

# Consolidated Modern Slavery Statement

## FY24

### Zebra Technologies Corporation

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## Introduction

The Australia Modern Slavery Act (2018), the California Transparency in Supply Chains Act of 2010, the UK Modern Slavery Act of 2015, and the Canada Fighting Against Forced Labour in Supply Chains Act (S.C. 2023, c.9) require certain businesses to outline the steps they have taken to address that slavery and human trafficking are not taking place in any of its supply chains or its own business. 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.

This statement is designed to meet the expectations and reporting obligations under the acts for the Reporting Entities noted in this statement and sets forth the steps taken by the Reporting Entities for the financial year ending 31 December 2024.

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.

## Reporting Entities

The below wholly owned subsidiaries of Zebra are providing this statement in accordance with the acts noted and is effective on the dates set forth in the respective signature pages or if no signature page is provided on May 31, 2025.

- Zebra Technologies Australia Pty Ltd (ABN 14 153 920 462) (“ZTAPL”) is the operational business in Australia. As the entity carrying on business in Australia, ZTAPL is providing this statement pursuant to the Australia Modern Slavery Act of 2018.
  - Zebra Technologies (New Zealand) Limited (“ZTNZL”) is a wholly owned subsidiary of ZTAPL operating in New Zealand. As ZTNZL forms part of the Zebra group of companies where the processes are aligned across the group, this statement would similarly apply to ZTNZL. ZTAPL consulted ZTNZL in the development of this statement.
- Zebra Technologies Corporation (“ZTC”) is the operational business in the United States. As the entity carrying on business in the United States, ZTC is providing this statement pursuant to the California Transparency in Supply Chains Act of 2010.

- Zebra Technologies Europe Limited (“ZTEL”) is the operational business in the United Kingdom. As the entity carrying on business in the United Kingdom, ZTEL is providing this statement pursuant to the UK Modern Slavery Act of 2015.
- Zebra Technologies Canada, ULC (“ZULC”) is the operational business in Canada. As the entity carrying on business in Canada, ZULC is providing this statement pursuant to the Canada Fighting Against Forced Labour in Supply Chains Act (S.C. 2023, c.9)
  - Matrox Electronic Systems Ltd. (“MES”) is a wholly owned subsidiary of ZULC operating in Canada. As MES forms part of the Zebra group of companies where the processes are aligned across the group, this statement would similarly apply to MES. ZULC consulted MES in the development of this statement.

## About Us and Our Supply Chain Practices

Zebra is a global leader in the Automatic Identification and Data Capture (“AIDC”) industry. The AIDC market consists of mobile computing, data capture, radio frequency identification devices (“RFID”), thermal barcode printing, and other workflow automation products and services. Zebra’s products, services, and software solutions (“offerings”) are proven to help our customers and end-users digitize and automate their workflows to achieve their critical business objectives, including improved productivity and operational efficiency, optimized regulatory compliance, and better customer experiences. We design, manufacture, and sell a broad range of AIDC offerings, including mobile computers, barcode scanners and imagers, RFID readers, specialty printers for barcode labeling and personal identification, real-time location systems (“RTLS”), related accessories and supplies, such as labels and other consumables, and related software applications. We also provide machine vision and robotics automation solutions; a full range of services, including maintenance, technical support, repair, managed and professional services; as well as cloud-based software subscriptions. End-users of our offerings include those in retail and e-commerce, manufacturing, transportation and logistics, healthcare, public sector, and other industries. We operate in 114 facilities with approximately 9,900 employees worldwide. We provide our offerings globally through a direct sales force and an extensive network of over 10,000 channel partners, operating in approximately 176 countries.

Final assembly of our hardware products is performed by third parties, including electronics manufacturing services companies (“EMSs”) and joint design manufacturers (“JDMs”). Our products are currently produced in facilities primarily located in the Asia-Pacific region, including China, Taiwan, Vietnam, and Malaysia, as well as Mexico. The EMSs and JDMs produce our products to our design specifications. We maintain control over portions of the supply chain, including supplier selection and price negotiations for key components.

The manufacturers generally purchase all the components and subassemblies used in the production of our products. Our products are shipped to regional distribution centers, operated by third party logistics providers or the Company. A portion of products are reconfigured at the distribution centers through firmware downloads, packaging, and customer specific customization

before they are shipped to customers. In addition, certain products are manufactured in accordance with procurement regulations and various international trade agreements and remain eligible for sale to the U.S. government. Production facilities for our supplies products are located in the U.S. and Europe. We also supplement our in-house supplies production capabilities with third party manufacturers, principally located in Asia-Pacific. Repair services for our products are performed by either our own operations or through third parties, with repair service hubs located in each of the regions in which we serve our customers.

## Zebra's Policies

Zebra is a member of the Responsible Business Alliance ("RBA") 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's commitment to doing business with high standards of compliance and business ethics is set forth in its Code of Conduct ("Zebra's Code") and is reinforced by Zebra's Chief Executive Officer and senior management. Zebra's Code 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 18 languages and calls on all employees to be actively involved in the detection and prevention of potential misconduct by employees or third party suppliers to Zebra. Zebra employees with compliance concerns may report these to their manager, the Compliance and Ethics team, or through Zebra's "Make the Right Call" Program, which offers a confidential and anonymous mechanism for reporting concerns or allegations of misconduct, where legally permitted, via an online system or toll-free phone numbers accessible in over 30 countries. Information on Zebra's "Make the Right Call" Program is posted online and at each of its locations and concerns may be reported 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.

Zebra's Compliance Committee leads the organizational design, implementation, and oversight of Zebra's Compliance and Ethics Program. Through the Compliance and Ethics Program, Zebra's 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. Zebra's Compliance Committee consists of the individuals serving in the following Zebra positions: Chief Compliance Officer, Chief Legal Officer, Chief People Officer and Vice President, Internal Audit.

## Risks and Supplier Audits

Zebra takes into consideration the risks associated with operating a vast supply network consisting of numerous suppliers and manufacturers around the world. The use of bonded, short-term, or outsourced, workers is a key risk which must be monitored by Zebra. 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 in conjunction with official RBA external audits. These annually 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. Two separate audits are held, a virtual document audit and an on-site inspection audit conducted by a trained Zebra auditor or member of Zebra's Supply Chain CSR Team. The document audit covers around 100 different policies and procedures undertaken by the supplier to adhere to the core principles of responsible manufacturing. These audits cover the following areas: Labor, Environment, Health & Safety, Ethics, and Management Systems. Documents relating to a supplier's policies and activities to address forced labor, bonded labor, foreign worker fees, withholding of passports, child labor, and other major topics of Modern Slavery are asked to be submitted to the Zebra Supply Chain CSR Team and reviewed. If there are any questions, clarifications, or actions needed by the supplier, Zebra will request this and if necessary, escalate any failure to respond to the supplier's leadership. All documents are reviewed to ensure their validity, thoroughness, and their revision frequency. The on-site portion of the CSR Audit includes another set of questions relating to the health and safety of the facility and its workers. The designated Zebra auditor will inspect the facility and, if any non-conformances are found, will document this, provide photographic evidence, and submit this evidence to the Supply Chain CSR Team. Non-conformances relating to both the Document and On-Site Audits are reviewed with the supplier. Non-Conformances are classified according to their severity: Opportunity Improvement, Minor, Major, and Priority. Each supplier is responsible for creating a Corrective Action Plan ("CAP") to implement corrective actions to resolve non-conformances (and provide evidence of resolution) within a defined period of time depending on the type of non-conformance. CAP progress is regularly monitored by Zebra's Supply Chain CSR Team. Audit finding closure status is confirmed by Zebra's Supply Chain CSR Team if corrective actions are identified. If there is a Priority finding (serious violation) identified in an audit, Zebra procedures require escalation to a Zebra CSR Leader, 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 constantly monitors and remains mindful of the effective procedures and processes set forth by the UN Guiding Principles and other internationally accredited institutions, laws, and leading industry practices pertaining to Modern Slavery and the risks they pose to Supply Chain. Zebra will continue to assess the efficiency of our internal procedures, ensuring that we not only remain vigilant in identifying and managing Modern Slavery risks but serve as an industry benchmark. Zebra expects our suppliers to both respect and adhere to our CSR initiatives and help us in our mission to continuously improve our efforts as a partner in this space.

## Training

Zebra provides annual mandatory training on Zebra's Code and requires all existing and new employees to certify and acknowledge that they have read, understand, and agree to comply with Zebra's Code. In addition, all new and existing employees are also required to take training in specialized areas as part of Zebra's Core Compliance Training Program. This training also provides designated employees on what constitutes slavery and human trafficking in the supply chain, how to identify, and ways to address suspected violations.

## Statement Approval

For the purpose of the UK Modern Slavery Act 2015, this Statement has been approved by the board of Zebra Technologies Europe Limited and signed by a director (signature attached).

For the purpose of the Australian Modern Slavery Act 2018, this Statement has been approved by the board of Zebra Technologies Australia Pty Ltd and signed by a director (signature attached).

For the purpose of the Canada Fighting Against Forced Labour and Child Labour in Supply Chains Act (S.C. 2023, c.9), this Statement has been approved by the board of **Zebra Technologies Canada, ULC**. This Statement has been signed by a director who has the authority to bind Zebra Technologies Canada, ULC (signature attached).

## Statement Signatures

Signed by Tim Stoddard on behalf of Zebra Technologies Europe Limited

By:  on Jun 13, 2025



Signed by  Loke Weng Hong Adrian on behalf of Zebra Technologies Australia Pty Ltd.

Jun 13, 2025

By: \_\_\_\_\_ on \_\_\_\_\_

Signed by Derek Spychalski, Vice President and Secretary on behalf of Zebra Technologies Canada, ULC

By:  on 29 May 2025

# Zebra Consolidated Modern Slavery Statement FY2024

Final Audit Report

2025-06-13

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