



# ANTI-CORRUPTION POLICY

Logitech remains committed to a culture where the instinct to do the right thing is instilled in and drives each of us. We do business the right way, meaning that we approach everything we do with ethics and integrity. **There is no right way to do the wrong thing**, which makes clear our Anti-Corruption Policy statement:

**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.**

Compliance with this policy and related laws is **mandatory** for all employees, contractors and other third parties who conduct business on our behalf. For employees, **non-compliance may result in disciplinary action**, including termination of employment. For third parties, non-compliance may result in termination of our business relationship. In addition, any person involved in corruption may face heavy fines and jail time.

## WHAT IS CORRUPTION? WHY IS ANTI-CORRUPTION IMPORTANT TO LOGITECH?

Most people associate corruption with bribery of government officials. Corruption, however, includes **any abuse of position—public or private—for gain**. Corruption does not require money changing hands; **offering, providing or receiving anything of value for an improper purpose is corruption**. Here “improper purpose” means taking any of these actions with the intent to cause someone to misuse or abuse their position on behalf of a person or company.

We combat corruption with our policies, training, due diligence, audits and enforcement. We do so because corruption can erode and destroy our reputation, cause loss of investor and consumer confidence and may result in severe civil and criminal penalties. Engaging in any form of corruption undermines our values and exposes the individual and the company to unnecessary risk.

Real work examples of non-cash items used in corrupt activities:

- Product samples
- Sports event tickets
- Wine
- Airline tickets
- Artwork
- Jobs for relatives

## NO FACILITATION PAYMENTS

In some countries the payment of small sums to facilitate or expedite government processes may seem the norm. Our policy and various laws preclude payment of facilitation or expediting payments. The only

exception is when you have a good faith belief that your health or safety is in danger. In such case you should immediately report the circumstances of the payment to your manager and Legal. You must also document and account for the payment using iExpense.

### Exception Example:

Maria is on a business trip in an area with civil unrest. She decides to leave early as tensions are rising. On her way to the airport she is stopped by a soldier who demands that she pay a fine or be arrested for violating a curfew that was never announced. In these circumstances Maria may pay the "fine" if she feels her safety is in danger as long as she reports it to Logitech Legal and accounts for it as soon as she is in a safe place.

## GIFTS AND HOSPITALITY

Appropriate use of gifts, hospitality and entertainment can help build strong business relationships. At Logitech we adhere to common sense boundaries to avoid even the appearance of impropriety when giving or receiving gifts. In short, employees may give and receive gifts as long as they are:

- of nominal value (i.e., less than \$200 USD per person per year unless it is a suitable Logitech product)
- infrequent (i.e. generally once a year per person depending on local custom)
- not motivated by an improper purpose
- compliant with local law and custom
- openly and transparently given/received
- properly reported and expensed using iExpense

Gifts should **never be in the form of cash or cash equivalents** unless approved in advance by Logitech's General Counsel or Chief Compliance Officer.

Providing or receiving hospitality also requires following similar common sense rules. Namely, meals and entertainment must:

- not be motivated by an improper purpose
- be related to Logitech's business
- not be lavish
- be provided openly and transparently
- comply with local law and customs
- be properly expensed using iExpense

We need to take extra care when gifts or hospitality involve government officials.

**Before giving a gift or providing hospitality to a government official, you must submit a Request for Gift or Hospitality for a Government Official form** to your manager and the Legal Department for review and approval. You can get this form from the Legal Department or on the Legal Department page on the Logitech Exchange.

"Government official" includes any elected or appointed official or any other employee or person acting in an official capacity for a government organization, department or agency.

Employees of state-run or state-owned entities, such as public utilities or schools, are also included.

## TRAVEL FOR THIRD PARTIES

Payment for travel for third parties (excluding contractors or consultants engaged by Logitech and traveling for Logitech business) is forbidden unless such payment is **approved in advance** by our General Counsel or Chief Compliance Officer. The travel must be reasonable and bona fide and for (a) the promotion, demonstration, or explanation of products or services, or (b) the execution or

performance of a contract with the traveling party's employer. If the travel is intended as a proper marketing incentive to the traveler, our payment or the travel must also be approved by the traveler's employer, and, if the traveler is a government official, payment must be made through the traveler's employer.

Detailed rules and guidelines for gifts, hospitality and travel are set out in Logitech's Anti-Corruption Guidelines for Giving & Receiving Gifts, Hospitality and Travel. **Before purchasing travel for any third party, you must submit a Request for Third Party Travel form.** You can get this form from the Legal Department or on the Legal Department page on the Logitech Exchange. Any exceptions must be approved in advance by our General Counsel or Chief Compliance Officer.

## DUE DILIGENCE: MAKING SURE THIRD PARTIES MEET OUR ETHICAL STANDARDS

Before engaging third parties we need to make sure they are reputable and committed to our standards of business ethics. We also need to make sure we are not doing business with any person or entity on sanctioned, banned or restricted parties' lists. To accomplish this, our Trade Compliance and Legal teams run background checks on our vendors and intermediaries. **Before engaging a new vendor or intermediary** (i.e., someone acting as Logitech's agent or representative to government or private third parties), **please complete the Logitech FCPA & Anti-corruption Verification Form** (found on the Logitech Exchange under WW Trade Compliance Services). Please also work with a member of the Legal team to make sure any agreement with third parties includes our standard anti-corruption language.

## YOUR DUTY TO REPORT CORRUPTION

We all have a vested interest in preventing, exposing and stopping corruption. Looking the other way when you see corruption is simply not acceptable. Each Logitech employee has a duty to report corruption. You may report the matter to your manager, Internal Audit, People & Culture, Logitech Legal, our Chief Compliance Officer or General Counsel. You can also use our third party service, EthicsPoint, to make a report in any language you are comfortable using. While we encourage you to identify yourself to assist with investigation of the matter, **you may choose to remain anonymous and Logitech will respect your choice.** Please rest assured that Logitech policy prohibits any type of retaliation against you for making a good faith report.

### TO MAKE A REPORT VIA ETHICSPPOINT

visit [www.ethicspoint.com](http://www.ethicspoint.com) or call Toll-Free\*

\*Click on the Ethics Hotline button under Resources on the Logitech Exchange home page for EthicsPoint details and toll-free numbers.