



Global Specification for the Environment (GSE)

Recycling Standard

WWP-230351.003

Definitions

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

Term	Definition
Downstream contractors	Any third party who provides services to or on behalf of Logitech's partners with respect to recycling, reuse, or disposal of end-of-life devices.
End-of-life devices	End-of-life devices, and associated parts, components or materials, which are dependent on an electric current or electromagnetic fields to operate, with the following exceptions: <ul style="list-style-type: none"> • Used devices for repair under warranty or for assessment for refurbishment or repair, with the intention of re-use; • Materials defined as non-hazardous under the Basel Convention; • Working equipment and parts that are not intended for disposal or recycling, but are for donation, reuse or resale; • Components being returned to the original equipment manufacturer that are under warranty; • Materials to be used in manufacturing that do not require further processing or preparation.
End-of-life (EOL)	A device, packaging or battery that has reached the end of its useful life.
End-of-life management	The series of steps that are taken to ensure environmentally sound management.
Environmentally Sound Management	The collection, storage, treatment, recovery, or (where appropriate) disposal of waste in an environmentally sound manner i.e., a manner that complies with all relevant legislation and avoids significant adverse impacts on the environment or human health.
Recyclers	Any organization working in partnership with Logitech to manage or deliver recycling services. By definition, this includes Producer Responsibility Organisations (PROs), which are financed by Logitech to manage recyclers and achieve recycling goals.
OECD	Organization for Economic Co-Operation and Development and European Union.
Recycling	The management of end-of-life Logitech assets to enable recovery of materials for reuse.
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 authorization 3) recycle and 4) incinerate for energy recovery 5) incinerate with no energy recovery 6) landfill
WEEE	Waste Electronic or Electrical Equipment (WEEE) See "End-of-life devices"

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1. Purpose

This standard defines Logitech’s minimum requirements for recycling devices, batteries and associated packaging.

The purpose of this standard is to protect the planet and people. By defining our minimum requirements for recycling, our goal is to safeguard the environment and human health from the adverse impacts that can arise during the end-of-life management of products, batteries and packaging.

2. Scope

The requirements outlined in this standard apply to:

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

The requirements outlined in this standard apply to all Recyclers working for or on behalf of Logitech to directly or indirectly manage end-of-life devices, batteries and associated packaging. This includes but is not limited to:

- Recyclers engaged in Logitech EoL stewardship programs;
- Logitech customers (resellers), distributors and warehousing partners; and
- Logitech employees and contractors in offices, warehousing, and manufacturing facilities.

In writing this standard, we considered the carbon, circularity and social impact of recycling. When considering social impacts, we considered the safety, health and wellbeing of our employees, customers and the communities where we operate and recycling occurs.

3. Roles and Responsibilities

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 and 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
Recyclers	<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 (WWP-230351 Logitech Recycling Standard).

4. Recycling Requirements

4.1 Sustainability commitment

- **Management Representative:** Partners shall appoint a competent “Management Representative for Sustainability” to act as a point-of-contact for Logitech Sustainability. Recyclers shall notify Logitech before changing the individuals appointed to this role.
- **RBA Code Compliance:** Recyclers 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
 - o Suppliers and facilities shall maintain all applicable regulatory approvals Evidence of compliance shall be available for review on request.
- **Good Practice Management Systems:** Recyclers shall maintain ISO 14001 and ISO 45001, or equivalent certifications. Evidence of certification shall be available to Logitech on request.
- **Good Practice Recycling Standards:** Recyclers shall ensure that recycling activities are carried out by suppliers in accordance with R2, RIOS, E-steward, EN 50625-1², or equivalent good practice standards. Evidence of certification shall be available to Logitech on request.

4.2 Waste Hierarchy

Management of end-of-life devices, batteries and associated packaging shall adhere to the Waste Hierarchy. This includes residuals and byproducts. However, for the avoidance of doubt, in all cases, legal requirements shall be adhered to at all times. Our Waste Hierarchy of preferential end-of-life management pathways can be summarized as follows.

¹ For example, ISO 14001 and ISO 45001 are accepted as equivalent to RBA Code Requirements set out in Section B (Health & Safety) and Section C (Environment) of the RBA Code.

² EN 50625-1:2014 Collection, logistics & Treatment requirements for WEEE - Part 1 (General treatment requirements)

- **Avoid & Reduce:** Logitech shall manage sales and product delivery and quality to maximize the successful launch of products and avoid waste, product breakage and customer returns.
- **Sort:** End-of-life devices, batteries and associated packaging materials shall not be disposed of with household waste. They shall be sorted and segregated from household waste and each other, to optimize resource recovery and recycling and ensure recyclers' safety. This first step is critically important and important at every stage, to maximize the opportunity for downstream recyclers to give materials and components a second life.
- **Reuse:** Logitech shall consider opportunities to refurbish or rework returned product to enable resale or donation, where appropriate, with Logitech's authorization.
- **Recycle:** Where end of life products cannot be avoided, reduced or reused, Logitech shall support responsible recycling.
- **Incinerate with energy recovery:** Where recycling is not possible, incineration with energy recovery is permitted.
- **Incinerate without energy recovery:** Where recycling or incineration with energy recovery are not possible, incineration without energy recovery may be permitted as a last resort, to avoid landfilling.
- **Zero Landfill:** Every reasonable effort shall be made to ensure end-of-life devices, batteries or packaging do not end up in landfill.

Where incineration or landfill is required, Logitech shall be notified during the due diligence process and in advance of the decision being taken.

4.3 Waste Export

- The export of end-of-life devices (including their components), batteries and associated packaging materials from its country of origin is prohibited unless there is no Environmentally Sound Management available for such waste within the country.
- In the case of end-of-life devices stored in a bonded warehouse, exportation for end-of-life management is required unless in-country management is deemed feasible and prudent due to import and taxation regulations.
- End-of-life devices and batteries should be recycled in-country, where possible. Where this is not possible and export is proposed, Logitech shall be notified and exports shall be carried out in compliance with all

applicable laws and international laws such as those pertaining to the transboundary movement of hazardous waste e.g. Basel Convention.

- Export of e-waste to non-OECD countries outside of the EU is prohibited (in accordance with the Basel Ban Amendment to the Basel Convention) either directly or through intermediaries. Export of e-waste is only permitted in compliance with all applicable laws, including international laws e.g. Basel Convention.

4.3 Hazardous Materials Management

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

4.4 Subcontractor & Supply Chain Management

- Recyclers 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.
- Recyclers shall maintain and make available a list of downstream contractors through to final material disposal.
- Recyclers shall carry out periodic due diligence activities such as documentation review and independent/third party audits of facilities, processes and contractor management, where necessary, to verify compliance.
- Recyclers shall allow Logitech access to audit records and facilities on request and following the establishment of a mutually agreed NDA.

4.5 Cooperation & Reporting

- Recyclers are subject to Logitech's Sustainability Due Diligence Process and must submit all requested information and documentation related to activities that will be carried out on behalf of Logitech prior to commencing work with Logitech.
- Recyclers shall cooperate with Logitech's efforts to check, verify and demonstrate compliance with applicable legislation, stewardship reporting requirements, annual Sustainability Reporting and good practice standards.
- Recyclers shall respond promptly to reasonable requests for information and/or requests for corrective action.
- Recyclers shall provide reasonable evidence of recycling, where requested by Logitech e.g. Recycling Reports & Tracker Files, Certificates of Treatment. Specific requirements vary, depending on the nature of recycler activities. Where relevant, a template for reporting will be agreed between Logitech & the Recycler as part of contract development.

- Recyclers shall provide access to facilities, records, products, materials and equipment, where necessary to facilitate auditing by persons working for or on behalf of Logitech.
- Recyclers 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 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
003	S. McCabe	Updated to add GSE to the title, acknowledge EN 50625-1, add references to our existing vendor due diligence requirements and process, and add reference to our existing export rules for e-waste.	C. Kennedy E. Gormally U. Rochat	C. Kennedy	Feb 2024