The California Transparency in Supply Chains Act of 2010 (SB 657) requires certain businesses to provide disclosure regarding their efforts, if any, to address the issue of slavery and human trafficking in their supply chains. The disclosures are intended to increase the amount of information made available by companies in order to allow consumers to make more informed choices regarding the products they buy and the companies they choose to support.

Zebra Technologies Corporation (“Zebra”) leadership has a strong commitment to high ethical standards. Zebra’s reputation and the continued success of its business depend upon all Zebra employees conducting their activities with integrity and in compliance with the law. Zebra does not condone any form of human trafficking or the use of slavery in its business or in the manufacture of Zebra products, and Zebra expects its suppliers to conduct themselves consistent with this belief. Zebra has implemented various policies, procedures and steps that aid in mitigating the risk of slavery and human trafficking in its business and in its supply chain.

Zebra is a member of the Responsible Business Alliance (“RBA,” formerly known as Electronic Industry Citizenship Coalition or EICC) and supports the vision and goals of the RBA and the application of its standards in maintaining and improving social, economic and environmental performance in operations of Zebra and its suppliers. Zebra is committed to conforming to the principles of the RBA Code of Conduct (which prohibits the use of forced labor, bonded labor (including debt bondage), indentured labor, involuntary prisoned labor, slavery or trafficking) in its own operations, and promotes that its suppliers implement the principles of the RBA Code in their operations as well as within their supply chains. A number of Zebra’s major suppliers, which comprise approximately 80% of Zebra’s direct supply chain by spend, represent and warrant performance with ethical standards and in conformance with applicable legal requirements in the agreements they sign to supply products and services to Zebra. Some of these major supply agreements also include representations to comply with the RBA Code of Conduct or commitments to not use prohibited labor. Further, Zebra template purchasing documents, if utilized, require suppliers to represent and warrant performance with ethical standards and in conformance with applicable legal requirements. A number of those template documents require suppliers to understand the principles and intent of the Corporate Social Responsibility (CSR) principles fostered by the RBA Code of Conduct or any internationally recognized equivalent in the areas of Environmental Sustainability, Health and Safety, and Labor and Ethics, and to provide services in conformance with the principles and aims of the RBA Code of Conduct, to the extent applicable. Zebra’s supply chain reviews agreements with current suppliers as they expire for the purpose of promoting such compliance. A violation of these provisions in Zebra’s supply agreements may be considered a breach of the supply agreement and a number of Zebra’s major supply agreements provide Zebra with the ability to terminate the supply agreement and pursue various penalties and damages against that supplier.

Zebra views assessments and audits as an integral part of Zebra’s overall supplier management process and regularly conducts its own Corporate Social Responsibility (CSR) Audits of major suppliers to evaluate and address risks. These announced audits are performed according to Zebra’s standard quality measures and CSR audit checklist, the RBA Code of Conduct, and related laws and regulations. Audit findings are shared with suppliers and Zebra requests suppliers to provide a corrective action plan and implement corrective actions (and provide evidence of such), within a defined period of time (depending on type of finding) if deficiencies are identified. Audit finding closure status is confirmed by Zebra’s Supplier Development Engineering
if corrective actions are identified. If there is a critical finding (serious violation) identified in an audit, Zebra procedures require escalation to a Zebra CSR Leader and then top management and procurement within a 72-hour period of time. Zebra recognizes that our review and assessment of our actions to identify and address our modern slavery risks in our operations and across our supply chain will be an ongoing and evolving process that we are committed to continue to build upon. Zebra has commenced and will continue to work on developing frameworks and processes to ensure we can review the effectiveness of the actions we are taking to assess and address modern slavery risks in our operations and supply chains.

Zebra’s commitment to doing business with high standards of compliance and business ethics is set forth in its Code of Conduct, and is reinforced by Zebra’s Chief Executive Officer and senior management. Zebra’s Code of Conduct applies to all Zebra employees, at all of Zebra’s global locations, and each employee is responsible for acting within the letter and spirit of Zebra’s Code, Zebra policies and the laws, rules and regulations applicable to the employee’s country or territory. Zebra’s Code is available in 24 languages and encourages the involvement of all employees in the detection and prevention of potential misconduct by employees or third-party suppliers to Zebra. Zebra employees that have compliance concerns may report these concerns to their manager or through “Zebra’s Make the Right Call Program”, which provides employees with a process to report concerns or allegations of misconduct on a confidential and anonymous basis either through the web-based reporting system or through the Zebra compliance hotline toll-free telephone numbers. Information on Zebra’s Make the Right Call Program is posted at each of its locations and concerns may be reported both by Zebra employees and third-parties. Employees found in violation of Zebra policies or relevant laws and regulations applicable to Zebra’s global operations may be subject to disciplinary action, up to and including termination.

The Zebra Corporate Compliance Committee consists of the individuals serving in the following Zebra positions: Chief Compliance Officer, Chief Legal Officer, Chief Administrative Officer and Senior Director, Internal Audit. The Compliance Committee leads the organizational design, implementation and oversight of Zebra’s Compliance & Ethics Program. Through the Compliance & Ethics Program, the Compliance Committee promotes a culture of ethical and lawful behavior by Zebra employees and establishes systems and procedures that are generally effective in preventing and detecting criminal conduct and breaches of Zebra’s Code of Conduct Code.

Zebra provides mandatory training on the Zebra Code of Conduct to its new employees, as well as periodic training in specialized areas to new and existing employees. Training is also provided to designated employees on what constitutes slavery and human trafficking in the supply chain, how to identify, and ways to address suspected violations. All employees are asked to certify annually acknowledgement that they have read, understand and agree to comply with Zebra’s Code of Conduct.