

Responsible Minerals Policy

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.

1.4 In May 2017 the European Union (EU) issued the Regulation (EU) 2017/821, also called the Regulation on Responsible Sourcing of Minerals. The operational due diligence provisions of this regulation have been applicable to EU importers since January 1, 2021. It establishes obligations for EU importers, whose annual imports of the specified minerals exceed certain thresholds to perform and report on due diligence in their supply chains.

2.0 PURPOSE

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

3.0 SCOPE

3.1 This document defines Flex’s due diligence requirements and expectations within its supply chain.

4.0 DEFINITIONS AND ACRONYMS

4.1. **3TG:** Commonly referred to as Tin, Tantalum, Tungsten, and Gold

4.2. **DMS:** Document Management System

4.3. **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.

4.4. **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.

4.5. **CAHRA-free:** Means minerals that were extracted and did not directly or indirectly benefit armed groups, and/or widespread systematic violations of international law, including human rights abuses.

4.6. **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.

4.7. **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.

4.8. **Regulation (EU) 2017/82:** The EU Regulation on Responsible Sourcing of Minerals was issued in May 2017 but came into full force on January 1st, 2021. It is intended to prevent or reduce the sourcing of minerals from regions where profits fund armed conflict, criminal activities, or other behaviors violating human rights. These rules apply for importers of covered metal or minerals.

4.9. **Responsible Minerals Initiative (RMI):** RMI serves as an umbrella organization for the voice of progressive industry to support responsible mineral sourcing broadly and convenes stakeholders and resources for companies addressing issues related to the responsible sourcing of minerals in their supply chains.

4.10. **Securities and Exchange Commission (SEC):** The Acts and statutes administered by the SEC are designed to promote full public disclosure and protect the investing public against fraudulent and manipulative practices in the securities markets.

4.11. **SEC Form Specialized Disclosure (SD):** It is a form used to satisfy special disclosure requirements implemented under the Dodd-Frank Wall Street Reform and Consumer Protection Act relating to conflict minerals contained in products that reporting companies manufacture or contract to be manufactured and necessary to the functionality or production of those products.

4.12. **The Organization for Economic Co-operation and Development (OECD):** It is an international organization that works to build better policies for better lives, establishing evidence-based international standards and finding solutions to a range of social, economic and environmental challenges.

4.13. **OECD Guidelines:** The guideline is recommendations from governments to multinational enterprises on responsible business conduct. The guidelines set standards for responsible business conduct across a range of issues such as human rights, labor rights, and the environment.

5.0 ITEMS FURNISHED BY FLEX

5.1

Document Title	Document Number	Document \ Hyperlink
Responsible Sourcing Minerals Policy	CSE-CPL-1-003-00	Responsible Minerals Policy
SEC Form SD	0-23354 (Commission File Number)	FORM SD

9.0 POLICY STATEMENT

6.1 Responsible Sourcing Minerals Policy

Flex is committed to responsibly sourcing the raw materials used in the components and products we assemble to mitigate the risk of using minerals from conflict-affected and high-risk areas and ensure sustainability within our supply chain. Flex exemplifies its commitment by being a member of the Responsible Minerals Initiative (“RMI”) and dedicates resources to identifying, assessing, and remediating human rights violations in its supply chain, specifically as it relates to the procurement of minerals. Flex does not directly purchase or procure primary sourced minerals from mine sites. We are, however, strive to meet and exceed internationally accepted due diligence standards for primary minerals and recycled materials supply chains. We collaborate with the RMI, our customers, suppliers, and other stakeholders to prioritize the mineral substances considered to have the most salient environmental and social impacts and will contribute to mitigating those impacts Flex expects its sub-suppliers to provide due diligence confirming that various minerals besides 3TG identified as a source of concern by the RMI have been responsibly sourced. Flex requires its suppliers who use smelters and refiners to regularly conduct risk assessments directly or via a third party, such as the Responsible Minerals Assurance Process administered by the RMI. Flex believes transparency in the implementation of this process is key to establishing real change and accountability and willingly provides reports on Flex’s progress to stakeholders.

“Conflict Minerals” refers to minerals or other derivatives mined in the Democratic Republic of the Congo (DRC), its adjoining countries, or in CAHRAs, where revenues may be directly or indirectly financing armed groups engaged in civil war, or other behaviors violating human rights which results in serious social and environmental abuses.

Consistent with the `OECD Due Diligence Guidance for CAHRAs, Flex has adopted the RMI Due Diligence reporting process and requires declarations from Flex suppliers, ensuring transparency in our supply chain.

Flex suppliers are required:

- 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 CAHRAs.
- To work toward sourcing only from RMAP conformant and RMI active smelters and refiners.
- To have policies and procedures in place to ensure that products and parts supplied to Flex are DRC Conflict-free and CAHRAs-free.
- To provide all necessary due diligence information to confirm that all 3TG or other minerals supplied to Flex are DRC Conflict-free and CAHRAs-free.
- To pass this requirement on to their supply chain.
- To respond to Flex inquiries for due diligence information, and promptly implement corrective actions identified and requested by Flex.

Flex closely monitors compliance with this policy. In the instances where suppliers don't perform risk assessments to smelters or refiners or fail to implement corrective action plans derived from the risk assessments, Flex shall require its applicable suppliers to ensure such actions are taken and validate the execution of the latter activities with its suppliers. If these requirements are not met, Flex suppliers shall implement an immediate transition plan for the substitution of non-conformant smelters and refiners. Flex may terminate business relationships with suppliers that do not make substantive and prompt efforts to comply with this policy.

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

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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