# logitech

## **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 recently refreshed our Code of Conduct to make it easier to read, understand and follow. We are rolling out new-hire and targeted periodic training designed to help all of us understand our ethical obligations and reinforce the positive behaviors that makes Logitech a great place to work. Please take time to review the Code, attend the training and join me in making or renewing your commitment to follow our Code of Conduct.

Bracken Darrell

## 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.

## **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 suspect 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 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 with agents, contractors, consultants, lawyers, distributors or other persons that you know or suspect would circumvent these laws. 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, including our suppliers, must strictly comply with all local human rights laws for all countries in which we or our suppliers do business. As a global policy 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 is available on the Logitech Exchange under the Policies tab. Detailed guidelines for complying with our Anti-Corruption Policy are available at the same location. This includes practical guidance for giving and receiving gifts as well as handling meals, entertainment and third party travel. If you have any question about our Anti-Corruption Policy please ask a member of the Legal team or email us at **compliance@logitech.com**.

**Securities Laws.** Our stock is publicly listed on the Swiss and NASDAQ stock exchanges and we are subject to various securities laws and regulations. You must follow our Insider Trading Policy available on the Logitech Exchange under the Policies tab. It has detailed instructions and guidance on prohibited trading activities and the safeguards we have put in place. You also can ask the Legal department or email us at **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 thatwould 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 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 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 by selecting 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.

## **CONFLICTS OF INTEREST**

You should avoid all conflicts between your personal interests and the business interests of Logitech. Meaning, any situation where you are—or could even appear to be—subject to influences, interests or relationships that conflict with Logitech's

## NEVER DISCUSS

With competitors

- Pricing
- Dividing up markets
- Creating barriers to competitors

With channel partners

Fixing resale proces

best interests should be avoided. It's not possible to anticipate every conflict situation but here are some common conflict situations and our policy/guidance:

POTENTIAL CONFLICT SITUATION	POLICY/GUIDANCE
Employment by or consulting for a competitor, customer or supplier.	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 and you must obtain authorization in advance from the General Counsel or Chief Compliance Officer before taking such a position.
Serving on boards of other companies.	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 nonprofits) without prior approval by the General Counsel or Chief Compliance Officer.
Having a significant financial interest in an entity that does business, seeks to do business or competes with us.	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.
Soliciting or accepting gifts, favors, loans or preferential treatment from any person or entity that does business or seeks to do business with us.	Please consult our Anti-Corruption Policy for requirements and guidance. Please keep in mind that we want to avoid even the appearance of impropriety.
Taking personal advantage of corporate opportunities.	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.
Conducting personal or family business with Logitech.	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 or provide all details to **compliance@logitech.com**.

## **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 below:

**Sexual Harassment.** You must comply with Logitech's Sexual Harassment Policy available on the Logitech Exchange under the Policies tab. In short, 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 your People & Culture Business Partner or Legal with any questions or concerns.

Other Harassment. We also 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 the restrictions an employer 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 or on social media. For further guidance please see Logitech's Social Media Policy available on the Logitech Exchange under the Policies tab.

**Non Discrimination.** Logitech treats each employee fairly and with respect, and provides 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 or gender or sexual orientation, in accordance with the law. You must avoid any actions in your job that would undermine Logitech's policy against discrimination.

## **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 SWX Swiss Exchange, 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 to assure that Logitech's public reports are full, fair, accurate, timely and understandable. Each of us is expected to take this responsibility very seriously and to provide prompt and accurate answers to internal inquiries related to Logitech's public disclosure requirements.

#### SAFEGUARDING LOGITECH PROPERTY

You should always safeguard Logitech's property and its confidential information. Please see Logitech's Confidential Information Policy for guidance on the latter. As to Logitech's physical property, you should always follow the local security procedures mandated by our security team. (You can contact our global security team any time at +1 510-713-4910 or <code>lsecurity@logitech.com</code>). 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.

## 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.

You have several options to report violations or raise concerns, and you may choose to remain anonymous. In any event, Logitech will not retaliate, nor will it permit retaliation, against you for making a good faith report.

To report a violation or raise a concern please talk to your supervisor or any member of the Legal or Internal Audit teams; send an email to compliance@logitech.com; or use EthicsPoint, our third party hotline reporting service.

# TO MAKE A REPORT VIA ETHICSPOINT

visit 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.