



Recycling Standard for End-Of-Life Devices & Batteries

WWP-230351.002

Rev	Document Owner
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002	Caroline Kennedy (Sustainability)

Definitions

The following defined terms and acronyms are used in this document.

Term	Definition
End-of-life devices	Logitech-branded end-of-life devices, which are dependent on electric current or electromagnetic fields to operate. (aka: Waste Electronic or Electrical Equipment - WEEE)
End-of-life (EoL)	A device, packaging or battery that has reached the end of it's useful life
End-of-life management	The series of steps that are taken to ensure environmentally sound management.
Logitech Partner	Any organisation working in partnership with Logitech to manage end-of-life devices and batteries, having committed to uphold this Recycling Standard
Recycling	Management of end-of-life Logitech assets to enable recovery of materials for reuse.
Recycling Notes	Documented evidence of quantities recycled, where appropriate for Logitech corporate stewardship scheme reporting.
Waste Hierarchy Principle	This principle aims to minimize the generation of waste, by following a hierarchy of preferred environmental management: 1) reduce waste arising, 2) reuse with Logitech authorisation 3) recycle and 4) incinerate for energy recovery 5) incinerate with no energy recovery 6) landfill
WEEE	Waste Electronic or Electrical Equipment - WEEE aka: End-of-life devices

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1. Purpose

Logitech is committed to protecting natural resources, the environment, and the health and safety of our employees, customers and the communities where we operate. Wherever possible, end-of-life devices, batteries and associated packaging materials should be segregated from household waste and recycled to give materials and components a second life.

This standard defines Logitech's minimum requirements for managing Logitech end-of-life (EoL) devices, batteries and associated packaging materials.

2. Scope

The requirements set out in this standard apply to:

- end-of-life devices;
- end-of-life batteries; and
- associated end-of-life packaging materials.

The requirements set out in this standard apply to all Logitech Partners working for or on behalf of Logitech to directly or indirectly manage end-of-life devices and batteries, including but not limited to those from:

- Logitech EoL stewardship programs;
- Customers; and
- Logitech offices, warehousing, distribution and manufacturing facilities.

3. Roles, Responsibilities & Authorities

Roles, responsibilities and authorities associated with this standard are defined in the following table.

Role	Responsibilities
Logitech Sustainability	<ul style="list-style-type: none">• Own and maintain this standard.• Review this standard on a periodic basis and update requirements, where necessary to ensure it continues to align with, and reflect, relevant legal requirements, established good practice, including Logitech policy• Communicate this standard to relevant functions within Logitech• Implement training and awareness-raising activities to support implementation, where appropriate• Carry out due diligence activities, where necessary to verify compliance, where relevant
Logitech Legal	<ul style="list-style-type: none">• Ensure this standard is referenced in Logitech contractual agreements with relevant partners

Logitech Partners	<ul style="list-style-type: none"> • Manage end-of-life devices and batteries in compliance with all relevant legal requirements and Logitech requirements, as set out in this standard.
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4. Recycling Requirements

- **Sustainability Commitment:** Partners shall appoint a competent “Management Representative for Sustainability”, to act as a point-of-contact for Logitech Sustainability. Logitech Partners shall notify Logitech prior to changing the individuals appointed to this role.
- **RBA Code Compliance:** Logitech Partners shall comply with the current version of the RBA Code of Conduct (here: <http://www.responsiblebusiness.org/code-of-conduct/>) or equivalent standards¹.
- **Legal Compliance:** End-of-Life devices, batteries and associated packaging materials shall be managed in accordance with all applicable laws and regulations
 - Suppliers and facilities shall maintain all applicable regulatory approvals
 - Evidence of compliance shall be available for review, on request.
- **Good Practice Management Systems:** Logitech Partners shall maintain ISO 14001, and OHSAS 18001 (or equivalent) certifications. Evidence of certification shall be available to Logitech, on request.
- **Good Practice Recycling Standards:** Logitech Partners shall ensure recycling activities are carried out by suppliers with R2, RIOS, E-steward or equivalent good practice standards. Evidence of certification shall be available to Logitech on request.
- **Waste Separation:** End-of-life devices, batteries and associated packaging materials shall not be disposed of with household waste. They shall be segregated from household waste and each other, to optimise resource recovery and recycling and to ensure the safety of recyclers.

¹ For example, ISO14001 and OHSAS 18001 are accepted as equivalent to RBA Code Requirements in Section B (Health & Safety) and Section C (Environment)

- **Waste Hierarchy:** management of end-of-life devices, batteries and associated packaging shall adhere to the Waste Hierarchy:
 - Reduce: Manage sales and product delivery and quality to maximise the successful launch of products and avoid waste, product breakage and customer returns;
 - Reuse: Consider opportunities to refurbish or rework returned product to enable resale or donation, where appropriate, with Logitech's authorisation;
 - Recycle: Recycle products in a responsible manner.
 - Zero Landfill: In addition to any restrictions imposed by law, every reasonable effort should be made to ensure that no portion of the end-of-life devices, batteries or packaging, including residuals and byproducts, shall be sent to a landfill facility, where a more sustainable alternative solution is available.

- **Waste Export:**
 - End-of-life devices and batteries shall not be exported unless such exports are in compliance with all applicable laws and international laws such as those pertaining to the transboundary movement of hazardous waste e.g. Basel Convention.

- **Hazardous Materials Management:** Hazardous materials shall be managed in accordance with all relevant legal requirements to ensure legal compliance and the health, safety and wellbeing of workers engaged in recycling activities, and environmental conservation.

- **Subcontractor & Supply Chain Management:** Logitech Partners shall:
 - Select and manage subcontractors to ensure they hold all appropriate licenses and registrations, and operate in conformance with all applicable laws and regulations and Logitech requirements.
 - Carry out periodic due diligence activities (e.g. audits) of facilities, processes and subcontractors, where necessary to verify compliance.
 - Allow Logitech access to audit records and facilities, on request and on establishment of a mutually agreed NDA.

- **Cooperation & Reporting:** Cooperate with Logitech's efforts to check, verify and demonstrate compliance with applicable legislation, stewardship reporting requirements, annual Sustainability Reporting and good practice standards. More specifically, Logitech Partners shall:
 - Respond promptly to any requests for information and/or requests for corrective action.

- Provide reasonable evidence of recycling². where requested by Logitech.
- Provide access to facilities, records, products, materials and equipment, where necessary to facilitate auditing by persons working for or on behalf of Logitech.
- Logitech Partners shall notify Logitech of any non-conformance with this standard and provide Corrective Action Reports where necessary - specifying the actions needed to address any issues that were identified, and improve performance, along with timeframes for implementation of actions and associated roles, responsibilities, and resources.

6. Revision History

Version	Author	Key Changes	Reviewed	Approved	Approved Date
001	C. Kennedy	First Draft	C O'Driscoll N. Kalita U. Rochat R. O'Mahony	R. O'Mahony	July 2019
002	C. Kennedy	Replaced "EEE" with "Devices" Refined definitions Expanded scope to include Logitech Partners who are signatory Streamlined R&R sections Improved addressal of packaging Amended reporting requirements to clarify templates will be provided offline of this standard	N. Kalita	C. Kennedy	Jan 2021

² Specific requirements vary, depending on the nature of the Supplier Partner activities. A template for reporting will be provided to the Logitech Partner by Logitech