

The California Transparency in Supply Chains Act of 2010 and the United Kingdom Modern Slavery Act of 2015 require certain businesses to provide disclosure concerning their efforts, if any, to address the issues of slavery and human trafficking in their supply chains. The disclosures are intended to provide consumers the ability to make better more informed choices about the products and services they buy and the companies they support.

## SUMMARY

Flex is committed to maintaining and improving systems and processes to avoid complicity with human rights violations related to our own operations, our supply chain and our products. Flex acknowledges that slavery and human trafficking can occur in many forms such as forced labor, child labor, domestic servitude, sex trafficking and workplace abuse. Therefore, throughout this disclosure we use the terms “slavery and human trafficking” to encompass these various forms of coerced labor.

As discussed in greater detail below, Flex takes certain steps throughout the year to ensure that slavery and human trafficking are not taking place in our supply chains or other part 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 slavery and human trafficking.

Our commitment to human rights is outlined in the Code of Business Conduct and Ethics (“Flex Code of Conduct”) and the Flex Pledge platform. Every employee, officer and director of Flex must know, understand, and follow the Flex Code of Conduct 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, address shareholders, collaborate with business partners, and contribute to our communities.

The Flex Code of Conduct dictates that:

- We Treat Others with Respect and Comply with Fair Labor and Employment Practices
- We are open and honest with one another and treat each other with integrity and respect.
- We do not discriminate against anyone on the basis of race, color, gender, age, national origin, religion, or any other legally protected characteristic.
- We strive to maintain a workplace where individuals are free from all forms of harassment or abuse.
- We follow applicable wage and hour laws.
- We provide employees with, at a minimum, all legally required benefits.
- We do not use child, forced, indentured, or bonded labor, and maintain a minimum age requirement for employment.
- We recognize the rights of our workers to associate freely, and believe that open communication and direct engagement between workers and management is the most effective way to resolve workplace issues.
- We do not allow retaliation against anyone who raises a concern about discrimination, harassment, or any labor and employment practice.
- We expect our business partners to also meet these same standards.

In addition to these policies, Flex is an active member of the Electronic Industry Citizenship Coalition (EICC). We have a commitment to improve our programs and implement the EICC Code of Conduct across our business including the supply chain. The EICC Code of Conduct contains specific requirements covering slavery and human trafficking. Flex is a founding member of the Electronics Industry Citizenship Coalition (EICC). Through this industry organization's efforts, including the Trafficked and Forced Labor taskforce, we are working with other members of the electronics supply chain, customers, suppliers and competitors to better understand the full extent of this issue and to effectively combat the occurrence of trafficked and forced labor.

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 resource in collaborating with others to address system level industry wide improvements. Flex continues to undertake efforts aimed at ensuring there is no human trafficking or slavery of any kind in our supply chain.

#### **VERIFICATION**

Flex takes steps to verify, evaluate and address risks of slavery and human trafficking in our supply chain. The first step in this process is to set clear expectations for our suppliers. These expectations are codified in the EICC Code of Conduct. Central to this commitment are the principles of Freely Chosen Employment, which are included in Flex's Code of Conduct and the EICC Code of Conduct, which states *"Forced, bonded (including debt bondage) or indentured labor, involuntary prison labor, slavery or trafficking of persons shall not be used."* Flex adheres to the EICC Code of Conduct and has adopted the Flex Code of Conduct to address a number of compliance related issues including trafficked and forced labor.

We establish expectations with our supply base and notify them of their obligation to comply with the EICC Code of Conduct, including the Freely Chosen Employment labor standard. For example, the vast majority of our supplier contracts and PO terms contain language requiring the suppliers to comply with these codes. Additionally, we monitor compliance through Self-Assessment Questionnaires completed by the suppliers.

Flex also publishes any significant findings in our supply chain in our annual Corporate Sustainability Report. See the latest Report at <https://www.flextronics.com/who-we-are/global-citizenship/global-citizenship-report-2015>

#### **SUPPLIER AUDITS**

Flex uses the Supplier Self-Assessment Questionnaire responses as well as other factors to assess risk within the supply base. Based on this risk assessment, internal Flex auditors perform audits covering CSER topics, including Slavery and Human Trafficking. Specifically, as part of focused efforts to combat Slavery and Human Trafficking in Southeast Asia, we contracted with third party audit firms to audit labor providers in the region. As a result of these audit findings, Flex has committed to changing our approach on how we do business to reduce the risk for issues involving forced labor to arise at our

factories. We have also identified suppliers in the region that are potentially dealing with these same labor supply chain issues in an effort to understand the situation with those suppliers so that we can take appropriate action. See page 52 of the Flex Global Citizenship Report.

Flex conducts on average 170 on-site supplier audits annually primarily in China and Southeast Asia. If deficiencies are found during an audit, Flex formally requests the supplier to develop and submit a Corrective Action Plan (CAP) within seven days of the audit for critical deficiencies, and within one month for non-critical items. 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.

To confirm that suppliers have put effective measures in place to correct critical deficiencies, Flex carries out a follow-up on-site audit. For non-critical items, the suppliers are required to provide objective evidence that demonstrates the corrective action resolution. If corrective actions for non-critical items cannot be verified via the document review process, Flex's Supplier CSER Team will conduct an on-site audit.

#### **CERTIFICATION**

Flex suppliers must comply with Flex supplier contracts and purchase order terms. Flex standard supplier contract terms require suppliers to comply with all applicable laws in the country or countries in which they do business and the EICC Code of Conduct, without limitation, which addresses freely chosen employment.

#### **INTERNAL ACCOUNTABILITY**

Though Flex's Code of Conduct, the direction is set by our CEO, that we do not condone child, forced, indentured or bonded labor. Our Labor and Human Rights Policy also makes those same standards clear.

[https://www.flextronics.com/sites/default/files/component\\_b2/Flex%20Labor%20and%20Human%20Rights%20Policy.pdf](https://www.flextronics.com/sites/default/files/component_b2/Flex%20Labor%20and%20Human%20Rights%20Policy.pdf)

Through the Flex Code of Conduct, (which contains specific language on slavery and human trafficking) we seek to promote honest and ethical conduct, deter wrongdoing and support compliance with applicable laws and regulations. The principles embodied in the Flex Code of Conduct reflect our policies related to but not limited to slavery, human trafficking, conflicts of interest, nondiscrimination, antitrust, anti-bribery and anti-corruption and protection of our company's assets and reputation.

The Flex Code of Conduct is available in 15 languages and employee training sessions incorporate real case scenarios. Employees are encouraged to raise questions and concerns and have multiple channels to do so – anonymously if they prefer through a hotline and as permitted by law.

FlexPledge, the management system for our Corporate Social and Environmental Responsibility (CSER), establishes policies, procedures and processes for managing compliance to all CSER topics, including Forced Labor and Human Trafficking, both at our internal operations as well as in the Supply Chain.

Flex also has an Audit Committee that is chartered by the Board of Directors to oversee the compliance program. The Chief Ethics & Compliance Officer (“CECO”) reports quarterly to the Audit Committee on the status of the compliance program. The CECO also reports quarterly to the Executive Sponsors, a group of Flex executives who provide feedback and support on the scope and content of the compliance function and ensure implementation. In addition, the Compliance Program is supported by members of the Compliance Council, a cross-functional team of subject matter experts in the various compliance areas. The Compliance Council helps drive Flex’s culture of compliance in our Company across the globe. The Council consists of the Chief Ethics & Compliance Officer, Regional Compliance Attorneys, Compliance Directors, Corporate Compliance Team, and other relevant stakeholders from the business segments 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 to share key accomplishments and future goals.

#### **TRAINING**

Flex provides mandatory training to all Flex employees on our Code of Conduct, which contains the content regarding Forced Labor and Human Trafficking. Every employee, officer and director of Flex must know, understand, and follow the Flex Code of Conduct as well as the procedures and related policies referenced in it.