

# Gifts, Hospitalities, and Entertainment

March 2017

## Our position

Zebra A/S recognizes the importance of establishing and cultivating our business relations around the globe. Our practices are conducted responsibly and with integrity and we expect the same approach from our partners and suppliers. Gifts, hospitalities, and events are a common part of business and cultural interactions; however, they must be aligned with our values and be within legal limits.

We do not offer, give, or accept gifts, entertainment, or any other advantages, if they exceed local triviality limits, affect decision making objectivity and/or improperly influence the outcome of a business transaction. Gifts, entertainment, and hospitality are only acceptable if they are reasonable, proportionate and made in good faith.

## Key rules

We do not, and encourage our business partners and suppliers to not, offer, accept a gift, or participate in an event that conflict with the following key rules. Gifts, hospitalities, and entertainment offers must:

- Be reasonable and have a legitimate business purpose, e.g. no hospitality can be offered outside of a business interaction.
- Not interfere with the exercise of independent judgement in the best interest of Zebra A/S, e.g. to influence the outcome of a sourcing decision.
- Be occasional, transparent and given openly, e.g. seasonal gifts that do not breach our value limits are acceptable and must always be accepted on behalf of Zebra and not as personal gifts.
- Comply with the law, e.g. must be in line with national anti-corruption law.
- Be consistent with local custom and practice, e.g. be aligned with local business traditions and not be extravagant and culturally inappropriate.
- Not violate the giver's or receiver's policies on the matter, e.g. the Zebra Business Ethics Policy.
- Never be cash or equivalent to cash, e.g. gift cards or coupons.

## Limits for gifts and hospitalities

Symbolic gifts may express appreciation of business relations, however they are required to be reasonable.

- Flying Tiger Copenhagen can only offer gifts that are among our product range.
- We can only accept gifts of symbolic value and fall below **500 DKK/67 EURO**.
- Other countries may have deviating limits; we will not accept higher limits, but lower if this is defined in local law.

We acknowledge that hospitalities legitimately serve as means to establish and strengthen business relations.

- It is acceptable to participate in and offer social events and hospitalities (breakfast, lunch, dinner), however the amount (per occasion, per person) may not exceed **100 EURO**



## When in doubt

Always use your common sense to assess whether gifts and hospitalities are of reasonable value and within triviality limits. When in doubt, always consult your manager(s) and/or the Zebra A/S Head of CSR & Compliance.

