



# CODE OF CONDUCT

## A MESSAGE FROM OUR CEO

Dear Colleagues:

Few things are as important as your reputation. That's true for companies and individuals alike. Logitech's ethical reputation is the foundation of our continued success. Each of us is responsible for our own reputation and for Logitech's. By following the principles and policies spelled out in the attached Code of Conduct we will protect both.

We have tried to make our Code of Conduct easy to read, understand and follow, and our new-hire and targeted periodic trainings are designed to help all of us understand our ethical obligations and reinforce the positive behaviors that make Logitech a great place to work. Please take time to review the Code, attend the trainings, and join me in making or renewing your commitment to follow our Code of Conduct.

Hanneke Faber

## OUR CODE

We are committed to doing business the right way, and our Code of Conduct provides the framework to help us keep this commitment. Although it's virtually impossible to spell out the right approach for every situation, the following points sum up the spirit and intent of our Code:

- Obey the laws wherever we are
- Always compete fairly
- Avoid all conflicts of interest
- Foster a collaborative, harassment-free workplace
- Build a culture where we exemplify integrity in everything we do

By applying common sense, good judgment, and these core principles, we can handle any situation with ethics and integrity.

If you have any questions or concerns about the Code or any other Logitech policy, or about any situation in which you might find yourself, you should discuss the situation with your manager, People & Culture, or any member of the Legal team.

## BUSINESS CONDUCT

### COMPLIANCE WITH APPLICABLE LAWS

We compete aggressively but always within the bounds of the laws and regulations that apply to us where we do business. You should never take any action that you know or think would violate any applicable law or regulation.

Likewise, we should never direct, encourage, or assist anyone to violate the laws of any country. This is true even where conduct is legal in some countries if it is illegal in the country in question. If you have any question about the legality of any action, please ask a member of the Legal team for help.

A few areas of the law are worth specific mention because, as a global company, these areas inherently present special risks to us.

**Foreign Tax and Currency Laws.** We must follow both foreign and domestic tax laws and foreign currency exchange control laws. You may not enter into any transaction that you know or think would violate these laws. Nor can you work with any agent, contractor, consultant, lawyer, distributor, or other persons that you know or think would circumvent these laws on our behalf. Any transaction that could have the appearance of permitting someone to circumvent these laws must receive the prior approval of the General Counsel.

**Labor and Human Rights Laws.** We and our suppliers must strictly comply with all local human rights laws for all countries in which we or our suppliers do business. We prohibit the use of forced labor, child labor, and unsafe working conditions in any of our or our suppliers' operations.

**Anti-Corruption Laws.** You are expected to understand and abide by our Anti-Corruption Policy at all times, and our position is clear:

**Logitech does not tolerate corruption in any form. Neither Logitech nor anyone working for or on our behalf may give or receive any bribe, kickback, or other corrupt incentive.**

This policy, along with detailed guidelines for complying with it, is available on the Logitech employee web portal where policies are found. These documents include practical guidance for giving and receiving gifts, as well as handling meals, entertainment, and travel. If you have any question about our Anti-Corruption Policy or the Guidelines for Gifts, Hospitality and Third-Party Travel, please ask a member of the Legal team or email us at [compliance@logitech.com](mailto:compliance@logitech.com).

**Securities Laws.** Our stock is publicly listed on the SIX Swiss Stock Exchange and the Nasdaq Global Select Market, and we are subject to various securities laws and regulations. You must follow our Insider Trading Policy available on the Logitech employee web portal. Our Insider Trading Policy and related FAQs have detailed

instructions and guidance on prohibited trading activities and the safeguards we have put in place. You also can ask a member of the Legal team or email us at [compliance@logitech.com](mailto:compliance@logitech.com) for help.

## FAIR DEALING AND FAIR COMPETITION

We want to compete and win with superior products and services and operational excellence—but never through unethical or illegal business practices. We each are expected to deal fairly with our customers, suppliers, employees, and other third parties while doing our jobs.

We are subject to competition and antitrust laws throughout our operations. These laws are designed to benefit consumers by setting a level playing field for fair competition. You should never enter into any understanding or agreement with an actual or potential competitor, supplier, or channel partner that would illegally limit or restrict in any way either party's or a third party's ability to compete.

We also are subject to laws that prohibit the theft or misuse of proprietary or confidential information. You should never attempt to acquire such information through improper means. This includes inducing past or present employees of other companies to divulge such information. Likewise, you should never use improperly obtained information. If you have any questions about the legality of proposed information gathering, please contact a member of the Legal team. Please keep in mind that we also are subject to various laws that prohibit deceptive, unfair, or unethical sales practices and other laws that make it illegal to misrepresent products or services in connection with sales activities.

Employees involved in procurement have a special responsibility to adhere to principles of fair competition in the purchase of goods and services. You must select suppliers based exclusively on normal commercial considerations, such as quality, cost, availability, service, and reputation, and not on the receipt of special favors, kickbacks, or other incentives.

## COLLABORATIVE AND HARASSMENT FREE WORKPLACE

One thing that draws talent to Logitech is our spirit of collaboration. We each are responsible for protecting and enhancing our collaborative environment. Actions that can harm this environment are inappropriate in any job, and some are outright illegal. A few merit special mention:

**Sexual Harassment.** You must comply with Logitech's Sexual Harassment Policy available on the Logitech employee web portal. We do not tolerate any form of sexual harassment in the workplace, including unwelcome sexual advances, requests for sexual favors, and other verbal, visual, or physical acts of a sexual nature. Please contact a member of the People & Culture or Legal teams with any questions or concerns you might have.

**Other Harassment.** We prohibit any conduct that creates an intimidating, hostile, or offensive work environment. You should never bring firearms, explosives, or other weapons into our facilities or onto the surrounding properties, including in vehicles in our parking areas. At locations where local law provides the right to keep a weapon in a vehicle, you may do so as long as you follow any additional restrictions that we may impose under local law. And, of course, you should never make any physical threat or engage in any verbal abuse toward other employees whether at work, on social media, or elsewhere. For further guidance please see Logitech's Social Media Guidelines available on the Logitech employee web portal

**Non-Discrimination.** We strive to treat each employee fairly and with respect, and to provide equal employment opportunities without regard to any distinctions based on race, color, ancestry, place of origin, religion, marital status, family status, physical or mental disability, gender, gender expression, intersex status or sexual orientation, in accordance with the law. You must avoid any actions in your job that would undermine Logitech's policy against discrimination.

## CONFLICTS OF INTEREST

You should avoid all conflicts between your own personal interests and the business interests of Logitech. Any situation where you are—or could even appear to be—subject to influences, interests, or relationships that conflict with Logitech's best interests should be avoided. It's not possible to anticipate every situation in which a conflict might arise, but here are some common conflict situations and our policy/guidance:

POTENTIAL CONFLICT SITUATION	POLICY/GUIDANCE
<b>Other employment, or employment by or consulting for a competitor, customer, or supplier.</b>	<p>We value your time, efforts, and contributions to Logitech. Taking on employment or consulting work for any other company can raise concerns about intellectual property, confidential and proprietary information, and constraints on your time and energy.</p> <p>Working for or actively supporting a Logitech competitor is prohibited. Employment by or service on the board of a customer or supplier is generally discouraged.</p> <p>If you are considering taking on additional employment or consulting work for any other company, you must obtain authorization in advance from the General Counsel or Chief Compliance Officer before taking such a position.</p>
<b>Serving on boards of other companies.</b>	Because serving on a board creates duties that can conflict with your duty of loyalty to Logitech, you may not become a board or advisory board member for another company (including non-profits) without prior approval by the General Counsel or Chief Compliance Officer.
<b>Having a significant financial interest in an entity that does business, seeks to do business, or competes with us.</b>	If you already have such an interest, you must fully disclose any such interest and be walled off from any Logitech decision involving such entity. If you want to acquire such an interest, you must fully disclose it and seek approval in advance from the General Counsel or Chief Compliance Officer.
<b>Soliciting or accepting gifts, favors, loans, or preferential treatment from any person or entity that does business or seeks to do business with us.</b>	Please consult our Anti-Corruption Policy for requirements and guidance. Please keep in mind that we want to avoid even the appearance of impropriety.
<b>Taking personal advantage of a potential Logitech opportunity.</b>	If you become aware of a business opportunity that could benefit Logitech, you must inform your manager. You should never offer your own services or products if Logitech offers similar services or products.
<b>Conducting personal or family business with Logitech.</b>	You should not conduct Logitech business with your own business or the business of family members unless the relationship is fully disclosed, the business is awarded out of a neutral bidding process, and the transaction is approved in advance by the General Counsel or Chief Compliance Officer.

Conflicts of interest can also arise through family and dating relationships. Employees who are dating, or employees who are close relatives, should not work together where one is in a supervisory role over the other or may be perceived to have authority over the other. In addition, you should not be involved with hiring and other employment decisions concerning your close relatives.

In practice, it may not be clear whether or not a conflict of interest may exist. Your safest course is to fully disclose the potential conflict and get guidance from the Legal team. In any event, you may not proceed in the face of an actual or potential conflict of interest without a waiver from Logitech. If you need advice or would like to request a conflict waiver, please contact our General Counsel or Chief Compliance Officer and provide all details to them.

## CULTURE OF INTEGRITY

### TRUE AND ACCURATE COMMUNICATIONS AND RECORDS

We should always be truthful in communications with each other, our customers, internal and external auditors, government agencies, and other third parties. No employee should ever conceal any business information from our internal or external auditors.

We also must maintain business records that accurately and fairly reflect Logitech business and financial transactions. No employee should ever falsify or forge any business records.

We all have a duty to make sure that Logitech at all times provides full, fair, accurate, timely, and understandable disclosure in reports and documents that it files with, or submits to, the SIX Swiss Exchange, the Nasdaq Stock Market, the U.S. Securities and Exchange Commission, other regulatory authorities, and in other public communications made by Logitech. Employees may be called upon to provide information internally or externally to assure that Logitech's public reports are full, fair, accurate, timely, and understandable, and that we comply with laws, this Code of Conduct, and other policies. Each of us is expected to take this responsibility very seriously, and to provide prompt and accurate answers to inquiries related to Logitech's public disclosure and compliance requirements.

### SAFEGUARDING LOGITECH PROPERTY

You should always safeguard Logitech's property and its confidential information. Please see Logitech's Data Classification Policy and Data Handling Guidelines for guidance on confidential information. As to Logitech's physical property, you should always follow the local security procedures mandated by our security team. And, if you access our information systems or use our electronic devices, you must follow our Acceptable Use Policy.

You may not use or permit others to use Logitech property or services for personal purposes or benefit unless properly authorized. Any unauthorized removal of Logitech material, equipment, or supplies or the submission of fraudulent expense reports will be considered theft. Employees who are authorized to use Logitech-issued credit cards should only do so for legitimate Logitech business purposes.

### RECORDS MANAGEMENT & RETENTION

We retain records for as long as they are useful to Logitech and in no case less than the period of time required by applicable law. The Logitech Record Retention Policy suggests minimum record retention periods for certain types of records. There may be times when the Legal team will require you to retain documents longer than the typical retention period; this is referred to as a "legal hold." If asked by the Legal team to retain records relevant to a litigation, audit, or investigation, you must do so until the hold is lifted. If you have a question as to whether a record pertains to an investigation or litigation, contact the Legal team before disposing of the record in question.

### CONSEQUENCES AND DUTY TO REPORT VIOLATIONS

Violation of our Code of Conduct may result in discipline, including termination of employment or referral to authorities for prosecution if the conduct is criminal. Third parties who violate our Code may face termination of their business with Logitech, as well as claims for breach of contract.

We all have a joint reputation to protect. It's simply not enough to do the right thing on your own while ignoring violations by others. Failure to report violations not only works against our culture of integrity, it may also be seen as aiding the wrongful acts of others.

## RAISING CONCERNS

You have several options to report a violation or raise a concern, and you may choose to remain anonymous. You can contact any of the following:

- Your manager
- Any member of the Legal, Compliance, or Internal Audit teams
- Your People & Culture Business Partner

You can also send an email to [compliance@logitech.com](mailto:compliance@logitech.com) or use our third-party reporting service EthicsPoint, either online via its website at [www.ethicspoint.com](http://www.ethicspoint.com) or using the toll-free telephone numbers found on its website.

## NON-RETALIATION

Logitech will not retaliate, nor will it permit retaliation, against you for making a good faith report or for participating in an investigation of a legal, audit, or compliance matter. If you believe someone has retaliated against you, report the matter to [compliance@logitech.com](mailto:compliance@logitech.com) or use our third-party reporting service.