



# INSIDER TRADING POLICY

We are pleased to have our employees and other service providers take an ownership interest in Logitech by acquiring our public stock. Directors, officers, employees, consultants, and contractors, however, may learn important information about the company's plans or performance before it's made public. Trading on such "inside" information is not only unfair — it's illegal. The same goes for "inside" information about other companies that we learn through our confidential business dealings.

As a publicly traded company we are governed by securities laws and regulations that impose stiff civil and criminal penalties for any form of insider trading. This Insider Trading Policy provides instructions and guidance on prohibited trading activities and other safeguards that we have put in place to protect you and Logitech. All directors, officers and employees of Logitech, as well as any consultants or contractors with access to Logitech confidential information, are subject to this Policy.

## WHAT IS INSIDER TRADING?

Insider trading includes any **decision to buy or sell any security** (e.g., stock) that is **made while in possession of material, non-public information**. It is not a defense that you made the decision without using the inside information—you need only be aware of the inside information to be liable.

Insider trading violations also occur when a person provides material, non-public information to another (also known as "tipping") and the other person then trades while in possession of it.

Information is considered "**material**" if a **reasonable investor would consider it important in deciding whether to buy, hold or sell securities**. In general, information that could reasonably be expected to affect the market price of a security is likely to be material. Either **positive or negative information may be material**. The following are examples of information often considered material:

- Financial results, earnings, guidance, projections or forecasts, particularly if inconsistent with investor expectations

- Business plans or budgets
- Significant developments in business relationships, including execution, modification or termination of significant agreements or orders
- Product introductions, modifications, defects or recalls or significant pricing changes or other significant product announcements
- Significant legal or regulatory developments, whether actual or threatened
- Significant transactions such as a pending or proposed merger, acquisition, divestment or joint venture
- Major personnel changes, senior management changes or lay-offs

Information is “non-public” if it has **not yet been widely disseminated to the general public for a sufficient period of time to be reflected in the price of the security**. Given that we support a fair and open market for our securities we strive to make material information public as soon as practical under the circumstances. We do so by issuing press releases, holding pre-announced public webcasts, and by making public disclosure filings with the securities authorities. As a general rule, information should be considered nonpublic **until at least one full trading day has elapsed** after the information released by the company to the public.

## ENFORCEMENT AND CONSEQUENCES

The authorities use sophisticated electronic surveillance techniques to investigate and detect insider trading, and they vigorously pursue violations. They have successfully prosecuted cases involving trading through foreign accounts, trading by family members or friends, and trading involving only a small number of shares. Potential penalties include imprisonment (up to 20 years), individual fines (up to \$5 million USD), company fines (up to \$25 million USD), and loss of eligibility to serve as an officer or director of a public company.

Likewise, Logitech prohibits all forms of insider trading and will aggressively pursue violators. Any director, officer or employee found to have engaged or attempted to have engaged in insider trading may, in addition to other civil or criminal actions, have their employment terminated, and any contractor or consultant may have their business relationship with Logitech terminated.

## PREVENTIVE MEASURES

As we highlight in our Anti-Corruption Policy, we strive to avoid even the appearance of impropriety. That’s why we have put in place, and why we all must follow, the preventive measures explained below.

**Global Quarterly Blackout Period.** No director, officer or employee of Logitech, or any consultant or contractor with access to Logitech confidential information, may directly or through others trade in Logitech’s securities during the **period starting on the 15th day of the last month of each fiscal quarter until two days after our earnings are released** to the public.

Please note that trading outside of the Global Quarterly Blackout Period does not give you a safe harbor. You should never trade when you are in possession of material, non-public information. **Each individual is accountable for his/her trading decisions at all times.** If you have any question about the propriety of a trade, please ask the Legal department for help or email us at [compliance@logitech.com](mailto:compliance@logitech.com).

**Other Blackout Periods.** The company may declare other blackout periods when in the judgment of the General Counsel's office a blackout period is warranted. The impacted personnel will be given notice of any such blackout period. Depending on the circumstances the existence of the special blackout period could be kept strictly confidential and only known by those affected (e.g., a team working on a confidential merger or acquisition).

**Pre-Approval for "Access Person Trades"**. Logitech's directors, executive officers and other persons who regularly have access to material, non-public information (e.g., enterprise-wide financial data etc.) are considered Access Persons and are listed on Logitech's Access Person List. The Logitech Access Person List is maintained by the Legal department and is reviewed by the senior leadership team and updated quarterly. All Access Persons will be notified that they are on the list.

No one on the Logitech Access Person List may trade in Logitech's securities without prior approval by the General Counsel or the Associate General Counsel, Corporate and Securities. If you are on the Access Persons List, you must submit your request to trade to the General Counsel, the Associate General Counsel, Corporate and Securities, or by email to [compliance@logitech.com](mailto:compliance@logitech.com). Please note that Access Persons requesting to trade must certify that they are not in possession of material, non-public information.

**Other Prohibited or Restricted Transaction Types.** Certain types of transactions create significant risks for individuals and the company and are prohibited or restricted as explained below:

**Short sales.** Short sales (i.e., the sale of a security that must be borrowed to make delivery) and "selling short against the box" (i.e., a sale with a delayed delivery) of Logitech's securities are prohibited.

**Derivative securities and hedging transactions.** Engaging in transactions in publicly-traded options, such as puts and calls, and other derivative securities with respect to the Logitech's securities is prohibited. This prohibition extends to any hedging or similar transaction designed to decrease the risks associated with holding Logitech's securities. Stock options, stock appreciation rights, and other securities issued pursuant to our benefit plans or other compensation arrangements with Logitech are exceptions to this ban.

**Using Logitech securities as collateral.** You may not use Logitech securities as collateral for a loan if you are subject to Section 16 of the Securities Act, are an Access Person or if the collateral could be called during a blackout period applicable to you.

**Holding Logitech securities in a margin account.** You may not hold Logitech securities in a margin account.

**Open orders.** Please be cautious when placing open orders (i.e., orders that remain open until filled) as they can be executed during blackout periods.

If you have any question about the propriety of entering into these or any other type of securities transaction, please ask Legal or email us at **compliance@logitech.com**.

## COMPLIANCE FOR SECTION 16 PERSONS

Special rules, restrictions, and reporting requirements apply to individuals subject to Section 16 of the Securities & Exchange Act. All such individuals must abide by the requirements of Section 16. Logitech provides detailed memorandum and guidance to help such individuals comply with their Section 16 obligations, however, compliance with Section 16 is an individual responsibility and Logitech is not responsible if an individual fails to comply.

## REPORTING VIOLATIONS OF THIS POLICY

Each of us has a duty to report known or suspected violations of this Policy. You have several options to make a report 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 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.