provide guidance and collaborate with the corresponding functions to ensure alignment with this policy and its principles are transmitted across the company, within the supply chain, and to other stakeholders.

7.5 Supply Chain

- Will provide necessary training, guidance, and monitoring to ensure adherence to these policy principles within the supply chain.
- Ensure that human rights principles are effectively communicated and upheld within the supply chain. Compliance is enforced through contracts, guidelines, and training.
- Establish procedures to track and monitor training initiatives, ensuring consistent implementation across all supply chain partners.

7.6 Flex employees, partners, and other stakeholders

- Act in accordance with the principles outlined in this policy and any related policies or codes of conduct.
- Promptly report any suspected human rights violations or unethical behavior as outlined in section 9.
- Respect the rights and dignity of colleagues, customers, and communities and act in accordance with all applicable human rights laws and labor regulations in their jurisdiction.

8.0 Training requirements

- 8.1 All sites are required to ensure all employees receive comprehensive training and communication regarding Human Rights principles and this policy.

9.0 Reporting, cooperation, and escalation processes

9.1 Reporting

- 9.1.1 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 Legal Department, or the Ethics & Compliance Department.
- 9.1.2 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.
- 9.1.3 Flex Ethics Hotline offers employees, business partners, suppliers, and customers an avenue to report any suspected ethical concerns to our Ethics & Compliance Department. Anyone can report information in multiple languages by either calling the Flex Ethics Hotline using a [local toll-free number](#) or submitting a report via the external Ethics Hotline website (www.flexethicshotline.com). The information submitted to the Ethics Hotline will be confidentially and anonymously forwarded to the ethics & compliance team. The Company has a very clear policy of non-retaliation and protection for anyone reporting a violation using the Ethics hotline.

9.2 Cooperation

- 9.2.1 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.
- 9.2.2 Flex will protect all migrant or foreign employees suspected of being victims of or witnesses to prohibited activities, prior to returning to the country from which the employee was recruited, in those sites where migrant and foreign employees are present. Flex will not prevent or hinder the ability of these employees from cooperating fully with government authorities.

9.3 Escalation

- 9.3.1 At Flex, our approach to behavioral and policy-related concerns is guided by a structured escalation framework designed to ensure fairness, consistency, and alignment with our values, applying appropriate measures that reflect the nature and severity of the issue. All decisions are made in consultation with HR and in accordance with local labor laws, ensuring transparency and due process throughout.

9.3.2 This escalation process is designed to provide employees with opportunities for improvement while ensuring that appropriate actions are taken in response to violations of conduct and performance standards.

9.4 Addressing Human Rights Concerns

9.4.1 Flex is committed to promptly identifying and addressing any human rights concerns within the organization. All cases are managed in accordance with established protocols, ensuring that appropriate actions are taken and progress is monitored effectively.

10.0 Assessment of conformance method

10.1 Compliance with this policy will be assessed by Human Resources through internal and external audits, such as RBA VAP.

11.0 Document review and approval requirements

11.1 This document will be maintained on Flex's document management system portal.

11.2 This document will be available for download from Flex's document management system portal and the public website.

11.3 This policy will be revised by Global Sustainability and HR owners when required.

12.0 Appendix A: Relevant policies and guidelines

12.1 To ensure a comprehensive approach to this policy, integrating accountability and ensuring management across our value chain, this policy is complemented by several other policies, regulations, and guidelines. Our strategy aligns with various international regulations and standards, ensuring all relevant aspects are covered.

12.2 Our commitment to human rights is supported by the following **Flex umbrella policies**:

12.2.1 [Code of Business Conduct and Ethics](#): recognizes and respects 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.

12.2.2 [Environmental, Health, and Safety Policy](#): 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.

12.2.3 [Anti-Corruption Policy](#): elaborates on the prohibition of bribery and corruption in any form, ensuring that all Flex's business dealings are conducted transparently and ethically.

12.2.4 [Forced Labor and Human Trafficking Statement](#): demonstrates Flex's commitment to combating forced labor and human trafficking within its operations and supply chain. Flex also encourages reporting of any violations

through confidential channels and remains committed to continuous improvement in upholding human rights and ethical labor practices.

12.2.5 [Responsible Minerals Policy](#): aims to avoid the use of conflict minerals that finance armed groups by requiring suppliers to source responsibly and transparently, and to describe how Flex applies the international guidelines in this matter.

12.2.6 [Flex supplier Code of Conduct](#): requires all suppliers to follow the standards described in the document, which is based on the RBA Code of Conduct. Flex's standards are stricter than the RBA Code, especially in social and environmental areas. Suppliers must implement policies to ensure compliance and cascade these standards throughout their supply chain. Compliance is enforced through contracts, guidelines, and training.

12.3 As part of our strong commitment to sustainability, we have set clear goals that guide our actions and reflect our long-term vision for positive environmental and social impact. These goals are part of our sustainability strategy. To learn more about our sustainability commitments, visit our website to access our [2030 Sustainability Goals](#). These goals reflect our dedication to climate action, circular economy practices, and social impact — including targets on emissions reduction, renewable energy use, waste diversion, and inclusive workplace practices.