



**Zebra's Code of Conduct
Compliance Starts With You**



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Responsibly Delivering a Performance Edge: A Message from Our CEO

At Zebra Technologies, we're not just doing business – we're reinventing it. While Zebra's stripes have changed over the past half century, our shared commitment to innovation and integrity has not wavered. Today and always, you'll find us at the edge of the enterprise, creating solutions that lead to better visibility, better decisions and better business.

My hope is that we continue to preserve this proud legacy for generations to come. As a dynamic community of builders, doers and problem solvers, we each play a role in delivering a performance edge to our customers, partners and the industry as a whole. Our Code of Conduct shows us how to do this work responsibly. It's your guide for upholding our Values, making good decisions and putting Zebra's policies into practice.

Read the Code carefully. It covers ethical situations you could face at work and points you to our policies and other resources for help. Be sure to ask questions if something in the Code isn't clear or if something doesn't feel right. We also rely on you to "Make the Right Call" if you believe someone has violated the Code, our policies or the law – even if you're not sure that misconduct has occurred.

Above all, remember that Zebra's future depends on you!

Anders Gustafsson
Chief Executive Officer

Our Values

We're continually reinventing how businesses operate, including our own, but we always maintain the same steadfast commitment to our Values. They assist our decisions and actions every day.



We do the right thing no matter what. We always act with courage and respect and maintain the highest ethical standards.



We are one Zebra. We value team over individual success and capitalize on unique contributions of all in our efforts to better serve our customers.



We are nimble, proactive and adaptable. We are comfortable with risks and recognize the need to adjust quickly to seize new opportunities.



We proactively seek solutions and are undaunted by obstacles. We accept responsibility for our decisions, commitments and relationships.



We are creative thinkers who champion bold ideas in all aspects of our business. We freely challenge the status quo to advance the business and help our customers.

Our Compliance and Ethics Program

Compliance and ethics are part of our culture at Zebra, and our Compliance and Ethics Program (the “Program”) is about promoting employee integrity and compliance with our policies and the laws that apply to our business. The Compliance Committee is made up of Senior Company leaders that oversee the Program and coordinate with Company Management to encourage lawful behavior and prevent misconduct.



Living Our Code

Our Code of Conduct is the written expression of Zebra's commitment to integrity and helps us translate our Values into everyday actions.



**Integrity
Teamwork**

**Agility
Accountability
Innovation**

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About the Code

Consider our Code of Conduct (“the Code”) as an extension of our Company Values. Our Code is not just a list of rules or good intentions: it’s a guide for turning our Values into tangible, ethical actions. The Code can assist you as you work through complex situations and help you uphold the laws and regulations that apply to us. Within the Code you’ll find:

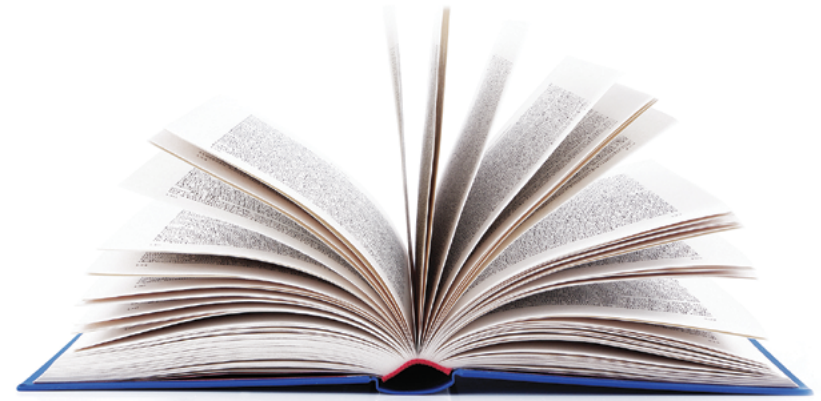
- Overviews of important ethical topics and tips on how to handle them
- Decision-making tools
- Examples of real-life situations you might face
- Additional policies and resources for help

Who is this Code for?

It’s for you. If you work for Zebra or on our behalf, you are expected to uphold the letter and spirit of the Code. That includes all full-time and part-time employees in every country and in every Zebra location. The Code also applies to full and part-time vendors, suppliers and third-parties working on Zebra’s behalf. Regardless of the job you hold or the work you do, your responsibility remains the same: to uphold both the letter and spirit of our Code, and comply with our policies and the law.

Following laws and regulations

A variety of laws and regulations apply to Zebra’s business, and we’re committed to upholding them. After all, even one violation of the law can harm our reputation. It can also lead to penalties like fines and even prison time if serious enough. And because laws vary in different countries, they can sometimes conflict with U.S. laws.



That’s why we expect you to be familiar with all of the laws that apply to your work. You don’t have to become a legal expert, but following our Code and our policies is the best way to comply – so is asking questions when the right course of action isn’t clear or you are not sure of what to do. Contact Zebra’s Legal Department before taking any action that may violate a law or a Zebra policy.

If the Code is violated

No one at Zebra is “above the law.” Breaking our policies or the law breaks our Code as well. That includes failing to report misconduct or pressuring someone to violate our Code or policies by participating in misconduct. We take our responsibility to uphold the Code seriously. That means we also take violations seriously. Violations can result in disciplinary action – even termination, and if an act violates the law, it could lead to prosecution, fines or jail time.

Code updates

When laws and regulations change, our Code must adapt, so we may make periodic updates. You can keep up with any changes by referring to the Code often. That way, you’ll always know what’s expected of you and our Company. Zebra’s current Code is located on zConnect.

Your Responsibilities

When it comes to upholding our Code, we all share the same responsibilities:

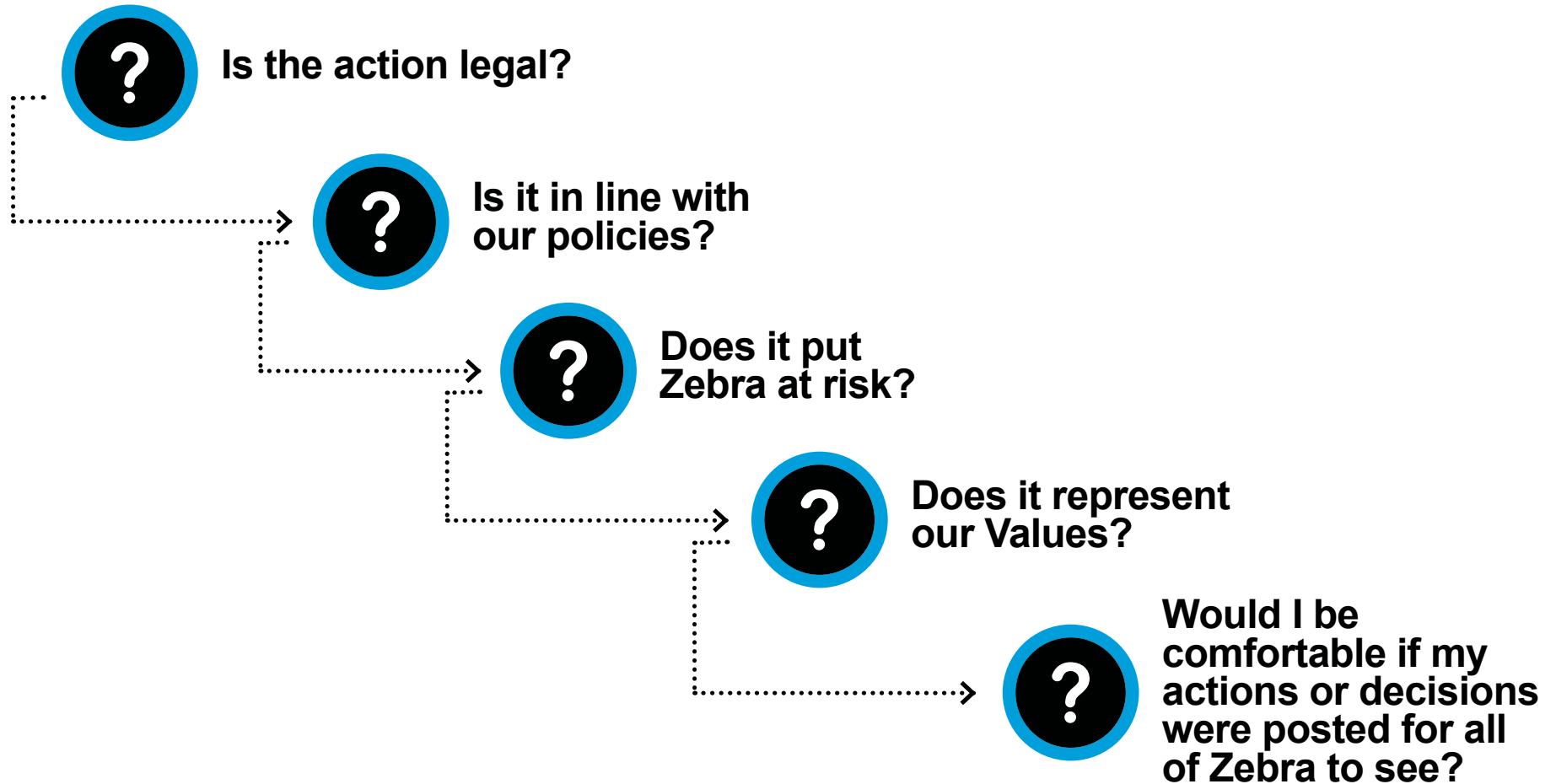
Know the Code	Read it carefully, along with any policies that apply to the work you do.
Show integrity	You represent Zebra, so be honest and ethical in every decision and action.
Follow our policies and the law	Familiarize yourself with the laws that apply to our business.
Get clarification	Check with your supervisor or Zebra Legal when laws seem to conflict or something isn't clear.
Ask before you act	If you're ever in doubt about what to do, ask for guidance before acting.
Watch for misconduct	Stay alert for any acts that may violate our policies, our Code or the law.
Speak up	If you see or suspect misconduct, don't ignore it and take action immediately.

If you supervise others, you have further responsibilities:

Model integrity	Your team looks to you as an example of how to act. Bring our Values to life by always acting ethically and fairly.
Promote the Code	Openly use the Code and refer employees to it whenever they have questions.
Open your door	Be sure employees know they can come to you with questions or concerns. Be a good listener and offer guidance and additional resources for help.
Take action	Stay alert for misconduct and report it to the proper resources immediately. Also watch for possible retaliation against employees who speak up. If you become aware of retaliation towards an employee, please immediately report it to your supervisor, HR Business Partner, a member of Zebra's Legal Department or Make the Right Call.

Making Good Choices

It could happen to any of us: You find yourself in a situation where the right thing to do isn't clear. Before you take action, ask yourself:



Were you able to answer “yes” to every question? If not, or you answered “maybe” to any of them, take a step back. Reconsider your actions and ask for help before proceeding. You can go to your immediate supervisor, HR Business Partner or a member of Zebra’s Legal Department for assistance.

Speaking Up

Since integrity starts with you, it's up to you to speak up when you think misconduct may be happening. So, if you see or suspect that someone's actions are violating our Code, our policies or the law, please speak up right away. It's the best way to protect our Company, our customers and each other.

Where do I begin?

Your best first stop should be your immediate supervisor, HR Business Partner or Zebra's Legal Department. But if you're uncomfortable speaking up directly, there is another option: the "Make the Right Call" Program, a hotline you can reach either by phone or online. This service is operated by an independent third-party vendor, and it allows you to report anonymously, where permitted by law, 24 hours a day, 7 days a week in more than 30 languages.

To Make the Right Call:

Go online ...	Visit tnwgrc.com/zebra or
Call toll-free ...	In the United States or Canada – 888-361-5808

Outside of the U.S. and Canada, visit tnwgrc.com/zebra to locate your country access code and phone number to place a toll-free call.

What happens next?

Once you have shared a concern, we take every report seriously. Compliance reviews each report promptly and confidentially and shares information with others on a strictly need-to-know basis. You may report anonymously, where permitted by law; however, please keep in mind that if a report is anonymous, it may prevent Compliance from conducting a thorough investigation.



Make the Right Call

Report any compliance concern – Available 24/7.

Promptly. Discreetly. Confidentially.

Make the Right Call to Protect Zebra's reputation and our business.

Phone

In the US or Canada:
+1 888 361 5808

Non – US & Canada:
Please go to
www.tnwgrc.com/zebra
to locate the access code and telephone number to place a toll-free call.

Online

Report via the Web:
www.tnwgrc.com/zebra



No Retaliation

At Zebra, we understand that employees are less likely to share concerns if they feel uncomfortable speaking up or are worried about possible retaliation. Whether the concern you want to report is something you've seen, something you suspect or something that turns out to be unfounded, what's most important is that you feel confident bringing it to the Company's attention.

For that reason, Zebra does not tolerate retaliation of any kind against someone who reports a concern in good faith, in other words, honestly and sincerely. Retaliation in itself is a serious violation of our Code, and it has no place in our Company.



Connect to Our Policies

Non-Retaliation Policy



Q: I have a concern I want to report, but the person involved is a high-level manager in my department. I'm worried I could lose my job if I speak up. What should I do?

A: You should speak up. It doesn't matter what job the person you're concerned about holds. Our policies apply equally to every employee, and we will not tolerate any kind of retaliation against you for speaking up in good faith. You can go to your immediate supervisor, HR Business Partner or a member of Zebra's Legal Department. If you're uncomfortable speaking up directly, please use Zebra's "Make the Right Call" hotline either by phone or online.

Working Together

We are one Zebra. We value team over individual success and capitalize on the unique contributions of all in our efforts to better serve our customers and each other.

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Inclusion and Diversity

Our diverse workforce makes us a more innovative and effective Company.

Zebra Nation is diverse and inclusive, made up of individuals with varied backgrounds, talents and experiences. Our people are what make Zebra great, and investing in Inclusion & Diversity (“I&D”) is one key area that will support our continued success. The intent of our I&D efforts is to celebrate the uniqueness of our **entire** workforce by creating an environment where everyone can grow, develop and contribute.

WE STRIVE TO

follow employment laws to make sure each person has equal opportunities within Zebra. In your daily work, help us preserve Zebra’s positive and welcoming environment. Practice fairness and show respect in every interaction with coworkers, applicants, customers and business partners.

How can I promote equal employment opportunity?

If you make decisions that affect someone’s employment, such as those that involve hiring, promotions, compensation, training or discipline, tangible benefits (such as parental leave) or intangible benefits (such as flex working arrangements), act fairly and in support of employment laws.

In your decisions:

Only consider

factors like a person’s qualifications, merit and talent.

Don’t consider

factors like race, color, age, religion, gender, national origin, sexual orientation, pregnancy, childbirth, disability, medical condition, domestic violence victim status, military or veteran status, marital status, familial status, citizenship status, gender identity, gender expression, genetic information, ancestry, status with respect to public assistance, political activities or affiliations or any other characteristic protected by law.

Are you aware of any act that goes against our commitment to inclusion and diversity? We want to know, so talk to your supervisor, HR Business Partner or a member of Zebra’s Legal Department. You may also use the Make the Right Call Program to share your concerns.

Be aware of personal biases, and don’t allow them to affect your decision-making. Overcoming bias in our workplace broadens our talent pool and exposes us to new perspectives and ideas.



Connect to Our Policies

Equal Employment Opportunity Policy
Inclusion & Diversity Program

Q: I feel like a job applicant was passed over due to her disability. But since she isn’t an employee, should I just let this go?

A: No, you shouldn’t. We need to know about discrimination if it happens during any employment decision. Make the Right Call immediately to protect our hiring process and help us comply with the law.

Respect and Dignity

We believe a respectful workplace is fundamental to our productivity and well-being.

Coworkers don't always see eye-to-eye, but at Zebra, we handle our differences respectfully. We are committed to maintaining a workplace where every individual feels valued and respected – without fear of abusive conduct, bullying or harassment.

WE use care in our interactions and treat others fairly and respectfully. We rely on you to help keep harassing and disrespectful behavior out of our Company. Be courteous and supportive of others, and never single out anyone to disparage or humiliate or engage in any form of harassment.

STRIVE TO

Recognize and report harassment

Harassment happens when someone's unreasonably offensive behavior disrupts someone else's work or creates a hostile environment. It takes many different forms and can be verbal, physical or visual in nature. Harassment can include acts like:

- Intimidation, bullying or threats
- Racial slurs
- Sharing offensive material
- Ethnic jokes
- Sexual advances, suggestions or requests for sexual favors
- Unwanted verbal or physical conduct
- Sexually suggestive compliments or comments

If you experience or suspect harassment of any kind, don't ignore it. Report the incident to your supervisor, involve your HR Business Partner or Make the Right Call immediately.

Saying things like “I didn't mean it,” or “you're too sensitive” is never an excuse for acting inappropriately. If someone perceives an act as offensive or hurtful, that's what matters under Zebra's policies; so, please be aware of how others may perceive your actions *before* you act.



Connect to Our Policies

Respect at Work Policy

Non-Retaliation Policy



Q: I have noticed a coworker continually flirting with another employee. The employee seems very uncomfortable with it but hasn't complained. Should I forget about this and let the employee handle it?

A: No, don't forget about it. If you feel you can talk to the employee involved, let the employee know you're concerned. If you feel you can't or the behavior continues, report the incident to your supervisor, involve your HR Business Partner or Make the Right Call immediately if you cannot go to your supervisor or HRBP.

Human Rights

We recognize our Company's responsibility to protect people everywhere.

Zebra's work is about solving challenges people face. We're committed to making a positive and beneficial impact on people and communities. For that reason, we work to protect human rights and follow laws that prohibit forced or compulsory labor, child labor or human trafficking.

WE STRIVE TO show respect for human rights in every aspect of our business. Whether it's the way we produce and distribute our products or the partnerships we maintain, we're aware of the impact our actions can have on people and those around us.

What human rights do we protect?

We work to ensure that individuals have:

- Freedom to choose whether or not to work
- Legal and fair pay and work hours
- Safe working conditions
- Freedom of association with trade unions or collective bargaining

Keep in mind that Zebra won't use forced, bonded or child labor, or purchase materials that were knowingly produced that way. If you become aware of a human rights violation by a Zebra employee or one of our business partners, Make the Right Call immediately.

Our business partners work on our behalf, so it's important that they share our respect for human rights. If you're involved in selecting a business partner, do your due diligence to ensure that they treat workers fairly and do not engage in human rights abuses.



Connect to Our Policies

California Transparency in the Supply Chain Statement

UK Modern Day Slavery Statement



Q: I heard a rumor about a vendor we recently began working with that involved unsafe working conditions. Since I'm not sure if this is true, and we're already working with them, what can I do?

A: Even though it's a rumor, speak up about it right away so the Company can investigate. If it turns out not to be true, that's good. Whenever possible, you should monitor your vendors' work to ensure that no abuses are occurring.

Health, Safety and Security

We promote a culture of safety and security to protect our employees' well-being.

A safe and secure work environment is essential to any workplace, but at Zebra, our commitment to safety goes beyond identifying and avoiding hazards. We recognize the responsibility we all have to protect ourselves and each other from harm.

WE STRIVE TO follow safety and security requirements, laws and procedures and stay alert for unsafe conditions to keep our team and our partners injury-free. Every employee in every Zebra location has a duty to secure our facilities, prevent substance abuse and keep violence out of the workplace.

What's my role?

There are a number of ways you can help:

- Adhere to Zebra's Drug & Alcohol policy, which prohibits performing any work for Zebra while under the influence of alcohol, or any drug which can adversely impact your performance or safety at work.
- Wear Personal Protective Equipment if your job requires it and follow all safety procedures.
- Help secure our facilities by watching for and reporting any suspicious behavior or unauthorized people. Also report unsafe behavior or hazardous conditions to your supervisor, corporate security or by contacting Zebra's Environmental Health and Safety Team at their zConnect site.
- If you believe there is an imminent threat to your safety or the safety of others, you should immediately call your local emergency number, (such as "911" in the U.S.) then call Zebra's Global Security at +1-224-733-0911.
- Remember, weapons are not permitted on Zebra property. Reach out to your supervisor, HR Business Partner or Make the Right Call if you are aware of a weapon in the workplace or any behavior that creates an unsafe or intimidating environment.

Ours is a drug-free environment – a place that prohibits the use, sale, possession or transfer, trafficking or distribution of any illegal drugs or controlled substances in the workplace.



Connect to Our Policies

Health and Safety Policy

Drug-Free Workplace Policy

Weapon-Free Workplace Policy

Workplace Violence Prevention Policy



Q: A colleague of mine has been acting different lately. She's often angry and sometimes slams doors and hits office equipment. Since she hasn't lashed out at any people, should I just let this go?

A: No, you shouldn't. Behavior like this can be a warning sign. Speak up about your concerns by reaching out to your supervisor, HR Business Partner or a member of Zebra's Legal Department. You may prevent her from causing harm and you may enable her to get the help she may need.

Data Privacy

We believe personal information is valuable and deserves our respect and protection.

Maintaining the privacy of personal information helps us build and maintain trust between our employees and our customers and business partners. It's also a legal responsibility that we all share as members of the Zebra Nation. All Zebra employees are responsible for protecting individual privacy rights and preventing unauthorized disclosure.

WE STRIVE TO respect personal information and follow the laws designed to protect it. That means we use care when collecting, accessing, using, storing, sharing and disposing of personal information – only doing so if we are authorized and only using it for legitimate business purposes.

What is personal information?

Depending on the region, it can be any information that could be used to identify a person (including our employees, customers, suppliers and other business partners), either directly or when combined with other information. Additional requirements apply to banking information, health records and other sensitive categories of information. Examples of personal information can include an individual's:

- Personal email address
- Work email address
- Phone number
- Social Security or National ID Number
- Credit card
- Bank account number

- How can you protect personal information?**
- **Properly store, secure, transfer and dispose of personal information. Ask for guidance from the Zebra Privacy Office if you're ever unsure.**
 - **Never share it with anyone inside or outside of Zebra who doesn't have a legitimate business need to access it.**
 - **Access it only if you're authorized and only on Zebra networks and equipment – never on personal devices or unsecured or public networks.**



Connect to Our Policies

Privacy Statement

EMEA Employee Data Protection Policy

Global Privacy Policies

Q: I sometimes work with personal information as part of my job, and I work outside of the United States. The laws are different in the country where I work, so how do I know if I'm protecting personal information properly?

A: Maintaining the privacy of personal information is the right thing to do, and you're right that laws vary in different countries; so, check with Zebra's Legal Department to make sure you're following the rules specific to that country. Send any privacy questions to: privacy@zebra.com.

Caring for Our Company

We represent Zebra through our culture and accept responsibility for our decisions, actions, commitments and relationships.

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Protecting Our Assets

We're entrusted with vital Zebra assets and information, which we protect from harm or improper disclosure.

Our assets keep our Company running and innovating. They are the tools and the ideas we leverage to advance our business and help our customers. If these assets are misused or improperly disclosed, it could damage our reputation, our competitive advantage and our relationships.

WE STRIVE TO

use Zebra's assets responsibly and protect them from loss, damage, theft, fraud, waste and disclosure. Follow our Security and IT policies and procedures as well as our Trade Secret Policy to prevent unauthorized access or disclosure. Intellectual Property assets should never be used for personal use. However, physical assets may be used for business purposes or incidental personal use – and never for anything illegal or improper as outlined in our Acceptable Use Policy.

What are our assets?



Physical assets

This includes our facilities, funds, office equipment, computers, hardware, machinery, materials and products. Secure these assets and maintain them properly. If you're aware of any theft, loss or damage to these assets, Make the Right Call immediately.



Intellectual property

These assets make us uniquely Zebra. They include, but are not limited to, our designs, engineering and manufacturing know-how, inventions, plans, patents, marketing, trade secrets and copyrighted material. Secure them physically and electronically to prevent unauthorized access or disclosure.

Did you know, we don't just protect our own intellectual property? We also protect intellectual property belonging to our customers, business partners and other third-parties. Be sure to secure and protect third-party assets just like you would Zebra's own assets.

To protect Zebra's systems and technology:

- **Never share your ID or password.**
- **Never install unauthorized software onto a Zebra device or copy or transfer software licensed to us.**
- **Exercise caution when clicking unknown links or opening attachments in emails from unfamiliar external senders.**



Connect to Our Policies

Acceptable Use of Zebra Technologies' Computer Systems and Networks Policy

Company Property Policy

Trade Secret Policy

Non-Disclosure Agreement Policy

Q: I'm moving to a new city with my family and am leaving the Company. I'd like to take some of my design ideas with me to my next job – ideas that we didn't end up developing at Zebra. Is that OK?

A: No, it isn't. Any ideas you create during your employment with Zebra belong to the Company, and even if they haven't been implemented, you may not take them with you when you leave Zebra and cannot share them with anyone outside of Zebra.

Protecting Information

We take pride in our Company and protect its valuable confidential information.

Zebra's business is driven by information and innovation – creative thinking that leads to bold ideas and leading-edge products. Because our work is based largely on confidential and proprietary information, it could benefit our competitors or harm our Company if such information is misused or disclosed.

WE STRIVE TO practice vigilance to protect Zebra's confidential information, including the confidential information of our employees, partners, customers and suppliers. We understand the critical nature of this information. That's why we limit access to it so only those who are authorized and have a business need to access it may use it, and only for authorized purposes.



What is confidential at Zebra?

If information is not available to the public and/or not yet publicly disclosed, it's confidential. That includes, but is not limited to, the following:

- Financial data and sales forecasts
- Capital investment and expansion plans
- Marketing and pricing plans and strategies
- Customer lists and contact information
- Personal employee information
- Inventions, designs and processes
- Product lines, prototypes, research and testing data

How can you help protect it?

If you are exposed to confidential information through your work:

- Only share information the recipient needs to do their job. Don't share it with anyone who isn't authorized and doesn't have a need to know, either inside or outside of Zebra.
- Don't discuss confidential information in public, on unsecured networks or on social media.
- Don't share confidential information belonging to Zebra or our employees, customers or business partners without proper authorization.
- If you must disclose our confidential information with anyone outside of Zebra, make sure a non-disclosure agreement is in place and contact Zebra's Legal Department for help.

Protecting Information

Are you aware of a possible breach of our confidential information or an inadvertent disclosure? To protect the information and our Company, please immediately Make the Right Call or contact Zebra Legal for assistance.

Follow Zebra's Trade Secret Policy to protect a special category of confidential information: trade secret information.

Use care in how you save or store confidential information. Only store it or access it on approved Zebra devices that comply with Zebra's Security and IT policies and procedures.



Connect to Our Policies

- Non-Disclosure Agreement Policy
- Trade Secret Policy



Q: I'm on the team that's developing a new product. I'm so excited about it – is it OK to talk to my friends about it on social media as long as I don't give a lot of details?

A: No, it isn't. What you're working on is confidential and should only be shared with people who are authorized and have a business need to know. Any one of your friends could share the information with others, so keep this to yourself.

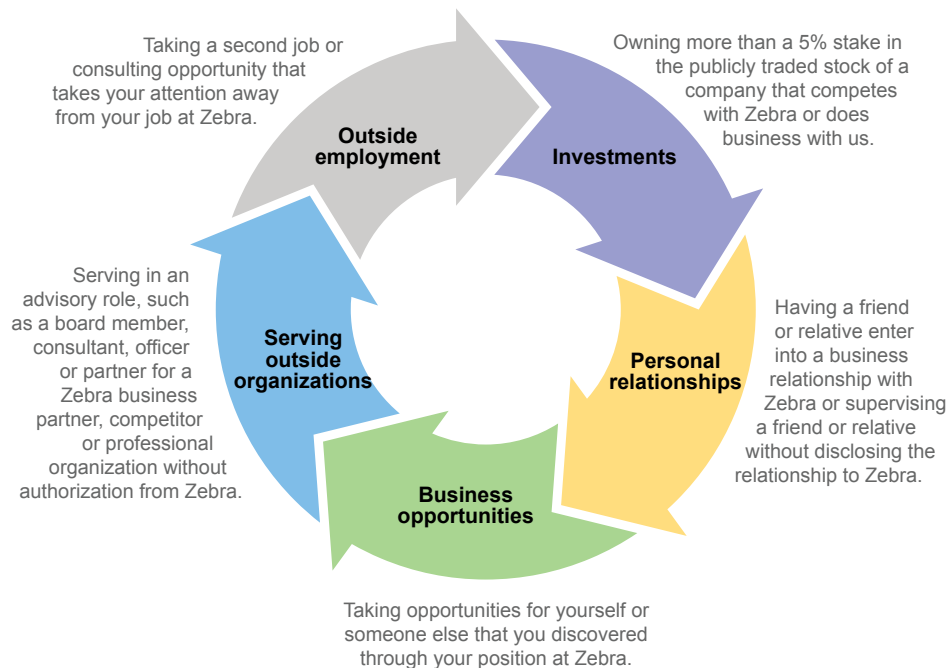
Conflicts of Interest

We are all members of the Zebra Nation and should act in our Company's best interests.

The decisions we make at work should always be impartial – never influenced by our own personal interests or relationships. If a situation like that comes up, it's a conflict of interest. Even the appearance of conflicts of interest could harm our Company, so we're committed to avoiding them.

WE STRIVE TO make sure that our personal activities don't interfere with the decisions we make for Zebra. It's up to each of us to be proactive by learning to recognize and avoid even potential conflicts of interest.

What does a conflict look like?



Sometimes conflicts of interest can be hard to recognize. If you're in a situation that makes you wonder if it's a conflict of interest, talk to your supervisor right away. Then, you can work with your supervisor and the Company to come up with a solution that avoids the conflict.



Connect to Our Policies

Conflict of Interest Policy

Related-Party Transactions Policy



Q: My sister owns a company that's bidding on a contract with Zebra. I would end up working with her, but since I'm not involved in the decision process, should I speak up about my relationship with her?

A: Yes, you should. While it's good that you're not involved in the decision process, you will be working with her if her company is selected; so, let your supervisor know about this relationship right away.

Gifts, Entertainment and Hospitality

We make business decisions ethically, without improper influence.

The exchange of gifts has long been a part of doing business, but sometimes offers can cross the line. When a gift appears to say more than “thank you,” it’s inappropriate, and it may even break the law.

WE STRIVE TO make business decisions freely – without the influence of special offers, gifts, hospitality or entertainment, and we never try to influence anyone else’s decisions in this way. Zebra relies on you to follow the law and our policies, recognize what’s inappropriate and know when to say “no, thank you.”

How do I know what’s appropriate?

A gift, entertainment, hospitality or other offer may be:

Permitted when it’s ...

- ✓ Given occasionally
- ✓ Legal
- ✓ Reasonable in value
- ✓ Related to promotion of our products and services
- ✓ Given as a token of thanks

Not permitted when it’s ...

- ✗ Creating an obligation
- ✗ Given to influence a decision or win favors
- ✗ Given to a government official
- ✗ Cash, a loan or a cash equivalent (gift cards)
- ✗ Lavish or extravagant

If you want to give a gift:

- Make sure you understand and respect the rules that apply to the recipient’s company. Violating another company’s rules could damage our relationship.

- Don’t allow an intermediary or “middleman” to offer (or accept) improper gifts on our behalf. That includes sales representatives, contractors, distributors or resellers.
- Use extra care with government officials. Zebra employees may not offer **anything** of value to government employees or employees of government-owned companies or their immediate families, including gifts of any value (even promotional items or small meals or drinks), gratuities, favors, travel or entertainment.

There are times when you’re offered a gift, and you believe you might offend the giver if you refuse it. In this case, ask for guidance from your supervisor or Zebra Legal before accepting. We can help you determine how to handle the situation politely and ethically.



Connect to Our Policies

Gifts, Entertainment and Anti-Corruption Policy
U.S. Government Contracting Addendum

Q: A vendor has offered me tickets to see a popular show that’s in town. He says he can’t go and wants me to use them. May I accept?

A: If these tickets are more than nominal value and give the appearance of trying to win favor, you should not accept them. While it’s sometimes OK to attend an event **with a vendor**, you should politely refuse the offer because the vendor is not attending the event.

Third-Parties

Our business relationships are based on mutual trust and integrity.

The way business partners work reflects on Zebra and can impact our reputation. Any unethical act, breach of trust or violation of law can have serious consequences for our partners, and subsequently, for us.

WE STRIVE TO act as trustworthy business partners and only enter relationships with organizations that share our high standards. Zebra expects any employee who works with our business partners to act fairly and ensure that third-parties follow our Code, the policies and the law.

How do we choose ethical partners?

If you help select our business partners, don't allow personal bias to enter the decision. Only consider Zebra's business needs, the products and services offered, as well as price and quality.

To ensure that we work together ethically:

- Avoid the appearance of anything inappropriate by never accepting inappropriate gifts, offers or favors from third-parties.
- Make sure our third-parties are aware of and uphold our Code and policies.
- Periodically monitor third-parties' performance to make sure they are reflecting our Values and following the law and Make the Right Call if you become aware of any concerns.

Do you know what we expect of our vendors? We ensure that they:

- **Meet our quality, safety and environmental standards**
- **Maintain a safe workplace where workers are treated fairly**
- **Prohibit the use of child labor**
- **Protect privacy and confidentiality**
- **Comply with trade and anti-corruption laws and regulations**



Connect to Our Policies

Gifts, Entertainment and Anti-Corruption Policy

Q: A vendor that we've worked with for years has been accused and found guilty of an environmental safety violation. Since their record has always been good and they've done reliable work for us, should I just let this go?

A: No, you shouldn't. Even though they have had a good record in the past, we can't ignore any new concerns, so speak up about what you've heard right away and report this information to your supervisor or Zebra Legal for assistance.

Communications About Our Company

Our words have the power to inspire or do harm, so we choose them carefully.

The things we say about our Company and our brand directly impact our reputation. Making harsh or false statements externally can cause serious damage, so it's vital that Zebra and our employees communicate with care. It's up to each of us to help ensure responsible communications.

WE STRIVE TO

Speak publicly about our Company with one voice, allowing only Zebra's Global Public Relations team and authorized individuals to communicate on Zebra's behalf. We also make sure that any statements given about our Company or our products and services are accurate and reliable.

How can I help?

Keep this in mind: if you speak for us and you're not authorized, you might mislead or offend others, or without meaning to, you could divulge confidential information or even violate the law. If you receive a request for comment, please refer the request as follows:

Requests from:

The Media, including traditional journalists as well as bloggers and influencers.

Investors, stockholders or anyone inquiring about Zebra financials.

Refer to:

The Global Public Relations team

Vice President, Investor Relations

Use special care on social media by never suggesting that you are speaking for Zebra. See [Social Media](#) for more information.



Q: I received a request for comment from a reporter, and I already answered her. Now I realize I shouldn't have, since I'm not authorized. Is it too late?

A: No, it isn't. Let your supervisor know what happened immediately. Together, you should work with Zebra's Global Public Relations team to get the right message out.

Social Media

Our social media activities are positive and can be used to promote our Company.

Social media has become an integral part of our communications – both personally and professionally. Zebra recognizes the importance of participating in online conversations and we are committed to ensuring that we participate in social media in the right way.

WE STRIVE TO communicate with care on social media, understanding and avoiding the risks involved in posting or sharing something that's proprietary, inaccurate or inappropriate. As employees, each of us has a responsibility to ensure that our social media activities align with our Code and our Values.

What should I do?

Whenever you're using social media:

- Do not create user names that reference Zebra or use your zebra.com email address as your user name.
- Refer to Zebra, but make it clear that you don't speak on Zebra's behalf – your opinions are your own.
- Safeguard Zebra, its employees' and its partners' nonpublic information, as well as personal information about colleagues, customers and business contacts.
- Focus on trying to be respectful and thoughtful – just as you would in a conversation.
- You are responsible for your actions. Anything you post that could violate our policies will ultimately be your responsibility.

What if you want to use social media for business purposes or create an account or profile dedicated to your job function? Please reach out to socialmedia@zebra.com for guidance before proceeding.



Connect to Our Policies

- Social Media Guidelines
- Social Media Policy
- Social Media Standards



Q: I have identified myself as a Zebra employee on a professional networking site. Is this OK?

A: Yes, it is. On sites designed for professional networking, it's acceptable to identify yourself and your position as a Zebra employee. Just make sure your postings are factual and professional.

Doing What's Right

We do the right thing no matter what.
We respect and maintain the highest
ethical standards.

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- 28 Anti-Money Laundering
- 29 Insider Trading
- 30 Fair Competition
- 31 Anti-Corruption and Anti-Bribery
- 32 Trade Compliance
- 33 Government Contracting
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Financial Integrity

We believe our records should fairly and accurately reflect our financial status.

Inaccurate books and poor records management can damage credibility and reputations. We're committed to complying with applicable recordkeeping policies and following our internal accounting and financial controls.

WE STRIVE TO handle our business records with care. Whether we are recording our time or preparing a financial statement, Zebra expects us to do so honestly and completely. Make sure that any information you provide for our records is complete, fair, accurate, timely and understandable.

What is a business record?

Business records include any document or data with information related to a business dealing, such as:

- Accounting reports
- Expense reports
- Timesheets and invoices
- Account reconciliations
- Vendor invoices
- Customer contracts and invoices
- Shipping records

We each play a critical role in ensuring that we appropriately record and report financial information. Follow applicable laws, internal processes and policies when creating, maintaining, retaining or destroying financial documents. Never establish any undisclosed, unrecorded or off-the-record accounts for any purpose.

Never dispose of or destroy documents in response to – or in anticipation of – an investigation or audit. Documents should only be disposed of in compliance with our retention policies and never in a way that conceals wrongdoing.



Connect to Our Policies

Global Finance Policies

Q: I just realized my supervisor attributed some of this month's sales to last quarter. What should I do?

A: Speak to your supervisor to find out why. It could be an honest mistake. However, if your supervisor refuses to correct it, talk to another manager or Make the Right Call.

Anti-Money Laundering

We keep illegal activity and illegal funds out of our Company.

At Zebra, we watch for and prevent crimes like money laundering, which happens when funds generated through criminal activity are moved through legitimate businesses to hide their criminal origin. It damages companies, clients and communities alike.

WE STRIVE TO use good judgment and pay close attention while conducting business to combat money laundering. Every Zebra employee has a responsibility to avoid questionable transactions. Know who is behind each transaction and only conduct business with reputable third-parties engaged in legitimate business activities.

What transactions are questionable?

Attempts at money laundering include questionable transactions, such as:

- Cash payments
- Payments from entities that are not party to the transaction
- Sudden changes in the pattern of transactions
- Attempts to avoid recordkeeping requirements

Each of us must stay alert and take action by reporting suspicious activity. Understand how clients use our products and services, know who is involved at both ends of a transaction and be familiar with the pattern of a customer's transactions, so you can spot if they go off course.

Money laundering is often used to hide a number of crimes, including drug dealing, terrorism, human trafficking, tax evasion and fraud. By combating money laundering, we help keep our communities safer.



Q: A third-party started making payments on behalf of a long-time distributor. What should I do?

A: Contact the distributor to confirm the details of this new arrangement. If you still have concerns, then reach out to your supervisor, Zebra Legal or Make the Right Call.

Insider Trading

We promote a level playing field for investors and support equal access to information for investors.

U.S. federal securities laws prohibit you from buying or selling Zebra common stock (including options to buy or sell common stock) on the basis of **material nonpublic information** known by you or “tipping” other persons about such information. We are committed to following insider trading laws and our own internal controls.

Insider trading is done either by:

Trading on “material inside information” (nonpublic information that could affect one’s decision to buy or sell a security) or

“Tipping” (sharing inside information with those without a legitimate business need for it).

WE STRIVE TO protect material inside information and won’t trade or tip someone else to trade based on that information. Take the time to understand the many forms inside information takes, and use caution if you have access to it in the course of doing your job.

Can you recognize inside information?

Examples of potential material inside information (information not yet made publicly available) include:

- Unreleased financial earnings or losses
- New products or projects
- Significant or potentially significant business deals
- Budgets or changes in budgets
- Changes in executive leadership
- Significant security or privacy breach or serious product security vulnerability

Through your work, you could be exposed to or learn about nonpublic inside information either about Zebra or our business partners. If so, remember that trading on inside information is not only unfair, it is illegal, so always play it safe. If you’re in doubt, treat all information like inside information until you find out more.

The consequences for violating insider trading laws can be severe, including fines or imprisonment. Be sure to ask questions if you are still unsure about how to avoid insider trading or about what kind of information is inside information.



Connect to Our Policies

All Employee Securities Trading and Confidentiality Policy
Securities Trading and Confidentiality Policy

Q: My supervisor told me that we recently gained a new customer. I don’t believe this is inside information. May I share it with a friend?

A: Not yet. If you have a question about whether something is inside information or not, it’s best to ask your supervisor before proceeding. You can also check publicly available sources. If our Company has released an official public statement about this, then it’s not inside information and you may share it.

Fair Competition

We compete vigorously and fairly and never rely on unfair tactics to succeed.

Unfair competitive practices damage our free and open market and go against Zebra's Values. We promote full and fair competition because we know it leads to innovation and improved quality.

WE STRIVE TO take care in situations where there is a potential for violation of fair competition laws. Avoid collaboration – or even the appearance of it – with competitors, and when seeking competitive information, such as commercially sensitive information related to market development, use legitimate sources. Never attempt to acquire such information unfairly or illegally.

What kinds of practices should I avoid?

Unfair competition practices can include agreements (even informal or verbal ones) with a competitor, a supplier, or a customer, distributor or reseller to:

- Set prices on selling our products and services
- Divide territories, markets or customers
- Refuse to deal with a customer or supplier for improper reasons
- Participate in any form of bid rigging (for example, when competitors agree in advance which firm will win the bid)

Deal honestly and fairly with our customers. Promote positive business relationships and never take unfair advantage of anyone by misleading or deceiving them. Win business the right way – by being truthful about our Company and what we sell. Never make inaccurate remarks about our competitors.

Improper conversations can happen at conferences or trade shows, so use care. Never discuss topics like pricing, costs, terms of sale, market segments, clients or marketing strategies with competitors. Remove yourself from any such conversations and report them to Zebra's Legal Department immediately.



Q: A channel partner just invited me to dinner to discuss his request to have an “exclusive territory.” How should I respond?

A: Decline the invitation and report the request to your supervisor or Zebra Legal as soon as possible.

Anti-Corruption and Anti-Bribery

Our success is the result of hard work and integrity, never unethical or illegal practices.

Bribery and corruption harm communities and businesses around the world. We're committed to keeping this activity out of our business and following anti-corruption and anti-bribery laws everywhere we operate.

WE STRIVE TO deal honestly with business partners, customers and third-parties – without the influence of bribes or special favors. Learn to recognize bribes and understand the anti-bribery laws that apply to your work. These laws vary around the world, but most prohibit acts like bribes, kickbacks and inappropriate favors.

Can you recognize a bribe?

Bribes come in many different forms and can be hard to spot. They can include:

- Cash, gift cards or special discounts
- Lavish gifts or entertainment
- Charitable or political contributions
- Job offers
- Personal travel reimbursement
- Stock options or securities

We can be held responsible for bribes made on our behalf by third-parties, so practice due diligence when using third-parties and monitor their work to ensure they conduct business in accordance with the law and our policies. Never hire a third-party to do something that you are not permitted to do yourself, and if you see or suspect a bribe, Make the Right Call immediately!

Violating anti-bribery laws is serious, and so are the consequences. It can lead to fines and jail time, so don't offer or accept anything of value to gain an unfair advantage or influence a business decision.



Connect to Our Policies

Gifts, Entertainment and Anti-Corruption Policy
Temptime Foreign Corrupt Practices Act ("FCPA")
and Anti-Corruption Policy



Q: I have nearly finished closing a deal with a customer, and I'm considering offering him some tickets to a sold-out concert that I can't use myself. Would this be considered a friendly gesture or a bribe?

A: Offering something like this could violate Zebra policies – even if that isn't your intent. It looks like you're doing this to encourage him to sign the deal, so don't make the offer. Win the job without the gift.

Trade Compliance

We export and import goods around the world and always follow the rules.

International trade laws govern where, how and with whom we can do business. We're committed to following these laws to honor the ethical practices of the countries where we operate and to grow our customer base.

WE maintain ethical trade practices by understanding and following trade regulations. That includes being accurate and honest, working only with reputable trade partners and avoiding potentially suspicious deals.

STRIVE TO

How do we comply?

Make sure you know who is on either side of a transaction, where products are going and how they will be used. Also, ensure that every transaction:

- Meets all regulatory requirements
- Is recorded accurately, transparently and completely
- Clearly indicates proper value, final destination and end-user
- Has all appropriate export and import licenses in place
- Involves only approved countries – not a country on an embargoed list or otherwise restricted
- Involves no restricted entities or individuals on certain government lists
- Avoids paying facilitation fees
- Ensures no participation in a boycott of any country

If you are involved in choosing our trade partners, make sure they share our Values and commitment to the law. Make the Right Call about any possible violations immediately.

Trade law violations can lead to severe penalties against our Company and anyone involved, including loss of export/import privileges or licenses, delays in future imports and exports, seizure of goods, fines and even prison time.



Connect to Our Policies

[Global Import Compliance Manual](#)

[Global Export Compliance Manual](#)



Q: A customer has requested that merchandise be delivered to its freight forwarder in the U.S. without specifying the final recipient. Since that first recipient is in the U.S., do I really need to determine the final recipient?

A: Yes, you do. Despite the first U.S. recipient, we must always know the final recipient of Zebra's goods or technology. Clearly identify the final recipient before completing this transaction.

Government Contracting

The government can count on Zebra to be a responsible and ethical partner.

When Zebra is bidding on or awarded a government contract, we have a responsibility to comply with all of the government's requirements. Violating or deviating from the bid requirement or the contract breaches the trust we have established and opens Zebra up to potentially serious legal consequences.

WE STRIVE TO act with integrity when seeking and fulfilling government contracts, responding to investigations or interacting with government representatives. Zebra relies on each of us to understand and follow the laws that apply to these situations and submit accurate and complete information.

What does it mean to act with integrity?

Whenever you are involved in government contracts or interactions:

- Focus on building open, honest and transparent relationships with government officials.
- Follow the rules related to the procurement process and Zebra's compliance commitments.
- Submit timely and accurate information when fulfilling government requests – never submit a false or fraudulent claim.
- Cooperate fully and honestly with government investigations and audits.
- Act ethically with government officials, never offering them anything of value.

If you become aware of any investigation by a government or regulatory agency that involves Zebra, contact Zebra's Legal Department right away. Then, the Company can take steps to prepare and respond appropriately.

Keep in mind that government contracts are usually more strict than other contracts and may have additional obligations, so it's important to use extra caution and never cut ethical corners.



Connect to Our Policies

U.S. Government Contracting Addendum
Gifts, Entertainment and Anti-Corruption Policy

Q: I have learned that a government official will be visiting our facility as part of an investigation. A coworker advised me to destroy some documents that we have been asked to provide. Is this OK?

A: No, it isn't. Destroying any documents requested by the government violates our policy and possibly the law, and should be reported to Zebra Legal. Please immediately report to Zebra Legal any visit by a government official to a Zebra location, whether the official's visit is known or unannounced.

Charitable and Political Activities

We contribute to causes and communities independently and responsibly.

Zebra is proud to engage and invest in the communities where we live and work. We believe it's vital to support our employees' desire to contribute to the causes they're passionate about – it benefits people everywhere and builds a collaborative and inspired workforce.

WE STRIVE TO make a positive impact in our communities. Zebra encourages us to be responsibly involved in charitable and political activities. It's a mission that requires a personal commitment of time and resources and a commitment to our Values.

How can I get involved?

- First, get involved in Zebra's Global Community Relations Program, which gives you a variety of ways to volunteer.
- **If you get involved in charitable or political activities outside of Zebra-sponsored events, make your contributions using your own time and resources. Don't take any actions or make donations in Zebra's name or use Company resources to support your particular cause.**
- If you volunteer for any Zebra-sponsored event, let your supervisor know if you will be volunteering during work time. Zebra offers two special volunteer programs for you to get involved in:
 - **Volunteer Community Service Days** – Get paid time off to volunteer with an eligible charity during regular business hours.

- **Donations for Doers** – Volunteer for an eligible charity, and Zebra will donate up to \$200 to that organization for every 8 hours of service (up to \$800 per year).

→ Remember that getting involved is purely voluntary, so don't pressure your colleagues to support or donate to your causes.

Keep in mind that Zebra does not typically endorse any political candidate or make political contributions. Any Company contributions must be *pre-approved* by our Senior Vice President, General Counsel and Corporate Secretary.

Q: I have a family member who is running for a local government position. I'm a manager and would like to encourage members of my team to volunteer. Is that OK?

A: No, it isn't. Because you're a manager, your employees may feel as if they're being pressured to participate. You can let them know that you support this candidate, but that's all.

Being Our Best

We take pride in rolling up our sleeves to get things done and to exceed the expectations of our customers, our partners and each other.

- 36 Quality
- 37 Customer Experience
- 38 Corporate Citizenship
- 39 Environmental Stewardship

Quality

We freely challenge the status quo to advance our business and help our customers.

Decades of innovation and hard work go into every Zebra product. Our customers choose our products for this very reason, and we won't let them down. Anything less than our best could damage our reputation and our relationship with our customers.

WE STRIVE TO

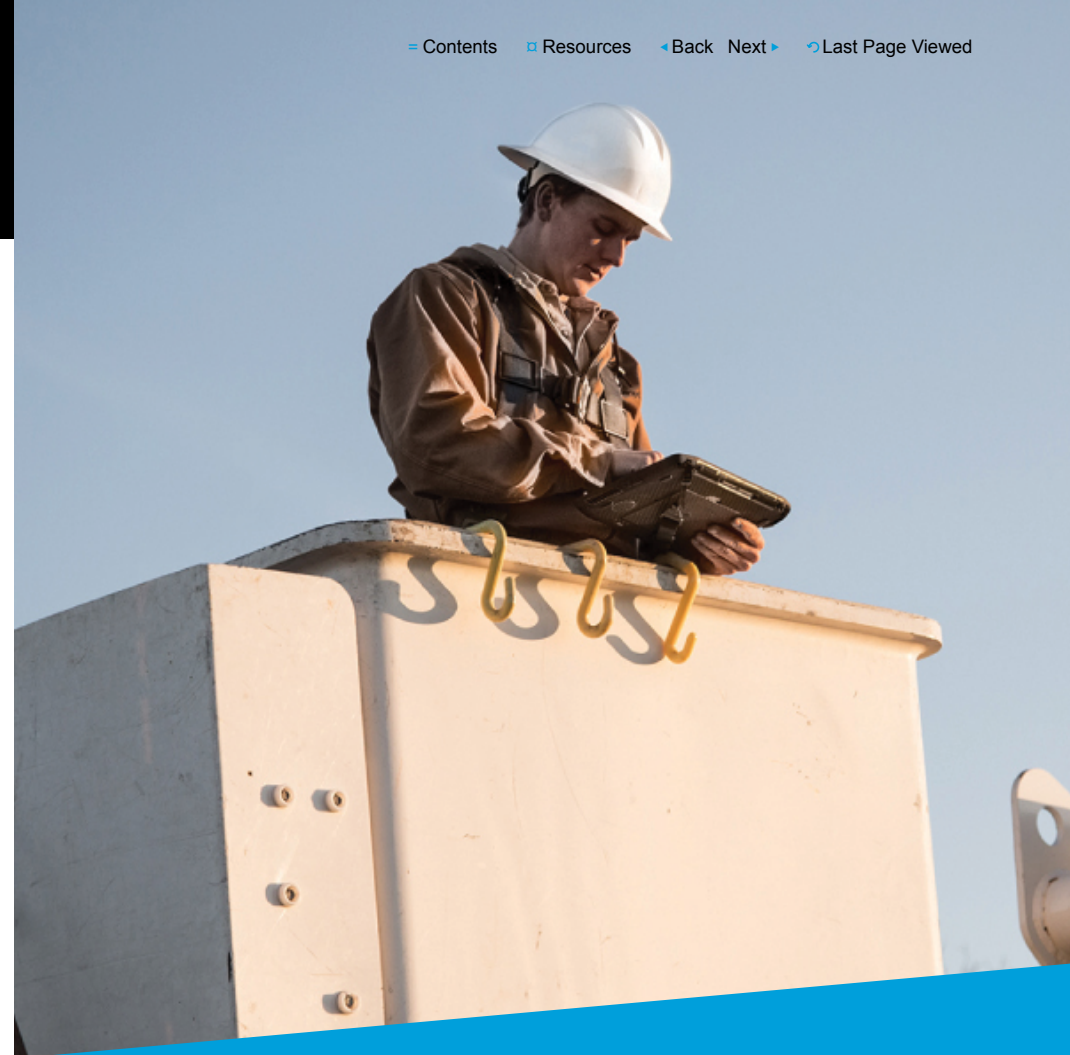
hold ourselves to the highest standards of quality. That's what we're known for, and each of us has a responsibility to preserve that reputation by complying with product standards and regulations, protecting our supply chain and demanding the best from ourselves and our third-parties.

What can I do?

Take pride in the products we provide. You can help in your daily work by:



If you ever become aware of anyone, whether a Zebra employee or a third-party, compromising our quality or safety standards, speak up about your concerns immediately by reporting your concerns to your immediate supervisor, HR Business Partner, Zebra Legal or Make the Right Call.



Q: My work involves manufacturing our products. A coworker suggested a change to our process that will speed things up, but I believe may also compromise our quality. Which is more important?

A: While we always consider factors like efficiency, costs and marketability, quality is always an important consideration that should be included in any final decision.

Customer Experience

Our business partners trust us to act fairly and honestly in everything we do.

At Zebra, we don't just sell to our partners – we build long-term relationships with them, based on trust and transparency. That is why we're committed to ensuring that every interaction we have with our partners enhances that relationship.

WE STRIVE TO put our business partners and customers first. Their satisfaction is our number one goal, so we use care in our dealings and communications with them. We focus on delivering superior products and services and never act unethically with our partners and customers or knowingly compromise their satisfaction.

What can I do?

If your work involves interacting with or communicating with partners and customers:

- Be truthful. Everything we tell our partners and customers must be reliable, including our marketing and advertising.
- Deliver the highest level of customer service, always being helpful and transparent.
- Never make misleading or false claims. Be able to back up any claims with documented evidence.
- When comparing our products to those of our competitors, be truthful and fair.

Remember, we are responsible for any claims we make about our products and services – even if someone misinterprets a claim we make. Always promote our products in a way that cannot be misinterpreted.



Q: I work in marketing, and a coworker suggested that we say in a white paper that our competitor's product doesn't follow the same quality standards as ours. If I only hint at it, is it OK to say this in our white paper?

A: Maybe. Remember that any claims like this must be truthful. Make sure you can substantiate this claim with documented evidence. If you can't, you shouldn't include it in the white paper.

Corporate Citizenship

We believe in doing good – benefiting lives and communities wherever we work.

Zebra's reputation is built on more than our products and services. We're known for our good works and our commitment to making a positive impact on our world.

WE STRIVE TO be a good corporate citizen, being mindful of the social and economic impact of our actions. Zebra expects each of us to ensure a positive impact by upholding the law and making ethical and responsible choices.

What can you do?

You play a critical role by using care in your actions and remembering to:

- Get to know the employment laws that apply to our Company and follow them carefully to ensure fair pay, hours and working conditions for our employees, contractors and business partners.
- Make sure that neither Zebra nor our business partners use forced labor or purchase materials or goods produced in this way.
- Follow Zebra policies and perform due diligence at the time of appointment of any business partner.
- Make the Right Call if you see or suspect activity that violates our Code or our commitment to corporate social responsibility.

You can help improve Zebra's reach within local communities by searching for opportunities to promote investment, employment and good works in these areas. Look into Zebra's Global Community Relations Program for more information and to get involved.



Q: I'm involved in purchasing raw materials for our products. I've found a new supplier who could provide the same materials but focuses more on sustainability and fair wages in their operations. I'm happy with our current supplier, but should I look into this new one?

A: Yes, you should. Zebra welcomes opportunities to promote sustainable and fair practices throughout our supply chain. Let your supervisor know about this new supplier and consider them as a potential resource.

Environmental Stewardship

We are committed to making a positive impact on our world.

Like every business, Zebra's operations affect our environment. From how we use our resources to how we manufacture and distribute our products – it all has an impact.

WE operate in an environmentally friendly manner. It's up to each of us to recognize our responsibilities as individuals and make decisions that help minimize Zebra's environmental impact.

STRIVE TO

Be a good steward.

- Use our resources responsibly in your daily work. Whenever you can, recycle materials like paper, bottles and cans.
- Conserve resources in our facilities like water, electricity and paper.
- Follow our procedures for storing, handling and disposing of waste and hazardous materials.
- Use sustainable practices whenever possible and try to identify third-parties who share our commitment to environmental protection when you are sourcing materials.

Watch for and report possible violations of environmental laws or our policies. Report acts like:

- Improper waste disposal
- Chemical or pollutant leaks, spills or improper dumping
- Improper storage or transportation of hazardous materials



Connect to Our Policies

Global Environmental Policy



Q: I have noticed some wasteful practices in our facility. What should I do about it?

A: Speak up about your concerns to your supervisor. We're always open to new ideas about conservation and environmental protection. Your idea may be implemented, so don't keep it to yourself. Reach out to the Environmental, Health and Safety Team.

Closing Thoughts

Thank you for reading Zebra's Code of Conduct. By taking its guidance to heart, you're showing your commitment to our Values and our future. We ask that you keep the Code in mind, use it often and let it serve as your guide to your good works and good decisions.

If you have any questions about what you've read in the Code, please speak up. Ask your supervisor for help or contact one of the [Helpful Resources](#) listed in the Code. We also welcome your questions or thoughts about the Code or any of our Company policies.

At Zebra, we're reinventing how businesses operate at the enterprise edge. Being a part of Zebra Nation, we accept responsibility for doing business with integrity and creating an environment where everyone can grow, develop and contribute towards Zebra's success.

REMEMBER,
COMPLIANCE
STARTS WITH YOU!



Helpful Resources

Zebra has a variety of options for you to seek guidance and report concerns:

Issues or Concerns	Contact
To ask questions, report potential misconduct or other ethical concerns	Your immediate supervisor, HR Business Partner or a member of Zebra’s Legal Department for assistance. Or to report using the “Make the Right Call” hotline either: Go online Visit tnwgrc.com/zebra Or Call toll-free In the United States or Canada – 888-361-5808 Outside the U.S. and Canada, visit tnwgrc.com/zebra to locate your country access code and phone number to place a toll-free call.
For legal questions	https://zconnect.zebra.com/legal
For financial questions	https://zconnect.zebra.com/finance
To view Company policies and see guidelines for your particular location	Please check zConnect to identify relevant policies. https://zebra.sharepoint.com/Employee%20Central/Pages/Global-Human-Resources-Policies.aspx
To see guidelines for your location	Please check zConnect for your relevant region’s guidelines.
For information about Company benefits	Human Resources Department https://zebra.sharepoint.com/Employee%20Central/Pages/default.aspx
For media inquiries	https://zconnect.zebra.com/Marketing/GlobalIPR
For inquiries from shareholders or investors	InvestorRelations@zebra.com

Zebra supports your right to speak out publicly about matters of public concern or to engage in certain activities related to the terms and conditions of your employment. Nothing in this Code or in any of our policies is intended to limit or interfere with your right to engage in those activities protected under Section 7 of the U.S. National Labor Relations Act, such as discussions about wages, hours, working conditions, health hazards and safety issues.