

Logitech's Policy on Sourcing of Conflict Minerals

On August 22, 2012, the final rule regarding sourcing of conflict minerals under Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act") was approved by the U.S. Securities and Exchange Commission ("SEC"). The rule imposes reporting requirements on publicly traded companies subject to the SEC to report annually the presence of conflict minerals originating in the Democratic Republic of the Congo ("DRC") or adjoining countries in the products they manufacture, or contract to manufacture, where the conflict minerals are necessary to the functionality or production of a product.

What is Logitech doing about Conflict Minerals?

Logitech is taking all steps to comply with the legislation and is implementing a due-diligence process to meet our obligations. We are committed to sourcing components and materials from companies with shared values around human rights, ethics and environmental responsibility.

As a manufacturer of products that contain gold, tantalum, tin and tungsten, it is Logitech's policy to refrain from purchasing from any known conflict mineral sources and we expect that our suppliers adhere to these same standards. We have notified all our suppliers of this policy on conflict minerals and have asked each supplier to provide us with a confirmation of their conflict-free status.

Logitech is a member of the [Electronics Industry Citizenship Coalition \(EICC\)](#), which is a coalition of electronics industry companies committed to improving social and environmental conditions in the electronics supply chains. We are actively engaged in the work of the EICC coalition specifically on conflict minerals where EICC is developing a process that companies can use to track the origin of conflict minerals regardless of the industry they will be used in.

How is the EICC facilitating Logitech's compliance with Conflict Minerals requirements?

The EICC launched its Extractives Work Group in 2008 to look in-depth at the metals that are most abundant in electronics, including the "conflict minerals" used to make tantalum, tin, tungsten, and gold.

Tracing materials back to their mine of origin is a complex aspect of responsible sourcing in the electronics industry supply chain. For each of the conflict minerals, the EICC took an active role in pulling together stakeholders throughout their respective supply chains to discuss the challenges with tracing the chain of custody of minerals.

In 2011, the EICC launched the world's first [conflict-free smelter \(CFS\) program](#), which tracks documentation from the smelter back to the mine of origin. The CFS program is a global program where an independent third party evaluates a smelter's procurement activities and determines if the smelter demonstrated that materials they processed originated from conflict-free sources. Through this industry collaborative effort, smelters are audited globally.

In the same year, Logitech began the process of outreach to our supply chains to educate and inform our supply chain on the topic of Conflict Minerals and to outline our expectation of compliance to a Conflict Free supply chain. Please see our [Conflict Free statement](#) for more specific details.

Since 2011, Logitech continues to support the work of the EICC and its proposed CFS program to support an industry-wide approach to addressing social responsibility issues throughout the supply chain. The benefit of the industry combined CFS program is that industry can look at these issues more strategically and holistically than any individual company by, for example, influencing the social and environmental performance of the entire mining sector.

In parallel to Logitech's activities with EICC, we continue surveying suppliers in our supply chain to understand what programs they have in place to track the source of minerals used in the products they manufacture. Due to the enormity of Logitech's and its suppliers' respective supply chains, it will take time for many suppliers to verify the origin of conflict minerals used in their components and materials. Using our supply chain due diligence process, driving accountability within the supply chain through the EICC Conflict Free Smelter program, and continuing our partnership with the EICC will further augment our goal of conflict-free sourcing.

What is Logitech's Supply Chain Expectation for Conflict Minerals?

Logitech expects its suppliers to commit to the EICC Code of Conduct which includes a provision related to the responsible sourcing of minerals. Pursuant to that Code of Conduct, suppliers must have a policy to reasonably assure that the tantalum, tin, tungsten and gold in the products they manufacture are conflict free. Logitech expects suppliers to establish their own due diligence program to ensure conflict-free supply chains. Logitech also requires our suppliers to undertake reasonable due diligence to determine if the specified metals are being sourced from certified conflict-free smelters validated as compliant to the CFS protocol, using the CFS Compliant Smelter List and, if not, to make deliberate progress towards doing so.

The list of compliant smelters and refiners is posted at www.conflictreesmelter.org.

Logitech is working toward the goal of responsible sourcing globally, including from the DRC, through a conflict-free supply chain, confirmed by a robust verification system.



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