Our Code of Business Conduct and Ethics
Flex is a company built on relationships, and trust is the cornerstone of all relationships. We build on that trust by always acting with full integrity.

Our values are shaped by a commitment to transparency, accountability, respect and inclusion.

Revathi Advaithi
CEO of Flex
Letter from Our Chairman of the Board and Our Chief Executive Officer

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Conclusion
At Flex, we take compliance and ethics seriously. That is why our Code of Business Conduct and Ethics (the “Code”) is so important to the Company and our employees. Following the law and operating with integrity is a core part of who we are.

Our Code is designed to make sure that each of us – no matter what position we hold – operates the highest ethical standards in every aspect of our work. While the Code cannot cover every challenge we may face in the workplace, it helps us spot issues, become more familiar with Flex’s policies, and act with integrity in all that we do.

Every employee, officer, and director of Flex must know, understand, and follow the Code as well as the procedures and related policies referenced in the Code. This is what we expect and rely on as we work together, interact with customers, address shareholders, collaborate with business partners, and contribute to our communities.

We must use good judgment in making decisions that affect our business. We must also ask questions when we have them. Everyone should feel completely comfortable in promptly reporting any behavior or matter that may appear to conflict with the Code or our policies; indeed, in some circumstances you are obligated to report what you have observed.

Our dedication to our key values, leadership traits, and culture of integrity will help us continue to succeed as a competitive, healthy, and sustainable business.

Thank you for making the right choices every day and ensuring the success of our Company.

Revathi Advaithi  
Chief Executive Officer

Michael Capellas  
Chairman of the Board of Directors
Who must follow Flex’s Code of Business Conduct and Ethics?

All employees, officers and board members of Flex and its subsidiaries and controlled affiliates are required to understand and follow the Code. We also expect Flex partners, contractors, consultants, suppliers, temporary labor workers, distributors and sales representatives to follow the Code.

Application

As a global company, we recognize the challenges of operating around the world. Many laws have international application, however we are also mindful of observing the laws of the countries in which we operate and diverse local customs. We are committed to ensuring that every action we take is in full compliance with the law - and in keeping with our ethics. If compliance with Flex policies conflicts with local laws or regulations, employees should discuss their concerns with the Flex Legal Department.
1. Making Ethical Decisions
1.1 Making Ethical Decisions

If you have a question about a matter or are unsure about any action, behavior, request, or condition, ask yourself each of the questions in the flow chart below and follow the guidance. If you believe a custom or law in your country or region differs from the Code of Business Conduct and Ethics, ask for guidance from the Legal department. You can also report a matter anonymously by using the independent 3rd party Ethics Hotline (“Ethics Hotline”) that Flex has partnered with or any of our other reporting resources found in Section 1.2 of this Code.

Ask Yourself:

Is it legal?

Is it in compliance with Flex policy?

Does it feel like the right thing to do?

Would you feel comfortable if your action was reported in the media?

No.
Do not proceed.

Not Sure.
If you are uncertain, ask your manager for clarification or use one of Our Reporting Resources.
(See Next Page)

Yes.
If the answer to each of these questions is “Yes”, then you CAN proceed with the Activity.
1.2 Speaking Up: Asking Questions and Reporting Concerns

At Flex, we recognize the importance of “Speaking Up” and encourage it at every turn. That means having the courage to ask a question about something that doesn’t seem right or where you are unclear about a Flex policy or procedure, or Flex’s legal obligations.

We expect our employees to speak up and ask questions or report concerns. When you do, you protect Flex, our brand, and our sites, and you help improve our operations and prevent potential misconduct.

See also Accounting and Auditing Whistleblower Policy under Legal DMS portal

Whenever you become aware of conduct or proposed conduct that may violate the law, regulation or this Code, you must report the same through one of the reporting resources discussed in this Code. Further, any violations of Company policy outside of this Code should also be reported through these reporting resources.

1.3 Our Reporting Resources

We provide a number of ways to voice concerns and receive assistance, from the Ethics Hotline to our Open Door Policy.
Ethics Hotline

Flex maintains an Ethics Hotline to allow employees, officers, directors, and business partners to voice their concerns without fear of retaliation. The Ethics Hotline is available 24 hours a day, seven days a week, and translation services are available. Reports may be made anonymously.

Flex does not tolerate retaliation, if you have a question about a Flex policy or procedure, or have concerns about any conduct or proposed course of action, we want you to feel comfortable seeking out someone such as a Flex manager, a member of our Ethics & Compliance Team, any attorney in the Legal Department, Human Resource manager, etc. to address your questions or concerns. When you do not feel comfortable making such outreach, you should use the Ethics Hotline to report your concerns anonymously.

Flex takes all allegations seriously and will review and investigate each matter as appropriate.

Any Manager

Managers are individuals who supervise others, oversee our work, and act as leaders and role models in our Company. They are often our first and best resources for assistance.

Flex supports an open and respectful environment, and our Open Door Policy encourages employees to contact a Manager – any Manager – if you have a question or concern.

If a question or concern is about your Manager, or if you are simply not comfortable speaking with your direct Manager, you should feel free to speak to another Manager either inside or outside your area; your local Human Resources representative; any member of the Ethics & Compliance Team; or any of the other reporting resources provided. They are all here to assist you!

Compliance Directors

Compliance Directors are subject matter experts in our key compliance areas – Antitrust, Anticorruption, Brand Protection, Confidential Information, Corporate Governance & Securities, Data Privacy, Environmental, Finance, Global IT, Global Trade, Health & Safety, IT Security, Intellectual Property, Labor & Employment, Medical Regulatory, Procurement and Tax.

Each Compliance Director is responsible for ensuring that we follow our policies, procedures, and applicable laws in these compliance areas.

These Compliance Directors are resources you may contact if you have questions about their specific areas, if you’d like to report a concern, or if you have a general compliance question or concern. They, in turn, ensure that thorough and timely investigations are conducted and that any issues are properly addressed.

An up-to-date list of all the Compliance Directors and their contact information is available on the Compliance Website.
Chief Ethics & Compliance Officer

Flex’s Chief Ethics & Compliance Officer is responsible for overseeing our Ethics and Compliance Program and ensuring that Flex follows all applicable laws and regulations as well as our own policies and procedures. The Chief Ethics & Compliance Officer is also responsible for partnering with stakeholders and reports quarterly to the Business Presidents, Executive Sponsors, and Audit Committee on the compliance program and significant matters.

Our Chief Ethics & Compliance Officer is Marianne Wolf.

To learn more about Marianne, our Ethics and Compliance Program, and our Legal department please go to the Legal Home Page.

If you have a question or concern, you should feel free to contact any of our trusted leaders directly, including the Chief Ethics & Compliance Officer or anyone on the Corporate Ethics and Compliance team.

Human Resources

Human Resources (HR) supports Flex’s employees in areas such as recruiting, on-boarding, compensation, benefits, goal setting, performance appraisal, training and leadership development.

Our HR department is there to assist with questions and concerns on issues ranging from pay and benefits to concerns about conflicts with co-workers or managers.

HR Managers support our respectful and open environment and assist in the thoughtful and effective handling of many of our everyday issues. You should feel free to use your local HR as one of your primary resources for any question or concern. If they cannot answer your questions themselves, they will be able to effectively direct you to the proper resource within Flex.

For more information about HR, go to HR Home Page.

Legal Department

Flex’s Legal department is comprised of attorneys and other professionals who are here to support Flex by providing business-focused legal advice.

The Legal department is led by our General Counsel, Scott Offer. All the members of the department are available to answer our questions, hear our concerns and to either assist us or direct us to the proper resource for assistance.

Refer to the Legal Home Page for more information or to contact a Flex attorney.
European Union Reporting

Several countries within the European Union (EU) maintain data privacy laws and regulations concerning the use of Company hotlines, and Flex complies with the applicable laws, rules and regulations that apply to our global business.

When you call the Ethics Hotline or access the hotline website in a country that does not allow its use, you will be directed to the appropriate Flex contact to file your report.

Any employee in the EU should feel free to contact our hotline or either of the individuals below:

Roy Scott
Sr. Director, HR Compliance
Roy.Scott@flex.com
Tel: +353 (01) 8114510
Mobile: +353 (086) 6049772

Ferdinand Trauttenberg
Sr. Corp. Counsel, EMEA
Ferdinand.Trauttenberg@flex.com
Tel: +43 16024100 1737

Additional Reporting Channels

When in doubt, you may always contact a member of our Ethics & Compliance Team, the Legal department, the Audit Committee, the Board of Directors, or any of our trusted leaders with any questions or concerns. They will assist you directly or lead you to the resource best suited to address your issue.

The link below may also be used as a reporting resource:

Board of Directors
1.4 We do not tolerate retaliation.

Flex does not tolerate retaliation against anyone who, in good faith, asks a question, speaks up about possible misconduct, or participates in an audit or investigation. Retaliation includes, in addition to other things, a change in work hours or schedule, demotion, or other adverse consequence imposed in response to speaking up about a possible violation of the Code. Any retaliation, or any attempt to discern or reveal the identity of an employee who confidentially reports a concern, can lead to disciplinary action up to and including termination of employment.

If you believe you have been retaliated against, report it immediately. See Ethics Hotline.

1.5 We cooperate appropriately with proper government requests for information.

We will always cooperate appropriately with proper government requests or investigations. All employees must notify to their local/regional Legal Department if the Company receives a government notice, subpoena, search warrant, request for an interview, or any other non-routine request for information related to company matters. Any information provided to the government must be truthful and not misleading. You must not alter, withhold or destroy records related to an investigation and/or subject to a legal hold notice.

While legal process directed at the Company must be handled in accordance with the guidance above, nothing in this Code is intended to impede your ability to report or otherwise speak with any governmental, law enforcement, or regulatory agency concerning suspected violations of law.
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Integrity in the Workplace
At Flex, we appreciate the diverse ideas and experiences of our employees, and value the creativity and innovation that comes from them.

We are committed to treating one another with respect and providing a safe, healthy, sustainable and responsible workplace.

2.1 We do the right thing.
- We make ethical decisions.
- We follow our Code, Flex policies, and the law.
- We subscribe and adhere to the principles of the Responsible Business Alliance (RBA).
- You should proactively ask questions about Flex policies or procedures whenever you are unclear about them.
- You must report any violations of this Code, the law or applicable regulations. See Ethics Hotline.
- You must cooperate fully and honestly with any internal audit or investigation.
- Each of us must foster an environment where employees feel comfortable asking questions, raising concerns, and reporting matters without fear of retaliation.

2.2 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 dignity and respect.
- We do not discriminate against anyone on the basis of race, color, gender, age, national origin, religion, sexual orientation, gender identity, disability, or any other legally protected characteristic.
- We strive to maintain a workplace where individuals are free from all forms of harassment or abuse, including bullying.
- We strive to build a diverse workforce of employees with different backgrounds, experiences and perspectives.
- 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 are committed to respecting the Human Rights of all people through our operations and in our value chain, in alignment with the United Nation’s Guiding Principles on Business and Human Rights.

We expect our business partners to also meet these same standards.

You can find the Diversity-Equal Employment and Prevention of Workplace Harassment Policy and the Complaint/Issue Resolution Policy under the Human Resources DMS portal.
2.3 We recognize the importance of data privacy.

- We comply with all laws which protect the privacy and confidentiality of personal data.
- We take appropriate measures to properly manage and protect employee personal information from unauthorized or improper access or use.
- We follow applicable laws and regulations governing data privacy.

2.4 We provide a safe work environment for our employees.

- The health and safety of our workforce are Flex’s highest priorities.
- We invest in the facilities, tools, equipment, processes, and people to provide a safe work environment for our employees.
- We have health and safety programs to reduce and prevent work injuries and illnesses, and train our employees on safe work practices.
- We require employees to report to work free from the influence of any substance that could prevent us from conducting work activities safely and effectively.
- We strictly prohibit violence or the threat of violence in the workplace. We enforce a culture of health and safety at all our global operations.
- You should report concerns about unsafe conditions to a manager as soon as possible. At a minimum, you must report such matters through one of the reporting resources discussed in Section 1.2 of this Code.

You can find more information under the CSER DMS Portal.

Retaliating against any employee who honestly expresses a concern about any labor or employment practice, data privacy issue, or health, or safety concern violates our Code and will not be tolerated. See also EHS Policy.
Integrity for Our Company and Our Shareholders
3.1 We avoid conflicts of interest.

A “conflict of interest” exists when an individual’s personal relationship, financial or other interest could get in the way of his or her duty to act in the best interests of Flex or could appear to improperly affect decisions on behalf of Flex.

Conflicts of interest, if not properly addressed, can cause serious harm to the Company. Even the appearance of a conflict of interest can result in potentially irreversible damage to the Company’s reputation. You must avoid any activity or personal interest that creates or appears to create a conflict between personal interests and the interests of the Company or would otherwise interfere with your ability to perform or carry out job responsibilities.

You may not:

• Take for yourself opportunities discovered through the use of Company assets, or information in your possession.
• Use Company assets, or information in your possession for personal gain or personal gain of a family member or friend.
• Compete with the Company.

In the sections that follow, we consider examples of common conflicts that may arise and the appropriate responses to those scenarios:

3.1.1 Family and Personal Relationships

A family member or close friend is, or wants to become, a Flex vendor, supplier, or employee. You must tell your manager about your relationship and must not be involved in selecting or managing the potential vendor or employee.

You or one of your family members has a position or financial interest (for example, has material stock holdings) in a company that competes, does business, or wants to do business with Flex. If so, promptly tell your manager so the conflict can be addressed.

You manage or can influence work decisions for a family member, friend, or person with whom you have a romantic relationship. If so, promptly tell your manager so it can be addressed. When employees in the same reporting line are in a relationship, a potential conflict of interest is created. Such relationships must be disclosed. In addition, you must disclose any other romantic relationship in the workplace that presents a possible or perceived conflict.

You can find the Nepotism and Dating Policy on the HR DMS portal.

3.1.2 Financial, Investment, or Business Opportunities

You want to take advantage of a business or investment opportunity available to Flex. If so, immediately let your manager and the Company’s Chief Ethics & Compliance Officer know and make sure that the opportunity is first offered to Flex. If Flex declines the opportunity and no other conflict exists and the activity otherwise complies with applicable Company policies, then you may pursue it.
3.1.3 Service on Outside Boards

• You want to serve as a director of another for-profit or non-profit company. If so, follow the Employee Board Service Policy to get proper prior written approval.
• You can find the Employee Outside Board Service Policy on the Legal DMS portal.

3.1.4 Secondary Employment; Outside Activities

You would like to have a second job or want to consult for another for-profit company that competes, does business with, or may become a customer of Flex. If so, tell your manager immediately so the potential conflict can be addressed. Secondary employment which does not create a conflict of interest or interfere with your Flex job duties is permissible.

You own a business or have shareholdings in an entity outside of your work for Flex, and that business competes, does business with, or may become a customer of Flex. If so, tell your manager immediately so the potential conflict can be addressed.

If you find yourself in any of these or other actual or possible conflict of interest situations, immediately tell your manager, or use any of our reporting resources to report the matter and comply with the Legal Department’s requirements to complete Flex’s Conflict of Interest Screening Process, so it can be evaluated and resolved. Managers will ensure that matters concerning conflicts of interest are escalated to a Director within their organization, or directly to the Flex Legal department or Ethics & Compliance.

You may only act after the conflict has been reviewed and approved in writing by the manager and Ethics & Compliance.

By fully disclosing the potential conflict before you act, you help ensure that business is done objectively, fairly, and in line with Company policy. You also keep from being involved in an inappropriate conflict of interest situation that may require discipline up to and including termination.

You can find the Conflict of Interest Policy & Checklist on the Legal DMS portal.

3.2 We safeguard Flex information.

3.2.1 Confidential Information

During our work, we frequently have access to and use confidential information about our Company, including information about our employees, or the companies with which we do business. For this purpose, “confidential information” means information of the Company or the companies with which we do business that is not generally available to the public or that is reasonably understood to be confidential, including forecasts, marketing plans, and personal information about employees or information that third-parties have entrusted to us under promises of confidentiality. This information might be useful to a competitor or harmful to our Company if it gets into the wrong hands, or Flex could be exposed to liability for the improper use or disclosure of such information. This can include private information concerning employees, although you are always free to disclose your own compensation and terms and conditions of employment.
Common examples of confidential information include:

- Customer or supplier lists
- Customer or supplier terms, discount rates, pricing data
- Financial information
- Designs, drawings, formulas, trade secrets, inventions, patent applications
- Marketing and sales plans, product launches, acquisitions
- Manufacturing processes
- Employee data (other than your own)
- Information about Board and Board committee deliberations

Both during and after your employment with Flex, you must protect, safeguard, and only disclose confidential information to:

1. Coworkers who have a business need to have the information;

2. People outside of our Company who have a business need to have the information, a clear duty to keep the information confidential, and have signed a Non-Disclosure Agreement; or

3. Those who have a legal right to have the information.

Your duty of confidentiality does not prohibit or limit you from disclosing confidential information to governmental authorities in connection with reporting suspected violations of law, without any requirement to advise or notify the Company, although you should advise such authority of the confidential nature of any information you disclose, and you are not permitted to disclose attorney-client privileged communications.

We follow our Company’s data classification system for handling of our confidential information, which requires us to classify documents as either “Restricted”, “Sensitive Personal Information”, “Confidential Personal Information”, “Internal Use Only”, or “Public”.

You can find the Document Classification for Data Protection Policy on the Legal DMS portal.
3.2.2 Flex Intellectual Property

- “Intellectual property” includes patents, trademarks, copyrights, trade secrets, know-how, and any other intangible personal property that is created through the intellectual efforts of its creator.
- Flex intellectual property is a key asset of the Company, and you are expected to help identify, capture, and protect our intellectual property.
- The Company has policies and procedures in place for considering filing for patent protections on inventions created by our employees – you can speak with your manager or the Legal department to learn more about the process.
- You must not knowingly use the intellectual property of third parties without permission, and it is the responsibility of each employee to respect the intellectual property (including copyrighted materials such as software programs and confidential information) of our suppliers, customers, business partners, competitors, and other third parties.
- You must not use or disclose confidential Information or trade secrets belonging to a former employer even if you think it would be helpful to Flex. Ask the Legal department for guidance if you are uncertain about whether you are permitted to use Information that does not belong to Flex.

If you have any questions or concerns about intellectual property rights, contact the Legal department.

3.3 We accept gifts and business entertainment only when appropriate.

You must not accept any gifts, entertainment or other business courtesies that could influence or be perceived to influence your business decisions on behalf of the Company. You must never request or ask for gifts, entertainment or any other business courtesies from people doing business with the Company. Giving or receiving any payment or gift in the nature of a bribe or kickback is absolutely prohibited.

If you are offered or given something of value (for example, a special discount on an appliance, free tickets to a sporting event, a discounted apartment, or other item) from a Flex customer or vendor that is lavish, not within our Company’s guidelines, or questionable, tell your manager immediately so the potential conflict can be addressed. Managers will ensure that matters concerning conflicts of interest or potentially inappropriate gifts are escalated to a Vice President within their organization, or directly to the Legal department or to Ethics and Compliance.

Specifically, you may not accept:

- Lavish gifts, gifts in the form of personal loans, cash, cash equivalents or securities.
- Loans of property, including vacation facilities or equipment for personal use.
- Personal services performed for less than market value.
- Discounts on the purchase of goods or services for personal use.

See also Code Section 4.4 Doing Business with Governments, Section 5.2 Procurement Practices and Section 6.2 No Bribery or Kickbacks.
As a global company, Flex often requires many of us to travel for business purposes. It is our responsibility to ensure that we follow our Company’s Travel and Entertainment policy and only submit for reimbursement those receipts that are directly related to that business travel and are appropriate for reimbursement.

You can find our Travel and Entertainment Policy on the FlexTravel portal.

3.4 We use Flex assets wisely.

3.4.1 Physical Assets and Technology

• We are trusted with Company assets, including workspaces, facilities, computers, mobile and desk phones, other equipment, confidential information and any Company funds that we control or manage.

• We respect, care for, and properly use our Company assets, and work hard to prevent their theft, destruction, or misuse.

• We each have a responsibility to use Company technology appropriately and to help keep our systems secure against data breaches or other cybersecurity incidents. We keep our laptops and other devices secure at all times and promptly report their loss or theft, we do not share our passwords, and we are careful when connecting to unfamiliar WiFi networks or when downloading software or emailed links. You must promptly report any suspected unauthorized access or breach of company systems or networks to IT.

• We dispose of Company equipment, or other assets, legally and appropriately, and do not steal or misuse our property or technology.

• We understand that while certain Flex assets may be used for incidental and occasional personal purposes (such as Company-assigned mobile phones), to the extent allowed by law, access, search, and review any communications, data, or equipment maintained in any of these places, with or without your consent. There is no expectation of privacy with regard to anything stored on Flex-owned equipment or which is transmitted through Flex’s systems, where permitted by local law.

• We use Company assets in a safe, lawful, and appropriate manner and do not use Company assets to download, store, or send sexually explicit, offensive, or discriminatory material.

• We do not share personal user identification numbers or passwords.

• We report unlawful or accidental sharing of personal information immediately, following the Flex Data Breach
3.4.2 Communications and Social Media

We communicate clear, accurate, up-to-date, and appropriate information about our businesses, but only the Chairman, Chief Executive Officer, Chief Financial Officer, Treasurer and Chief Marketing Officer are authorized to communicate with the public on behalf of our Company. Requests for financial or other information about the Company from the media, the financial community, stockholders or the public should be referred to one or more of these authorized spokespersons. All other employees are prohibited from responding to any request for information about Flex from the media, securities analysts, current or prospective investors or other third parties without prior approval. This means that if approached by a reporter or analyst, or when using social media, including any blogs, social networking site, photo/video sharing, and chat rooms, we should:

- Not share information about our Company or customers.
- Get approval from Global Communications department before posting any official information about our Company in a public place.
- Protect our Company’s assets.
- Obtain prior approval from the Chief Financial Officer or the Chief Marketing Officer before allowing reporters or analysts to visit a facility.
- Protect confidential information.

You can find the Social Media Policy on the Marketing and Corporate Communications Portal and the Internet Usage Policy under DMS portal. See also Code Section 3.2.1 Confidential Information and Section 3.6 Complying with Securities Laws.

3.5 We maintain accurate books and records.

- We seek to create value by achieving superior financial results. We must always produce honest, accurate and complete financial information, strictly follow generally accepted accounting principles (“GAAP”) and have appropriate internal controls and processes to ensure that all accounting and financial reports comply with applicable rules and are properly documented.
- We are responsible for ensuring that our books and records are free from false or misleading entries engaging independent auditors, and ensuring that our books and records are kept according to legal requirements and applicable accounting standards.
- We do not keep undisclosed or unrecorded corporate funds for any purpose.
- We issue payment only where there is appropriate, complete, and accurate supporting records and approval.

If you believe that any Flex business records or accounts have been falsified, improperly changed, or destroyed, immediately contact the Legal department or use another one of our reporting resources. This kind of activity will not be tolerated.

You can find the Enterprise Record Retention Policy on the Corporate Records Management portal.
3.6 We comply with all securities laws.

- As determined by management, we provide timely, full, fair, accurate and understandable information to the investing public in keeping with securities laws.
- We follow Regulation FD, which prohibits the selective disclosure of material, nonpublic information (e.g., to security holders or members of the financial analyst community).
- We act with integrity when it comes to the securities markets, and have implemented an insider trading policy which requires:
  - You may not trade in Flex securities while you are aware of material nonpublic information about Flex. This prohibition also applies to transactions in the securities of other publicly-traded companies about which you may learn material, nonpublic information while working for Flex. “Material information” is defined broadly and includes any information that has not been made available to the public and that a reasonable investor would consider important in deciding to buy, sell or retain securities. Any information that could reasonably be expected to affect the price of the security is material. Material information can be positive or negative. It is not possible to define all categories of material information and when in doubt, you should treat nonpublic or confidential information as material and consult with the Legal Department prior to engaging in a securities transaction.
  - You may not communicate or “tip” material, nonpublic information to others who may trade in Flex securities (or any other publicly traded securities) based on that information. You may not have another person trade in Flex securities (or any other publicly traded securities) for you based on that information.
  - You must not engage in derivative transactions such as trading in any interest or position relating to the future price of Flex’s securities, such as a “put”, “call”, or “short sale”, and do not engage in hedging transactions with Flex’s securities or use such securities as collateral for margin accounts or loans.
  - If you are in possession of material, nonpublic information when you cease to be a director, officer, employee, consultant or contractor of the Company, these requirements will continue to apply until that information has become public or is no longer material.

Further information is available in the Insider Trading Policy on the Legal DMS portal or upon consultation with the Legal Department.
Integrity for Our Customers and Business Partners
4.1 We engage in responsible sales and marketing practices.

We are responsible and ensure that our promotional, sales, and marketing materials contain truthful statements about Flex, our services, and the products we manufacture.

4.2 We compete fairly in the marketplace.

- Competition and antitrust laws are intended to encourage and protect free and fair competition. We support strong competition and do not tolerate unfair business practices.
- Our directors, officers and employees deal fairly with customers, suppliers, competitors and their employees. We do not take unfair advantages through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other practice involving unfair dealing.
- When collecting information about the activities of others, we do so in a manner that is both legal and ethical.
- We do not cooperate with competitors, and while we may join trade associations or participate in benchmarking or other similar activities from time to time, we may do so only with consent from the Legal department. In particular, you must never discuss the following with people outside of Flex without getting consent from the Legal department:
  - Pricing or pricing policy, terms of sale, costs, marketing or strategic plans, levels of production
  - Proprietary or confidential information
  - Potential mergers and acquisitions, joint ventures, or other partnerships
  - Boycotts
  - Allocations of customers, products, services, sales, supplies, or territories
  - Exclusive dealing arrangements
  - Certain restrictions on, or tying arrangements with, suppliers or customers
  - Any other specific terms of any agreement with a supplier or customer

If you have questions about whether to share our information or to use information about one of our competitors, seek guidance from the Legal department. You can find the Antitrust and Competition Policy under the Legal DMS portal.
4.3 We protect third-party information and property.

- We protect the confidential information that our customers and business partners share with us, and we do not share this information with anyone inside or outside the Company who does not have a legal or contractual right or legitimate business need to have it.
- We take proactive steps to protect the information and property of our customers, suppliers, and business partners.
- We use software made by other companies, but do not make unauthorized copies or resell or transfer the software without permission under applicable license agreements. You should expect that Flex may inspect your computers and other devices to verify that only approved and licensed software is installed.

You can find the Software Copyright Policy, End User Policy and Flex’s Internet Usage Policy on the IT portal. See Code Section 3.6 Complying with Securities Laws.
4.4 We act with integrity when doing business with governments.

- We act honestly and with integrity when working with governments and conduct diligence on third parties who interact with governments on our behalf.
- We take care in preparing and maintaining records relating to government contracts.
- We follow the applicable laws and regulations that apply to government contracting, and follow the terms and conditions of any contract with any government entity. The Legal department must review and approve all contracts with any government entity.
- You may not offer, promise, or give anything of value to any government official or to any employee of a state-owned or controlled company or agency to improperly secure or keep business, or to improperly influence any decision concerning Flex, and we do not use any third party (such as a consultant, agent, or business partner) to do so for Flex. There are strict laws that govern providing gifts, including meals, entertainment, transportation and lodging, to government officials and employees. We do not provide gifts or anything of value to government officials or employees or members of their families in connection with Company business without the prior approval of the Legal department.

If you receive an inquiry or request from a government entity, you should immediately contact the Flex legal team to determine how to respond. See Code Section 6.2 No Bribery or Kickbacks, Section 5.2 Procurement Practices, and Section 3.3 Receiving Gifts and Business Entertainment. You can find the Anticorruption Policy on the Legal DMS portal.
Integrity in Our Global Supply Chain
5.1 We do business with responsible suppliers and business partners.

• We select suppliers based on their qualifications and merit.
• We develop strong working relationships with suppliers who deliver superior quality, excellent service, competitive pricing, and follow the contractual, legal, privacy, and ethical business standards of our Company.
• We are a founding and proactive member of the Responsible Business Alliance (RBA) and require our suppliers to conform to the RBA, including in our supply chain security practices.

• We are committed to purchasing and using materials only from appropriate and properly authorized sources.
• We audit our supply chain service providers on compliance with security and contractual obligations under Supply Chain Security programs.

If you suspect a supplier is acting in a way that is inconsistent with these expectations, contact the Ethics Hotline or use any one of our reporting resources found in Section 1.2 of the Code to voice your concern.
5.2 We maintain fair procurement practices.

- Flex creates value for customers through competent and swift product development, high productivity, high quality, agility, and cost competitiveness.
- Flex dealings with our customers, suppliers, and business partners are based on good business judgment and fair dealing.
- We use a competitive bidding process that is fair and transparent, and engage in procurement practices that are consistent with our global sourcing policies and appropriate site policies.
- While conducting procurement activities, we do not offer or give bribes, kickbacks, or anything of value, including a gift or entertainment, to a supplier, customer, or business partner to improperly control the recipient’s actions or decisions.

If you suspect that a supplier has been selected in a manner that is not consistent with our Company’s procurement practices or policies, or you suspect that improper favoritism was involved in the vendor selection process, you must contact the Ethics Hotline or use any one of our reporting resources found in Section 1.2 of the Code to voice your concern.

You can find the Procurement Practices Guidebook, Supplier Selection and Management Policy, Scrap and Excess & Obsolete Policy and Global Procurement and Supply Chain Policy on the Global Procurement and Supply Chain portal. See also Code Section 6.2 No Bribery or Kickbacks and Section 3.3 Receiving Gifts and Business Entertainment.
6

Integrity in Our Global Communities
As a good corporate citizen, we act responsibly, conduct operations safely, and prepare for emergencies that may occur. We also give back to the community by supporting and partnering with educational, civil, and charitable organizations.

6.1 We are committed to protecting the environment.

- Flex uses a robust environmental strategy to ensure that we are focused on producing environmentally compliant products using environmentally compliant manufacturing processes and suppliers.
- We follow all applicable environmental laws and regulations in order to protect the environment, conserve energy and natural resources, and prevent pollution by applying appropriate management practices and technology.
- We comply with global and local regulatory requirements relating to the use, storage, discharge, and disposal of hazardous materials used during our manufacturing processes.
- We comply with global regulations for hazardous substances in products, materials and components for which we are responsible.
- We monitor our compliance with these laws to maintain our status as a responsible corporate citizen in all global communities in which we operate. In addition, we review our practices and procedures regularly to address changing circumstances, and to continually improve our performance.
- You can find the Flex Sustainability Report on the Global Citizenship portal.
6.2 We do not offer or give bribes or kickbacks to anyone.

- We prohibit bribery, kickbacks and improper payments in any form and to anyone.
- We comply with the U.S. Foreign Corrupt Practices Act (FCPA), the U.K. Bribery Act 2010 and the applicable anti-bribery and anticorruption laws in the countries in which we conduct business.
- You must not offer, promise, or give anything of value (such as cash or cash equivalents or non-business travel) to anyone, including to any government official, to improperly secure or keep business, or to improperly influence any decision regarding Flex; and you must not use any third party (such as a consultant, agent, or business partner) to do so on Flex’s behalf.
- We provide reasonable gifts and entertainment per industry and specific country practices, but we do not provide such gifts or entertainment if they in any way obligate or appear to obligate the person receiving them. You must not provide gifts that are against applicable law or the recipient company’s policy.
- You must not provide entertainment that could lead to the embarrassment of the Company, including entertainment that is degrading or exploitive in nature.
- We require all third parties engaged by Flex to comply with all applicable anti-corruption laws and the company’s integrity standards.
- You must not make business decisions with any supplier, vendor, customer, or other business partner based on any personal benefit that is either offered or given to you, directly or indirectly.

- We do not ask for, demand, or accept bribes or kickbacks.
- We do not offer or give bribes, kickbacks, or anything of value, including a gift or entertainment, to a supplier, customer, or business partner to improperly control the recipient’s actions or decisions; and we do not use any third party intermediary (such as an agent, consultant, distributor, or business partner) to do so for Flex.

A “bribe” is anything of value, including cash, gifts, entertainment, or business courtesies given with the intent to improperly influence another’s actions or decisions to get or keep business, or to get an unfair business advantage.

A “kickback” is the payment of money or anything of value as a reward for giving business or giving an improper business advantage.

You can find the Anticorruption Policy on the Legal DMS portal. See also Code Section 3.3 Receiving Gifts and Business Entertainment, Section 4.4 Doing Business with Governments, and Section 5.2 Procurement Practices.
6.3 We do not engage in money laundering or terrorist-related activities.

We are committed to avoiding the use of Flex resources for the purpose of money laundering, which is the attempt to hide the proceeds of a crime to make the proceeds appear appropriate or lawful. To this end, we do not accept payment from any entity that is not a party to the transaction legally allowed to make a payment.

We do not use Flex assets to aid terrorism or terrorist-related activities.

6.4 We obtain approval before making charitable or political contributions or engaging in lobbying activities on behalf of Flex.

- You must not use Flex funds for political contributions of any kind to any political candidate or person who holds any government office without prior written approval. “Political contributions” include direct and indirect payments, loans, advances, deposits, or gifts of money, or any service. It also includes subscriptions, memberships, tickets, the purchase of advertising space, payment of expenses, or compensation of employees for a political organization, candidate, or public official.
- You may make any political contribution of our choosing with our own money and time.
- We obtain prior approval from the Legal department before engaging in any lobbying activities on behalf of the Company.

6.5 We comply with laws governing international trade.

6.5.1 Imports and Exports

- As an importer, we accurately describe and classify goods and state their value and country of origin. We also follow local customs and other government agency import laws and regulations.
- As an exporter, we follow the laws of the country from which we ship our finished products, components or technology as well as the export laws of the United States, regardless of the shipping country.

6.5.2 Boycotts and Restricted Countries

- We do not do business with prohibited countries or individuals, nor do we cooperate in any way with unsanctioned foreign boycotts of countries.

You can find more information about Global Trade Compliance on the Global Trade portal.
Consequences of noncompliance

Each of us is faced with challenges and difficult decisions every day. Each of us is responsible for making good decisions and helping Flex live up to its commitment to act with integrity and honesty. All directors, officers and employees of Flex are expected to comply with the Code of Business Conduct and Ethics and cooperate in internal investigations of suspected violations. Violations can lead to consequences for Flex and its directors, officers and employees, including:

- Loss of business and competitive advantage and loss of jobs.
- Disciplinary action, up to and including termination of employment or other association with the Company, consistent with applicable laws and Company policies.
- Referral to law enforcement and any other appropriate corrective action.
- Consequences can apply to anyone who engages in misconduct and to any employee who authorizes the misconduct, does not take reasonable steps to prevent known misconduct, or retaliates against anyone who in good faith reports a possible violation of our Code or policies.

You can find the Corrective Action, Discipline & Conduct Policy under “HR Policies & Guidelines” on the Human Resources portal.

Flex strongly encourages its employees to report any suspected violations of company policy through the reporting resources described in this Code. If you receive information or have reason to believe that Flex, any director, officer or employee, or any person acting on behalf of Flex has violated the Code of Business Conduct and Ethics or the law, you must promptly report it through the reporting resources described in Section 1.2. As noted above, failure to do so may expose you to serious consequences.
At Flex, everything we do is based on a culture of ethics, integrity, and superior performance. Our Code of Business Conduct and Ethics is our guide to help us do the right thing, all the time, and everywhere we operate.