REACH Policy and Declaration of Compliance

1. Purpose

The Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH) Regulation (EC 1907/2006) was introduced by the European Union (EU) to improve chemical management and protect human health and the environment. The regulation places obligations on companies that manufacture, import, or supply products within the EU market.

As a responsible manufacturer, Logitech is committed to complying with REACH by ensuring that its products meet all applicable legal requirements. This policy sets out Logitech's approach to REACH compliance and provides a formal declaration of compliance regarding the substances present in Logitech products.

Our objectives can be summarized as follows.

- Ensure compliance with REACH and related chemical regulations.
- Protect health and the environment by limiting hazardous substances.
- Monitor and verify compliance through supplier engagement and testing.
- Maintain transparency by disclosing regulated substances in products.

2. Scope

This policy applies to all Logitech products that are placed on the EU market.

Logitech does not manufacture chemical substances but, as a producer of articles, we assess our responsibilities under REACH concerning the following.

- Substance registration
- Restricted substances compliance (Annex XVII)
- Substances of Very High Concern (SVHC) notification and declaration

3. REACH Compliance Declaration

3.1 REACH Substance Registration

Under REACH, manufacturers and importers must register chemical substances with the European Chemicals Agency (ECHA) if they produce or import them in quantities above one tonne per annum (tpa).

Logitech does not manufacture or import chemical substances exceeding the one tpa threshold and is therefore not subject to REACH substance registration requirements.

3.2 Article Registration

If a product (article) releases significant amounts of regulated chemicals under normal use, it must be registered under REACH. Logitech conducts regular product testing and chemical

assessments, and our analysis confirms that Logitech products do not release substances at levels that require REACH registration.

3.3 Compliance with REACH Annex XVII (Restricted Substances)

Annex XVII of REACH defines substances that are restricted for use in products due to health or environmental risks. Where applicable, these restrictions are incorporated into Logitech's Global Specification for the Environment (GSE) corporate standards (available here). Logitech ensures that all products comply with the relevant restrictions under Annex XVII.

3.4 Substances of Very High Concern (SVHC) Compliance

REACH requires companies to notify ECHA if they import or manufacture more than one tpa of an SVHC. Logitech does not import or manufacture SVHCs above this threshold and is therefore not required to notify ECHA.

Additionally, under REACH Article 33, Logitech must inform customers if an article in a product contains more than 0.1% weight by weight (w/w) of an SVHC.

Logitech continuously monitors updates to the SVHC list published by ECHA and ensures compliance through robust supplier engagement, material testing, and product design reviews. Based on our assessments, the following products may contain SVHCs above the 0.1% w/w threshold.

SVHC		Article containing SVHC[1]	Product
110-71-4	1,2-dimethoxyethane,ethylene glycol dimethyl ether (EGDME)	Coin cell battery	Wireless keyboards, tablets, remotes, smartphone accessories and home switches
1120-71-4	1,3-propanesultone	Lithium battery	Wireless cameras, wireless headsets, wireless keyboards, wireless mice, tablets, mobile speakers, wireless touchpads, wireless gamepads, remotes
7439-92-1	Lead	EE Components[1] Metal Alloys[2] Solder Alloy[3]	All products
12626-81-2	Lead Titanium Zirconium Oxide	EE Components[1]	Hard disk drive
79-94-7	Tetrabromobisphenol-A	Plastic parts	Speakers
3147-75-9	2-(2H-benzotriazol-2-yl)-4-(1,1,3,3-tetramethylbutyl)phenol (UV-329)	Insulating plastic material	Light-colored cables

115-86-6	Triphenyl phosphate	Plastic parts	Keyboards, mice, cloud gaming handheld, gaming consoles, presenters, stylus, tablets, VC conferences, headsets, webcams, power adapters, ethernet adapters
84852-53-9	1,1'-(ethane-1,2-diyl)bis[pentabromobenzene] (DBDPE)	EE Components, Insulating plastic material	Gaming consoles, mice, headsets, VC conferences,power adapters

The above substances are based on the current SVHC list as maintained on the ECHA website *(here)*. Logitech ensures that all relevant compliance obligations, including customer disclosures, are met in accordance with REACH.

RoHS Exemptions Applicable to Listed Articles

Some of the articles containing lead are covered under RoHS exemptions, including:

1. Electrical and electronic components under EU RoHS exemption 7c-I (lead in glass or ceramic materials in capacitors and piezoelectric devices).
2. Metal alloys under EU RoHS exemptions 6a-I, 6b-II, and 6c (lead in steel, aluminum, and copper alloys within specified limits).
3. Solder alloys under EU RoHS exemption 7a (high melting temperature lead-based solders).

Logitech ensures that all products meet RoHS and REACH requirements, including applicable exemptions, through thorough assessments and internal compliance controls.

4. Logitech Requirements

Logitech requires all suppliers and business partners to comply with REACH 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 REACH 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 REACH. Specifically:

- All products supplied to Logitech must comply with applicable REACH requirements, including restrictions on the use of hazardous substances.
- Suppliers must ensure that Substances of Very High Concern (SVHC) are not used in products or components above the 0.1% threshold by weight.
- Suppliers must implement a compliance management program that includes internal controls, testing, and reporting mechanisms to verify that products meet REACH standards.
- Suppliers are required to notify Logitech promptly if any SVHCs are found in components supplied, particularly if these substances exceed the 0.1% threshold by weight.

5. Compliance Assurance

Logitech ensures compliance with REACH through a combination of internal policies, procedures, and supplier engagement. To verify that products meet REACH standards, we:

- Maintain a systematic testing program that includes regular testing of product samples from both our manufacturing facilities and supplier manufacturing facilities.
- Require suppliers to provide detailed declarations of compliance for all components used in our products.
- Periodically audit our supply chain to ensure that suppliers maintain compliance and that they adhere to our GSE (General Specification for the Environment) standards, including GSE 751707, which is reflective of REACH requirements and a contractual obligation for any supplier or partner who wishes to do business with Logitech.

In cases of failure to comply with phthalate 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.

5. Review and Update

This policy is reviewed and updated as necessary to reflect regulatory changes and industry best practices. Logitech remains committed to working with suppliers, industry groups, and regulatory bodies to ensure compliance with all applicable chemical regulations.

6. Further Information

For further information or compliance inquiries, please contact sustainability@logitech.com.

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