



Global Specification for the Environment (GSE)

Recycling Standard

WWP-230351.004

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, that 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	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.
EOL	End-of-life
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) prevent and 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 sets out Logitech’s minimum requirements for the responsible recycling of devices, batteries, and packaging. Its purpose is to protect both people and the planet by ensuring that end-of-life materials are managed in a way that safeguards human health and the environment. By defining these requirements, we aim to maximize the recovery and reuse of valuable materials, supporting a circular economy and minimizing the negative impacts associated with waste disposal.

Our objectives can be summarized as follows.

- Ensure responsible recycling of devices, batteries, and packaging to protect human health and the environment.
- Maximize material recovery and reuse to support a circular economy.
- Minimize negative impacts associated with waste disposal.

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.

These requirements apply to all recyclers working for or on behalf of Logitech to directly or indirectly manage end-of-life materials. This includes, but is not limited to the following.

- Recyclers and business partners engaged in Logitech’s end-of-life stewardship programs
- Logitech customers (resellers), distributors, and warehousing partners
- Logitech employees and contractors involved in waste and recycling processes in offices, warehouses, and manufacturing facilities

In developing this standard, we assessed the carbon, circularity, and social impacts of recycling, with a focus on the safety, health, and well-being of employees, customers, and the communities in which we operate and where recycling takes place.

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

	<p>necessary to ensure it continues to align with and reflect, relevant legal requirements and established good practice, including Logitech policy</p> <ul style="list-style-type: none"> • 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 recycling activities are carried out in accordance with R2v3, RIOS, E-steward, EN 50625-1, WEEELABEX, or equivalent good practice standards. Evidence of certification and third-party audit reports, shall be made 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

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.

Hierarchy of preferential end-of-life management pathways can be summarized as follows.

- **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 method 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.

- Exporting e-waste from OECD member countries to non-OECD countries for disposal and recovery is prohibited (in accordance with the Basel Ban Amendment to the Basel Convention) either directly or through intermediaries. Exporting e-waste is only permitted in compliance with all applicable laws, including international laws such as the Basel Convention.

4.3 Hazardous Materials Management

- Hazardous materials (e.g. POPs) 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.
- Subcontracting of recycling activities is only permitted if the recycling partner has been disclosed to Logitech and subject to Logitech's due diligence process. Where recycling activities are subcontracted, Logitech's contracted party shall ensure recycling activities are carried out in accordance with R2v3, RIOS, E-steward, EN 50625-1, WEEELABEX, or equivalent good practice standards. Evidence of certification and third-party audit reports, shall be made available to Logitech on request.
- 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.
- Where the recycler has independent audits, Logitech reserves the right to request the report be disclosed to Logitech within one week, under NDA.
- Logitech reserve the right to audit recyclers, if the recycler cannot provide evidence of auditing by trusted independent auditors (e.g a certification body or an e-steward organization)
- Recyclers shall notify Logitech of any non-conformance with this standard and provide Corrective Action Reports where necessary. Corrective Action Reports shall specify the preventative and corrective actions needed to address any identified issues and improve performance, along with timeframes for implementing actions and associated roles, responsibilities, and resources.

5. End of Life components requiring separate collection or treatment

Article 8 of the WEEE Directive 2012/19/EU requires companies to communicate where a producer uses electrical or electronic components that require special treatment at end of life. Annex VII of the WEEE Directive defines the materials and components that require selective treatment.

The following listed components are used in Logitech devices and require special consideration in the recycling process. These components should be separated by recyclers for special treatment, in accordance with relevant regulatory requirements.

- Batteries.
- Printed circuit boards greater than 10 square centimeters (as per Annex VII (1) of the WEEE Directive 2012/19/EU).
- Plastic-containing brominated flame retardants used in some Logitech equipment, such as video conference equipment, PC speakers and power adapters.
- Liquid crystal displays (together with their casing where appropriate) with a surface greater than 100 square centimeters, such as those used in a limited number of Logitech screen devices e.g. Logitech Tap, Logitech Tap Scheduler and Logi Dock Flex.
- External electric cables.

If you are an authorized recycler and have questions about Logitech products you are recycling, including products that may contain the materials and components requiring selective treatment listed here, please email recycling@logitech.com for further information on the presence and location of these materials and components.

5. Labor & Human Rights

Recyclers working for or on behalf of Logitech shall manage labour relations and working rights in accordance with the requirements of the [RBA Code of Conduct](#) and ensure

Logitech is committed to upholding fair labor practices and ensuring safe and dignified working conditions across our value chain, including in end-of-life product recycling. We require all recycling partners to adhere to internationally recognized labor standards including, but not limited to, the United Nations Global Compact and [RBA Code of Conduct](#), as well as Logitech's own policies, including our Responsible Recruitment Policy and Human Trafficking Statement. These policies set clear expectations regarding fair treatment, health and safety, working hours, wages, and ethical recruitment.

Recycling partners must ensure that all workers, including temporary, migrant, and subcontracted workers, are employed voluntarily, with freely agreed terms of employment. Forced, bonded, or child labor is strictly prohibited. Employment conditions must comply with local labor laws, and workers must receive fair wages and benefits that meet or exceed legal minimums. Recruitment practices must align with the principles outlined in Logitech's Responsible Recruitment Policy, ensuring that workers do not pay recruitment fees and that contracts are transparent and accessible. Workers must also have the right to freely associate and engage in collective bargaining in accordance with local laws.

To promote a safe and equitable working environment, recycling partners must provide adequate training, protective equipment, and procedures to prevent workplace hazards. They must also establish grievance mechanisms that allow workers to raise concerns confidentially and without fear of retaliation.

Logitech reserves the right to assess compliance through audits or third-party verifications and expects continuous improvement from recycling partners in aligning with responsible labor practices. By embedding these principles into recycling operations, we aim to uphold human rights, improve working conditions, and contribute to a responsible circular economy.

5. Review Process

This standard is reviewed at least once annually and when changes to legislation or other relevant external factors arise. The annual review process is coordinated by Logitech's Sustainability team on behalf of the Approver set out in the following section and includes engagement with relevant stakeholders across the business, where relevant. Any suggested changes or updates are reviewed and approved by the Approver.

6. Further Information

This standard is reviewed at least once annually and when changes to legislation or other relevant external factors arise. The annual review process is coordinated by Logitech's Sustainability team on behalf of the Approver set out in the following section and includes engagement with relevant stakeholders across the business, where relevant. Any suggested changes or updates are reviewed and approved by the Approver.

7. Further Information

For any questions or clarifications regarding this policy, please contact recycling@logitech.com.

8. Revision History

Version	Author	Key Changes	Reviewed	Approved	Approved Date
001	C. Kennedy	<ul style="list-style-type: none"> First Draft 	C O'Driscoll N. Kalita U. Rochat R. O'Mahony	R. O'Mahony	July 2019
002	C. Kennedy	<ul style="list-style-type: none"> Replaced "EEE" with "Devices" Refined definitions Streamlined R&R sections Additional content on packaging Amended reporting requirements to clarify templates will be provided offline of this standard 	N. Kalita	C. Kennedy	Jan 2021
003	S. McCabe	<ul style="list-style-type: none"> Updated to add GSE to the title, acknowledge EN 50625-1 Added references to our existing vendor due diligence requirements and process Clarified and overtly communicated our requirements in relation to 3rd party audits Added a reference to our existing export rules for e-waste. 	C. Kennedy E. Gormally U. Rochat	C. Kennedy	May 2024
004	S. McCabe R. Rooney	<ul style="list-style-type: none"> Added new section entitled "End of life components requiring separate collection or treatment" Updated the purpose section to place additional focus on resource management and circularity and clearly communicate our objectives.. Added new section entitled "Labor & Human Rights" Added section entitled "Further Information" 	R.Rooney C. Kennedy	C. Kennedy	March 2025