

Restriction of Hazardous Substances (RoHS) Policy and Declaration of Compliance

1. Purpose

This policy outlines Logitech's commitment to compliance with the Restriction of Hazardous Substances (RoHS) Directive and similar regulations worldwide.

Hazardous substances in electronics pose environmental and human health risks during production, use, and disposal. As a responsible company, Logitech is committed to full compliance with all applicable RoHS requirements, proactively monitoring regulatory developments, and applying industry best practices to maintain the highest standards of product safety and compliance.

Our objectives can be summarized as follows.

- Ensure full compliance with global RoHS regulations.
- Minimize risks to human health and the environment.
- Enforce supplier accountability for RoHS compliance.
- Implement rigorous testing and verification processes.
- Proactively monitoring and adapting to regulatory changes.

2. Scope

This policy applies to all Logitech electrical and electronic products worldwide. It details our approach to ensuring compliance, including material restrictions, testing protocols, and verification processes.

3. ROHS Declaration of Compliance

The European RoHS Directive (2002/95/EC) was introduced to limit hazardous substances in electrical and electronic equipment (EEE). It was recast as Directive 2011/65/EU (RoHS 2), adding Declarations of Conformity and CE Marking requirements. Further amendments under Directive 2015/863 (RoHS 3) introduced restrictions on four phthalates, effective 22 July 2019. Similar RoHS-type legislation has been adopted in multiple jurisdictions worldwide.

Logitech fully complies with all applicable RoHS regulations worldwide. Our Sustainability team continuously tracks global RoHS legislation to ensure our policies, procedures, and practices remain up to date with evolving compliance requirements.

Logitech products placed on the market after 1 January 2013 comply with Directive 2011/65/EU, including the specific hazardous substances restrictions outlined below, subject to any exemptions permitted by law. Logitech products conform to the essential requirements of:

- Directive 2011/65/EU (RoHS 2) – applicable to EEE placed on the market before 22 July 2019
- Directive 2015/863 (RoHS 3) – applicable to EEE placed on the market on or after 22 July 2019

As such, all Logitech products meet the following maximum concentration limits for restricted substances:

RoHS Substances	Maximum concentration (by weight, homogeneous level)
Lead	1,000 ppm (0.1%)
Mercury	1,000 ppm (0.1%)
Cadmium	100 ppm (0.01%)
Hexavalent Chromium	1,000 ppm (0.1%)
Flame Retardants: PBB, PBDE	1,000 ppm (0.1%)
Phthalates: DEHP, BBP, DBP, DIBP	1,000 ppm (0.1%)

4. Logitech Requirements

Logitech requires all suppliers and business partners to comply with RoHS regulations and all relevant amendments. As a condition of doing business with Logitech, suppliers are contractually obligated to ensure that their products and materials meet RoHS compliance standards. Suppliers must ensure that their own supply chains, as well as their suppliers, adhere to these regulations, so that they can provide us with products and services that comply with RoHS. Specifically:

- All products supplied to Logitech must comply with applicable RoHS requirements, including restrictions on the use of hazardous substances.
- Suppliers must ensure RoHS substances that are used in products or components do not exceed the regulatory thresholds defined by law.
- Suppliers must implement a compliance management program that includes internal controls, testing, and reporting mechanisms to verify that products meet RoHS standards.
- Suppliers are required to notify Logitech promptly if any RoHS substance is found in components supplied, particularly if these substances exceed the regulatory thresholds defined by law.

Failure to comply with RoHS regulations and Logitech's GSE standard *WWP-751707 Product Substance & Material Requirements* may result in the discontinuation of Logitech's business relationship with a supplier.

5. Compliance Assurance

Logitech implements a systematic testing program to verify RoHS compliance across our supply chain, including products manufactured in-house and by external suppliers. Testing and verification activities include the following:

- Products and components are mechanically disjointed to the homogeneous material level for testing.
- X-Ray Fluorescence (XRF) analysis is used as an initial screening method.
- Wet chemical analysis (e.g., ICP, UV-Vis) is conducted where required, following good laboratory practices.
- A traceability system ensures each individual component meets RoHS thresholds.
- Logitech issues Declarations of Conformity and maintains test reports for regulatory purposes.

In cases of failure to comply with RoHS regulations, this policy and Logitech's GSE standard WWP-751707 Product Substance & Material Requirements, suppliers will be required to provide corrective action plans, and Logitech may take steps to find alternate suppliers or sources of compliant materials and discontinue Logitech's business relationship with a supplier.

6. Review and Update

This policy is reviewed a minimum of once annually to reflect regulatory updates, industry advancements, and best practices. The Sustainability Team oversees the review process, ensuring continued compliance with global RoHS regulations.

7. Further Information

For additional details or clarification regarding this policy, please contact sustainability@logitech.com.



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