RESPONSIBLE SOURCING OF MINERALS POLICY

Conflict Minerals and other minerals of concern in our program

Logitech is subject to Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act ("the Dodd-Frank Act"). The Dodd-Frank Act defines Conflict Minerals as cassiterite (tin), coltan (tantalum), wolframite (tungsten) and gold (or derivatives of these minerals), which are mined in the Democratic Republic of Congo (DRC) or adjoining countries, and fund conflict. These four minerals are commonly referred to as 3TG.

At present, our due diligence program includes these 3TG and also includes Cobalt, and Mica. Cobalt and Mica are included as, if unchecked, they have the potential to have originated from other conflict-affected and high-risk areas (CAHRAs). As a manufacturer of products that contain 3TG, Cobalt and Mica we are committed to avoiding minerals that originate or support conflict or high-risk areas. We are committed to responsible sourcing of these minerals in our supply chain to ensure a verified fair and equitable supply chain for all stakeholders involved. Our program thus ensures that legal and regulated mining can continue to provide livelihood opportunities to those in need while eliminating any direct or indirect support of conflict and human rights abuses.

What standards do we uphold?

As a member of the Responsible Business Alliance (RBA) and the Responsible Minerals Initiative (RMI), we have an established Responsible Minerals Sourcing Program aligned with RMI requirements. Our program also complies with all relevant legal requirements and reflects international best practice including, but not limited to, the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas ("the OECD Guidance"), and the RBA Code of Conduct.

We also consider the European Conflict Minerals Regulations and other emerging regulations and good practices with active interest. At this time, we do not import minerals or metals to the EU and therefore the mandatory supply chain due diligence requirements of the EU regulation does not apply. We have however put measures in place to ensure our program continues to grow and develop in line with the spirit of the law and stakeholder interests in the EU and elsewhere.

How do we manage risks?

We engage our suppliers to raise awareness of the risks associated with mineral sourcing and our commitment to responsible minerals sourcing and compliance with international good practice. This policy is communicated via our website, to our supply chain and reflected in relevant supplier contracts.

Each year, we review our direct (Tier 1) suppliers, to identify who supply materials or components that could potentially contain 3TG, Cobalt, and Mica. We survey those suppliers to identify, map and verify the smelters or refiners (SORs) in their supply chain and verify those SOR facilities are validated through third-party accredited audits inline with RM good practice expectations.

Our efforts to date have reaped tangible outcomes for our direct supply chain. 100% of our 3TG related suppliers have participated in our survey efforts for the last six years, and the number of SORs participating in third-party audit programs has also increased year-on-year. In CY20, for the first time, we were delighted to report that 100% of our 3TG SORs were participating in third-party certification programs and 98% have achieved certification with the remaining 2% on track to achieve certification pending conclusion of the verification process.

We submit annual reports to the Securities Exchange Commission (SEC) and our annual Sustainability Report includes a full description of our program. Both reports are disclosed publicly on our website.
What do we require of our suppliers?

We expect our suppliers to demonstrate their commitment to responsible minerals sourcing and provide reasonable assurance that the 3TG, Cobalt, and Mica that they provide to us are sourced responsibly. As such, we require our direct suppliers to:

- Commit to upholding the RBA Code of Conduct, including requirements relating to responsible sourcing of minerals, as a contractual requirement;
- Establish a Conflict Minerals policy, which is consistent with the standards we uphold, including OECD Guidance. This policy must be authorised by a senior company representative;
- Work with us to identify relevant SORs of 3TG, Cobalt and Mica in our supply chain and report the details and certification status of those suppliers using the RMI Conflict Minerals Report Template (CMRT), Cobalt Reporting Template (CRT), and Mica Reporting Template (MRT).
- Source 3TG from SORs that are participating in third-party audit programs (such as RMAP, LBMA, RJC) and working towards certification.
- Develop action plans to address SORs that are not yet certified, eliminate them from our supply chain or push them to engage in RMAP or equivalent certification programs and obtain certification.
- Support and facilitate any on-site auditing or other assurance processes implemented by Logitech (or third parties working on Logitech’s behalf) to manage risks relating to 3TG, Cobalt and Mica.

We look forward to expanding our Responsible Sourcing programs over time and as necessary to include other minerals or materials that may become a concern. With that, we continue to apply diligence to the responsible sourcing landscape and are committed to acting accordingly.

If you wish to know more about our Responsible Sourcing programs, please email sustainability@logitech.com

Robert O’Mahony
Head of Sustainability, Global Operations