

July 2020

## CONFLICT MINERALS POLICY

### What are Conflict Minerals?

Conflict minerals are minerals that are mined in areas of armed conflict and human rights abuses, which are sold, traded or financing armed groups. US legislation and OECD due diligence guidelines currently define 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. This policy shares our approach to managing Conflict Minerals in line with all legal requirements and international good practice.

In August 2012, Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act (“the Dodd-Frank Act”) was amended to include requirements for publicly trading companies, which are subject to Securities Exchange Commission (SEC) reporting, to produce an annual Conflict Minerals report. Our reports are disclosed publicly on our website.

In 2008, the Responsible Business Alliance (RBA) launched an Extractives Work Group to look at Conflict Mineral risks for the electronics industry. Tracing minerals back to their mine of origin is a complex part of responsible sourcing. For each of the 3TG minerals, RBA played an active role in drawing together the relevant stakeholders to map out the key challenges and opportunities associated with tracing chains of custody. This work led to the launch of the world’s first Conflict-Free Smelter Program (CFSP) in 2011, and this program was renamed in 2017 as the Responsible Minerals Assurance Process (RMAP). The RMAP includes an independent third-party audit programme, which audits smelters across the globe, to determine the source of 3TG minerals, and certify relevant facilities as conflict-free, where appropriate.

### How is Logitech managing Conflict Minerals risks?

As a manufacturer of products that contain 3TG, we understand the importance of avoiding conflict minerals, and are committed to sourcing components and materials from companies with shared values around human rights, ethics and environmental responsibility. Our goal is to ensure conflict-free sourcing. As an active member of RBA, we supported the initial assessment work of the RBA Extractives Working Group and we continue to use the key tools and processes advised by the RBA. We work with our suppliers and other RBA members to exert the full influence of the electronics industry on smelters worldwide, and encourage smelter participation in credible certification programs such as the RMAP.

We have an established Conflict-Free Sourcing Program, which complies with relevant legal requirements and incorporates international best practice, including the OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas (“the OECD Guidelines”), and the RBA Code of Conduct. Mining activity is understood to be crucial to the development of the DRC economy. Our program 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.

Each year, we review our direct (Tier 1) suppliers, identify those that supply materials at risk of containing 3TG, and work with those suppliers to identify, map and verify our supply chain and ensure smelters in the supply chain adequately demonstrate and ensure the conflict-free status of materials. Smelters must provide evidence of their conflict-free certification, and/or evidence of participation in a credible third-party audit program, which will verify their conflict-free status.

We track and report the status of our suppliers as part of both internal reporting to SEC. Our efforts to date have reaped tangible outcomes for our own supply chain already, with the response rate of our suppliers has increased year-on-year, as suppliers have become more familiar with our requirements and number of smelters participating in third party audit programs and certified as conflict-free has increased year-on-year.

We engage our suppliers to raise awareness with respect to the risk of Conflict Minerals and our requirements for compliant international good practice. This policy is communicated via our website, to our supply chain and embedded into relevant supplier contracts.

### What do we require of our suppliers?

We expect our suppliers to demonstrate their commitment to Conflict Minerals management and provide reasonable assurance that the 3TG they provide to us is conflict free. The size of our supply chain means it will take time for

suppliers to verify the origin of 3TG minerals used in components and materials and our requirements reflect that understanding. As such, we require our direct suppliers to:

- Commit to upholding the RBA Code of Conduct, including requirements relating to responsible sourcing of minerals;
- Establish a Conflict Minerals Policy, which is authorised by a senior company representatives, communicating commitment to management of conflict minerals risks;
- Use the Conflict Minerals Report Template (CMRT) to identify relevant 3TG smelters in the supply chain;
- Use the the latest version of the RMAP Conformant Smelter List or other equivalent lists to identify which smelters are a) certified as conflict-free b) engaged in the RMAP audit process or an equivalent process c) not yet engaged in the RMAP audit process or an equivalent process.
- Develop a Due Diligence Plan showing the actions the supplier will take to engage, request and encourage smelters that are not yet engaged in RMAP or an equivalent certification program, to engage in such programs and obtain evidence of conflict-free status.
- Only accept 3TG minerals from smelters that are certified as conflict-free, or engaged in the RMAP or an equivalent program, and working towards conflict-free status.
- Provide evidence of due diligence measures, the completed CMRT, and supplier/smelter communications on an annual basis, and where requested by Logitech.
- 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 conflict minerals.

## What next?

Using our supply chain due diligence process, driving accountability within the supply chain through the RMI Responsible Minerals Initiative, and continuing our partnership with the RBA, will further accelerate our work to achieve the goal of conflict-free sourcing. We will move away from use of suppliers or smelters who are not engaged in the RMI process or an equivalent program.

Over the forthcoming year, we will review and benchmark our existing Conflict Minerals Management Program and performance against good practice and peer company performance to determine appropriate targets for 2021.

We are also watching the emergence of the European Conflict Minerals Regulations with active interest, and have put measures in place to ensure our program continues to grow and develop in line with emerging legal requirements and stakeholder interests in the USA, EU and elsewhere. For now, as Logitech does not import minerals or metals to the EU, the mandatory supply chain due diligence requirements of the Regulation do not apply to Logitech. However, Logitech acknowledges the importance of the issue and engages in ongoing and close dialogue with its suppliers about sustainable business practices and transparency of material use.

## Beyond regulations on Conflict Minerals

We have also broadened our responsible material management system to include Cobalt, which is primarily used in the production of lithium ion batteries, and are implementing the OECD Due Diligence Guidelines using the tools and programs of the RMI. We expect suppliers to follow this same framework and to participate in Cobalt due diligence processes and capability building efforts around responsible minerals sourcing.



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